

**COUNTY OF SAN MATEO
PLANNING AND BUILDING DEPARTMENT**

DATE: April 9, 2014

TO: Planning Commission

FROM: Planning Staff

SUBJECT: EXECUTIVE SUMMARY: Consideration of the certification of a Subsequent Mitigated Negative Declaration/Initial Study and an Amendment to Skylawn Memorial Park's Master Use Permit (20-year term), Resource Management Permit, and a Grading Permit, for the expansion of the previously approved Phase 1 Project to include an additional approximate 7-acre area to prepare the land for in-ground burials as well as the construction of access improvements, involving a total grading quantity of approximately 145,000 cubic yards for the revised project, located at 100 Lifemark Road near the intersection of San Mateo Road (Highway 92) and Skyline Boulevard (Highway 35) in an unincorporated area of San Mateo County.

County File Number: PLN 2010-00026 (Skylawn Memorial Park)

PROPOSAL

The Phase 1 Project is the first of several phases planned for Skylawn Memorial Park that would entail future development within the existing cemetery over the next several years. The Master Use Permit for the Phase 1 Project (35 acres) was approved on August 10, 2011, along with the certification of the Phase 1 Project Mitigated Negative Declaration (2011 MND), and will extend over a 20-year period through August 10, 2031. The approved Phase 1 Project allowed up to a total of 50,000 cubic yards (c.y.) of grading and included a 201-acre Environmental Protection Zone (EPZ) area that will not be developed.

The applicant, David Montgomery of the Northstar Memorial Group, proposes to extend the boundaries of the approved Phase 1 Project to include an additional approximate 7 acres for a total Phase 1 Project area of 42 acres. Proposed activities in this area include the reconsolidation of fill to prepare the land for in-ground burials, the widening of an existing 12-foot private road to 26 feet, and the creation of a new roundabout. The area consists of a Near-Term Development Area (27 gross acres), where plans have been developed and construction activities would commence shortly after project approval, as well as a Long-Term Development Area (10 gross acres), where plans have not been developed and construction activities within that area would commence later in the permit term.

Within the 7-acre extension area, proposed grading activities would include a total of approximately 22,463 c.y. of balanced cut and fill (or approximately 45,000 c.y. of grading total) on-site. Additionally, the revised project includes an additional 50,000 c.y. of grading in the approved Phase 1 Project area in order to correct an earthwork calculation discrepancy. There would be no change in the physical outcome of the approved project and the shape of the project area from the previously approved project. Total grading in the Phase 1 area would total 145,000 c.y. of balanced grading.

The revised project would not expand utilities such as wastewater, potable water service, and circulation systems to provide services to the new cemetery development. No additional offices or customer service areas will be developed and no new buildings would be constructed with the exception of new maintenance sheds.

RECOMMENDATION

That the Planning Commission certify the Subsequent Mitigated Negative Declaration/Initial Study (Subsequent MND/IS) and approve the Amendment to Skylawn Memorial Park's Master Use Permit (20-year term), Resource Management Permit and Grading Permit, County File Number PLN 2010-00026, by making the required findings and adopting the conditions of approval listed in Attachment A of the staff report.

SUMMARY

A Subsequent MND/IS for the Revised Phase 1 Project was issued in conformance with California Environmental Quality Act (CEQA) Guidelines. The public review period for this document commenced on March 7, 2014 and will end on April 7, 2014. As of the publication of this report, no comments regarding these documents were received. Any subsequent comments will be addressed at the public hearing of April 9, 2014.

As discussed in the staff report, the project complies with the conditions of approval of the Master Use Permit approved by the Planning Commission on August 10, 2011. Most conditions have been retained and/or updated as either mitigation measures or conditions of approval in Attachment A of the staff report to reflect the current project. Three conditions have been deleted as they are no longer applicable to the project.

The project complies with the County's General Plan policies as they relate to the subject property, which is rural and designated for open space land uses. The project complies with policies of the Vegetative, Water, Fish and Wildlife Resources Element, as the 7-acre extension area is generally located in a disturbed area and all mitigation measures of the 2011 MND have been updated to include this area. The project complies with policies of the Visual Quality Element. An eastern portion of the project site is located within the Junipero Serra (I 280) State Scenic Corridor. The extended Phase 1 Project area is not visible from I-280 or any existing residential areas, water bodies, or roads. As proposed and conditioned, graded contours would blend with existing contours in the project vicinity and disturbed areas would be revegetated with native, water efficient, and fire resistant landscaping.

The project meets the required finding for a Use Permit in that the project, as proposed and mitigated, would not be detrimental to the public welfare or injurious to property or improvements in said neighborhood. The project, as proposed and conditioned, also conforms to the County's Grading Regulations, including timing of grading activity, erosion and sediment control, and dust control. The project conforms to applicable development review criteria for the issuance of a Resource Management Permit, including applicable Environmental Quality Criteria, Site Design Criteria, Water Resources Criteria, and Cultural Resources Criteria. As proposed and conditioned, disturbed areas would be revegetated with landscaping that blends with the surrounding environment, mitigation measures addressing geological hazards have been included as conditions of approval, proposed swales and v-ditches would direct project drainage to a dissipation and infiltration area within the project area, and requirements for a historical resources report and an archaeological study are included as conditions of approval.

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**COUNTY OF SAN MATEO
PLANNING AND BUILDING DEPARTMENT**

DATE: April 9, 2014

TO: Planning Commission

FROM: Planning Staff

SUBJECT: Consideration of the certification of a Subsequent Mitigated Negative Declaration/Initial Study, pursuant to the California Environmental Quality Act, and an Amendment to Skylawn Memorial Park's Master Use Permit (20-year term) and Resource Management Permit, pursuant to County Zoning Regulations Sections 6500 and 6313, respectively, and a Grading Permit, pursuant to Section 8600 of the San Mateo County Ordinance Code, for the expansion of the previously approved Phase 1 Project to include an additional approximate 7-acre area to prepare the land for in-ground burials as well as the construction of access improvements, involving a total grading quantity of approximately 145,000 cubic yards for the revised project, located at 100 Lifemark Road near the intersection of San Mateo Road (Highway 92) and Skyline Boulevard (Highway 35) in an unincorporated area of San Mateo County.

County File Number: PLN 2010-00026 (Skylawn Memorial Park)

PROPOSAL

The Previously Approved Project

The Phase 1 Project is the first of several phases planned for Skylawn Memorial Park that would entail future development within the existing cemetery over the next several years. The Master Use Permit for the Phase 1 Project was approved on August 10, 2011, along with the certification of the Phase 1 Project Mitigated Negative Declaration (2011 MND), and will extend over a 20-year period through August 10, 2031.¹ Figure 2 of Attachment D shows the approved boundaries of the Phase 1 Project, which encompasses approximately 35 acres in the eastern portion of the existing Skylawn property. The County approved the Phase 1 Project such that grading activities would not exceed a total of 50,000 cubic yards (c.y.) during construction. Both traditional and natural burials will be developed as part of the Phase 1 Project. The Phase 1 Project also includes within a 201-acre Environmental Protection Zone (EPZ) area that will not be developed.²

¹ Skylawn has not applied for permits for any other phases.

² No development or any ground disturbing activities would occur within the EPZ, with the exception of minor work associated with existing and/or future utility line easements. This area would be preserved in its natural state throughout the life of the project.

Proposed Project Changes

As shown in Table 1 below, the applicant, David Montgomery of the Northstar Memorial Group, proposes to extend the boundaries of the previously approved Phase 1 Project to include an additional approximate 7 acres (extended Phase 1 Project area) (see Figure 3 of Attachment D).

Table 1 Project Area		
Previously Approved Project	Project Change	Total
35 Acres*	+7 Acres	42 Acres*
* Includes 4 acres not proposed for development in the Phase 1 Project.		

The extended Phase 1 Project area abuts the northern boundary of the Phase 1 Project area and would increase the total project area to 42 acres. Activities proposed for the extended Phase 1 Project area include the reconsolidation of fill to prepare the land for in-ground burials as well as access improvements, including the widening of an existing 12-foot private road to 26 feet and the creation of a new roundabout. The applicant would also designate four existing parking stalls within the property reserved for public access to the Bay Area Ridge Trail system. Also, as shown in Figure 4 of Attachment D, the revised Phase 1 Project area consists of two areas: a “Near-Term Development Area” and a “Long-Term Development Area.” The project applicant has developed project design plans for the Near-Term Development Area (27 gross acres), and construction activities for this area would commence shortly after project approval. Specific project design for the Long-Term Development Area (10 gross acres) has not been developed, and any construction activities within that area could commence later in the permit term. Since the approval of the 2011 MND, additional geotechnical studies revealed that approximately 4 acres of the approved Phase 1 Project contain unstable soils and steeper than expected slopes. This area, shown in Figure 4 of Attachment D, is not proposed to be developed as part of the Phase 1 Project; however, the area remains within the original project boundaries.

Additional grading activities would include a total of approximately 22,463 c.y. of balanced cut and fill (or approximately 45,000 c.y. of grading total) on-site within the boundaries of the new project area. Additionally, since the approval of the Phase 1 Project, which allowed 50,000 c.y. of total grading for the Phase 1 Project, communication between the applicant and County staff has revealed a discrepancy in the calculation of grading amounts. To clarify, the applicant’s intention for a total of 50,000 c.y. of grading for the Phase 1 Project included an excavation of 50,000 c.y. of earth and the relocation of the same amount on-site as fill. The County’s calculation of this operation would be that the total earthwork includes 100,000 c.y. of grading. As shown in Table 2 below, this includes 50,000 c.y. of cut and 50,000 c.y. of fill added together. While there is a difference in the calculation of total grading work, there would be no change in the physical outcome of the project and the shape of the project area from the previously approved project. Fill will not be imported on-site and cut will not be

exported; all grading activities would occur on the site. However, for the purpose of resolving this discrepancy, an additional 50,000 c.y. has been included as a part of the revised project.

Table 2 Approximate Grading Quantities			
Approved Phase 1 Project	Revised Phase 1 Project	Extended Phase 1 Area	Revised Project (Total)
50,000 c.y.	+50,000 c.y.	45,000 c.y.	145,000 c.y.

The revised project would not expand utilities such as wastewater, potable water service, and circulation systems to provide services to the new cemetery development. No additional offices or customer service areas will be developed and no new buildings would be constructed with the exception of new maintenance sheds.

RECOMMENDATION

That the Planning Commission:

1. Certify the Subsequent Mitigated Negative Declaration/Initial Study, by making the required findings listed in Attachment A.
2. Approve the Amendment to Skylawn Memorial Park’s Master Use Permit (20-year term), Resource Management Permit and Grading Permit, County File Number PLN 2010-00026, by making the required findings and adopting the conditions of approval listed in Attachment A.

BACKGROUND

Report Prepared By: Camille Leung, Project Planner, Telephone 650/363-1826

Owner: Skylawn Memorial Park

Applicant: David Montgomery, Northstar Memorial Group

Address: 100 Lifemark Road, unincorporated North Skyline Area of San Mateo County

APN: 056-550-020

Parcel Size: 154.19 acres (Skylawn property is 521 acres)

Existing Zoning: Resource Management (RM) District³

³ While certain portions of the Skylawn property are located within the Coastal Zone (RM-CZ), the project area is not located in the Coastal Zone.

General Plan Designation: General Open Space

Existing Land Use: The Skylawn property is comprised of two parcels totaling approximately 521 acres, of which 94 acres are currently developed with cemetery-associated uses (i.e., traditional and tiered interment burial, a mortuary, a mausoleum, an administration building, and a reservoir (see Cemetery Map included as Attachment C)). A paved roadway provides access throughout the existing cemetery uses on the site and continues in a northerly direction past the existing cemetery along the eastern property border. Several buildings that are leased to a private company for radar equipment are located in the far northern portion of the site. Two vacant water tanks and a maintenance shed are also located on-site. A number of telecommunications facilities are located just east of the dirt access road between the existing cemetery and the Phase 1 Project area. The project area currently consists of a corporation yard (which includes a vacant two-story building), a grave spoils area, and ruderal grassland.

Flood Zone: Zone X (area of minimal flood hazard, usually depicted on FIRMs as above the 500-year flood level), FEMA Panels Nos. 06081C0145E and 06081C0165E, effective date October 16, 2012.

Environmental Evaluation: A Subsequent Mitigated Negative Declaration/Initial Study (MND/IS) was prepared with a public review period from March 7, 2014 to April 7, 2014 (discussion provided in Section II of this report).

Setting: The project site is located on the southwest side of Montara Mountain, along the northern expanses of Cahill Ridge. Elevations at the site range from 400 to 1,000 feet above mean sea level. The majority of the project site consists of rolling landscape with hills and canyons. The southern portion slopes southward toward Albert Canyon Creek (a tributary to Pilarcitos Creek), which crosses the southern portion of the site. The topography of the northern portion of the project site slopes westward toward a second, unnamed tributary of Pilarcitos Creek, which traverses the western portion of the project site. The slope on the project site ranges from 0% to over 30%. The 23,000-acre San Francisco State Fish and Game Refuge and Watershed area is just east of the subject property. Immediate surrounding land uses generally include open space and sparse agricultural development. An eastern portion of the project site is located within the Junipero Serra (I-280) State Scenic corridor.

Chronology:

<u>Date</u>	<u>Action</u>
1955	- County issues use permit for the operation of a cemetery facility at the project site.
June 26, 2002	- Planning Commission approves Use Permit (PLN 2000-00166) for a two-story mortuary/funeral home/chapel/administrative office facility. Condition No. 22 required that a "Preservation and Environmental

Management Zone,” or EMZ, be identified and that a plan identifying said zone would be submitted, reviewed and recorded. Building receives final inspection on March 17, 2008.

- 2007 - Applicant applies for a Use Permit Renewal.
- April 25, 2010 - Applicant rescinds use permit renewal application and applies for Master Use Permit, with a 20-year term for the Phase 1 Project (PLN 2010-00026).
- October 30, 2010 - County prepares an IS/MND for the Phase 1 Project (2011 MND) with a 30-day public review period.
- August 10, 2011 - Planning Commission approves Master Use Permit.
- October 1, 2012 - Applicant submits current application to amend the Master Use Permit to revise the approved Phase 1 Project area to add an additional approximate 7 acres.
- March 7, 2014 - County prepares a Subsequent MND/IS for the Revised Phase 1 Project and the 30-day public review period commences.
- April 7, 2014 - The public review period for the Subsequent MND/IS ends.
- April 9, 2014 - Planning Commission public hearing.

DISCUSSION

A. KEY ISSUES

1. Conformance with the Conditions of Approval of the Previous Use Permit

As of the writing of this report, the applicant has not yet initiated any work authorized by the Master Use Permit approved by the Planning Commission on August 10, 2011. All of the conditions of approval of the approved Phase 1 Project have been addressed in this document. As described in Table 3 below, most conditions have been retained and/or updated as either mitigation measures or conditions of approval to reflect the current project. Condition Nos. 22, 30, and 43 have been deleted for reasons provided below. Condition No. 45 has been replaced to reflect recent discussions between Skylawn, Caltrans, and the Planning staff.

Table 3 Conditions of Approval of 2011 Phase 1 Approval			
Original Condition No.	Requirement	Action (Retained/Updated, Deleted, or Replaced)	Rationale
1	Project to be implemented as approved on 8/10/11	Retained/Updated as Condition No. 1 in Attachment A	N/A
2	Term of Use Permit	Retained/Updated as Condition No. 2 in Attachment A	N/A
3	Waste Storage and Removal Plan	Retained/Updated as Condition No. 50 in Attachment A	N/A
4	Bay Ridge Trail	Retained/Updated as Condition No. 51 in Attachment A	N/A
5	Recordation of Environmental Management Zone (EMZ)	Retained/Updated as Condition No. 68 in Attachment A	Condition has been updated to require an MOU to protect the EMZ area and require recordation of a conservation easement at the end of the 20-year permit.
6	Screening of Existing Mausoleum	Retained/Updated as Condition No. 49 in Attachment A	N/A
7	Lighting	Retained/Updated as Condition No. 52 in Attachment A	N/A
8	County Water Efficient Landscape Ordinance	Retained/Updated as Condition No. 53 in Attachment A	N/A
9	Total Grading Authorized by Permit	Retained/Updated as Condition No. 54 in Attachment A	N/A
10	Grading and Drainage Plan	Retained/Updated as Condition No. 55 in Attachment A	N/A
11	NOI from State Water Resources Control Board	Retained/Updated as Condition No. 43/MM33 in Attachment A	N/A
12	Erosion Control Plan	Retained/Updated as Condition No. 56 in Attachment A	N/A
13	Seeding with Native grassland Mix	Retained/Updated as Condition No. 57 in Attachment A	N/A
14	Inspection of Grading by Engineer	Retained/Updated as Condition No. 58 in Attachment A	N/A

Table 3			
Conditions of Approval of 2011 Phase 1 Approval			
Original Condition No.	Requirement	Action (Retained/Updated, Deleted, or Replaced)	Rationale
15	Certification of Grading by Engineer	Retained/Updated as Condition No. 59 in Attachment A	N/A
16	Dust Control Plan	Retained/Updated as Condition No. 11/MM1 in Attachment A	N/A
17	Grading Moratorium	Retained/Updated as Condition No. 38/MM28 in Attachment A	N/A
18	Grading Schedule	Retained/Updated as Condition No. 38/MM28 in Attachment A	N/A
19	Access Road	Retained/Updated as Condition No. 60 in Attachment A	N/A
20	Geologic Investigation	Retained/Updated as Condition No. 32/MM22 in Attachment A	N/A
21	Placing of Fill	Retained/Updated as Condition No. 33/MM23 in Attachment A	N/A
22	Off-Site Hauling	Deleted	Project was revised to involve balanced grading only. No off-hauling is proposed.
23	Spark Arrestor	Retained/Updated as Condition No. 61 in Attachment A	N/A
24	Compliance with Noise Ordinance	Retained/Updated as Condition No. 44/MM34 in Attachment A	N/A
25	Foundation Plan	Retained/Updated as Condition No. 34/MM24 in Attachment A	N/A
26	Building Permit Required	Retained/Updated as Condition No. 62 in Attachment A	N/A
27	Green Building Regulations	Retained/Updated as Condition No. 63 in Attachment A	N/A
28	Undergrounding Utilities	Retained/Updated as Condition No. 64 in Attachment A	N/A
29	Safety Plan	Retained/Updated as Condition No. 65 in Attachment A	N/A

Table 3			
Conditions of Approval of 2011 Phase 1 Approval			
Original Condition No.	Requirement	Action (Retained/Updated, Deleted, or Replaced)	Rationale
30	Incidental Take Permit	Deleted	Not applicable as described in this Section
31	Rare Plant Survey	Retained/Updated as Condition No. 16/MM6 in Attachment A	N/A
32	Rare Plant Survey in/adjacent to Land and Water Management Zones	Retained/Updated as Condition No. 17/MM7 in Attachment A	N/A
33	Tree Survey	Retained/Updated as Condition No. 22/MM12 in Attachment A	N/A
34	Surveys of CRLF and SFGS*	Retained/Updated as Condition No. 12/MM2 in Attachment A	N/A
35	Surveys of CRLF and SFGS for Wetland and Riparian Areas	Retained/Updated as Condition No. 19/MM9 in Attachment A	N/A
36	Prevention of Accidental Removal of Wetland Habitat	Retained/Updated as Condition No. 20/MM10 in Attachment A	N/A
37	Consultation With and Approval by CDFW*	Retained/Updated as Condition No. 21/MM11 in Attachment A	N/A
38	Bay Checkerspot Butterfly	Retained/Updated as Condition No. 18/MM8 in Attachment A	N/A
39	Woodrat Nests Survey	Retained/Updated as Condition No. 13/MM3 in Attachment A	N/A
40	Evaluation of Bat Maternity Roosts in Trees and Structures	Retained/Updated as Condition No. 14/MM4 in Attachment A	N/A
41	Survey for Native Bird Species	Retained/Updated as Condition No. 15/MM5 in Attachment A	N/A
42	Archaeological and/or Cultural Resources	Retained/Updated as Condition No. 25/MM15 in Attachment A	N/A
43	Dry Wells	Deleted	No Dry Wells Proposed Due to Soil Conditions
44	CEQA Filing Fee	Retained/Updated as Condition No. 66 in Attachment A	N/A
45	Driveway Access Improvements onto Highways 35 and 92	Replaced with Condition No. 10 in Attachment A	Condition Partially Met

Table 3 Conditions of Approval of 2011 Phase 1 Approval			
Original Condition No.	Requirement	Action (Retained/Updated, Deleted, or Replaced)	Rationale
46	Coordination Meeting with County Staff	Retained/Updated as Condition No. 67 in Attachment A	N/A
* <i>California Red-Legged Frog (CRLF)</i> <i>San Francisco Garter Snake (SFGS)</i> <i>California Department of Fish and Wildlife (CDFW)</i>			

Deleted Conditions:

Original Condition No. 22, which required the applicant to submit a plan describing off-haul operations, has been deleted, as the project has been revised to involve on-site balanced grading only. No off-hauling is proposed. Original Condition No. 30, which required the applicant to obtain an incidental take permit from the U.S. Fish and Wildlife Service (USFWS), has been deleted upon the project biologist's recommendation. As described in the Subsequent MND/IS, the USFWS may only issue a Take Permit under Section 7 of the Federal Endangered Species Act (ESA) if there is a federal nexus (e.g., a permit is required from another federal agency or federal funds are being used). As the proposed project no longer includes disturbance of a wetland, there is no longer the need to obtain a permit from a federal agency (i.e., Section 404 permit from the U.S. Army Corps of Engineers (USACE) and, therefore, there is no longer a federal nexus that would allow the USFWS to issue an Incidental Take Permit pursuant to Section 7 of the ESA. The only other mechanism allowing the USFWS to issue a Take permit would be through Section 10 of the ESA, which requires the preparation of a Habitat Conservation Plan (HCP). The proposed project is not an appropriate candidate for an HCP because the currently proposed Phase 1 Project Area includes heavily disturbed and highly weedy grassland areas, and the potential for "take" to occur could be avoided through the implementation of standard avoidance measures, which have been incorporated as conditions of project approval. Original Condition No. 43 has been deleted as dry wells are no longer proposed due to soil conditions.

Replaced Condition:

Original Condition No. 45 requires the applicant to prepare a plan that involves repaving, striping, and, if deemed necessary, additional signage to improve access to and exiting from the Skylawn facility onto Highways 35 and 92. The plan, which is subject to both CalTrans and the County Planning and Building Department review and approval, must be implemented and completed prior to the completion of the next interment

project as anticipated in the Master Use Permit and including the completion of the Eternity Gardens project, the second phase of which is yet to be initiated. While work authorized under the Master Use Permit has yet to be initiated, the status of the progress on the applicant's compliance with Original Condition No. 45 was raised relative to analysis of potential traffic hazards in Section 16.d of the Subsequent MND/IS. In response to the need to follow up on the condition's intent, staff met with Skylawn administrative staff, Skylawn's traffic consultant (CH2M Hill), and several CalTrans staff at the Skylawn entrance off of SR-92 on August 21, 2013. At that meeting, some critical background issues and improvement constraints were discussed, as summarized in Section 16.d of the Subsequent MND/IS. Skylawn's traffic consultant intends to follow through with a proposed plan to improve accessibility to/from the Skylawn property. A possible striping plan for the Skylawn property entrance is included as Figure 7 of Attachment H. Staff has replaced the Original Condition No. 45 with Condition No. 10 to reflect the requirement that this plan be submitted and reviewed by CalTrans for the required encroachment permit.

Progress Update Regarding Compliance with Specific Conditions:

- Original Condition No. 4: This condition required Skylawn to continue to work with the San Francisco Public Utilities Commission (SFPUC), Golden Gate National Recreation Area (GGNRA), and the Bay Area Ridge Trail Council to accommodate the Bay Area Ridge Trail currently proposed on Skylawn's property along its eastern boundary per the adopted alternative as discussed in the SFPUC's 1999 Draft EIR for its Watershed Management Plan. The condition required a site plan of any proposed Skylawn project along or near the trail to show its actual designated trail boundaries to the degree that they are known at the time of that project's subsequent submittal and review. The applicant has continued to work with SFPUC, GGNRA, and the Bay Area Ridge Trail Council to coordinate trail planning and reduce project conflicts. As discussed in the Subsequent MND/IS, the revised project site is approximately 0.5 miles away from the closest point of this trail. With the project, access to the Fifield Cahill Ridge Trail will be maintained via Cahill Ridge Road. This existing service/circulation road will continue to provide public multi-use access between SR-92 and the Fifield Cahill Ridge Trail through the Skylawn Memorial Park. Future plans for Cahill Ridge Road include a new trail alignment/designation as part of the Bay Area Ridge Trail network. Existing portions of the road within the park will remain under Skylawn Memorial Park ownership, while portions of the trail outside of Skylawn property will be owned and maintained by the San Francisco Water Department. Under the revised Phase 1 Project, the applicant would designate four existing parking stalls within the property for public access to the Bay Area Ridge Trail system. The improvements

proposed under the revised project would not conflict with the Bay Area Ridge Trail or access to the trail.

- Original Condition No. 5: This condition was part of the use permit approved by the Planning Commission in 2002 and directed the “Environmental Management Zone to be recorded with the County Recorder’s Office prior to the issuance of any Phase 1 grading or building permits.” Since 2002, the property owner has communicated with the County regarding the difficulties involved in recording a conservation easement over the full area of the EMZ, including surveying and evaluating the 201-acre area for sensitive habitat and geologic hazards, among other factors. The property owner has proposed a phased approach to determine specific boundaries of the EMZ, involving the survey and evaluation of portions of the EMZ area which adjoin active areas of work and according to the schedule for such work over the 20-year term of the use permit, to be described in a Memorandum of Understanding (MOU) between the property owner and the County. However, the MOU, which is subject to the review and approval of the Community Development Director, shall require the recordation of a conservation easement over the full 201-acre area designated as the EMZ by the end of the term of this use permit in August 31, 2031. The revised condition reflecting these requirements is included as Condition No. 68 of Attachment A.
- Original Condition No. 6: The condition requires landscaping installed around the westerly and southerly perimeters of Skylawn’s existing mausoleum building to be maintained so that it achieves its maximum screening ability as required. Other than as recommended by a licensed arborist due to the trees’ health (whose report shall be submitted to the Planning Department for review and approval), they shall not be trimmed or topped. On March 26, 2014, the applicant provided, to Planning staff, photos of trees along the westerly and southerly perimeters of the mausoleum building. The trees appear untrimmed, untopped, and well maintained.
- Original Condition No. 7: The condition requires all existing or any new exterior lighting located anywhere on Skylawn’s property to be corrected, placed, and designed such that no light glare is visible from any public road or viewing location from within any surrounding scenic corridor. In March 2007, at the time of the Current Planning Section’s final approval for the new mortuary (BLD 2003-01336), Planning staff confirmed compliance with lighting requirements. No new lighting has been installed on the property since the Planning Commission’s approval of the project in August 2011.

2. Conformance with the General Plan

The County's General Plan designates the property for General Open Space land use. Table 7.1P of the General Plan describes the primary feasible uses associated with this land use designation as "Resource management and production uses, including, but not limited to, agriculture, oil and gas exploration. Recreation uses, including, but not limited to, stables and riding academies; and residential uses, including, but not limited to, non-transient housing. Service uses including but not limited to hotels and motels." The proposed expansion of the existing cemetery for in-ground burials is consistent with resource management use as the lands will remain largely vegetated and unencumbered by structures.

As proposed and conditioned, the project conforms to all applicable General Plan policies, with specific discussion of the following policies:

a. Vegetative, Water, Fish and Wildlife Resources Element

Policy 1.27 (*Regulate Development to Protect Sensitive Habitats*) calls to regulate land uses and development activities within and adjacent to sensitive habitats in order to protect critical vegetative, water, fish and wildlife resources; protect rare, endangered, and unique plants and animals from reduction in their range or degradation of their environment; and protect and maintain the biological productivity of important plant and animal habitats. The Phase 1 Extension Area consists of an equipment storage area (also referred to as the Maintenance Area), an area used to store grave spoils, and weedy grasslands bordering these areas.

A biological evaluation report was prepared for the Phase 1 Extension Area of the site in September 2012 by Pacific Biology (report included as Attachment C). The report dovetails on biological reports and surveys prepared for the review of the approved Phase 1 Project. There are no wetlands, aquatic features, sensitive habitat types (e.g., native grasslands) or trees in or bordering the Phase 1 Extension Area.

Plant Species:

Per the Subsequent Mitigated Negative Declaration/Initial Study (Subsequent MND/IS) included as Attachment H, no special-status plant species were identified during focused botanical surveys conducted by Vollmar Consulting in 2009. The proposed Near-Term Development Area (Figure 5 of Attachment E) includes heavily disturbed weedy habitats, which do not provide suitable habitat for special-status plant species. Updated surveys for rare plants were not conducted in the Long-Term Development Area because construction

activities are not immediately planned for that area, and any surveys conducted now would be outdated when construction activities commence in that area. Mitigation Measure 6 (Condition No. 16) requires an updated rare plant survey to be conducted by a qualified botanist prior to any construction activities commencing after spring of 2012 in the Long-Term Development Area. Mitigation Measure 7 (Condition No. 17) requires, prior to any grading or construction activities within or adjacent to the Land and Water Management Zones, a qualified botanist to conduct a survey of the immediate work areas to determine whether any rare plant species are present. Implementation of these mitigation measures of the Subsequent MND/IS would reduce project impact to plant species to a less than significant level.

Wildlife Species:

The Subsequent MND/IS in Attachment H includes a detailed discussion of potential project impact to the California red-legged frog (CRLF) and the San Francisco garter snake (SFGS). As the project area does not contain wetlands or aquatic features, potential impacts are limited impacts to individuals that could occasionally disperse across the project area given its location between areas providing suitable CRLF and SFGS habitat (i.e., Pilarcitos Creek and Crystal Springs Reservoir). Mitigation Measure 2 (Condition No. 12) requires a pre-construction clearance survey to be conducted for CRLF and SFGS by a qualified biologist. All mitigation/avoidance measures must be implemented prior to beginning any project grading.

The project could also result in potential impact to Steelhead, San Francisco Dusky-Footed Woodrat, Special-Status Bat Species, Western Pond Turtle, and Raptors and Other Nesting Birds. The Subsequent MND/IS includes a detailed impact analysis and required mitigation of impacts with the addition of Mitigation Measures 3 through 5 (Condition Nos. 13 through 15). These mitigation measures require pre-construction surveys/evaluations of the project area/vicinity for active woodrat nests with young, active bat maternity roosts, and nesting birds. Implementation of mitigation measures of the Subsequent MND/IS would reduce project impact to wildlife species to a less than significant level.

b. Soils Resources Element

As proposed and conditioned, the project complies with policies that apply to grading activities, including Policy 2.23 (*Regulate Excavation, Grading, Filling, and Land Clearing Activities Against Accelerated Soil Erosion*), and Policy 4.25 (*Earthwork Operations*). These policies call for the County to regulate excavation, grading, filling, and land clearing

activities to protect against accelerated soil erosion and sedimentation, encourage soil stabilization efforts, minimize grading operations in rural areas, and encourage contour grading rather than harsh cutting or terracing practices. Proposed grading in the Phase 1 Extension Area, involving 22,463 c.y. of balanced cut and fill (approximately 45,000 c.y. of total grading), is necessary to reduce the severity of slopes in the project area in preparation for in-ground burials. The grading work involving a proposed additional 50,000 c.y. of grading in the Approved Phase 1 Project Area was reviewed and approved with the original Phase 1 Project and is proposed at this time to correct a discrepancy regarding calculation of grading quantities. There will be no change in the physical outcome of work in the Phase 1 Project area and the shape of the project area from the previously approved project. Current Planning staff, Department of Public Works staff, and the Planning and Building Department's Geotechnical Engineer have reviewed the proposed Conceptual Grading and Drainage Plan and Conceptual Erosion Control Plan (included in Attachments F and G) and have found the project, as proposed and conditioned, to comply with the County's Grading Regulations (full discussion is included in Section I.3.C of this report).

c. Visual Quality Element

Policy 4.21 (*Scenic Corridors*) calls for the protection and enhancement of the visual quality of scenic corridors by managing the location and appearance of structural development. The 2011 MND determined that impacts to scenic corridors and highways would not be significant. An eastern portion of the project site is located within the Junipero Serra (I-280) State Scenic corridor. The extended Phase 1 Project area is not visible from I-280 or any existing residential areas, water bodies, or roads. The revised project would not result in a new significant impact not identified in the 2011 MND. Although the project involves a significant amount of grading that would result in the re-contouring of the project area to smoothen and flatten existing contours, the new contours would blend with existing contours in the project vicinity, and disturbed areas would be revegetated with native, water efficient, and fire resistant landscaping, as required by Condition Nos. 55 and 47. The Skylawn property is partially located within the Highway 92 Scenic Corridor, but the Revised Phase 1 Project site is not within the corridor. The project site is also near but is not within the Skyline State Scenic Corridor. Given the above, the physical character of the site would not substantially impact the visual quality of scenic corridors.

Policy 4.60 (*Roads and Driveways*) calls (1) for the design and construction of new roads, road improvements and driveways to be sensitive to the visual qualities and character of the scenic corridor,

including such factors as width, alignment, grade, slope, grading and drainage facilities; (2) to limit the number of access roads connecting to a scenic road to the greatest extent possible; and (3) to share driveways where possible to reduce the number of entries onto scenic roads. The applicant proposes to widen an existing 12-foot wide private road (Lifemark Drive) to 26 feet to meet Cal-Fire requirements and install a new roundabout with a radius of 35 feet. No new driveways, roads, or parking lots are proposed. Parking for cemetery visitors to the project area would be provided along the 26-foot wide road, as is customary in many areas of the cemetery. As stated previously, the project site is not visible from I-280.

d. Rural Land Use Element

Policy 9.43 (*San Francisco Watershed Lands*) recognizes the San Francisco watershed lands as unique areas of special open space significance and requires their protection from conflicting land uses in order to retain their value as open space, wildlife, water supply, and recreational resources. The project site borders upon San Francisco watershed lands (SF watershed lands) which contain the Fifield Cahill Ridge Trail⁴ and the project will be visible from those lands. The improvements proposed under the revised project would not conflict with the Bay Area Ridge Trail or access to the trail. The revised project site is approximately 0.5 miles away from the closest point of this trail. With the Project, access to the Fifield Cahill Ridge Trail will be maintained via Cahill Ridge Road. This existing service/circulation road will continue to provide public multi-use access between SR-92 and the Fifield Cahill Ridge Trail through the Skylawn Memorial Park.

Views of the project area from the SF watershed lands, which currently include views of a corporation yard (which includes a vacant two-story building), a grave spoils area and Lifemark Drive, will continue to include Lifemark Drive (widened from 12 feet to 26 feet). However, views from this location may improve as large portions of the area would be vegetated with the completion of projects over the 20-year permit term. As proposed, project drainage from new impervious surfaces will be diverted from the adjoining property by a proposed system of swales and v-ditches, whereby drainage will be directed to a dissipation and infiltration area within the project area (shown on Page C-2 of Attachment F).

e. Water Supply Element

⁴ The Bay Area Ridge Trail is a long-distance, continuous trail extending over 340 miles throughout the Bay Area, and connects over 75 parks and open spaces. It provides a protected greenbelt corridor for habitat and wildlife. In San Mateo County, it meanders along the eastern side of Skyline Ridge, along a portion of Pilarcitos Road.

Policy 10.25 (*Efficient Water Use*) encourages the efficient use of water supplies through effective conservation methods. Water is supplied to the site by two sources, an existing water well and water from the Coastside County Water District (CCWD). CCWD supplies non-potable water to the project site for irrigation of burial lawns and associated landscape. CCWD operates through California Water Service contracts and obtains water from the Hetch Hetchy and Crystal Springs Reservoir. The Phase 1 Project would require a total of 15 acres of irrigated landscape, which would increase the cemetery's water demand by 7.4 million gallons of water per year (mgy). Incorporating the extended Phase 1 Project would increase the water demand of the revised project to a total of 7.7 mgy. The 2011 MND determined that the increased demand for water from CCWD (7.4 mgy) would not result in an increased extraction of groundwater resources in the area. The revised project overall requires only a minimal increase in non-potable water demand for irrigation. The revised project has been reviewed by CCWD and approved by the Environmental Health Division and found to not require new or expanded entitlements. As the revised project would not include improvements that require potable water, there would not be increased demand for well water. Condition No. 53 requires compliance with the County's Water Efficient Landscape Ordinance.

3. Conformance with County's Zoning Regulations

a. Resource Management (RM) Zoning District Regulations

The project site is located within the Resource Management (RM) Zoning District. Per Section 6313 of the County Zoning Regulations, the project requires the issuance of a RM Permit, as it involves removal of vegetation over a large area. The requirement of a RM Permit necessitates a review of the proposal against criteria outlined in Chapter 20A (*RM District Regulations*) and Chapter 20A.2 of the County Zoning Regulations (*Development Review Criteria*). The following is an analysis of project compliance with applicable Environmental Quality, Site Design, Water Resources, and Cultural Resources Criteria:⁵

Environmental Quality Criteria:

Criterion (h): When an extensive change in vegetative cover is proposed, it must be demonstrated that the change will provide for minimal adverse impact on microclimatic conditions, and similar protection from erosion as that provided by the existing vegetation.

⁵ Where specific criteria are addressed by the discussion of compliance with other County policies in this report, specific discussion of project compliance with the criteria has been omitted to avoid redundancy.

Currently, as shown in photos of the site included in Attachment C, the project area is largely disturbed and devoid of vegetation. In areas that are vegetated, vegetation consists of weeds and non-native grasses. Prior to the completion of the grading permit and building permit for each project, the project area will be revegetated with native, water efficient, and fire resistant landscaping that blends with the surrounding environment, per Condition No. 47.

Site Design Criteria:

Criterion (f): The applicant shall demonstrate that the development will not contribute to the instability of the parcel or adjoining lands and that all structural proposals including excavation, and proposed roads and other pavement have adequately compensated for adverse soil engineering characteristics and other subsurface conditions. As stated in the Subsequent MND/IS, due to the fact that the revised project site is located on a high ridge, has a lack of shallow groundwater, and is underlain by hard bedrock, the potential for liquefaction to occur is generally low. However, additional instability of underlying units may be attributed to differential settlement, soil creep, or the triggering of localized slumps or landslides in response to grading at the site. Deep fills that are planned for the project area may induce some differential settlement in the underlying native materials. This impact is considered potentially significant prior to mitigation. Mitigation Measure 21 (Condition No. 31) requires, prior to grading, the submittal of a subsurface investigation, including exploratory borings, to be conducted in the area of the fill in order to determine the thickness of the material, as well as the subsurface conditions beneath the fill. In addition to new mitigation measures, Mitigation Measures 22 through 29 (Condition Nos. 32 through 39) incorporate the geology-related mitigation measures from the 2011 MND for the approved Phase 1 Project. The project has also been reviewed and approved by the County's Department of Public Works and the Planning and Building Department's Geotechnical Engineer.

Water Resources Criteria:

Criterion (e): Projects shall utilize methods to maintain surface water runoff at or near existing levels. As proposed, project drainage from new impervious surfaces will be diverted from the adjoining property by a proposed system of swales and v-ditches, whereby drainage will be directed to a dissipation and infiltration area within the project area (shown on Page C-2 of Attachment F). All drainage features are required to comply with requirements for stormwater treatment as contained in Provision C.3 of the NPDES Municipal Regional Permit and the Drainage Policy of the Department of Public Works (Condition No. 55).

Criterion (f): Development, with the exception of agricultural uses and public works and public safety projects, which might cause significant adverse impacts upon the natural course or riparian habitat of any stream, shall not be permitted. As discussed in the Subsequent MND/IS and based upon the biological evaluation report prepared for the project, there are also no wetlands, aquatic features, or sensitive habitat types (e.g., native grasslands) in the project areas.

Cultural Resources Criteria:

Criterion (a): Whenever there is substantial indication that an archaeological or paleontological site may exist within a project area, an appropriate survey by qualified professionals shall be required as a part of the Environmental Setting Inventory. As stated in the Subsequent MND/IS, there is a vacant two-story building located within the project site which appears to be relatively intact. The historical significance of the building is unknown; however, the building has unofficially been referred to as an old Coast Guard post. Grading activities and reorganization of the "Maintenance Area" within the revised project area could potentially impact this structure. Because of the age of this building, the proposed improvements would be considered a significant impact to a potential historical resource. Mitigation Measures 13 and 14 (Condition Nos. 23 and 24) require the applicant to prepare and submit to the County a historical resources report prior to any alteration of the two-story building, as well as the implementation of preservation, rehabilitation, restoration, and reconstruction mitigations in the event that significant historical resources are identified within the revised project site. Condition No. 26 requires the applicant to submit an archaeological study of the project site, prior to the issuance of the grading permit "hard card." Condition No. 27 requires the applicant to stop work in the vicinity of the find in the event of a discovery of a paleontological specimen during any phase of the project, until it can be evaluated by a professional paleontologist.

b. Conformance with Use Permit Regulations

Cemetery use is not a permitted use in the RM District and requires the issuance of a Use Permit. The County issued a use permit for the operation of a cemetery facility at the project site in 1955 and the subject project includes an amendment of the Use Permit to allow the expansion of the use. Section 6503 (*Procedure*) requires that, in order to grant the use permit as applied for or conditioned, the findings of the Planning Commission must include:

"That the establishment, maintenance and/or conducting of the use will not, under the circumstances of the particular case, result in a

significant adverse impact to coastal resources, or be detrimental to the public welfare or injurious to property or improvements in said neighborhood.”

As discussed in the Subsequent MND/IS, the project, which involves the expansion of the burial areas of the Skylawn cemetery by an additional 7 acres over its 521-acre property, would not result in significant land use change or significant aesthetic impacts. The conversion of the project area (which currently consists of a corporation yard, a grave spoils area, and ruderal grassland) would, as proposed and conditioned, involve grading, re-contouring where finished grades would blend with surrounding grades, and revegetation of disturbed areas. The project may result in potential significant impacts to air quality, biological resources, cultural resources, geology and soils, climate change, hazards and hazardous materials, and hydrology and water quality. Mitigation measures have been included in the Subsequent MND/IS to reduce these project impacts to a less than significant level. The project would not result in damage to coastal resources, as the specific project site is not located in the Coastal Zone.

c. Conformance with Grading Regulations

The project involves approximately 7 acres of additional land disturbance and 22,463 cubic yards (c.y.) of balanced cut and fill, associated with the reconsolidation of fill for the Revised Phase 1 Project. The project site is located within the Junipero Serra (I-280) State Scenic Corridor. Therefore, per Section 8604.3 of the Grading Regulations, the grading permit is subject to review by the Planning Commission. In order to approve this project, the Planning Commission must make the required findings contained in the Grading Regulations. The findings and supporting evidence are outlined below:

(1) That the project will not have a significant adverse effect on the environment.

Per the Subsequent MND/IS, project grading may result in substantial soil erosion or the loss of topsoil and impacts to water quality. Mitigation Measure 26 (Condition No. 36) requires submittal of an Erosion Control Plan, prior to start of grading, to include additional stormwater pollution prevention measures than those shown on the Conceptual Erosion Control Plan and to demonstrate compliance with the San Mateo Countywide Stormwater Pollution Prevention Program “General Construction and Site Supervision Guidelines.” Mitigation Measure 28 requires the applicant to limit project grading to the dry season

(May 1 to September 30) and provide to the Current Planning Section a schedule to include the date of erosion control installation and start of grading operations through to project completion and project area re-vegetation, prior to start of grading. Mitigation Measure 29 requires monitoring of erosion control measures by the project civil engineer. Additionally, Mitigation Measure 33 requires the applicant to obtain coverage under the State General Construction Activity NPDES Permit as the area of land disturbance exceeds 1 acre. Implementation of mitigation measures of the Subsequent MND/IS would reduce project impact to water quality to a less than significant level.

For a detailed discussion of potential environmental impacts associated with the project, including biological resources, cultural resources, geology/soils, and hydrology and water quality, please reference Attachment H. Mitigation measures of the Subsequent MND/IS have been incorporated as Condition Nos. 11 through 44 in Attachment A.

(2) That the project conforms to the criteria of Chapter 8, Division VII, San Mateo County Ordinance Code, including the standards referenced in Section 8605.

The project, as proposed, mitigated and conditioned, conforms to the standards in the Grading Regulations, including timing of grading activity, erosion and sediment control, and dust control. Condition No. 11 requires implementation of dust control measures. Condition Nos. 36 through 39 ensure compliance with County stormwater requirements, including limiting grading to the dry season (May 1 to September 30). The project has been reviewed and approved by the County's Department of Public Works and the Planning and Building Department's Geotechnical Engineer.

(3) That the project is consistent with the General Plan.

The General Plan land use designation for the property is General Open Space. As proposed and conditioned, the project complies with applicable General Plan policies, as discussed in Section I.B of this report.

B. ENVIRONMENTAL REVIEW

As the project involves a substantial alteration of the land and may potentially result in negative impacts to a scenic corridor and to special-status plant and wildlife species, the project is not exempt from the California Environmental Quality Act (CEQA) review per Section 15300.2. The County prepared and

circulated an Initial Study/Mitigated Negative Declaration (2011 MND) on October 30, 2010 for the Phase 1 Project, which was certified by the Planning Commission on August 10, 2011, in conjunction with the approval of the Phase 1 project.

The applicant has since submitted the subject proposal to revise the Phase 1 Project area to add an additional approximate 7 acres of land. The County determined that the appropriate CEQA review for the project revision was a “subsequent” Mitigated Negative Declaration. A subsequent Mitigated Negative Declaration is circulated, while a Mitigated Negative Declaration addendum would not be circulated. CEQA Guidelines, Section 15162, states that a subsequent Mitigated Negative Declaration is required when a lead agency determines that “substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.” New potential significant effects have been identified in the areas of historical resources (e.g., vacant house). Also, a substantial increase in the severity of previously identified significant effects has been identified in the areas of geological impacts (where new studies showed that a 4-acre portion of the Phase 1 Project area was found to have unstable soils and steeper than expected slopes) and paleontological resources (a mitigation measure for protection of such resources was not included in the 2011 MND).

A Subsequent MND/IS for the Revised Phase 1 Project was issued in conformance with CEQA Guidelines. The public review period for this document commenced on March 7, 2014 and will end on April 7, 2014.⁶ As of the publication date of this report, no comments regarding these documents were received. Any subsequent comments will be addressed at the public hearing of April 9, 2014.

The following is a summary of impacts and associated mitigation measures identified in the Subsequent MND/IS:

- **Biological Resources:** While there are no wetlands, aquatic features, sensitive habitat types or trees in or bordering the Phase 1 Extension Project area, the project could result in potential impacts to Steelhead, San Francisco Dusky-Footed Woodrat, Special-Status Bat Species, Western Pond Turtle, and Raptors and Other Nesting Birds. The Subsequent MND/IS includes a detailed impact analysis and required mitigation of impacts with the addition of Mitigation Measures 3 through 5. These mitigation measures require pre-construction surveys/evaluations of the project area/vicinity for active woodrat nests with young, active bat maternity roosts, and nesting birds. Implementation of mitigation measures of the

⁶ A draft of the Subsequent MND/IS was prepared by CirclePoint, which was reviewed and edited by the County prior to the County’s release of the document. CirclePoint also prepared the Initial Study of the 2011 MND.

Subsequent MND/IS would reduce project impact to wildlife species to a less than significant level.

- Cultural Resources: Due to the proposal to demolish a vacant two-story building of unknown historical significance, the project could result in significant impacts to a potential historical resource. Mitigation Measures 13 and 14 (Condition Nos. 23 and 24) require the applicant to prepare and submit to the County a historical resources report prior to any alteration of the two-story building, as well as the implementation of preservation, rehabilitation, restoration, and reconstruction mitigations in the event that significant historical resources are identified within the revised project site. Condition Nos. 26 and 27 require the applicant to submit an archaeological study of the project site and to stop work in the event of a discovery of a paleontological specimen during any phase of the project, until it can be evaluated by a professional paleontologist.
- Geology and Soils: Instability of underlying units within the project area may be attributed to differential settlement, soil creep, or the triggering of localized slumps or landslides in response to grading at the site. Deep fills that are planned for the project area may induce some differential settlement in the underlying native materials. These impacts are considered potentially significant prior to mitigation. Mitigation Measure 21 (Condition No. 31) requires, prior to grading, the submittal of a subsurface investigation, including exploratory borings, to be conducted in the area of the fill in order to determine the thickness of the material, as well as the subsurface conditions beneath the fill. Also, Mitigation Measures 22 through 29 (Condition Nos. 32 through 39) incorporate the geology-related mitigation measures from the 2011 MND for the approved Phase 1 Project.

As stated in the Subsequent MND/IS, the project may also result in impacts to hydrology and water quality related to proposed grading operations and noise impacts related to temporary noise generated by proposed grading and construction activities. All mitigation measures of the Subsequent MND/IS, including those requiring erosion control and imposing noise limitations, have been incorporated as conditions of approval in Attachment A. As proposed and mitigated, the project would not result in any significant environmental impacts. It should be noted that the mitigation measures of the 2011 MND have been revised and incorporated as conditions of approval of this project. Therefore, the mitigation measures of the 2011 MND would be superseded by the mitigation measures of the Subsequent MND/IS, once certified.

C. REVIEWING AGENCIES

County Planning and Building Department's Geotechnical Engineer
County Environmental Health Division
County Department of Public Works
County Building Inspection Section

California Department of Forestry and Fire Protection (Cal-Fire)
California Department of Transportation (CalTrans)
Committee for Green Foothills
San Francisco Public Utilities Commission
Coastside County Water District (CCWD)

ATTACHMENTS

- A. Recommended Findings and Conditions of Approval
- B. Vicinity Map
- C. Cemetery Map, Aerial View of Project Area, and Photo of Vacant House
- D. Project Area in Relation to Scenic Corridor Map
- E. Original Phase 1 Project Location Map (Figure 2), Revised Project Map (Figure 3), and Proposed Development Map (Figure 4)
- F. Project Plans: Title Sheet and Specifications, Existing Site Plan, Conceptual Grading and Drainage Plan, Conceptual Sections and Earthwork, Pages C0.0 through C3.0, E.T. Easter, Inc., dated January 2013
- G. Conceptual Erosion Control Plan, Page C4.0, E.T. Easter, Inc., dated January 2013
- H. Subsequent Mitigated Negative Declaration/Initial Study (MND/IS), released March 7, 2014 (with limited attachments; all attachments are available at the Planning Counter)
- I. Letter of Decision, Planning Commission Approval of a Master Use Permit, Resource Management Permit, and Grading Permit, dated August 12, 2011

Note: Initial Study/Mitigated Negative Declaration, certified on August 10, 2011, is available at the Planning Counter.

CML:jlh/pac – CMLY0216_WJU.DOCX

County of San Mateo
Planning and Building Department

RECOMMENDED FINDINGS AND CONDITIONS OF APPROVAL

Permit or Project File Number: PLN 2010-00026

Hearing Date: April 9, 2014

Prepared By: Camille Leung
Project Planner

For Adoption By: Planning Commission

RECOMMENDED FINDINGS

Regarding the Environmental Review, Find:

1. That the Subsequent Mitigated Negative Declaration/Initial Study is complete, correct and adequate, and prepared in accordance with the California Environmental Quality Act (CEQA) and applicable State and County Guidelines. An Initial Study was completed and a Subsequent Mitigated Negative Declaration issued in conformance with CEQA Guidelines. The public review period for this document was March 7, 2014 to April 7, 2014.
2. That, on the basis of the Initial Study, comments received hereto, and testimony presented and considered at the public hearing, there is no substantial evidence that the project, if subject to the mitigation measures contained in the Mitigated Negative Declaration, will have a significant effect on the environment. For impacts identified in the Subsequent Mitigated Negative Declaration/Initial Study (Subsequent MND/IS) as "significant unless mitigated," the applicant has concurred to the implementation of mitigation measures which, when implemented, ensure that impacts are not significant. The Subsequent MND/IS identifies potential significant impacts to air quality, biological resources, cultural resources, geology and soils, climate change, hazards and hazardous materials, and hydrology and water quality. All mitigation measures of the Subsequent MND/IS have been incorporated as conditions of approval in this attachment. As proposed and mitigated, the project would not result in any significant environmental impacts.
3. That the mitigation measures identified in the Subsequent MND/IS, agreed to by the applicant, placed as conditions on the project, and identified as part of this public hearing, have been incorporated as conditions of project approval (Condition Nos. 11 through 44 below).
4. That the Negative Declaration reflects the independent judgment of the County.

Regarding the Resource Management Permit, Find:

5. That the project is in conformance with the development review criteria for the Resource Management (RM) District as contained within Chapter 20A.2 of the Zoning Regulations. The project, as proposed and conditioned, complies with the policies and objectives of the RM District, including development standards and Site Design, Water Resources, Cultural Resources, and Primary Scenic Resources Criteria. As proposed and conditioned, the project is designed to fit its environment, would replace removed vegetation and proposes additional new landscaping, would reduce project impact to wildlife species to a less than significant level, incorporates geology-related mitigation measures, improves stormwater drainage through bioswales and other drainage features, and would not result in visual impacts to the I-280 State Scenic Corridor.

Regarding Use Permit, Find:

6. That the establishment, maintenance and/or conducting of the use will not, under the circumstances of the particular case, result in a significant adverse impact to coastal resources, or be detrimental to the public welfare or injurious to property or improvements in said neighborhood. As discussed in the Subsequent MND/IS, the project may result in potential significant impacts to air quality, biological resources, cultural resources, geology and soils, climate change, hazards and hazardous materials, and hydrology and water quality. Mitigation measures have been included in the Subsequent MND/IS to reduce these project impacts to a less than significant level. The project would not result in damage to coastal resources, as the specific project site is not located in the Coastal Zone.

Regarding the Grading Permit, Find:

7. That the granting of the permit will not have a significant adverse effect on the environment. After reviewing the Subsequent MND/IS as required by CEQA, staff found that if all mitigation measures were implemented, there would not be a significant adverse effect on the environment. All recommended mitigation measures in the Subsequent MND/IS as they apply to the project have been incorporated as conditions of approval, below.
8. That the project conforms to the criteria of Chapter 8, Division VII, San Mateo County Ordinance Code, including the standards referenced in Section 8605. The project, as proposed and conditioned, conforms to the standards in the Grading Regulations, including timing of grading activity, erosion and sediment control, and dust control. The project has been reviewed and approved by the County's Department of Public Works and the Planning and Building Department's Geotechnical Engineer.
9. That the project is consistent with the General Plan. The project, as proposed and conditioned, conforms to all applicable General Plan Policies, including policies that encourage the preservation and management of sensitive habitats, regulate

grading activities, protect scenic corridors, protect the San Francisco watershed lands, and encourage efficient water use. As proposed, the project would utilize non-potable water for irrigation. As proposed and conditioned, the project protects biological resources, soils resources, and views from I-280 and the San Francisco watershed lands by implementing recommended mitigation measures of the Subsequent MND/IS.

RECOMMENDED CONDITIONS OF APPROVAL

Current Planning Section

1. This approval applies only to the proposal, documents, and plans described in this report and submitted to and approved by the Planning Commission on April 9, 2014. Modifications beyond that which was approved by the Planning Commission will be subject to review and approval by the Community Development Director and may require review at a public hearing. Minor modifications that are consistent with the intent of, and in substantial conformance with, this approval may be approved at the discretion of the Community Development Director.
2. The Master Use Permit Amendment, Resource Management Permit, and Grading Permit, shall be valid for twenty (20) years (Phase 1) from the approval date of the original Phase 1 Project, through August 10, 2031. If continuation of this use is desired, the applicant shall file a use permit renewal application with the Planning and Building Department six (6) months prior to the permit's expiration and pay the fees applicable at that time. Any further cemetery development beyond the Phase 1 projects included in this permit shall be reviewed against the regulations in place at the time of application.

National Pollutant Discharge Elimination System (NPDES) Municipal Regional Permit (MRP) Provision C.3. Requirements:

3. Based on the completed C3 and C.6 Development Review Checklist submitted by the applicant on March 4, 2013, new and replaced project impervious surface exceeds 10,000 sq. ft. totaling 12,700 square feet. The applicant shall prepare a Stormwater Management Plan (SWMP) that includes, at a minimum, exhibit(s) showing drainage areas and location of Low Impact Development (LID) treatment measures; project watershed; total project site area and total area of land disturbed; total new and/or replaced impervious area; treatment measures and hydraulic sizing calculations; a listing of source control and site design measures to be implemented at the site; hydromodification management measures and calculations, if applicable; NRCS soil type; saturated hydraulic conductivity rate(s) at relevant locations or hydrologic soil type (A, B, C or D) and source of information; elevation of high seasonal groundwater table; a brief summary of how the project is complying with Provision C.3 of the Municipal Regional Permit (MRP); and detailed Maintenance Plan(s) for each site design, source control and treatment measure requiring maintenance. Treatment controls shall be designed

and sized to treat runoff from new and/or replaced impervious areas only. Regarding hydromodification management measures, since this project is being developed in phases, when the combined impervious areas of the entire phase reaches the limits set by the MRP, then the applicant shall have a licensed civil engineer review the project to determine if the combined project satisfies hydromodification management requirements, or if not, then additional measures will be added to the project to meet these requirements.

4. Based on the completed C3 and C.6 Development Review Checklist submitted by the applicant on March 4, 2013, the applicant proposes to use infiltration methods, including bioinfiltration and an infiltration trench. The following Conditions of Approval apply, if the applicant has demonstrated that it is feasible to infiltrate 80% of the average annual runoff volume:
 - a. In-situ infiltration rate shall be determined or confirmed by means of percolation testing for all infiltration treatment measures and devices.
 - b. Infiltration devices shall not be used where confirmed seasonal high groundwater is less than 10 feet from the bottom of infiltration measure or device.
 - c. Infiltration treatment measures or devices shall be designed in accordance with the infiltration guidance in Appendix E of the C.3 Technical Guidance.
 - d. All infiltration devices shall be located and designed to ensure no damage will occur to surrounding improvements from underground water.
 - e. Soil media within the bioinfiltration measure shall consist of 18 inches of biotreatment soil consistent with Attachment L of the MRP.
 - f. Other parameters of final design shall be consistent with the design guidelines presented in the latest version of the C.3 Technical Guidance.
5. LID treatment measures to be shown on final improvement or grading plans shall not differ materially from the LID treatment measures presented on the project plans, approved on April 9, 2014, without written approval from the Planning Department.
6. The property owner shall comply with the following Operation and Maintenance Agreement Requirements:
 - a. Prior to the final of the building permit for the project, the property owner shall coordinate with the project planner to enter into an Operation and Maintenance Agreement (O&M Agreement) with the County (executed by the Community Development Director) to ensure long-term maintenance and servicing by the property owner of stormwater site design and treatment control measures according the approved Maintenance Plan(s), for the life

of the project. The O&M Agreement shall provide County access to the property for inspection. The Maintenance Agreement(s) shall be recorded for the property.

- b. The property owner shall be responsible for conducting all servicing and maintenance as described and required by the treatment measure(s) Maintenance Plan(s). Maintenance of all site design and treatment control measures shall be the owner's responsibility.
- c. The property owner is responsible for submitting an Annual Report accompanied by a review fee to the County by December 31 of each year, as required by the O&M Agreement. The property owner is also responsible for the payment of an inspection fee for County inspections of the stormwater facility, conducted as required by the NPDES Municipal Regional Permit.
- d. Approved Maintenance Plan(s) shall be kept on-site and made readily available to maintenance crews. Maintenance Plan(s) shall be strictly adhered to.
- e. Site access shall be granted to representatives of the County, the San Mateo County Mosquito and Vector Control District, and the Water Board, at any time, for the sole purpose of performing operation and maintenance inspections of the installed stormwater treatment systems. A statement to that effect shall be made a part of the Maintenance Agreement for the property.
- f. The property owner shall be required to pay for all County inspections of installed stormwater treatment systems as required by the Regional Water Quality Control Board or the County.

C.3 Facility Installation Requirement:

- 7. Within one (1) week of the installation date of the approved facility, the project civil engineer shall notify Richard Lee, Associate Engineer, Department of Public Works, by email rlee@smcgov.org, or fax at 650/363-4859. Notice shall include the installation date of the last component of the approved facility and the name of the project civil engineer. The County will perform a final inspection of the approved facility within 45 days of the date of installation.

Tree Protection:

- 8. This permit does not authorize the removal of any trees with trunk circumference of more than 55 inches. Such activity would require application for and issuance of a separate Resource Management (RM) Permit. The property owner shall implement the following tree protection plan as required by Mitigation Measure 12:

- a. Tree protection zones shall be delineated using 4-foot tall orange plastic fencing supported by poles pounded into the ground, located as close to the driplines as possible while still allowing room for construction/grading to safely continue.
- b. The property owner shall maintain tree protection zones free of equipment and materials storage and shall not clean any equipment within these areas.
- c. Should any large roots or large masses of roots need to be cut, the roots shall be inspected by a certified arborist or registered forester prior to cutting.
- d. Any root cutting shall be monitored by an arborist or forester and documented.
- e. Roots to be cut should be severed cleanly with a saw or topers.
- f. Normal irrigation shall be maintained, but oaks should not need summer irrigation.

The above information shall be on-site at all times.

Grading and Erosion Control:

9. For the final approval of the grading permit, the property owner shall ensure the performance of the following activities within thirty (30) days of the completion of grading at the project site:
 - a. The engineer shall submit written certification that all grading has been completed in conformance with the approved plans, conditions of approval/mitigation measures, and the Grading Regulations to the Department of Public Works and the Planning and Building Department's Geotechnical Engineer.
 - b. The geotechnical consultant shall observe and approve all applicable work during construction and sign Section II of the Geotechnical Consultant Approval form, for submittal to the Planning and Building Department's Geotechnical Engineer and Current Planning Section.
10. Regarding the entry/exit modifications to Skyline Memorial Park off of Highway 92 (just east of the junction of Highway 35), the applicant shall refine the plan (as preliminarily submitted to CalTrans) to reflect all of their comments per their email dated February 24, 2014. Upon resubmittal to CalTrans and approval, the applicant shall obtain the required encroachment permit from CalTrans to initiate the work, which will require CalTrans' final inspection approval upon completion. This work shall be completed (with CalTrans' final inspection approval) prior to the

completion of the next significant grading expansion project undertaken by Skylawn, as an element anticipated under this Master Use Permit approval.

Condition Nos. 11 through 44 are mitigation measures from the Subsequent MND/IS made available on March 7, 2014 (changes made to the mitigation measures of the 2011 MND and the addition of new mitigation measures, are shown in strike-through and underline format):⁷

11. **Mitigation Measure 1 (2011 MND Mitigation Measure 20)**: The applicant shall submit a dust control plan to the Planning and Building Department prior to any Phase 1 grading or construction activities. The approved measures shall be implemented prior to beginning any grading and/or construction activities and shall be maintained for the duration of the project grading and/or construction activities. The plan shall, at minimum, include all the “Basic Control Measures” listed in Table ~~2~~ 4 of the BAAQMD CEQA Guidelines (~~see Appendix D~~):
- a. Water all active construction areas at least twice daily.
 - b. Cover all trucks hauling soil, sand and other loose materials or require all trucks to maintain at least 2 feet of freeboard.
 - c. Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
 - d. Sweep daily (with water sweepers) all paved access roads, parking areas and staging areas at construction sites.
 - e. Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.

Additional measures may be required in order to ensure that construction-related activities do not generate elevated levels of dust particulates at any point throughout the duration of the project.

12. **Mitigation Measure 2 (2011 MND Mitigation Measure 12)**: Prior to initial vegetation removal and/or grading activities in the upland portions of the ~~construction zone~~, Phase 1 area, a pre-construction clearance surveys shall be conducted for the California red-legged frog and San Francisco garter snake by a qualified biologist. Should either species be identified, construction activities shall be immediately halted until the frog or snake leaves the construction zone on its own, or is removed by a qualified biologist in possession of an appropriate permit

⁷ Mitigation measures may include requirements applicable to other activities and locations not covered by this permit. Under this permit, the Property Owner is only responsible for the implementation of mitigation measures as they apply to this project.

and authorized by the USFWS. The USFWS shall be immediately notified if either species is observed.

Additionally, following the pre-construction clearance survey and prior to any construction-related grading or excavation activities, vegetation will be mowed to eliminate cover habitat for wildlife. A biological monitor would walk in front of the mower to ensure that the California red-legged frog and San Francisco garter snake are not present.

13. **Mitigation Measure 3 (2011 MND Mitigation Measure 17)**: No earlier than 30 days prior to the commencement of any construction activities in coastal scrub or woodland habitats, a survey ~~shall~~ should be conducted to determine if active woodrat nests (stick houses) with young are present within the disturbance zone or within 50 feet of the disturbance zone. If active woodrat nests with young are identified, a fence ~~shall~~ should be erected around the nest site at a distance adequate to provide the woodrat sufficient foraging habitat at the discretion of a qualified biologist. Clearing and construction within the fenced area would be postponed or halted until young have left the nest. A qualified biologist should serve as a construction monitor during those periods when disturbance activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur. If woodrats or nests are observed within the disturbance footprint outside of the breeding period, individuals should be relocated to a suitable location within the Environmental Protection Zone by a qualified biologist in possession of a scientific collecting permit. This will be accomplished by dismantling woodrat nests (outside of the breeding period), to allow individuals to relocate to suitable habitat within the adjacent Environmental Protection Zone. The Environmental Protection Zone contains large expanses of suitable woodrat habitat that would be protected.
14. **Mitigation Measure 4 (2011 MND Mitigation Measure 18)**: If trees or structures are to be removed during the breeding season of native bat species (generally April 1 through August 31 in California), the presence of active bat maternity roosts should be evaluated by a qualified biologist. If the trees/structures to be removed are determined to provide potential bat roosting habitat, a focused survey should then be conducted to determine if an active maternity roost of a special-status ~~bat species is~~ bats are present. Should an active maternity roost of a special-status bat species be identified, the roost should not be disturbed until the roost is vacated and juveniles have fledged, as determined by the biologist. Once all young have fledged, the tree/structure may be removed.

15. **Mitigation Measure 5 (2011 MND Mitigation Measure 19)**: If a construction project would commence anytime during the nesting/breeding season of native bird species potentially nesting on the site (typically February through August in the project region), a pre-construction survey of the project vicinity for nesting birds shall be conducted. This survey shall be conducted by a qualified biologist (i.e., experienced with the nesting behavior of bird species of the region) within two weeks of the commencement of construction activities. The intent of the survey would be to determine if active nests of special-status bird species or other species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present within the construction zone or within 500 feet of the construction zone. The survey area would include all trees and shrubs in the construction zone and a surrounding 500-foot area. The survey should be timed such that the last survey is concluded no more than two weeks prior to initiation of construction. If ground disturbance activities are delayed following a survey, then an additional pre-construction survey should be conducted such that no more than two weeks will have elapsed between the last survey and the commencement of ground disturbance activities.

If active nests are found in areas that could be directly affected or are within 500 feet of construction and would be subject to prolonged construction-related noise, a no-disturbance buffer zone shall be created around active nests during the breeding season or until a qualified biologist determines that all young have fledged. The size of the buffer zones and types of construction activities restricted within them will be determined through consultation with the CDFG, taking into account factors such as the following:

- a. Noise and human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity;
- b. Distance and amount of vegetation or other screening between the construction site and the nest; and
- c. Sensitivity of individual nesting species and behaviors of the nesting birds.

Limits of construction to avoid an active nest ~~shall~~ should be established in the field with flagging, fencing, or another appropriate barrier, and construction personnel should be instructed on the sensitivity of nest areas. The biologist ~~shall~~ should serve as a construction monitor during those periods when construction activities would occur near active nest areas of special-status bird species to ensure that no impacts on these nests occur.

16. **Mitigation Measure 6 (2011 MND Mitigation Measure 9)**: An updated rare plant survey shall be conducted by a qualified botanist prior to any construction activities commencing ~~after spring of 2012~~ in the Long-Term Development Area. Should any rare plant species be identified, these populations should be avoided to the extent practical. If removal of special-status plant species is required,

transplanting to a suitable location in the Environmental Protection Zone will be considered as the first option. Given that the rare plant species of primary concern are evergreen shrubs or lilies, transplanting should be feasible. Prior to the transplanting of any rare plant species, a plant relocation plan shall be developed by a qualified botanist. At a minimum, the plan shall demonstrate the feasibility of replacing the number of individual plants to be removed at a 1:1 ratio. ~~The~~ This plan shall, at a minimum, specify the following: (1) the location of mitigation sites in the Environmental Protection Zone or other suitable locations; (2) methods for harvesting seeds and salvaging and transplantation of individual bulbs/plants to be impacted; (3) site preparation procedures for the mitigation site; (4) a schedule and action plan to maintain and monitor the mitigation area; (5) a list of criteria and performance standards by which to measure success of the mitigation site(s); and ~~(6) measures to exclude unauthorized entry into the mitigation areas; and (7)~~ (6) contingency measures in the event that mitigation efforts are not successful. The plan shall be subject to the approval of the Planning and Building Department prior to the removal of any special-status plant species.

17. **Mitigation Measure 7 (2011 MND Mitigation Measure 10)**: Prior to any grading or construction activities within or adjacent to the Land and Water Management Zones, a qualified botanist shall conduct a survey of the immediate work areas to determine whether any rare plant species are present. If any such species are identified, the botanist shall consult with the Planning and Building Department staff to determine how to proceed. No grading or construction activities shall occur in the area until the botanist and County staff have agreed on an appropriate course of action that will minimize adverse impacts to special-status plant species in the area.
18. **Mitigation Measure 8 (2011 MND Mitigation Measure 16)**: The outer limits of the stand of native grassland located within the Land and Water Management Zone adjacent to ~~Phase 1 development area~~ the Long-Term Development Area shall be identified by a qualified biologist and marked with wooden stakes or other equivalent markers. Development activities would not occur within this area. Land management activities shall not be allowed within the identified area, unless the timing and nature of the activity is found to not pose a threat to ~~bay~~ the Bay checkerspot butterfly by a qualified biologist.
19. **Mitigation Measure 9 (2011 MND Mitigation Measure 13)**: Prior to the commencement of construction activities within 50 feet of a wetland or riparian woodland, a pre-construction clearance survey of the area shall be conducted by a qualified biologist for the California red-legged frogs and San Francisco garter snake. Should either species be identified, construction activities should be halted until the animal leaves the construction zone on its own, or is removed by a qualified biologist in possession of an appropriate permit and authorized by the USFWS. If it is determined that no red-legged frogs or garter snakes are present, temporary exclusionary fencing shall then be installed around the perimeter of the wetland/riparian woodland and adjacent construction areas. The fencing

shall be maintained throughout the duration of construction activities near the wetland/riparian area. The adequacy of the fencing to prevent frogs and snakes from entering the construction zone shall be approved by a qualified biologist prior to the commencement of construction activities and shall be inspected daily to ensure it continues to operate effectively.

20. **Mitigation Measure 10 (2011 MND Mitigation Measure 14):** In order to prevent the accidental removal of wetland habitat (and potentially damaging the habitat of an endangered wildlife species), a qualified biologist shall determine and mark in the field the extent of all wetland areas in and adjacent to ~~Phase 1 development zones~~ near the Long-Term Development Area (see Figure 5). Any grading or construction activities within 50 feet of any wetland habitat shall be referred to and reviewed by the United States Fish and Wildlife Service (USFWS) prior to commencement of any construction activities. Prior to any disturbance within 50 feet of wetland habitats, proof of consultation with and approval by the USFWS shall be submitted to the Planning and Building Department.
21. **Mitigation Measure 11 (2011 MND Mitigation Measure 15):** The San Francisco garter snake is a California Fully Protected Species, which means that the California Department of Fish and Game (CDFG) cannot authorize the take of the species and needs to ensure the adequacy of the avoidance measures to be implemented. Therefore, the CDFG shall be consulted prior to the implementation of construction activities within 50 feet of a wetland habitats and any further recommended avoidance measures shall be implemented. Prior to any disturbance within 50 feet of wetland habitats, proof of consultation with and approval by the CDFG shall be submitted to the Planning and Building Department.
22. **Mitigation Measure 12 (2011 MND Mitigation Measure 11):** Prior to the commencement of construction activities, a tree survey shall be conducted by a qualified arborist indicating all the trees that could be removed or otherwise harmed during Phase 1 construction. At a minimum, the survey shall identify the size (diameter at breast height), species, and condition of the trees. The survey shall also identify which of these trees are considered protected, significant, or heritage trees. If any such trees are identified by the arborist within Phase 1 Project areas, the project applicant shall implement tree protection measures to ensure said trees are not damaged during construction. These measures may include protective fencing, prohibiting construction/grading activities within the dripline of trees to be preserved, or other appropriate measures approved by the Planning and Building Department.
23. **Mitigation Measure 13 (New Mitigation Measure):** In accordance with the Secretary of the Interior's Standards and Guidelines, the identification of historical resources shall be undertaken for the purpose of locating historic properties on the project site, and shall be composed of a number of activities which include, but are not limited to, archival research, informant interviews, field survey and analysis. Such report shall be provided to the Current Planning Section, prior to

any alteration of the two-story building. Any alteration is subject to the review and approval of the Community Development Director and, depending on the scope of alteration, may require a building permit. Combinations of these activities may be selected and appropriate levels of effort assigned to produce a flexible series of options. A qualified archaeologist shall be retained to conduct the identification of historical resources within the extended Phase 1 project area.

24. **Mitigation Measure 14 (New Mitigation Measure):** Should significant historical resources be identified within the revised project site, the following preservation, rehabilitation, restoration, and reconstruction mitigations would reduce project impacts to a less than significant level.
- a. The project applicant shall preserve and retain any architectural resources eligible for listing on the California Register of Historical Resources (CRHR) in their original setting, or rehabilitate the resources according to the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995). New construction near each resource should be consistent with their historic character.
 - b. The project applicant shall preserve and relocate any architectural resources eligible for listing on the CRHR to a different location in the vicinity of their existing locations, or to a different location within the project site appropriate to their historic character, or rehabilitate the resources according to the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995). New construction near each building should be consistent with their historic character.
 - c. The project applicant shall integrate and reuse architectural resources eligible for listing on the CRHR into the new cemetery development, or rehabilitate the resources according to the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995). New construction near each building should be consistent with its historic character.
25. **Mitigation Measure 15 (2011 MND Mitigation Measure 24):** If archaeological and/or cultural resources are encountered during grading or construction activities, work shall be temporarily halted ~~in the vicinity~~ within 30 feet of the discovered materials and workers shall avoid altering the materials and their context until a qualified professional archaeologist has evaluated the situation and

provided appropriate recommendations. The project applicant or archaeologist shall immediately notify the Current Planning Section of any discoveries made and shall provide the Current Planning Section with a copy of the archaeologist's report and recommendations prior to any further grading or construction activity in the vicinity.

26. **Mitigation Measure 16 (New Mitigation Measure):** Prior to the issuance of the grading permit "hard card," the applicant shall submit an archaeological study of the project site (with the exception of those areas determined not to have cultural resources). The study shall also show the results of attempts to contact local Native American tribe(s) regarding traditional, cultural, and religious heritage values.
27. **Mitigation Measure 17 (New Mitigation Measure):** A discovery of a paleontological specimen during any phase of the project shall result in a work stoppage in the vicinity of the find until it can be evaluated by a professional paleontologist. Should loss or damage be detected, additional protective measures or further action (e.g., resource removal), as determined by a professional paleontologist, shall be implemented to mitigate the impact.
28. **Mitigation Measure 18 (New Mitigation Measure):** Use existing roads to the maximum extent feasible to avoid additional surface disturbance.
29. **Mitigation Measure 19 (New Mitigation Measure):** During all phases of the project, keep equipment and vehicles within the limits of the previously disturbed areas of the project site. All areas to remain undisturbed shall be delineated on the Erosion Control Plan and the plan shall include measures, such as a fence or other kind of barrier, to demarcate the "limit of disturbance." The property owner shall demonstrate the implementation of these measures prior to issuance of the grading permit "hard card."
30. **Mitigation Measure 20 (New Mitigation Measure):** The property owner, applicant, and contractors must be prepared to carry out the requirements of California State law with regard to the discovery of human remains during construction, whether historic or prehistoric. In the event that any human remains are encountered during site disturbance, all ground-disturbing work shall cease immediately and the County coroner shall be notified immediately. If the coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within 24 hours. A qualified archaeologist, in consultation with the Native American Heritage Commission, shall recommend subsequent measures for disposition of the remains.

31. **Mitigation Measure 21 (New Mitigation Measure)**: Prior to any project grading, a subsurface investigation, including exploratory borings, shall be conducted in the area of the fill in order to determine the thickness of the material, as well as the subsurface conditions beneath the fill. This information will be necessary to guide future corrective grading and guidance for construction, drainage, etc. The report shall be submitted to the San Mateo County Planning and Building Department for review by the County Geologist prior to commencement of any grading or construction activities.
32. **Mitigation Measure 22 (2011 MND Mitigation Measure 1)**: A design level geotechnical investigation of the Phase 1 Area shall be performed prior to any project grading. The report shall include a static and seismic slope stability analysis of the Phase 1 Area to be graded and developed. The specific mitigation measures to be utilized in order to stabilize identified landslides and areas of potential seismically induced landslides in the Phase 1 Area shall be presented in the report. The report shall be submitted to the San Mateo County Planning and Building Department for review by the County Geologist prior to commencement of any grading or construction activities.
33. **Mitigation Measure 23 (2011 MND Mitigation Measure 6)**: Any fills used at the project site shall be properly placed with keyways and subsurface drainage, and adequately compacted following the recommendations of the final geotechnical report and geotechnical engineer, in order to significantly reduce fill sediment. Underground utilities shall be designed and constructed using flexible connection points to allow for differential settlement.
34. **Mitigation Measure 24 (2011 MND Mitigation Measure 7)**: Foundation plans shall be submitted to the Planning and Building Department for review prior to issuance of building permits. All foundation excavations shall be observed during construction by the geotechnical engineer to ensure that subsurface conditions encountered are as anticipated. As-built documentation shall also be submitted to the Planning and Building Department.
35. **Mitigation Measure 25 (2011 MND Mitigation Measure 2)**: The applicant shall obtain a grading permit hard card from the Planning and Building Department prior to commencement of any grading or construction activities.
36. **Mitigation Measure 26 (2011 MND Mitigation Measure 3)**: Prior to beginning any construction activities, the applicant shall submit an Erosion and Sediment Control Plan to include the proposed measures of the Conceptual Erosion Control Plan and additional measures as follows for review and approval by the San Mateo County Planning and Building Department. The plan must be fully implemented and inspected by County Planning and Building Department staff prior to the commencement of any construction and/or grading activities and shall be maintained throughout the duration of the project. Erosion control measure deficiencies, as they occur, shall be immediately corrected. The goal is to prevent sediment and other pollutants from leaving the project site and to protect all

exposed earth surfaces from erosive forces. Said plan shall adhere to the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) "General Construction and Site Supervision Guidelines," including:

- a. Stabilizing all denuded areas and maintaining erosion control measures continuously between October 15¹ and April 15³⁰. Stabilizing shall include both proactive measures, such as the placement of hay bales or coir netting, and passive measures, such as revegetating disturbed areas with plants propagated from seed collected in the immediate area.
- b. Storing, handling, and disposing of construction materials and wastes properly, so as to prevent their contact with stormwater.
- c. Controlling and preventing the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges to storm drains and watercourses.
- d. Using sediment controls or filtration to remove sediment when dewatering the site and obtaining all necessary permits.
- e. Avoiding cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated.
- f. Delineating with field markers clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees and drainage courses.
- g. Protecting adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers or filters, dikes, mulching, or other measures as appropriate.
- h. Performing clearing and earth-moving activities only during dry weather.
- i. Limiting and timing applications of pesticides and fertilizers to prevent polluted runoff.
- j. Limiting construction access routes and stabilizing designated access points.
- k. Avoiding tracking dirt or other materials off-site; cleaning off-site paved areas and sidewalks using dry sweeping methods.
- l. The contractor shall train and provide instructions to all employees and subcontractors regarding the construction best management practices. Additional best management practices in addition to those shown on the plans may be required by the Building Inspector to maintain effective

stormwater management during construction activities. Any water leaving the site shall be clear and running slowly at all times.

- m. Show storm drain inlets in the project vicinity and proposed protection of inlets.
- n. Stabilized construction entrance shall utilize a minimum 3"-4" fractured aggregate over geo-textile fabric.
- o. Provide a designated area for parking of construction vehicles, using aggregate over geo-textile fabric.
- p. Show areas for stockpiling. Cover temporary stockpiles using anchored-down plastic sheeting. For longer storage, use seeding and mulching, soil blankets or mats.
- q. Show location of garbage and/or debris dumpster(s), and portable toilets.

Failure to install or maintain these measures will result in stoppage of construction until the corrections have been made and fees paid for staff enforcement time. Revisions to the approved erosion and sediment control plan shall be prepared and signed by the engineer and reviewed by the Department of Public Works and the Community Development Director.

- 37. **Mitigation Measure 27 (2011 MND Mitigation Measure 4):** The applicant shall submit a grading and drainage plan (including calculations) to the Planning and Building Department and the Department of Public Works prior to the issuance of any project-related grading or building permits. The grading and drainage plan shall include all requirements listed in Grading Ordinance Section 8604.1.a.5 (*Application Requirements*). The drainage plan shall also include a narrative describing the type, size, and location of all permanent stormwater controls to be utilized in order to ensure compliance with the County's Drainage Policy, the San Mateo Countywide Water Pollution Prevention Plan (SMCWPPP) "General Construction and Site Supervision Guidelines," and National Pollutant Discharge Elimination System (NPDES) Permit Provision C.3.
- 38. **Mitigation Measure 28 (2011 MND Mitigation Measure 5):** Unless approved in writing and in advance by the Community Development Director, no grading shall be allowed during the winter season (October 15¹ to April 15³⁰) to avoid potential soil erosion. The applicant shall submit a letter to the Current Planning Section, ~~prior to the issuance of the grading hard card, which illustrates the approximate grading schedule, including start and end dates~~ at least two (2) weeks prior to commencement of grading, stating the date when erosion controls will be installed, date when grading operations will begin, anticipated end date of grading operations, and date of revegetation. All submitted schedules shall represent the work in detail and shall project the grading operations through to completion. (**Includes minor changes to increase the level of mitigation*).

39. **Mitigation Measure 29 (New Mitigation Measure):** It shall be the responsibility of the engineer of record to regularly inspect the erosion control measures for the duration of all grading activities, especially after major storm events, and determine that they are functioning as designed and that proper maintenance is being performed. Deficiencies shall be immediately corrected, as determined by and implemented under the observation of the engineer of record.
40. **Mitigation Measure 30 (New Mitigation Measure):** Idling grading or construction equipment shall to comply with best management practices from Bay Area Air Quality Management District guidance. Specifically, idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
41. **Mitigation Measure 31 (2011 MND Mitigation Measure 21):** The applicant shall comply with and follow all guidelines and regulatory requirements as stipulated by the County Environmental Health Division with regard to their use and disposal of all chemicals and fluids resulting from the embalming processes that occur at the Skylawn mortuary.
42. **Mitigation Measure 32 (2011 MND Mitigation Measure 22):** The project applicant (or authorized contractor) shall submit a safety plan for the development of Phase 1. The safety plan shall include measures to reduce and minimize accidents on-site and measures that address the proper procedures to clean up and contain spills. The safety plan shall be approved by the County Building Inspection Section prior to the start of any construction or grading activity on the site.
43. **Mitigation Measure 33 (2011 MND Mitigation Measure 8):** The project applicant shall file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and shall submit proof of filing said NOI to the Planning and Building Department prior to beginning any grading or construction activities. The applicant and all grading/construction contractors shall adhere to all conditions and regulations associated with the State General Construction Activity NPDES Permit.
44. **Mitigation Measure 34 (2011 MND Mitigation Measure 23):** Noise levels produced by proposed construction activities shall comply with the San Mateo County Noise Ordinance contained in Chapter 7.30 (Noise Regulations) ~~Chapter 4.88 (Noise Control)~~ of the County Ordinance Code at all times (this measures has been updated in alignment with San Mateo County Noise Ordinance). Construction activities shall be limited to the hours from 7:00 a.m. to ~~6:00 p.m.~~ 7:00 p.m., Monday through Friday, and ~~9:00 a.m.~~ 8:00 a.m. to 5:00 p.m. on Saturday, ~~construction operations shall be prohibited on Sunday and any national holiday~~ and 12:00 p.m. to 4:00 p.m. on Sundays and Holidays, or at such other

hours as may be authorized or restricted by the permit, if at least one of the following noise limitations are met:

- a. No individual piece of equipment shall produce a noise level exceeding 90-dB at a distance of 25 feet. If the device is housed within a structure or trailer on the property, the measurement shall be made outside the structure at a distance as close to 25 feet from the equipment as possible.
- b. The noise level at any point outside of the property plane of the project shall not exceed 90-dB.
- c. The operation of leaf blowers shall additionally comply with Chapter 10.80 "Operation of Leaf Blowers" (Ordinance 2004-16 Section 1, 2004).

Retained/Updated Conditions of Approval of the Phase 1 Project Approved by the Planning Commission on August 10, 2011 (changes shown in underline and strike-through format):

45. The landscaping installed around the westerly and southerly perimeters of Skylawn's existing mausoleum building shall be maintained so that it achieves its maximum screening ability as required. Other than as recommended by a licensed arborist due to the trees' health (whose report shall be submitted to the Planning Department for review and approval), they shall not be trimmed or topped.
46. All existing or any new exterior lighting located anywhere on Skylawn's property shall be corrected, placed, and designed such that no light glare is visible from any public road or viewing location from within any surrounding scenic corridor. Where necessary or applicable, the applicant shall submit an exterior lighting plan to the Planning and Building Department for review and approval to ensure that this standard is met. Such a plan shall include the location of all exterior lighting elements, including the manufacturer's specifications for type, design, height, and candle-power. Any and all new freestanding light fixtures shall not exceed four (4) feet in height and shall be placed and designed such that no light glare is visible from any public road or viewing location from within any surrounding scenic corridor. Any existing or new exterior lighting fixtures mounted to any building or structure shall be limited to those required for minimum security and safety purposes at those respective facilities. The glare from such lighting shall not be visible from any public road or viewing location from within any surrounding scenic corridor and shall be confined to those facilities. No existing or future interment projects shall include lighting for after-dark services or visitation except for any such lighting deemed necessary for previously cited minimum safety/security purposes. No up-lighting or display lighting intended to illuminate any building, structure, or surrounding landscaping shall be allowed.
47. The project shall make use of native species that are appropriate to hillside ecology, that blend the surrounding environment, and that reduces the carbon

footprint caused by the maintenance of trees, shrubs, and groundcover. Native plants, including drought and fire resistant plants, shall be used to the extent feasible throughout the proposed developed areas. Alternative sources of irrigated water, that may be available to the project applicant (including wastewater reuse), shall be pursued to meet the future irrigation needs to further reduce water demand. The property owner shall demonstrate compliance with this condition prior to the completion of the grading permit and each building permit for the project.

48. (For projects that do not require a building permit): Prior to the grading “hard card” issuance, the applicant shall coordinate with a building technician to open a building permit case and pay applicable fees for the completion and tracking of monthly erosion and sediment control inspections during the rainy season, as required by the Regional Water Quality Control Board, ~~and weekly construction inspections during the rainy season for sites within the ASBS watershed, as required by the Special Protections.~~
49. (Required for any project with a newly approved, privately maintained street): Prior to final approval of the building permit by the Department of Public Works, on-site storm drain inlets shall be clearly marked with the words “No Dumping! Flows to Bay,” or equivalent using thermoplastic material or a plaque.
50. Skylawn’s waste storage and removal plan shall continue to be in compliance with County Environmental Health Division requirements.
51. Skylawn shall continue to work with the San Francisco Public Utilities Commission (SFPUC), Golden Gate National Recreation Area (GGNRA), and the Bay Area Ridge Trail Council to accommodate the Bay Area Ridge Trail currently proposed on Skylawn’s property along its eastern boundary per the adopted alternative as discussed in the SFPUC’s 1999 Draft Environmental Impact Report (EIR) for its Watershed Management Plan. The site plan of any proposed Skylawn project along or near the trail shall show its actual designated trail boundaries to the degree that they are known at the time of that project’s subsequent submittal and review. While Skylawn agrees to cooperate in the trail’s development, they shall be under no financial or maintenance obligations associated with the trail acquisition or development as a condition of this permit. The easement and/or agreement for this area must be recorded prior to its inclusion in the Bay Area Ridge Trail.
52. All existing or any new exterior lighting located anywhere on Skylawn’s property shall be corrected, placed, and designed such that no light glare is visible from any public road or viewing location from within any surrounding scenic corridor. Where necessary or applicable, the applicant shall submit an exterior lighting plan to the Planning and Building Department for review and approval to ensure that this standard is met. Such a plan shall include the location of all exterior lighting elements, including the manufacturer’s specifications for type, design, height, and candle-power. Any and all new freestanding light fixtures shall not exceed four (4)

feet in height and shall be placed and designed such that no light glare is visible from any public road or viewing location from within any surrounding scenic corridor. Any existing or new exterior lighting fixtures mounted to any building or structure shall be limited to those required for minimum security and safety purposes at those respective facilities. The glare from such lighting shall not be visible from any public road or viewing location from within any surrounding scenic corridor and shall be confined to those facilities. No existing or future interment projects shall include lighting for after-dark services or visitation except for any such lighting deemed necessary for previously cited minimum safety/security purposes. No up-lighting or display lighting intended to illuminate any building, structure, or surrounding landscaping shall be allowed.

53. All Phase 1 and Revised Phase 1 projects shall comply with the Model County's Water Efficient Landscape Ordinance according to Assembly Bill 1881 (effective January 1, 2010). Prior to issuance of any Phase 1 grading or building permits, the applicant shall submit all applicable studies, analyses, reports, and proposals to the San Mateo County Planning and Building Department for review and approval.
54. This grading permit approval shall act as the master (umbrella) grading permit throughout the 20-year development of Phase 1. Total earthwork quantities for all Phase 1 development shall not exceed ~~50,000~~ 145,000 cubic yards. Prior to commencement of any such grading or land clearing activities, the applicant must obtain a separate grading permit for each individual Phase 1 and revised Phase 1 project. Each grading permit application will be reviewed by Planning and Building Department staff to ensure compliance with the Grading Ordinance, the Mitigated Negative Declaration prepared for this project, and National Pollutant Discharge Elimination System (NPDES) regulations. No site disturbance may occur until a complete "hard card" has been issued for each project.
55. When submitting grading permit applications for each Phase 1 project, the applicant shall submit a grading and drainage plan (including calculations) to the Planning and Building Department and the Department of Public Works prior to the issuance of any project related grading or building permits. The grading and drainage plan shall include all requirements listed in Grading Ordinance Section 8604.1.a.5 (*Application Requirements*). Grading Plans shall demonstrate that finished contours blend with existing contours in the project vicinity. The drainage plan shall also include a narrative describing the type, size, and location of all permanent stormwater controls to be utilized in order to ensure compliance with the County's Drainage Policy, the San Mateo County Water Pollution Prevention Plan (SMCWPPP), and NPDES Provision C.3. Said plan must contain project-specific erosion and sediment control measures that are best suited to address both construction related impacts and ongoing post construction stormwater management. ~~The plan shall adhere to the San Mateo Countywide Stormwater Pollution Prevention Program "General Construction and Site Supervision Guidelines," including:~~

- a. ~~Stabilizing all denuded areas and maintaining erosion control measures continuously between October 15 and April 15. Stabilizing shall include both proactive measures, such as the placement of hay bales or coir netting, and passive measures, such as revegetating disturbed areas with plants propagated from seed collected in the immediate area.~~
 - b. ~~Storing, handling, and disposing of construction materials and wastes properly, so as to prevent their contact with stormwater.~~
 - c. ~~Controlling and preventing the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges to storm drains and watercourses.~~
 - d. ~~Using sediment controls or filtration to remove sediment when dewatering the site and obtaining all necessary permits.~~
 - e. ~~Avoiding cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated.~~
 - f. ~~Delineating with field markers clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees and drainage courses.~~
 - g. ~~Protecting adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers or filters, dikes, mulching, or other measures as appropriate.~~
 - h. ~~Performing clearing and earth-moving activities only during dry weather.~~
 - i. ~~Limiting and timing applications of pesticides and fertilizers to prevent polluted runoff.~~
 - j. ~~Limiting construction access routes and stabilizing designated access points.~~
 - k. ~~Avoiding tracking dirt or other materials off-site; cleaning off-site paved areas and sidewalks using dry sweeping methods.~~
 - l. ~~The contractor shall train and provide instructions to all employees and subcontractors regarding the construction best management practices.~~
56. For all Phase 1 projects, the approved project-specific Erosion and Sediment Control Plan must be fully implemented and the measures inspected by County Planning and Building Department staff prior to the commencement of any construction and/or grading activities and shall be maintained throughout the duration of the project. Erosion control measures shall be routinely inspected and any deficiencies shall be immediately corrected. All erosion and sediment control

measures must be maintained in manner that prevents sediment and other pollutants from leaving the project site and protects all exposed earth surfaces from erosive forces to the maximum extent possible.

57. The applicant shall seed all disturbed areas (beyond the improved portions of any new project site) with a native grassland mix applied in conjunction with mulch and tackifier, as directed and overseen by the applicant's landscape architect, as soon as grading or clearing activities are completed in order to minimize the potential establishment and expansion of exotic plant species into newly-graded areas. Where a building permit is required, planning staff shall confirm that such revegetation/reseeding has been adequately applied prior to the Building Inspection Section's final inspection of the project's respective building permit.
58. The engineer who prepared the approved Grading and Drainage Plan shall be responsible for the inspection and certification of the grading as required by Section 8606.2 of the Grading Ordinance. The engineer's responsibilities shall include those relating to non-compliance detailed in Section 8606.5 of the Grading Ordinance.
59. At the completion of work, the engineer who prepared the approved Grading and Drainage Plan shall certify, in writing, that all grading, lot drainage, and drainage facilities have been completed in conformance with the approved plans, as conditioned, and the Grading Ordinance. Said engineer shall also submit a signed "as-graded" grading plan conforming to the requirements of Section 8606.6 of the Grading Ordinance.
60. The applicant shall submit, for review by the Department of Public Works and the appropriate Fire District, a plan and profile of: (1) the existing and proposed access from the nearest publicly maintained roadway to the proposed project site, and (2) any new roadways proposed during Phase 1 development. When appropriate, this plan and profile shall be prepared from elevations and alignment shown on the roadway improvement plans. The roadway plan shall also include and show specific provisions and details for both the existing and the proposed drainage patterns and drainage facilities. All new areas shall meet Cal-Fire access requirements including slope, surface, weight, and width requirements at time of building or grading permit application.
61. Pursuant to San Mateo County Ordinance Section 8605.5, all equipment used in grading operations shall meet spark arrester and firefighting tool requirements, as specified in the California Public Resources Code.
62. Where building permits are required, the applicant shall apply for and be issued a building permit prior to beginning any construction activities. Building permits may be required for proposed structures including mausoleum/columbarium facilities, retaining walls, storage tanks, permanent stormwater retention/treatment facilities, etc.

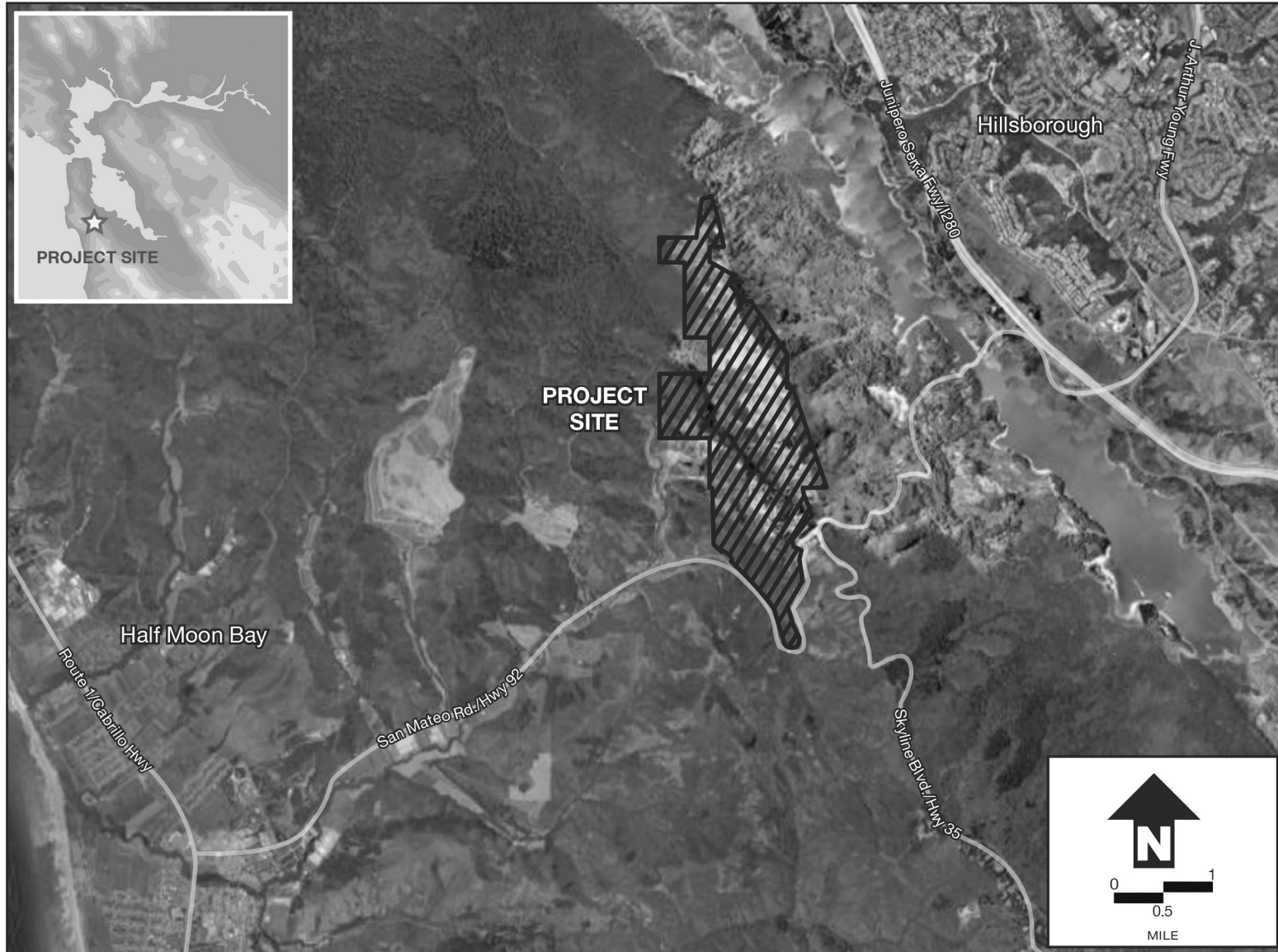
63. The applicant shall comply with the California Green Regulations of the California Building Code~~County Green Building Ordinance, Ordinance No. 04414~~, and any revision thereto in effect at the time of building permit application.
64. Any new electric or telephone utilities serving any new structure or facility throughout Skylawn's property shall be placed entirely underground, leading from the closest existing utility pole to the project site. Such undergrounding shall clearly be indicated on any required building plans.
65. The project applicant (or authorized contractor) shall submit a safety plan for the development of Phase 1. The safety plan shall include measures to reduce and minimize accidents on-site and measures that address the proper procedures to clean up and contain spills. The safety plan shall be approved by the County Building Inspection Section prior to the start of construction activity on the site.
66. The Department of Fish and Game has determined that this project is not exempt from Department of Fish and Game California Environmental Quality Act filing fees for the Initial Study and Mitigated Negative Declaration pursuant to Fish and Game Code Section 711.4. The applicant shall pay to the San Mateo County Recorder's Office an amount of ~~\$2,094.00~~ 2,181.25, plus the ~~a \$50.00 applicable~~ County Recorder filing fee to the San Mateo County Clerk, with in four (4) days of completion of the appeal period, which period expires on ~~August 25, 2014~~ April 23, 2014, unless these permits are appealed to the San Mateo County Board of Supervisors and a new decision date is determined.
67. Prior to the submittal of any grading and/or building permits associated with any development of the subject Master (Phase 1) Use Permit, the applicant shall schedule a meeting with the County Community Development Director, or his/her designee, to ensure the project's compliance with all applicable conditions of approval of this permit. This meeting shall include, where necessary, representatives from the County Planning and Building Department, Department of Public Works and Environmental Health Division and the County Fire Authority. The applicant shall be responsible for ensuring the attendance at this meeting of any current or new/future architects, landscape architects, geotechnical/civil engineers, biologist, ongoing or specific project managers and any other applicable consultants. It shall also be the applicant's responsibility to ensure that such project-related personnel and consultants comply with all applicable conditions of approval. Finally, the applicant shall be aware that any development on the subject property or that proposed within the cited Phase 1 area will be subject to the most current versions of County Building, Public Works, Environmental Health, County Fire Authority and/or any State-mandated regulations.
68. Prior to the issuance of any Phase 1 grading or building permits, the property owner shall enter into a Memorandum of Understanding (MOU) with the County to require the property owner to maintain the 201-acre area of the Environmental Management Zone (EMZ), with the area as defined and approximated by a map

which is subject to the approval of the County. The MOU shall require the creation and recordation of a conservation easement over the area, as more specifically defined and surveyed over time, which shall be recorded with the County Recorder's Office by August 10, 2031,~~prior to the issuance of any Phase 1 grading or building permits.~~

San Mateo County Fire Department

69. All new areas to meet San Mateo County Fire Department access requirements, including slope, surface, weight requirements and width at time of building permit application. All new and existing road access to have signage and street naming approved by the San Mateo County Fire Marshal.

CML:jlh/pac – CMLY0216_WJU.DOCX



Project Location Map

Figure 1

Figure 1: Phase 1 Extension Area and Original Phase 1 Area

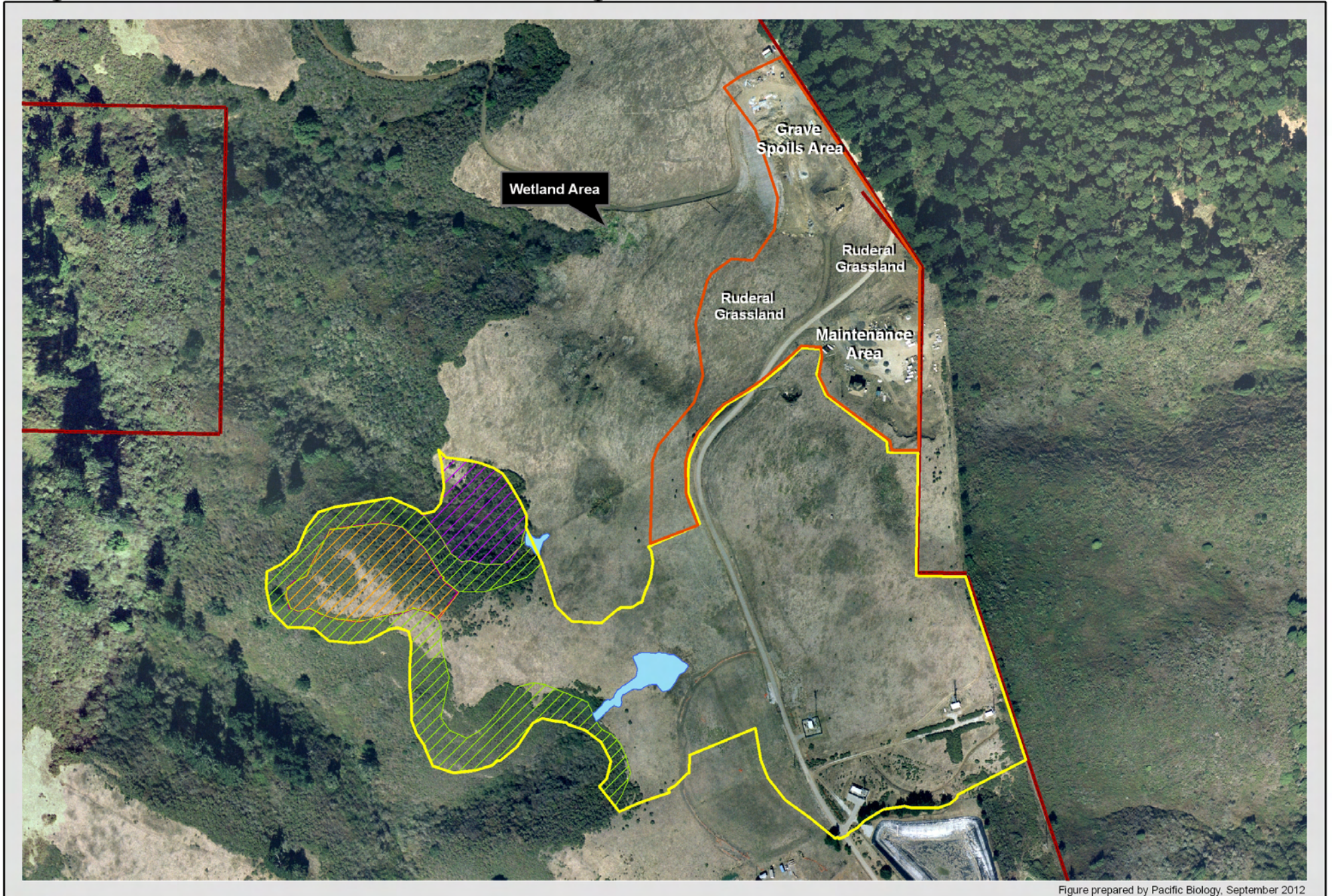


Figure prepared by Pacific Biology, September 2012

- Phase 1 Extension Area
- Original Phase 1 Boundary
- Wetlands (Delineated)
- Property Boundary
- Land Management Zone
- Water Management Zone
- Natural Burial Area

0 250 500 1,000 Feet

Scale 1:4500



Veteran's Columbarium

Here at Skyline we have 14 gardens dedicated to Marine's and their family. Illustrated in the picture is our Veterans' columbarium, featuring the statue of the Winged Victory Of Samothrace.

Bai Ling Plaza

Bai Ling Yuan II was designed to keep all of the elements of Feng Shui in mind.

Serenity Island

Serenity Island is one type of family Estate option offering both above ground and traditional ground burial.

Island East

Island East offers a unique setting for cremation memorialization with beautiful surroundings.

California Dreaming

Purchased on the edge of our property overlooking the Pacific Ocean, CA Dreaming offers stunning views along with cremation memorialization options that showcase various lifestyles and icons.

Sanctuary Estates

Clear, beautiful views along with an added feeling of privacy.

Elk's Garden

Features a mausoleum, columbarium, and traditional ground burial options that are dedicated to Elk's Club Members and their families.

Mausoleum in the Sky

With the recently opened second floor the Mausoleum in the Sky offers a grand view of the Pacific Ocean while being sheltered from the outside elements. Includes unique indoor gardens and water features.

Funeral Home

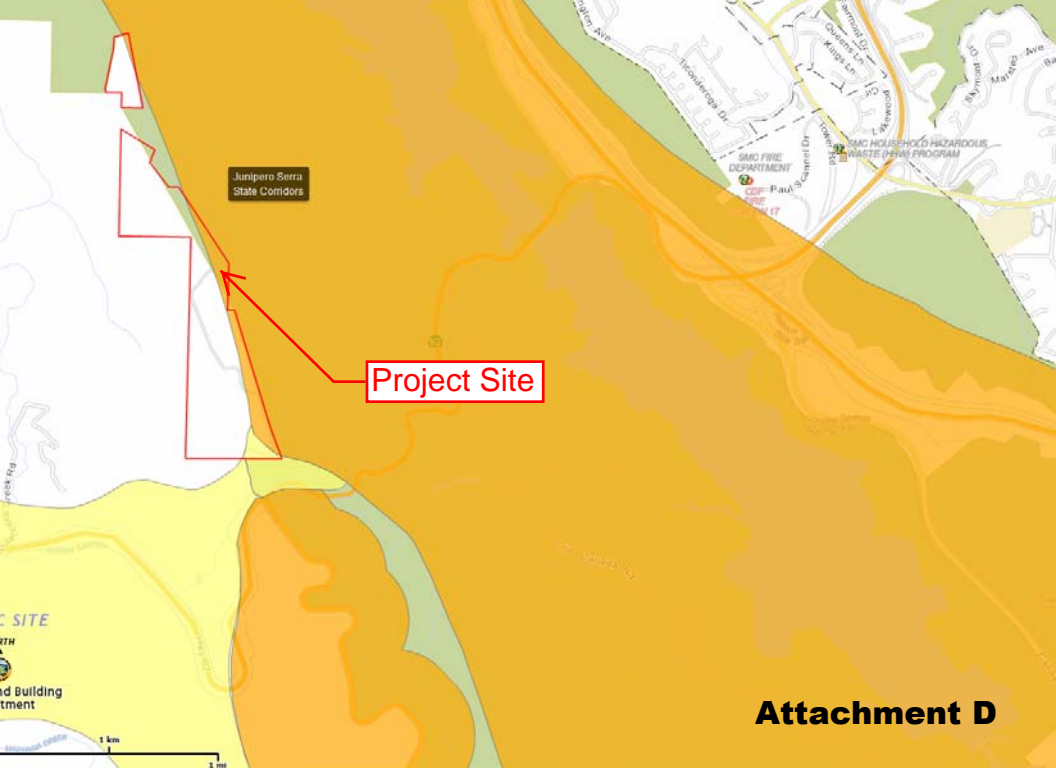
Expansive and welcoming, Skyline Funeral Home features bright and spacious visitation rooms, two elegant chapels, an exceptional reception room with an outdoor patio and floor to ceiling windows, opening to a picturesque waterfall and rock garden.





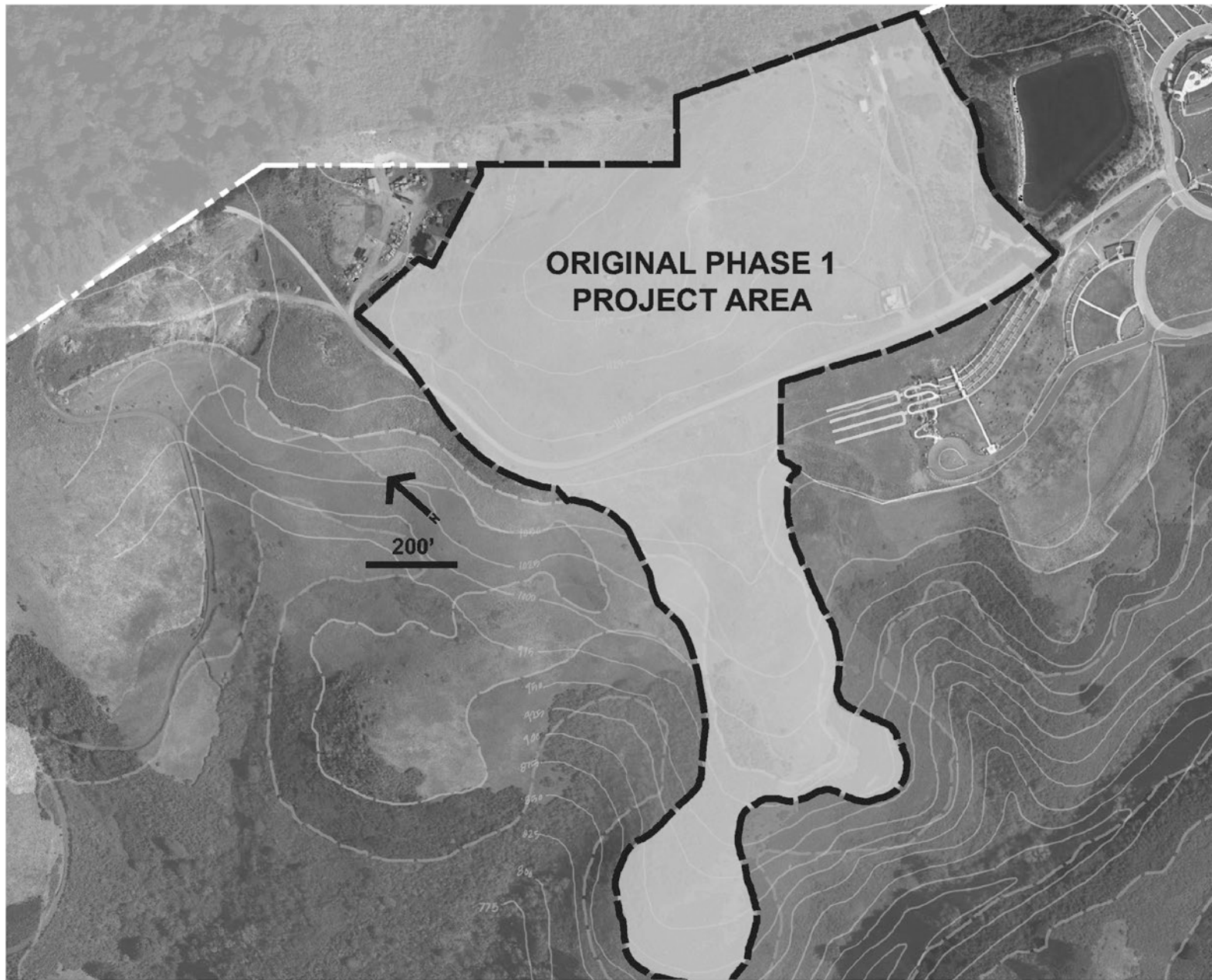
Potential Historic Structure in Service Yard

Figure



Junipero Sierra State Corridors

Project Site

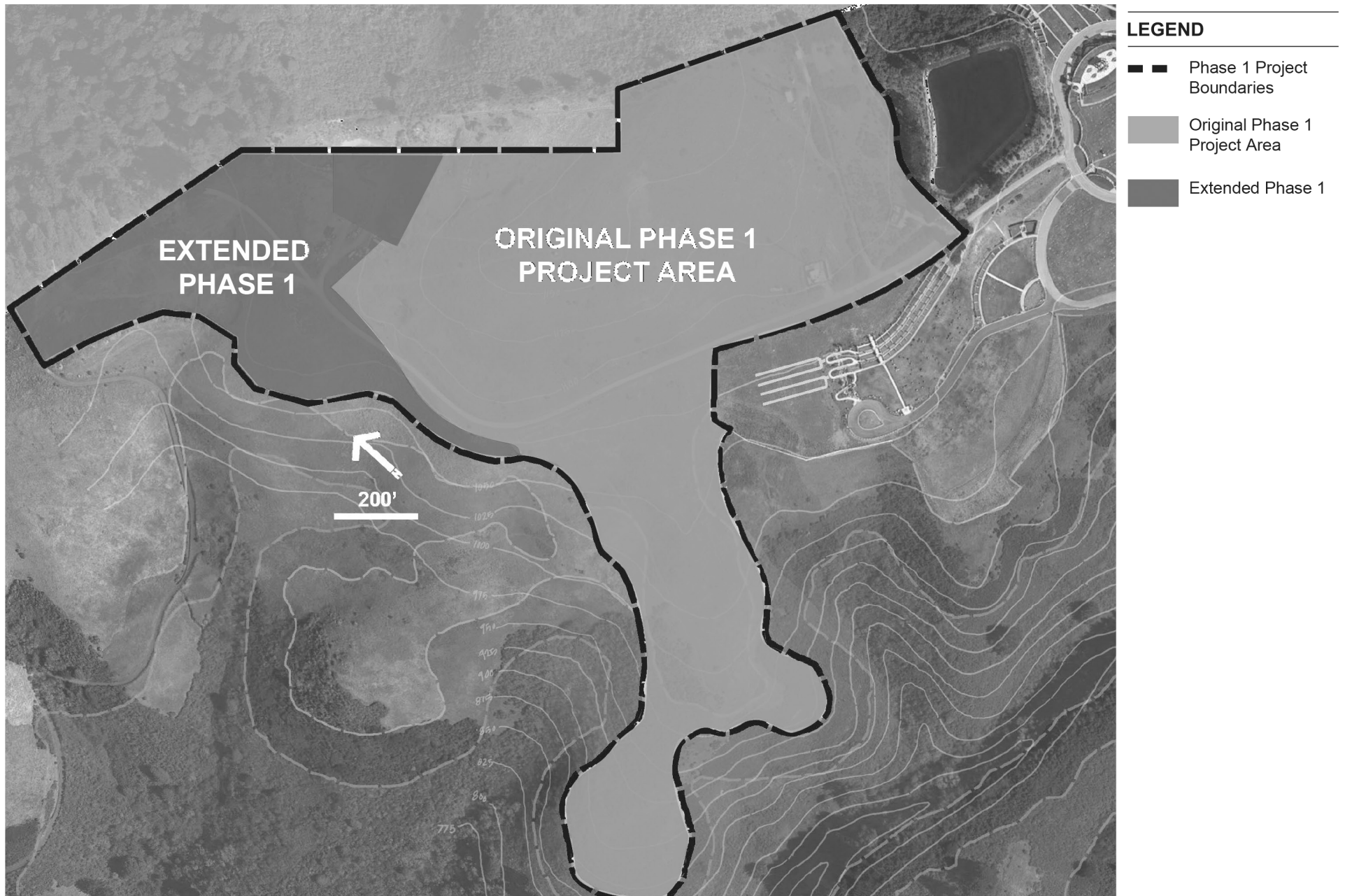


LEGEND

- Phase 1 Project Boundaries

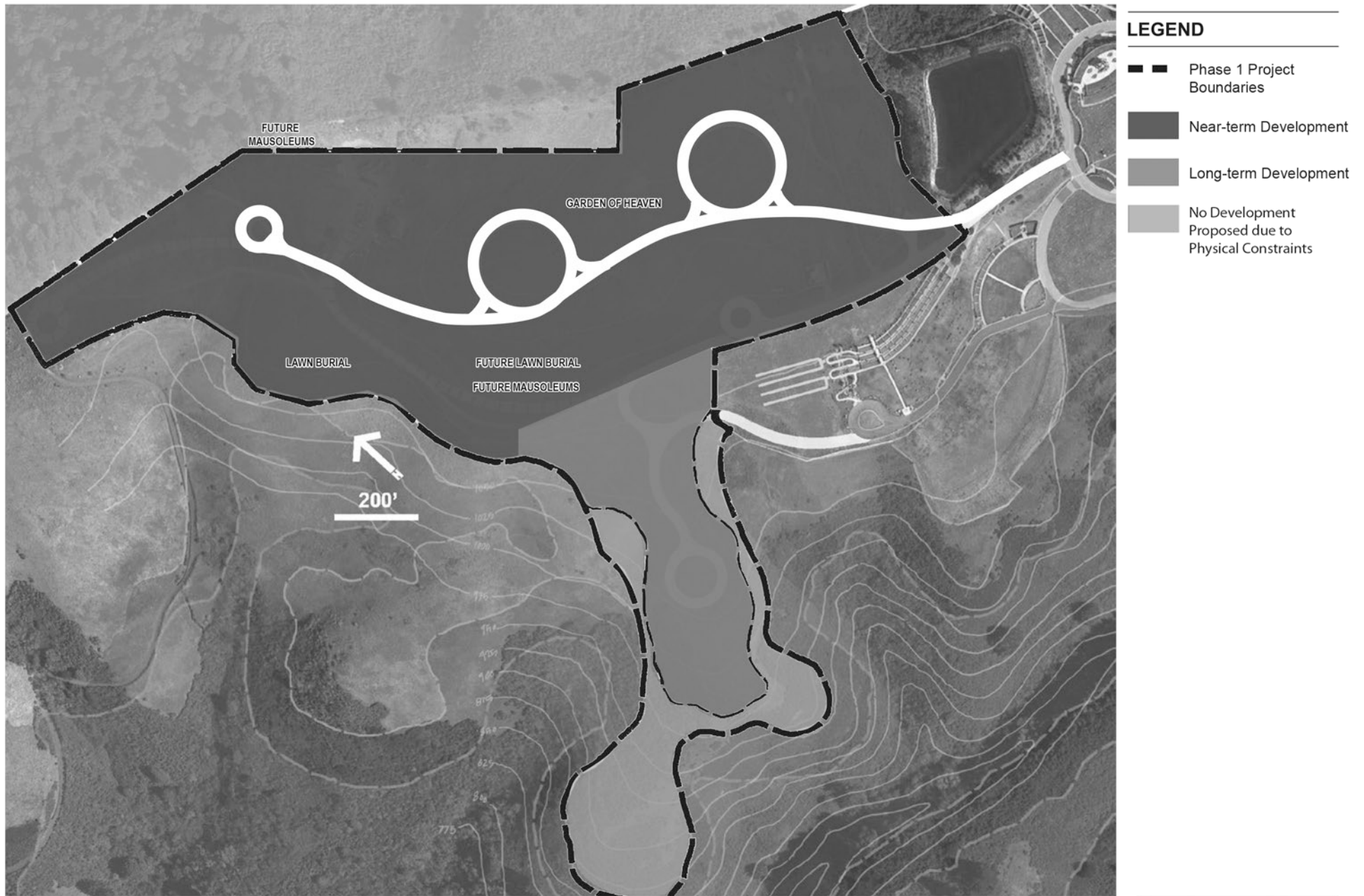
Original Phase 1 Project Area

Figure



Revised Project

Figure 3



Proposed Development

Figure 4

Skylawn Memorial Park • MLUP Phase I Extension

Skyline Blvd & Highway 92
San Mateo County, California

Project Directory

Client: Mr. Rick Miller, Vice President of Operations
Lifemart Center at Skylawn Memorial Park
100 Ross Blvd.
San Mateo, CA 94402
(650) 241-1111 ext
(650) 349-2194 fax

Project Engineer: Dale T. Estier, P.E.
E.T. Estier, Inc.
733. Box 7829
Sausalito, CA 94965
(415) 425-7551 direct
(415) 425-9203 fax

Engineering Geologist: Craig S. Havers, C.E.G.
Consulting Engineering Geologist
379 Park Drive
Newark, CA 94598
(415) 335-8145 direct/fax

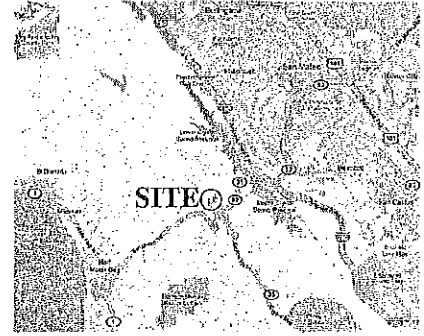
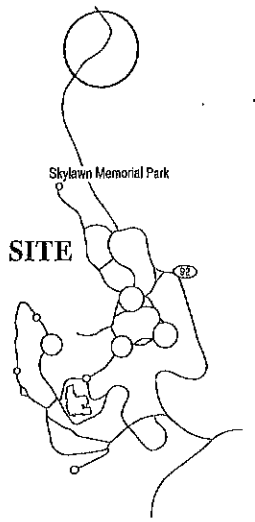
Geotechnical Engineer: Joseph Rafferty
Advanced Geotechnical Engineering Inc.
7430 Railroad Street
Orland, CA 95920
(916) 468-0200 direct
(916) 468-0244 fax

Symbols & Abbreviations

⊙	Control Point	RW	Retaining Wall
⊕	Splice Found or Set	BW	Base of Wall
(H)	Existing	TW	Top of Wall
(I)	Existing	FW	Face of Wall
(N)	New	Cont.	Concrete
Typ	Typical Structure	▨	Retaining Wall
GN	Ground Elevation	—	New 1' Contours
FG	Finish Grade	—	New 5' Contours
ToB	Top of Bank	—	Existing 1' Contours
ToS	Toe of Slope	—	Existing 5' Contours
BH	Bore Hole	⊖	Existing Elevation of Point
DJ	Drainage Jailer	⊖	New Elevation of Point
SDMG	Stream Drain Markers	—	Limit of Disturbance
Rim	Rim Elevation	⊖	Section Line
Fl	Flow Line	→	Slope
Inv	Invert Elevation	→	Direction of Flow/Ditch
B+C	Back of Curve	⊖	Utility Pole
BC	Begin Curve	○	Tree
PRC	Point of Reversing Curve	○	Rock
EC	End Curve		

Index of Sheets

C0.0	Title Sheet & Specifications
C1.0	Existing Site Plan
C2.0	Conceptual Grading & Drainage Plan
C3.0	Conceptual Section & Earthwork
C4.0	Conceptual Erosion Control Plan



General Notes

- These plans show the conceptual grading, drainage, landscaping and erosion control improvements for MLUP Phase I Extension, PLR2010-00026.
- All construction and geometry shall be in accordance with California standard details and specifications. If other details apply, they shall be provided.
- Construction shall comply with all applicable Building Codes, State, local laws and ordinances. The contractor shall provide all permits as required by the County of San Mateo. The extent of the improvements will include any specific requests by the interested governing agency. Job site safety shall be the sole responsibility of the Contractor. The Contractor shall maintain site safety at all times. Access to the construction site shall be controlled by security fencing or other means. Fencing, construction and loading shall be adequate to support the work vertically in both vertical and lateral directions. The extent of the safety and security measures will include any specific requests by the interested governing agency. Construction contractor and his subcontractors agree that in accordance with generally accepted construction practices, construction contractor and his subcontractors will be required to assume sole and complete responsibility for job site conditions during the course of construction of the project, including safety of all persons and property, that this requirement shall be made to apply continuously and not limited to normal working hours, and construction contractor and his subcontractors further agree to defend, indemnify, and hold design professional and owner harmless from any and all liability, real or alleged, in connection with the performance of work on this project, except liability arising from the sole negligence of design professional. The design professional and owner shall be named as additional insured on contractor's liability policy.
- The contractor shall maintain site control at all times by waiving or as otherwise specified in the plans. See Erosion Control Plans for temporary and final protection of the work area, if any.
- The contractor is responsible for the protection and adjustment of all gas valves, water valves, boxes and covers, drains, elevators, etc. Provide heat class AC patching and drilled new concrete in existing.
- Construction of fill slopes shall be done per chapter 18 and 33 of the Uniform Building Code.
- The contractor shall stop work during services or as reported by the Cemetery.
- No work shall be undertaken without obtaining a permit from the interested governing body. The contractor shall be responsible for compliance with all permit conditions.
- Work hours shall be limited to 9:00 AM to 5:00 PM, Monday through Friday, 9:00 AM to 5:00 PM Saturday. Saturday work shall require approval by the Public Works Director/Civil Engineer. No work shall be permitted on Sunday except for Emergency Repairs.
- All types of work activity shall be diligently and continuously pursued to final condition. Work suspensions while there are rough or open trenches, unexcavated pits, paving, temporary quantities, and other intermediate conditions shall be allowed for equipment.
- An Engineering Geologist reviewed the site and estimated the extent of the fill area based upon field review and USGS Mapping. The geotechnical engineer should be notified at least 14 days prior to site grading so that the work in the location can be coordinated with the grading contractor, and arrangements can be made for testing and observing. It is the grading contractor's responsibility to make arrangements for these required services.
- The contractor shall be responsible for the verification of construction quantities prior to placing any item. Quality of materials shown on these plans, or engineer's estimates are for estimating purposes only and shall not be considered as a basis for contractor payment. Contractor shall not be responsible for any inaccuracies in such quantities and estimates.
- The Civil Engineer preparing these plans will not be responsible for, or liable for, unexcavated changes to, or use of, these plans. All changes must be in writing and must be approved by the Civil Engineer prior to construction.

Re-Vegetation/Landscaping Notes

Narrative Description of Re-Vegetation/Landscaping for Skylawn Memorial Park Phase I Expansion
Approximately 50 acres (2,087,000 sq ft) of landscape is proposed for Phase I expansion (10 percent of planting will be drought tolerant, unmanipulated planting, 50 percent will be drought tolerant, dwarf treeless trees). All plantings will be appropriate to the coastal climate of San Mateo County and no invasive species will be used. The landscaping will be properly installed and irrigated with an efficient irrigation system using nonpotable water provided by Countywide County Water District.
Phase I expansion will comply with requirements of the CA Water Efficient Ordinance, which includes installing the water budget as shown below.
Estimated Total Water Use: 4,239,430 gallons/year Maximum Applied Water Allowance per Ordinance: 5,161,276 gallons/year

Hydrozone	Plant Water Use (gpm)	Plant Factors (PF)	Hydrozone Area (HA) (acres)	PF x HA (Equivalent feet)
Shrub Plantings	Medium	0.5	311.413	155.707
Shrub Plantings	Low	0.3	79.842	23.953
Sum			391.255	179.660

Maximum Applied Water Allowance (MAWA)
MAWA = (ET x 4.5) x (1.1) x (0.2) x (SLA)
ET = Evapotranspiration per CIMIS Zone 4 (gpm x 360 days)
SLA = Coverage Factor (by color)
RT = RT Adjustment Factor (RTPA)
LA = Landscape Area including SLA = 391.255 ac
RA = Additional Water Allowance (by SLA)
SLA = Special Landscape Area = 0 ac
MAWA = 1,299,827 gpm x 3.6 x 1.1 x 0.2 x 1.1 x 0.2 x 0 ac = 5,161,276 gallons/year

Estimated Total Water Use (ETWU)
ETWU = (ET x 4.5) x (1.1) x (0.2) x (SLA)
ET = Evapotranspiration per CIMIS Zone 4 (gpm x 360 days)
PF = Plant Factor from WUCOLS, Section 3.16.010
HA = Hydrozone Area
SLA = Special Landscape Area = 0 ac
IE = Irrigation Efficiency (calculated by 0.85)
ETWU = 1,299,827 gpm x 3.6 x 1.1 x 0.2 x 1.1 x 0.85 = 4,239,430 gallons/year
ETWU = 4,239,430 gallons/year < MAWA (5,161,276 gallons/year)
Therefore, the water budget complies with the MAWA.



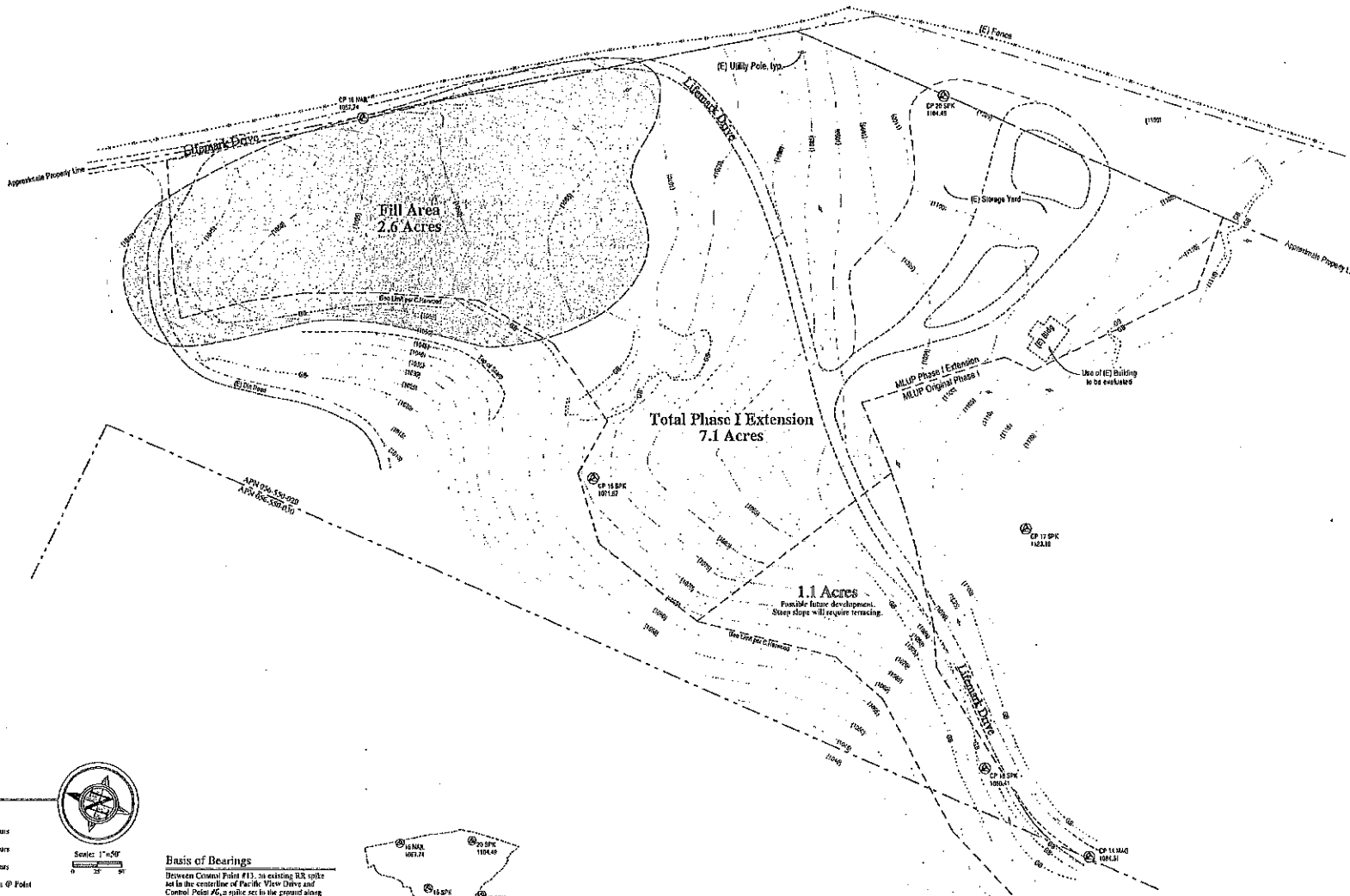
E.T. Estier, Inc.
Professional Engineer
No. C 48971
Exp. 9/30/12
City of San Mateo, CA 94402



Skylawn Memorial Park
MLUP - Phase I Extension
San Mateo County
California

Title Sheet & Specifications
DATE: January 2013
SCALE: 1" = 50'
JOB NO.: 1101
DRAWING NO.: 02-11-11-Phase I Extension
REVISION: 01.13.12-Phase I Extension



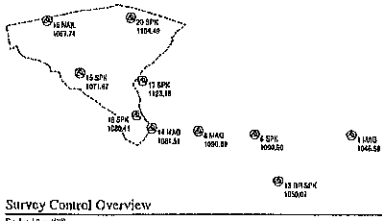


- Legend**
- ⊙ Control Point
 - Existing 5' Contours
 - Existing 1' Contours
 - Existing 5' Contours
 - Existing Elevation @ Point
 - Fence
 - (E) Existing
 - EP Edge of Pavement
 - GB Gravel Break
 - GN Ground
 - MAG Magnetic Nail
 - SPK Spike Point or Set
 - Typ Typical Stationer



Basis of Bearings
 Between Control Point #13, an existing SR set on the centerline of Pacific View Drive and Control Point #6, a spike set in the ground along Cypress Drive a distance of 209.56' measured at Control Point #13, Assumed Bearing N45°E.
 This is not a Boundary Survey.

Benchmark
 The control points shown hereon are temporary benchmarks based on Control Point #1, an existing Mag nail set in the pavement along Canyon View Drive by Prime Meridian Station (Job No. 11200), Assumed Elevation 1044.58'

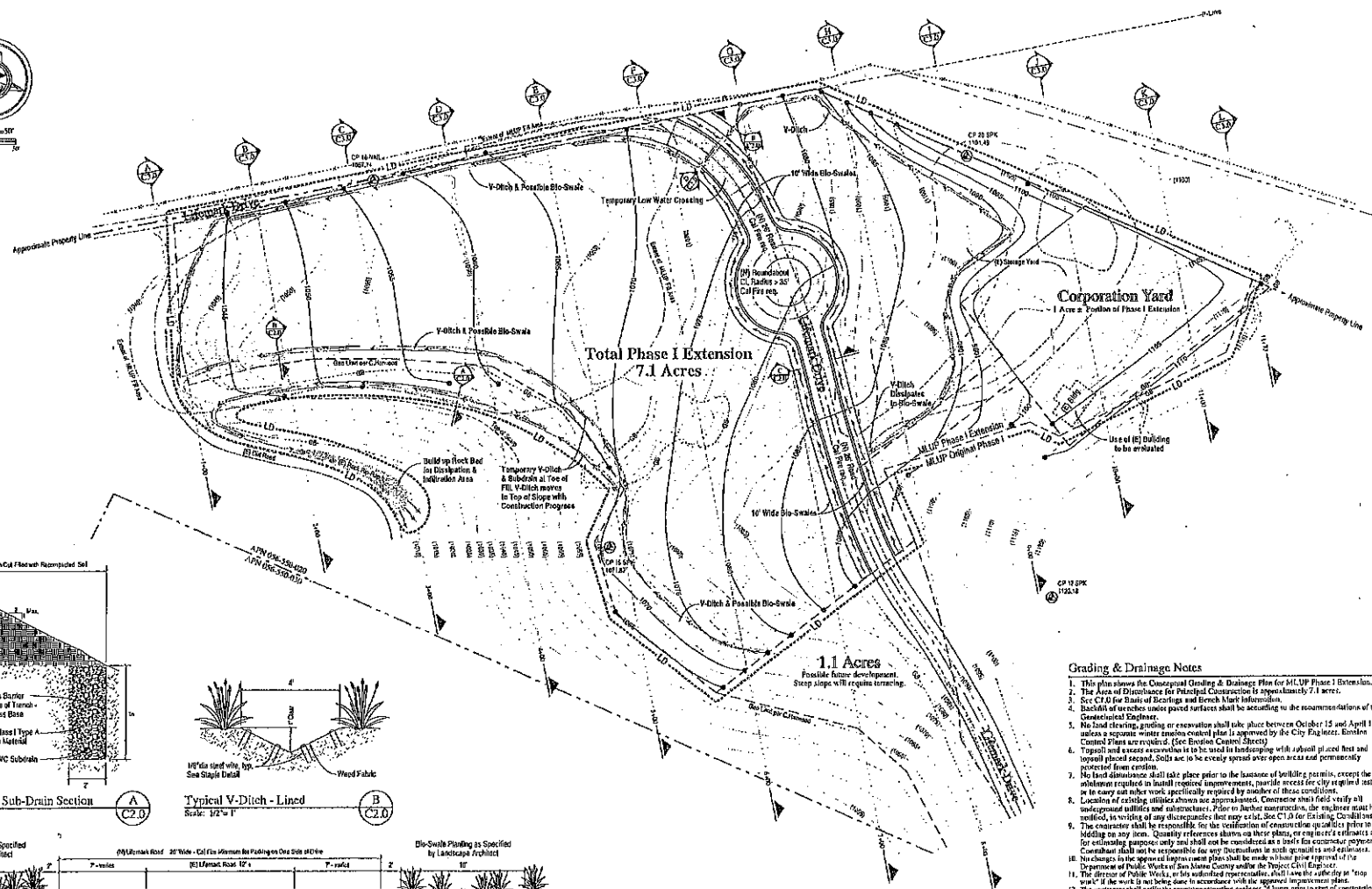


- Notes**
1. This plan shows the Existing Topography for the Motor Land Use Plan Extension, Phase I.
 2. Subsurface exploration required to determine extent of fill.

E. T. Estacer, Inc.
 a registered engineering firm
 10114 24th St., Suite 100
 San Mateo, CA 94403

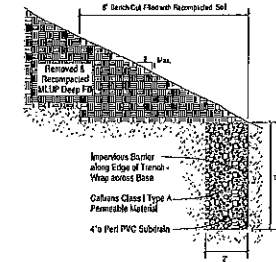
Skylawn Memorial Park
 MLUP - Phase I Extension
 San Mateo County California

Existing Site Plan	DRAWN: BEE, SJP, JHE 03/2013, 04/13/13
SCALE: 1" = 50'	DATE: January 2013
JOB NO: 1101	REVISION: 02.13.13, Phase I Extension

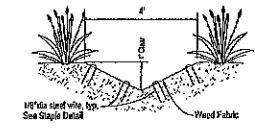


Grading & Drainage Notes

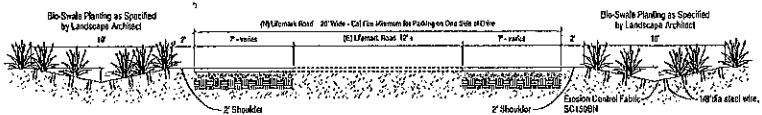
1. This plan shows the Conceptual Grading & Drainage Plan for MLUP Phase I Extension.
2. The Area of Disturbance for Principal Construction is approximately 7.1 acres.
3. See C1.0 for Details of Erosion and Storm Water Information.
4. Backfill of trenches unless paved surfaces shall be according to the recommendations of the Geotechnical Engineer.
5. No land clearing, grading or excavation shall take place between October 15 and April 15 unless a separate winter erosion control plan is approved by the City Engineer. Erosion Control Plans are available (See Erosion Control Sheets).
6. Topsoil and excess excavations to be used in landscaping with a soil placed first and topsoil placed second. Soils are to be evenly spread over open areas and permanently protected from erosion.
7. No land disturbance shall take place prior to the issuance of building permits, except the minimum required in local code requirements, provided access for city regional staff is in every case other work specifically required by number of these conditions.
8. Locations of existing utilities shown are approximate. Contractor shall verify all underground utilities and structures. Prior to earth construction, the engineer must be notified, in writing of any discrepancies that may exist, see C1.0 for existing conditions.
9. The contractor shall be responsible for the verification of construction quantities prior to bidding on any item. Quantity references shown on these plans or engineer's estimates are for estimating purposes only and shall not be considered as a basis for contractor payment. Contractor shall not be responsible for any discrepancies in such quantities and explanations as required.
10. No changes to the approved plans shall be made without prior approval of the Department of Public Works of San Mateo County and the Project Civil Engineer.
11. The Director of Public Works, or his authorized representative, shall have the authority to "stop work" if the work is not being done in accordance with the approved improvement plans.
12. The contractor shall notify the county construction engineer 24 hours prior to start of construction as required.
13. The engineer preparing these plans will not be responsible for, or liable for, unanticipated delays in the time of these plans. All changes must be in writing and must be approved by the Engineer prior to construction.
14. In the event that these County regulations of the public property district do not comply with the conditions of the Approval or any violation of the County Code, the owner shall pay in the County the full cost of such County, jurisdiction, including any follow-up expenses in their necessary reference manual, as well as including Approval or execution.
15. The dimensions shown are for location reference only. Do not scale this plan to determine the actual measurements of the various elements.



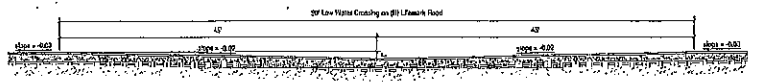
Typical Trench with Sub-Drain Section
Scale: 3/8" = 1'



Typical V-Ditch - Lined
Scale: 1/2" = 1'



Typical New Lifemark Road & Bio-Swale Section
Scale: 1/4" = 1'



Temporary Low Water Crossing on New Lifemark Road @ V-Ditch Crossing



E. T. Easter, Inc.
Professional Engineer
No. C 53077
State of California



Skylawn Memorial Park
MLUP - Phase I Extension
San Mateo County
California

DATE: January 2015	DRAWN: [Name]
SCALE: 1" = 50'	REVISION: 02.13.15: Phase I Extension
JOB NO: 1001	

Sheet
C2.0

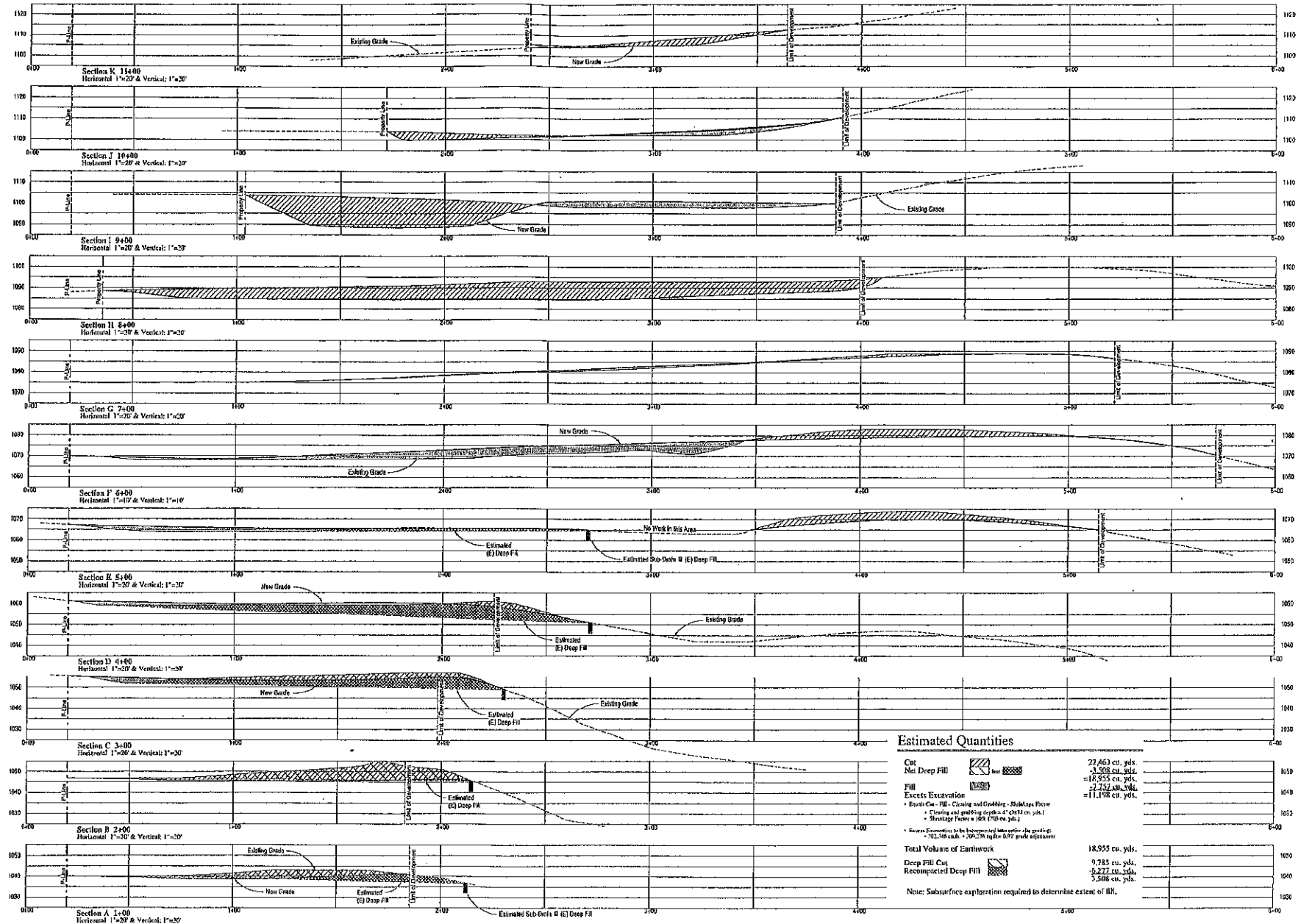


E. T. Esler, Inc.
 16,000
 06/05/13
 CIVIL
 STATE OF CALIFORNIA



Skylawn Memorial Park
 MLUP - Phase I Extension
 San Mateo County California

Conceptual Sections & Earthwork
 DRAWN: RBE, SBE, ASE
 DATE: January 2013
 SCALE: 1" = 20'
 JOB NO. 11021
 REVISION: 01/11/13; Phase I Extension



Estimated Quantities

Cut		22,463 cu. yds.
Net Deep Fill		3,508 cu. yds.
Fill		= 18,955 cu. yds.
Excess Excavation		= 2,737 cu. yds.
		= 11,198 cu. yds.
* Excess Excavation to be transported and disposed of as follows: - 2,737 cu. yds. @ 100% to the 30% grade equivalent - 188 (70 cu. yds.)		
Total Volume of Earthwork		18,955 cu. yds.
Deep Fill Cost		9,785 cu. yds.
Recompacted Deep Fill		9,272 cu. yds.
		5,806 cu. yds.

Note: Subsurface exploration required to determine extent of fill.





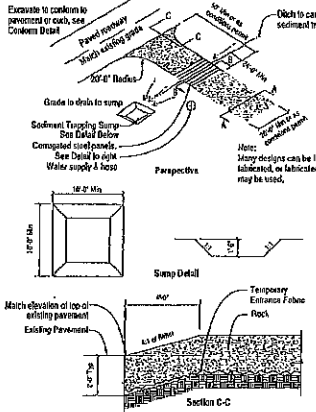
Erosion Control Notes:

Description
These elevations will be located in the construction area. There are no direct vertical markers on the developable area of the property.

Erosion and Sediment Control Program
Silt Fence will be used before the active construction area. Revegetated will be protected by permanent erosion control. If construction occurs during winter, silt fence shall be protected by rock blankets or other suitable erosion control devices.

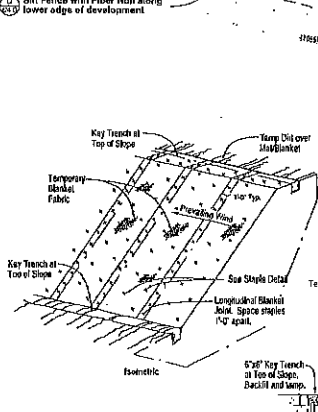
Maintenance Program
After October 1, all openings will be inspected daily, during and after each storm. Operations during a storm include the opening of the silt fence and/or the removal of silt and sediment based on the amount of rainfall and the degree to which silt may be seen. After October 1, silt fence shall be inspected and repaired as needed at the end of each day and whenever silt is observed. A 10' Silt Fence will be provided on the slope until the revegetation has been established. The silt fence shall be removed from the slope once the revegetation has been established. The silt fence shall be removed from the slope once the revegetation has been established. The silt fence shall be removed from the slope once the revegetation has been established.

General Notes:
1. These Plans show openings for winter environmental control of all exposed areas including soil stabilization, sediment control, watering, erosion, and storm water management during the construction period. Erosion Control measures will be incorporated into the Final Plans, and Overlay and Drainage Plans.
2. The Erosion Control Plan shall be in compliance with the County of San Mateo Erosion Control Ordinance and Chapter 12.03 of the San Mateo County Ordinance.
3. The erosion control program shall be in compliance with the State Water Resources Control Board (SWRCB) Storm Water Pollution Prevention Plan (SWPPP) using the Best Management Practices (BMP) published. For a complete listing and working details refer to California Storm Water Quality Handbook, Construction Site Management Practices Manual, March 1, 2002.
4. No grading will occur between October 15 and April 15 unless authorized by the Director of Public Works Engineering.
5. Change to this section and sediment control plan to meet all conditions will be made only with the approval of an order of the Director of the State Water Resources Control Board.
6. During the spring season, all paved areas will be kept clear of earth material and debris. This site will be maintained as per sediment best management practices (BMP) system. This plan covers the site during building construction. Plans shall be maintained for approval prior to October 1 of each subsequent year until the construction requirements are completed by the county.
7. A log of all corrective changes should be included and maintained at the site on a weekly basis.
8. Each day 1.0oz per sq. yd. shall be applied to exposed soil frequently enough to prevent significant amounts of soil from being lost.
9. The minimum slope is 1% for drainage collection only. Do not work depths in excess of the actual measurements of the various sections.



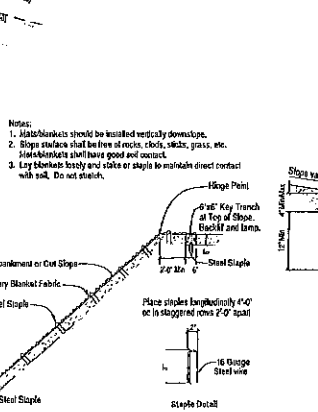
Silt Fence Barrier w/Fiber Roll
Scale: as shown
Callouts: BMP SC-1 (C4.0)

Silt Fence with Fiber Roll along lower edge of development
Scale: as shown
Callouts: BMP SC-1 (C4.0)



Erosion Control Blanket on Slope
Scale: as shown
Callouts: BMP TC-1 & TC-3 (C4.0)

Typical Fiber Roll Silt Barrier
Scale: as shown
Callouts: BMP SC-5 (C4.0)



Typical Fiber Roll Silt Barrier
Scale: as shown
Callouts: BMP SC-5 (C4.0)

Erosion Control Legend

Symbol	Description	BMP During Construction
	Wind Erosion Control, Hyalomath and Tackifier	SS-3, SS-4, WE-1/EC3.0
	Erosion Control Hydroseed with Hyalomath and Tackifier	SS-3, SS-4, WE-1/EC3.0
	Driveway or Asphalt Road	WE-1
	Sedimentation Entrance	TC-1, TC-3/A-B-2.0
	Silt Fence	SS-3/EC3.0
	Fiber Roll Silt Fence	SS-3/EC3.0
	V-Ditch, Direction of Drainage	WS-3/EC3.0
	Silt Fence	SS-3/EC3.0



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SkyLawn Memorial Park
MLUP - Phase I Extension
San Mateo County California

Conceptual Erosion Control Plan
DRAWN: S.M. SUP. 105
DATE: January 2013
REVISION: 02.11.13
JOB NO. 11221



**SKYLAWN MEMORIAL PARK
REVISED PHASE 1 PROJECT**

**Subsequent Mitigated Negative Declaration/
Initial Study**

(County File No. PLN 2010-00026)

Prepared By:

**Circlepoint
1814 Franklin Street, Suite 1000
Oakland, CA 94612**

Prepared For:

**Northstar Memorial Group, LLC
P.O. Box 5070
San Mateo, CA 94402
650/376-5022**

March 2014

SKYLAWN MEMORIAL PARK REVISED PHASE 1 PROJECT

SUBSEQUENT MITIGATED NEGATIVE DECLARATION (MND)

Pursuant to the California Environmental Quality Act (CEQA)
Division 13, Public Resources Code

San Mateo County
Planning and Building Department
455 County Center
Redwood City, CA 94063

Project Description

The project applicant is proposing to extend the boundaries of the previously approved Phase 1 Project to include an additional approximate 7 acres (extended Phase 1 project area) (see **Figures 1-3**). The extended Phase 1 project area abuts the northern boundary of the Phase 1 Project area and would increase the total project area to 42 acres. Activities proposed for the extended Phase 1 project area are similar to the proposed development activities for the approved Phase 1 Project and include the reconsolidation of fill to prepare the land for in-ground burials as well as access improvements. The total amount of grading quantities proposed for the revised project is 145,000 cubic yards. The term for project development is 20 years, ending August 10, 2031.

Since the approval of the 2011 Mitigated Negative Declaration (2011 MND), additional geotechnical studies revealed that approximately 4 acres of the approved Phase 1 Project contain unstable soils and steeper than expected slopes. This 4-acre area is not proposed to be developed as part of the Phase 1 Project, but the area remains within the original project boundaries (see **Figure 4**).

Also, as shown in **Figure 4**, the 42-acre revised Phase 1 Project area consists of two areas: a "Near-Term Development Area" and a "Long-Term Development Area." The project applicant has developed project design plans for the Near-Term Development Area (27.4 gross acres) and construction activities for this area would commence shortly after project approval. Specific project design for the Long-Term Development Area (9.3 gross acres) has not been developed, and any construction activities within that area could commence as a later phase of the project. This Subsequent MND and associated initial study evaluates the potential impacts with development of both areas. Under the extended Phase 1 Project, the applicant would provide four parking stalls within the property reserved for public access to the Bay Area Ridge Trail system.

Determination

A Mitigated Negative Declaration (MND), County File No. PLN 2010-00026, was certified by the County of San Mateo for the project in 2011. This Initial Study and attached supporting

Addendum to the Skylawn Memorial Park MND

documents have been prepared to determine if the revised project would result in a new potentially significant impact or significant impact from the conclusions identified in the 2011 MND. On the basis of this study, it has been determined that the proposed action with the incorporation of the mitigation measures described below will not have a significant effect on the environment. All 24 of the mitigation measures from the 2011 MND have been brought forth into this Subsequent MND. Ten new mitigation measures have been added. Some measures that were brought forth from the 2011 MND have been revised to strengthen the measure. Changes to 2011 MND are shown in underline and strikethrough. For the purposes of clarity, new numbers have been assigned to mitigation measures for this Subsequent MND, where the 2011 MND mitigation measures and new measures are identified in parenthesis The supporting technical reports that constitute the record of proceedings upon which this determination is made are available for public review at the County of San Mateo, Planning and Building Department, 455 County Center, 2nd Floor, Redwood City, CA 94063, between 7:30 am and 5:00 pm, Monday through Friday.

**Table 1
Summary of Project Impacts**

<i>Environmental Factor</i>	<i>Mitigation Measures</i>	<i>Level of Environmental Impact</i>
Air Quality	<u>Mitigation Measure 1 (2011 MND Mitigation Measure 20):</u> The applicant shall submit a dust control plan to the Planning and Building Department prior to any Phase 1 grading or construction activities. The approved measures shall be implemented prior to beginning any grading and/or construction activities and shall be maintained for the duration of the project <u>grading and/or construction activities</u> . The plan shall, at minimum, include all the "Basic Control Measures" listed in Table 2 4 of the BAAQMD CEQA Guidelines (see Appendix D):	Less Than Significant With Mitigation Incorporated
"	a. Water all active construction areas at least twice daily.	"
"	b. Cover all trucks hauling soil, sand and other loose materials or require all trucks to maintain at least 2 feet of freeboard.	"
"	c. Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.	"
"	d. Sweep daily (with water sweepers) all paved access roads, parking areas and staging areas at construction sites.	"
"	e. Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.	"
"	Additional measures may be required in order to ensure that construction-related activities do not generate elevated levels of dust particulates at any point throughout the duration of the project.	"
Biological Resources	<u>Mitigation Measure 2 (2011 MND Mitigation Measure 12):</u> Prior to initial vegetation removal and/or grading activities in the upland portions of the construction zone , Phase 1 area, a pre-construction clearance surveys shall be conducted for the	Less Than Significant With Mitigation Incorporated

Addendum to the Skylawn Memorial Park MND

**Table 1
Summary of Project Impacts**

<i>Environmental Factor</i>	<i>Mitigation Measures</i>	<i>Level of Environmental Impact</i>
	California red-legged frog and San Francisco garter snake by a qualified biologist. Should either species be identified, construction activities shall be immediately halted until the frog or snake leaves the construction zone on its own, or is removed by a qualified biologist in possession of an appropriate permit and authorized by the USFWS. The USFWS shall be <u>immediately notified</u> if either species is observed.	
"	<u>Additionally, following the pre-construction clearance survey and prior to any construction-related grading or excavation activities, vegetation will be mowed to eliminate cover habitat for wildlife. A biological monitor would walk in front of the mower to ensure that the California red-legged frog and San Francisco garter snake are not present.</u>	"
Biological Resources	<u>Mitigation Measure 3 (2011 MND Mitigation Measure 17):</u> No earlier than 30 days prior to the commencement of any construction activities in coastal scrub or woodland habitats, a survey shall shall <u>should</u> be conducted to determine if active woodrat nests (stick houses) with young are present within the disturbance zone or within 50 feet of the disturbance zone. If active woodrat nests with young are identified, a fence shall shall <u>should</u> be erected around the nest site at a distance adequate to provide the woodrat sufficient foraging habitat at the discretion of a qualified biologist. Clearing and construction within the fenced area would be postponed or halted until young have left the nest. A qualified biologist should serve as a construction monitor during those periods when disturbance activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur. If woodrats or nests are observed within the disturbance footprint outside of the breeding period, individuals should be relocated to a suitable location within the Environmental Protection Zone by a qualified biologist in possession of a scientific collecting permit. This will be accomplished by dismantling woodrat nests (outside of the breeding period), to allow individuals to relocate to suitable habitat within the adjacent Environmental Protection Zone. The Environmental Protection Zone contains large expanses of suitable woodrat habitat that would be protected.	Less Than Significant With Mitigation Incorporated
Biological Resources	<u>Mitigation Measure 4 (2011 MND Mitigation Measure 18):</u> If trees or structures are to be removed during the breeding season of native bat species (generally April 1 through August 31 in California), the presence of active bat maternity roosts should be evaluated by a qualified biologist. If the trees/structures to be removed are determined to provide potential bat roosting habitat, a focused survey should then be conducted to determine if an active maternity roost of a special-status bat species is is <u>present</u> . Should an active	Less Than Significant With Mitigation Incorporated

Addendum to the Skylawn Memorial Park MND

**Table 1
Summary of Project Impacts**

Environmental Factor	Mitigation Measures	Level of Environmental Impact
	maternity roost of a special-status bat species be identified, the roost should not be disturbed until the roost is vacated and juveniles have fledged, as determined by the biologist. Once all young have fledged, the tree/structure may be removed.	
Biological Resources	Mitigation Measure 5 (2011 MND Mitigation Measure 19): If a construction project would commence anytime during the nesting/breeding season of native bird species potentially nesting on the site (typically February through August in the project region), a pre-construction survey of the project vicinity for nesting birds shall be conducted. This survey shall be conducted by a qualified biologist (i.e., experienced with the nesting behavior of bird species of the region) within two weeks of the commencement of construction activities. The intent of the survey would be to determine if active nests of special-status bird species or other species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present within the construction zone or within 500 feet of the construction zone. The survey area would include all trees and shrubs in the construction zone and a surrounding 500-foot area. The survey should be timed such that the last survey is concluded no more than two weeks prior to initiation of construction. If ground disturbance activities are delayed following a survey, then an additional pre-construction survey should be conducted such that no more than two weeks will have elapsed between the last survey and the commencement of ground disturbance activities.	Less Than Significant With Mitigation Incorporated
"	If active nests are found in areas that could be directly affected or are within 500 feet of construction and would be subject to prolonged construction-related noise, a no-disturbance buffer zone shall be created around active nests during the breeding season or until a qualified biologist determines that all young have fledged. The size of the buffer zones and types of construction activities restricted within them will be determined through consultation with the CDFG, taking into account factors such as the following:	"
"	a. Noise and human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity;	"
"	b. Distance and amount of vegetation or other screening between the construction site and the nest; and	"
"	c. Sensitivity of individual nesting species and behaviors of the nesting birds.	"

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<i>Environmental Factor</i>	<i>Mitigation Measures</i>	<i>Level of Environmental Impact</i>
"	Limits of construction to avoid an active nest shall shall be established in the field with flagging, fencing, or another appropriate barrier, and construction personnel should be instructed on the sensitivity of nest areas. The biologist shall should serve as a construction monitor during those periods when construction activities would occur near active nest areas of special-status bird species to ensure that no impacts on these nests occur.	"
Biological Resources	Mitigation Measure 6 (2011 MND Mitigation Measure 9): An updated rare plant survey shall be conducted by a qualified botanist prior to any construction activities commencing after spring of 2012 in the Long-Term Development Area. Should any rare plant species be identified, these populations should be avoided to the extent practical. If removal of special-status plant species is required, transplanting to a suitable location in the Environmental Protection Zone will be considered as the first option. Given that the rare plant species of primary concern are evergreen shrubs or lilies, transplanting should be feasible. Prior to the transplanting of any rare plant species, a plant relocation plan shall be developed by a qualified botanist. At a minimum, the plan shall demonstrate the feasibility of replacing the number of individual plants to be removed at a 1:1 ratio. The This plan shall, at a minimum, specify the following: (1) the location of mitigation sites in the Environmental Protection Zone or other suitable locations; (2) methods for harvesting seeds and salvaging and transplantation of individual bulbs/plants to be impacted; (3) site preparation procedures for the mitigation site; (4) a schedule and action plan to maintain and monitor the mitigation area; (5) a list of criteria and performance standards by which to measure success of the mitigation site(s); and (6) measures to exclude unauthorized entry into the mitigation areas; and (7) contingency measures in the event that mitigation efforts are not successful. The plan shall be subject to the approval of the Planning and Building Department prior to the removal of any special-status plant species.	Less Than Significant With Mitigation Incorporated
Biological Resources	Mitigation Measure 7 (2011 MND Mitigation Measure 10): Prior to any grading or construction activities within or adjacent to the Land and Water Management Zones, a qualified botanist shall conduct a survey of the immediate work areas to determine whether any rare plant species are present. If any such species are identified, the botanist shall consult with the Planning and Building Department staff to determine how to proceed. No grading or construction activities shall occur in the area until the botanist and County staff have agreed on an appropriate course of action that will minimize adverse impacts to special-status plant species in the area.	Less Than Significant With Mitigation Incorporated

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Environmental Factor	Mitigation Measures	Level of Environmental Impact
Biological Resources	Mitigation Measure 8 (2011 MND Mitigation Measure 16): The outer limits of the stand of native grassland located within the Land and Water Management Zone adjacent to Phase 4 development area the Long-Term Development Area shall be identified by a qualified biologist and marked with wooden stakes or other equivalent markers. Development activities would not occur within this area. Land management activities shall not be allowed within the identified area, unless the timing and nature of the activity is found to not pose a threat to Bay the Bay checkerspot butterfly by a qualified biologist.	Less Than Significant With Mitigation Incorporated
Biological Resources	Mitigation Measure 9 (2011 MND Mitigation Measure 13): Prior to the commencement of construction activities within 50 feet of a wetland or riparian woodland, a pre-construction clearance survey of the area shall be conducted by a qualified biologist for the California red-legged frogs and San Francisco garter snake. Should either species be identified, construction activities should be halted until the animal leaves the construction zone on its own, or is removed by a qualified biologist in possession of an appropriate permit and authorized by the USFWS. If it is determined that no red-legged frogs or garter snakes are present, temporary exclusionary fencing shall then be installed around the perimeter of the wetland/riparian woodland and adjacent construction areas. The fencing shall be maintained throughout the duration of construction activities near the wetland/riparian area. The adequacy of the fencing to prevent frogs and snakes from entering the construction zone shall be approved by a qualified biologist prior to the commencement of construction activities and shall be inspected daily to ensure it continues to operate effectively.	Less Than Significant With Mitigation Incorporated
Biological Resources	Mitigation Measure 10 (2011 MND Mitigation Measure 14): In order to prevent the accidental removal of wetland habitat (and potentially damaging the habitat of an endangered wildlife species), a qualified biologist shall determine and mark in the field the extent of all wetland areas in and adjacent to Phase 4 development zones near the Long-Term Development Area (see Figure 5). Any grading or construction activities within 50 feet of any wetland habitat shall be referred to and reviewed by the United States Fish and Wildlife Service (USFWS) prior to commencement of any construction activities. Prior to any disturbance within 50 feet of wetland habitats, proof of consultation with and approval by the USFWS shall be submitted to the Planning and Building Department.	Less Than Significant With Mitigation Incorporated

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Environmental Factor	Mitigation Measures	Level of Environmental Impact
Biological Resources	Mitigation Measure 11 (2011 MND Mitigation Measure 15): The San Francisco garter snake is a California Fully Protected Species, which means that the California Department of Fish and Game (CDFG) cannot authorize the take of the species and needs to ensure the adequacy of the avoidance measures to be implemented. Therefore, the CDFG shall be consulted prior to the implementation of construction activities <u>within 50 feet of a wetland habitats</u> and any further recommended avoidance measures shall be implemented. Prior to any disturbance within 50 feet of wetland habitats, proof of consultation with and approval by <u>the CDFG</u> shall be submitted to the Planning and Building Department.	Less Than Significant With Mitigation Incorporated
Biological Resources	Mitigation Measure 12 (2011 MND Mitigation Measure 11): Prior to the commencement of construction activities, a tree survey shall be conducted by a qualified arborist indicating all the trees that could be removed or otherwise harmed during Phase 1 construction. At a minimum, the survey shall identify the size (diameter at breast height), species, and condition of the trees. The survey shall also identify which of these trees are considered protected, significant, or heritage trees. If any such trees are identified by the arborist <u>within Phase 1 Project areas</u> , the project applicant shall implement tree protection measures to ensure said trees are not damaged during construction. These measures may include protective fencing, prohibiting construction/grading activities within the dripline of trees to be preserved, or other appropriate measures approved by the Planning and Building Department.	Less Than Significant With Mitigation Incorporated
Cultural Resources	Mitigation Measure 13 (New Mitigation Measure): <u>In accordance with the Secretary of the Interior's Standards and Guidelines, the identification of historical resources shall be undertaken for the purpose of locating historic properties on the project site, and shall be composed of a number of activities which include, but are not limited to, archival research, informant interviews, field survey and analysis. Such report shall be provided to the Current Planning Section, prior to any alteration of the two-story building. Any alteration is subject to the review and approval of the Community Development Director and, depending on the scope of alteration, may require a building permit. Combinations of these activities may be selected and appropriate levels of effort assigned to produce a flexible series of options. A qualified archaeologist shall be retained to conduct the identification of historical resources within the extended Phase 1 project area.</u>	Less Than Significant With Mitigation Incorporated

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Environmental Factor	Mitigation Measures	Level of Environmental Impact
Cultural Resources	<u>Mitigation Measure 14 (New Mitigation Measure):</u> Should significant historical resources be identified within the revised project site, the following preservation, rehabilitation, restoration, and reconstruction mitigations would reduce project impacts to a less than significant level.	Less Than Significant With Mitigation Incorporated
"	a. <u>The project applicant shall preserve and retain any architectural resources eligible for listing on the California Register of Historical Resources (CRHR) in their original setting, or rehabilitate the resources according to the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995). New construction near each resource should be consistent with their historic character.</u>	"
"	b. <u>The project applicant shall preserve and relocate any architectural resources eligible for listing on the CRHR to a different location in the vicinity of their existing locations, or to a different location within the project site appropriate to their historic character, or rehabilitate the resources according to the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995). New construction near each building should be consistent with their historic character.</u>	"
"	c. <u>The project applicant shall integrate and reuse architectural resources eligible for listing on the CRHR into the new cemetery development, or rehabilitate the resources according to the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995). New construction near each building should be consistent with its historic character.</u>	"

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Environmental Factor	Mitigation Measures	Level of Environmental Impact
Cultural Resources	Mitigation Measure 15 (2011 MND Mitigation Measure 24): If archaeological and/or cultural resources are encountered during grading or construction activities, work shall be temporarily halted in the vicinity within 30 feet of the discovered materials and workers shall avoid altering the materials and their context until a qualified professional archaeologist has evaluated the situation and provided appropriate recommendations. The project applicant or archaeologist shall immediately notify the Current Planning Section of any discoveries made and shall provide the Current Planning Section with a copy of the archaeologist's report and recommendations prior to any further grading or construction activity in the vicinity.	Less Than Significant With Mitigation Incorporated
Cultural Resources	Mitigation Measure 16 (New Mitigation Measure): Prior to the issuance of the grading permit "hard card," the applicant shall submit an archaeological study of the project site (with the exception of those areas determined not to have cultural resources). The study shall also show the results of attempts to contact local Native American tribe(s) regarding traditional, cultural, and religious heritage values.	Less Than Significant With Mitigation Incorporated
Cultural Resources	Mitigation Measure 17 (New Mitigation Measure): A discovery of a paleontological specimen during any phase of the project shall result in a work stoppage in the vicinity of the find until it can be evaluated by a professional paleontologist. Should loss or damage be detected, additional protective measures or further action (e.g., resource removal), as determined by a professional paleontologist, shall be implemented to mitigate the impact.	Less Than Significant With Mitigation Incorporated
Cultural Resources	Mitigation Measure 18 (New Mitigation Measure): Use existing roads to the maximum extent feasible to avoid additional surface disturbance.	Less Than Significant With Mitigation Incorporated
Cultural Resources	Mitigation Measure 19 (New Mitigation Measure): During all phases of the project, keep equipment and vehicles within the limits of the previously disturbed areas of the project site. All areas to remain undisturbed shall be delineated on the Erosion Control Plan and the plan shall include measures, such as a fence or other kind of barrier, to demarcate the "limit of disturbance." The property owner shall demonstrate the implementation of these measures prior to issuance of the grading permit "hard card."	Less Than Significant With Mitigation Incorporated
Cultural Resources	Mitigation Measure 20 (New Mitigation Measure): The property owner, applicant, and contractors must be prepared to carry out the requirements of California State law with regard to the discovery of human remains during construction, whether historic or prehistoric. In the event that any human remains are encountered during site disturbance, all ground-disturbing work	Less Than Significant With Mitigation Incorporated

Addendum to the Skylawn Memorial Park MND

Table 1 Summary of Project Impacts		
Environmental Factor	Mitigation Measures	Level of Environmental Impact
	<u>shall cease immediately and the County coroner shall be notified immediately. If the coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within 24 hours. A qualified archaeologist, in consultation with the Native American Heritage Commission, shall recommend subsequent measures for disposition of the remains.</u>	
Geology and Soils	Mitigation Measure 21 (New Mitigation Measure): Prior to any project grading, a subsurface investigation, including exploratory borings, shall be conducted in the area of the fill in order to determine the thickness of the material, as well as the subsurface conditions beneath the fill. This information will be necessary to guide future corrective grading and guidance for construction, drainage, etc. The report shall be submitted to the San Mateo County Planning and Building Department for review by the County Geologist prior to commencement of any grading or construction activities.	Less Than Significant With Mitigation Incorporated
Geology and Soils	Mitigation Measure 22 (2011 MND Mitigation Measure 1): A design level geotechnical investigation of the Phase 1 Area shall be performed prior to any project grading. The report shall include a static and seismic slope stability analysis of the Phase 1 Area to be graded and developed. The specific mitigation measures to be utilized in order to stabilize identified landslides and areas of potential seismically induced landslides in the Phase 1 Area shall be presented in the report. The report shall be submitted to the San Mateo County Planning and Building Department for review by the County Geologist prior to commencement of any grading or construction activities.	Less Than Significant With Mitigation Incorporated
Geology and Soils	Mitigation Measure 23 (2011 MND Mitigation Measure 6): Any fills used at the project site shall be properly placed with keyways and subsurface drainage, and adequately compacted following the recommendations of the final geotechnical report and geotechnical engineer, in order to significantly reduce fill sediment. Underground utilities shall be designed and constructed using flexible connection points to allow for differential settlement.	Less Than Significant With Mitigation Incorporated
Geology and Soils	Mitigation Measure 24 (2011 MND Mitigation Measure 7): Foundation plans shall be submitted to the Planning and Building Department for review prior to issuance of building permits. All foundation excavations shall be observed during construction by the geotechnical engineer to ensure that subsurface conditions encountered are as anticipated. As-built documentation shall also be submitted to the Planning and Building Department.	Less Than Significant With Mitigation Incorporated

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Environmental Factor	Mitigation Measures	Level of Environmental Impact
Geology and Soils	Mitigation Measure 25 (2011 MND Mitigation Measure 2): The applicant shall obtain a grading permit hard card from the Planning and Building Department prior to commencement of any grading or construction activities.	Less Than Significant With Mitigation Incorporated
Geology and Soils	Mitigation Measure 26 (2011 MND Mitigation Measure 3): Prior to beginning any construction activities, the applicant shall submit an Erosion and Sediment Control Plan to include the proposed measures of the Conceptual Erosion Control Plan and additional measures as follows for review and approval by the San Mateo County Planning and Building Department. The plan must be fully implemented and inspected by County Planning and Building Department staff prior to the commencement of any construction and/or grading activities and shall be maintained throughout the duration of the project. Erosion control measure deficiencies, as they occur, shall be immediately corrected. The goal is to prevent sediment and other pollutants from leaving the project site and to protect all exposed earth surfaces from erosive forces. Said plan shall adhere to the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) "General Construction and Site Supervision Guidelines," including:	Less Than Significant With Mitigation Incorporated
"	a. Stabilizing all denuded areas and maintaining erosion control measures continuously between October 15 ¹ and April 15 ³⁰ . Stabilizing shall include both proactive measures, such as the placement of hay bales or coir netting, and passive measures, such as revegetating disturbed areas with plants propagated from seed collected in the immediate area.	"
"	b. Storing, handling, and disposing of construction materials and wastes properly, so as to prevent their contact with stormwater.	"
"	c. Controlling and preventing the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges to storm drains and watercourses.	"
"	d. Using sediment controls or filtration to remove sediment when dewatering the site and obtaining all necessary permits.	"
"	e. Avoiding cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated.	"

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Table 1 Summary of Project Impacts		
Environmental Factor	Mitigation Measures	Level of Environmental Impact
"	f. Delineating with field markers clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees and drainage courses.	"
"	g. Protecting adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers or filters, dikes, mulching, or other measures as appropriate.	"
"	h. Performing clearing and earth-moving activities only during dry weather.	"
"	i. Limiting and timing applications of pesticides and fertilizers to prevent polluted runoff.	"
"	j. Limiting construction access routes and stabilizing designated access points.	"
"	k. Avoiding tracking dirt or other materials off-site; cleaning off-site paved areas and sidewalks using dry sweeping methods.	"
"	l. The contractor shall train and provide instructions to all employees and subcontractors regarding the construction best management practices. <u>Additional best management practices in addition to those shown on the plans may be required by the Building Inspector to maintain effective stormwater management during construction activities. Any water leaving the site shall be clear and running slowly at all times.</u>	"
"	m. <u>Show storm drain inlets in the project vicinity and proposed protection of inlets.</u>	"
"	n. <u>Stabilized construction entrance shall utilize a minimum 3"-4" fractured aggregate over geo-textile fabric.</u>	"
"	o. <u>Provide a designated area for parking of construction vehicles, using aggregate over geo-textile fabric.</u>	"
"	p. <u>Show areas for stockpiling. Cover temporary stockpiles using anchored-down plastic sheeting. For longer storage, use seeding and mulching, soil blankets or mats.</u>	"
"	q. <u>Show location of garbage and/or debris dumpster(s), and portable toilets.</u>	"
"	<u>Failure to install or maintain these measures will result in stoppage of construction until the corrections have been made and fees paid for staff enforcement time. Revisions to the approved erosion and sediment control plan shall be prepared and signed by the engineer and reviewed by the Department of Public Works and the Community Development Director.</u>	"

Addendum to the Skylawn Memorial Park MND

**Table 1
Summary of Project Impacts**

Environmental Factor	Mitigation Measures	Level of Environmental Impact
Geology and Soils	Mitigation Measure 27 (2011 MND Mitigation Measure 4): The applicant shall submit a grading and drainage plan (including calculations) to the Planning and Building Department and the Department of Public Works prior to the issuance of any project-related grading or building permits. The grading and drainage plan shall include all requirements listed in Grading Ordinance Section 8604.1.a.5 (<i>Application Requirements</i>). The drainage plan shall also include a narrative describing the type, size, and location of all permanent stormwater controls to be utilized in order to ensure compliance with the County's Drainage Policy, the San Mateo Countywide Water Pollution Prevention Plan (SMCWPPP) " <u>General Construction and Site Supervision Guidelines</u> ," and National Pollutant Discharge Elimination System (NPDES) Permit Provision C.3.	Less Than Significant With Mitigation Incorporated
Geology and Soils	Mitigation Measure 28 (2011 MND Mitigation Measure 5): Unless approved in writing and in advance by the Community Development Director, no grading shall be allowed during the winter season (October 15 to April 15) to avoid potential soil erosion. The applicant shall submit a letter to the Current Planning Section, prior to the issuance of the grading hard card, which illustrates the approximate grading schedule, including start and end dates <u>at least two (2) weeks prior to commencement of grading, stating the date when erosion controls will be installed, date when grading operations will begin, anticipated end date of grading operations, and date of revegetation.</u> All submitted schedules shall represent the work in detail and shall project the grading operations through to completion. (*Includes minor changes to increase the level of mitigation).	Less Than Significant With Mitigation Incorporated
Geology and Soils	Mitigation Measure 29 (New Mitigation Measure): It shall be the responsibility of the engineer of record to regularly inspect the erosion control measures for the duration of all grading activities, especially after major storm events, and determine that they are functioning as designed and that proper maintenance is being performed. Deficiencies shall be immediately corrected, as determined by and implemented under the observation of the engineer of record.	Less Than Significant With Mitigation Incorporated
Climate Change	Mitigation Measure 30 (New Mitigation Measure): Idling grading or construction equipment shall to comply with best management practices from Bay Area Air Quality Management District guidance. Specifically, idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.	Less Than Significant With Mitigation Incorporated

Addendum to the Skylawn Memorial Park MND

Table 1 Summary of Project Impacts		
Environmental Factor	Mitigation Measures	Level of Environmental Impact
Hazards and Hazardous Materials	Mitigation Measure 31 (2011 MND Mitigation Measure 21): The applicant shall comply with and follow all guidelines and regulatory requirements as stipulated by the County Environmental Health Division with regard to their use and disposal of all chemicals and fluids resulting from the embalming processes that occur at the Skylawn mortuary.	Less Than Significant With Mitigation Incorporated
Hazards and Hazardous Materials	Mitigation Measure 32 (2011 MND Mitigation Measure 22): The project applicant (or authorized contractor) shall submit a safety plan for the development of Phase 1. The safety plan shall include measures to reduce and minimize accidents on-site and measures that address the proper procedures to clean up and contain spills. The safety plan shall be approved by the County Building Inspection Section prior to the start of any construction or grading activity on the site.	Less Than Significant With Mitigation Incorporated
Hydrology and Water Quality	Mitigation Measure 33 (2011 MND Mitigation Measure 8): The project applicant shall file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and shall submit proof of filing said NOI to the Planning and Building Department prior to beginning any grading or construction activities. The applicant and all grading/construction contractors shall adhere to all conditions and regulations associated with the State General Construction Activity NPDES Permit.	Less Than Significant With Mitigation Incorporated
Hydrology and Water Quality	Mitigation Measure 34 (2011 MND Mitigation Measure 23): Noise levels produced by proposed construction activities shall comply with the San Mateo County Noise Ordinance contained in Chapter 7.30 (Noise Regulations) Chapter 4.88 (Noise Control) of the County Ordinance Code at all times (<u>this measures has been updated in alignment with San Mateo County Noise Ordinance</u>). Construction activities shall be limited to the hours from 7:00 a.m. to 6:00 p.m., 7:00 p.m., Monday through Friday, and 9:00 a.m. 8:00 a.m. to 5:00 p.m. on Saturday, construction operations shall be prohibited on Sunday and any national holiday and 12:00 p.m. to 4:00 p.m. on Sundays and Holidays, or at such other hours as may be authorized or restricted by the permit, if at least one of the following noise limitations are met:	Less Than Significant With Mitigation Incorporated
"	a. <u>No individual piece of equipment shall produce a noise level exceeding 90 dB at a distance of 25 feet. If the device is housed within a structure or trailer on the property, the measurement shall be made outside the structure at a distance as close to 25 feet from the equipment as possible.</u>	"
"	b. <u>The noise level at any point outside of the property plane of the project shall not exceed 90 dB.</u>	"

Addendum to the Skylawn Memorial Park MND

Table 1 Summary of Project Impacts		
Environmental Factor	Mitigation Measures	Level of Environmental Impact
"	c. <u>The operation of leaf blowers shall additionally comply with Chapter 10.80 "Operation of Leaf Blowers" (Ordinance 2004-16 Section 1, 2004).</u>	"


Jim Eggemeyer
Community Development Director

3/31/14
Date

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APPENDICES

Appendix A:	2011 Mitigated Negative Declaration
Appendix B:	Air Quality Memo (URBEMIS 2007 Model)
Appendix C:	Pacific Biology – Request to Waive Mitigation
Appendix D:	Rare Plant Survey
Appendix E:	Cultural Reconnaissance Report
Appendix F:	Traffic Study
Appendix G:	Site Observations by Engineering Geologist
Appendix H:	MLUP Phase 1 Extension Conceptual Plans

NOTE: Limited

Attachments provided

here: Figure 7 and

Appendices C & D only.

All other Figures and

Appendices are

available at the

Planning Department.

SKYLAWN MEMORIAL PARK REVISED PHASE 1 PROJECT INITIAL STUDY (IS)

Project Title: Skylawn Memorial Park – Phase 1 Project

Lead Agency Name and Address: San Mateo County Planning and Building Department,
455 County Center, 2nd Floor, Redwood City, CA 94063

Contact Person and Phone Number: Camille Leung, Project Planner, 650/363-1826,
cleung@smcgov.org

Project Sponsor's Name and Address: Northstar Memorial Group, LLC, P.O. Box 5070,
San Mateo, CA 94402

Project Address: 100 Lifemark Road, unincorporated North Skyline area of San Mateo
County, CA

Assessor's Parcel Number: 056-550-020

General Plan Designation: General Open Space

Zoning: Resource Management (RM)

Size of Project Site: Approximately 42 acres

Purpose of the Initial Study

The Skylawn property is located in an unincorporated portion of San Mateo County that is bordered to the south by Highway 92 (see **Figure 1**). Portions of the site are located within the following 7.5-minute USGS quadrangle: San Mateo, Half Moon Bay, Montara Mountain, and Woodside.

The purpose of this initial study is to evaluate proposed changes to the approved Skylawn Memorial Park Phase 1 Project to determine whether the revised project would have an impact to the physical environment as a result of project implementation. A Mitigated Negative Declaration (MND), County File No. PLN 2010-00026) was certified by the County of San Mateo for the project in 2011. This initial study and attached supporting documents have been prepared to determine if the revised project would result in a new potentially significant impact or significant impact from the conclusions identified in the 2011 MND. Much of the analysis used in this initial study is based on the information in the 2011 MND. Therefore, pursuant to CEQA Guidelines 15150, the 2011 MND is herein incorporated by reference to this initial study and proposed Subsequent MND. The 2011 MND is appended in its entirety to the end of this document as **Appendix A**.

The Previously Approved Project

The Phase 1 Project is the first phase of several phases that would entail future development within the existing cemetery over the next several years. The Phase 1 Project was approved on August 10, 2011. This approval will extend over a 20-year period through August 10, 2031.

Figure 2 shows the approved boundaries of the Phase 1 Project, which encompasses approximately 35 acres in the eastern portion of the existing Skylawn property. Both traditional and natural burial will be developed as part of the Phase 1 Project. The Phase 1 Project also includes areas that are protected and will not be developed as part of the Environmental Protection Zone (EPZ). No development or any ground disturbing activities would occur within the EPZ, with the exception of minor work associated with existing and/or future utility line easements. This area would be preserved in its natural state throughout the life of the project.

The development of high-density burials will include areas for cremation and outdoor garden crypts that result in cemetery landscapes that are far denser than traditional lawn burials. High-density burial facilities include:

- Concentrated ground burial private estates, where family “estate” areas are separated by retaining walls with burial vaults in the ground.
- Garden mausoleums, which are typically granite-faced crypts where the casket (full body burial) slides horizontally (i.e., into a vertical wall retained and benched into a sloping hillside) into concrete compartments.
- Columbaria or columbarium, which is similar to the construction of garden mausoleums, except that the actual crypts are much smaller since they are typically used to house cremation urns.
- Natural (or “Green”) burial areas that serve as both a visual and environmental buffer between the cemetery and the environmental protection zones.

The Phase 1 Project includes the expansion of utilities such as wastewater, potable water service, and circulation systems to provide services to the new cemetery development. No additional offices or customer service areas will be developed and no new buildings would be constructed with the exception of new maintenance sheds. The project did not provide parking for visitors to the Bay Area Ridge Trail. The project will, due to grading and re-contouring of land, alter the existing on-site drainage system and increase water demand for irrigation purposes.

The County approved the Phase 1 Project such that grading activities would not exceed a total of 50,000 cubic yards (cy) during construction. All grading activity will be governed by the San Mateo County Ordinance Code Section 8600, the regulation guiding “Excavating, Grading, Filling and Clearing on Lands in Unincorporated San Mateo County” (Grading Ordinance).

Table 2 Project Area		
Previously Approved Project	Project Change	Total
35 Acres*	+7 Acres	42 Acres*
<i>*Includes 4 acres not proposed for Phase 1 Development</i>		

Proposed Project Changes:

The project applicant is proposing to extend the boundaries of the previously approved Phase 1 Project to include an additional approximate 7 acres (extended Phase 1 project area) (see **Figure 3**). The extended Phase 1 project area abuts the northern boundary of the Phase 1 Project area and would increase the total project area to 42 acres. Activities proposed for the extended Phase 1 project area include the reconsolidation of fill to prepare the land for in-ground burials as well as access improvements. The total area of proposed development is shown in **Figure 4**, which includes the additional 7 acres. Since the approval of the 2011 MND, additional geotechnical studies revealed that approximately 4 acres of the approved Phase 1 Project contain unstable soils and steeper than expected slopes. This area, shown in **Figure 4**, is not proposed to be developed as part of the Phase 1 Project; however, the area remains within the original project boundaries.

Also, as shown in **Figure 4**, the revised Phase 1 project area consists of two areas: a “Near-Term Development Area” and a “Long-Term Development Area.” The project applicant has developed project design plans for the Near-Term Development Area (27.4 gross acres) and construction activities for this area would commence shortly after project approval. Specific project design for the Long-Term Development Area (9.3 gross acres) has not been developed, and any construction activities within that area could commence as a later phase of the project. This Subsequent MND and associated initial study evaluates the potential impacts with development of both areas. Under the extended Phase 1 Project, the applicant would provide four parking stalls within the property reserved for public access to the Bay Area Ridge Trail system.

Existing Conditions

The San Mateo County General Plan designates the 521-acre Skylawn property as General Open Space. The site is zoned Resource Management (RM) by the County’s Zoning Map, which allows such uses as hotels, restaurants, commercial recreation facilities and cemeteries upon securing a use permit and RM Development Review Permit. While the western portion of the Skylawn property is located within the Coastal Zone (CZ) and subject to the jurisdiction of the California Coastal Commission, none of the proposed Phase 1 project is within the CZ. A portion of the Skylawn property is also within the Highway 92 County Scenic Corridor; however, the Phase 1 Project is not located within the corridor.

The biological characteristics of the original Phase 1 area are described in the 2011 MND. The extended Phase 1 project area consists of areas that have been subject to a high-level of disturbance, including a corporation yard (or “Maintenance Area”), an area used to store grave spoils, and weedy grassland bordering these areas (Jane Valerius Environmental Consulting

Skylawn Memorial Park Subsequent Proposed MND/IS

(July 2013); Pacific Biology (October 2013; July 2013) (See Appendix)). These areas are characterized as follows:

- The Corporation Yard borders the Phase 1 Project area to the north and is located along the eastern edge of the Skylawn property. This area contains a vacant building and surrounding areas used to store equipment. The area is highly disturbed, appears to have been graded, and is largely devoid of vegetation. Vegetation within and surrounding the Corporation Yard consists of ruderal (i.e., weedy) species, such as bull Italian thistle (*Carduus pycnocephalus*), mustard (*Brassica nigra*, *B. rapa*), bristly ox-tongue (*Picris echioides*), narrow-leaved plantain (*Plantago erecta*), Himalayan blackberry (*Rubus discolor*), and various non-native grasses. Coyote brush (*Baccharis pilularis*), a native shrub often occurring in disturbed areas, is also present in dense patches along the edges of the corporation yard area. There are no wetlands, aquatic features, or sensitive habitat types (e.g., native grasslands) in or bordering the corporation yard area.
- The grave spoils area is located northwest of the corporation yard. This area has been graded, is devoid of vegetation, and is used for storing excavated soil. There are no wetlands, aquatic features, sensitive habitat types (e.g., native grasslands) or trees in or bordering the grave spoils area.
- The extended Phase 1 Project area also includes ungraded areas bordering the corporation yard area and grave spoils area. These areas generally contain a dense growth of non-native grasses and weedy species, including bull thistle, Italian thistle, mustard, bristly ox-tongue, and narrow-leaved plantain. Scattered coyote brush shrubs are also present. There are also no wetlands, aquatic features, or sensitive habitat types (e.g., native grasslands) in these areas.

Surrounding Land Uses: The project site is located in an unincorporated area of San Mateo County designated as General Open Space. Undeveloped lands, managed by the San Francisco Public Utility Commission (SFPUC), border the property to the north and east. Privately-owned land that is generally undeveloped (with the exception of limited agricultural uses) borders a portion of the property to the west. At its closest point, the property is located approximately 0.8 miles to the west of the Crystal Springs Reservoir.

Description of the Project

Activities proposed for the revised project include grading activities to prepare the land for in-ground burials as well as the construction of access improvements. The in-ground burials could entail similar natural and traditional burials as those approved under the Phase 1 Project portion of the project. Access improvements include the widening of an existing 12-foot private road to 26 feet and the creation of a new roundabout. Additional grading activities would include a total of approximately 22,463 cy of balanced cut and fill (or approximately 45,000 cy of grading total) on-site within the boundaries of the new project area.

Additionally, since the approval of the Phase 1 Project, communication between the applicant and County staff has revealed a discrepancy in the calculation of grading amounts. To clarify, the applicant's intention for a total of 50,000 cy of grading for the Phase 1 Project included balanced an excavation of 50,000 cy of earth and the relocation of the same amount on-site as

Skylawn Memorial Park Subsequent Proposed MND/IS

fill, regardless of the specific amounts of cut and fill. The County's calculation of this operation would be that the total earthwork assumes that includes 100,000 cy of grading work would be balanced on-site. This includes 50,000 cy of cut, and 50,000 cy of fill added together. While there is a difference in the calculation of total grading work, there is no change in the physical outcome of the project and the shape of the project area from the previously approved project. Fill will not be imported on-site and cut will not be exported; all grading activities would occur on the site. However, for the purpose of resolving this discrepancy, an additional 50,000 cy has been included as a part of the revised project.

Table 3 below provides the total grading activities for the revised project in "not to exceed" grading amounts using the County's calculation method. This table includes the revised grading amount for the Phase 1 Project and approximately 45,000 cy for the extended Phase 1 area. As shown in the table, the total grading quantities for the revised project would not exceed approximately 145,000 cy. This amount could reasonably deviate as much as 10 percent.

Approved Phase 1 Project	Revised Phase 1 Project	Extended Phase 1 Area	Revised Project (Total)
50,000 cy	+50,000 cy	45,000 cy	145,000 cy

The revised project would not expand utilities such as wastewater, potable water service, and circulation systems to provide services to the new cemetery development. No additional offices or customer service areas will be developed and no new buildings would be constructed with the exception of new maintenance sheds. The project would, due to grading and re-contouring of land, alter the existing on-site drainage system and increase water demand for irrigation purposes.

Discretionary Actions

The project requires the following discretionary approval:

- Adoption of the subsequent MND – County of San Mateo

Other Agency Permits and Approvals

State Water Resources Control Board (SWRCB)

Proposed Finding

This initial study uses an updated CEQA checklist from what was previously used in the 2011 MND. This required some additional analysis and the identification of potentially significant and/or significant impacts, prior to mitigation. Potential significant impacts are associated with cultural resources, specifically paleontological, unknown human burials, and a potentially significant historical building. The revised project boundaries include an additional approximate 7 acres of land north of the approved Phase 1 project area. This new area includes a potentially

significant historical structure (see **Figure 6**) that was not previously evaluated in the 2011 MND. A historical evaluation is currently being prepared to determine the structure's eligibility of historic significance. This initial study has included mitigation measures that would protect the resource and reduce the impact to a less than significant level if it is determined that the structure is determined to be eligible. An additional geotechnical measure to further reduce potential geological impacts has also been added.

The 2011 MND mitigation measures that apply to the revised project are incorporated into this initial study. For simplicity, the mitigation measures have been re-numbered to appear in chronological order. A previous mitigation measure, or new mitigation measure, is identified in parentheses for cross referencing purposes.

Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by the project, involving at least one impact that is a "Significant Impact" as indicated by the checklist on the following pages. Mitigation measures have been provided for each potential significant impact, reducing all to a less than significant level.

- | | |
|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural Resources |
| <input checked="" type="checkbox"/> Air Quality | <input checked="" type="checkbox"/> Biological Resources |
| <input checked="" type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology and Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials |
| <input checked="" type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use and Planning |
| <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation and Traffic |
| <input type="checkbox"/> Utilities and Service Systems | |

Determination

On the basis of this initial evaluation:

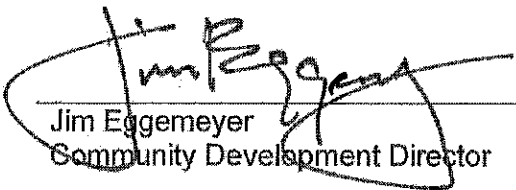
I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on the attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Jim Eggenmeyer
Community Development Director

3/5/14

Date

Skylawn Memorial Park Subsequent Proposed MND/IS

1. AESTHETICS. Would the project:				
	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
1.a. Have a significant adverse effect on a scenic vista, views from existing residential areas, public lands, water bodies, or roads?			X	
<p>Discussion: The 2011 MND determined that there would be less than significant impacts to off-site views from scenic vistas, which included existing residential areas, public lands, public water bodies, and roads. The revised project includes an additional 7 acres of land extending north from the approved Phase 1 project site (see Figure 3). The new area, similar to the Phase 1 Project site, is not fully visible from I-280 or any existing residential areas, public lands, water bodies, or roads. The revised project involves grading, widening of an existing 12-foot wide road to 26 feet, and construction of a roundabout. The revised project would result in a reduction (approximately 4 acres) in the area of development west of the service road.</p> <p>New cemetery development would be set into the existing topography of the project site as previously analyzed in the 2011 MND; therefore, views from the project site would not be obstructed by any of the proposed burial structures. These improvements would not result in obstruction to any known scenic vista, or impact views from existing areas, public lands, water bodies, or road from on-site or off-site locations.</p> <p>Conclusion: The revised project would have less than significant effects on a scenic vista, views from existing residential areas, public lands, water bodies, and roads.</p> <p>Source: County Scenic Corridor Maps; Project Plans; 2011 MND.</p>				
1.b. Significantly damage or destroy scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
<p>Discussion: The 2011 MND determined that there would be less than significant impacts to scenic resources. The revised project includes an additional 7 acres of land extending north from the approved Phase 1 project site (see Figure 3). The new area, similar to the Phase 1 Project site, is not fully visible from I-280 or from any other scenic highways. The revised project does not involve the removal of trees or rock croppings as part of the project.</p> <p>Conclusion: The revised project would have a less than significant impact to scenic resources located within a state scenic highway.</p> <p>Source: County Scenic Corridor Maps; Project Plans; 2011 MND.</p>				
1.c. Significantly degrade the existing visual character or quality of the site and its surroundings, including significant change in topography or ground surface			X	

Skylawn Memorial Park Subsequent Proposed MND/IS

relief features, and/or development on a ridgeline?				
<p>Discussion: The revised project includes the preparation of land for future burials and access improvements that would result in minimal changes to views of the site. The project would not involve development on a ridgeline. Although the project involves a significant amount of grading that would result in the re-contouring of the project area to smoothen and flatten existing contours, the new contours would be revegetated to match the surrounding environment and blend with existing contours in the project vicinity. Given the above, the physical character of the site would not substantially degrade the overall character of the area. Furthermore, the site is not clearly visible to off-site users.</p> <p>Conclusion: The revised project would have less than significant impacts to the existing visual character and quality of the site.</p> <p>Source: Project Plans; 2011 MND.</p>				
1.d. Create a new source of significant light or glare that would adversely affect day or nighttime views in the area?			X	
<p>Discussion: The revised project would not involve the introduction of permanent new sources of light. The revised project consists of preparing the land for future burials and access improvements. Once constructed, some additional light and glare from vehicles and cemetery visitors would be introduced in the project area; however, these are light and glare sources that currently exist at the cemetery. Additionally, the site is not clearly visible to off-site users.</p> <p>Conclusion: The revised project would have less than significant impacts to day or nighttime views in the area. Therefore, the revised project would not result in a new significant impact not identified in the 2011 MND.</p> <p>Source: Email Correspondence between County and Applicant, dated April 3, 2013; 2011 MND.</p>				
1.e. Be adjacent to a designated Scenic Highway or within a State or County Scenic Corridor?			X	
<p>Discussion: The 2011 MND determined that impacts to scenic corridors and highways would not be significant. The Skylawn property is partially located within the Highway 92 Scenic Corridor, but the Phase 1 Project is not located in the Corridor. The project site is near the I-280 and Skyline State Scenic Corridors. The extended Phase 1 project area and the Phase 1 Project area are not visible from I-280 or any existing residential areas, public lands, water bodies, or roads. The revised project would not result in a new significant impact not identified in the 2011 MND.</p> <p>Conclusion: The revised project would have less than significant impacts to scenic corridors and highways.</p> <p>Source: County Scenic Corridor Maps; Project Plans; 2011 MND.</p>				
1.f. If within a Design Review District, conflict with applicable General Plan or Zoning Ordinance provisions?				X

Skylawn Memorial Park Subsequent Proposed MND/IS

Discussion: The 2011 MND determined that there would be no impacts associated with applicable General Plan or Zoning Ordinance Provisions. The Skylawn property has operated with a County-issued Use Permit since 1955. The revised project proposes to expand development on an additional 7 acres of land that abuts the Phase 1 Project area. The revised project would not change the existing use of the property. The property is not located within a Design Review District.

Conclusion: The revised project would have no impacts associated with general plan and zoning ordinance provisions.

Source: County Zoning Maps; 2011 MND.

1.g. Visually intrude into an area having natural scenic qualities?			X	
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Discussion: The 2011 MND determined that the impacts to areas having natural scenic qualities would be less than significant. The extended Phase 1 project area consists of highly-disturbed land, with a corporation yard and weedy vegetation. The project includes the preparation of land for future burials and access improvements that would result in minimal changes to views of the site. The project would not involve development on a ridgeline. Although the project involves a significant amount of grading that would result in the re-contouring of the project area to smoothen and flatten existing contours, the new contours would be revegetated to match the surrounding environment and blend with existing contours in the project vicinity. Given the above, the revised project would not visually intrude into an area having natural scenic qualities.

Conclusion: The revised project would have a less than significant impact to natural scenic qualities.

Source: Project Plans; 2011 MND.

2. **AGRICULTURE AND FOREST RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forestland, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
2.a. For lands outside the Coastal Zone, convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland)				X

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<p>as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?</p>				
<p>Discussion: The 2011 MND determined that there would be no impact to existing or potential agricultural uses at the site.</p> <p>The revised project includes an additional 7 acres of land that would extend the northern boundaries of the Phase 1 Project area. This land is not designated by the General Plan for agricultural land use and does not contain prime soils. Furthermore, the project site is considered "Urban and Built-up Land" and "Grazing Land" by the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP). FMMP land classifications that surround the project site are "Grazing" and "Other" (non-agriculture) land. The site has been operating as a cemetery facility since 1955.</p> <p>Conclusion: The revised project would have no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.</p> <p>Source: General Plan Land Use Maps; County Prime Soils Maps; FMMP Maps; 2011 MND.</p>				
<p>2.b. Conflict with existing zoning for agricultural use, an existing Open Space Easement, or a Williamson Act contract?</p>			<p>X</p>	
<p>Discussion: The 2011 MND determined that there are no open space easements or Williamson Act protected lands that could be affected by the Phase 1 Project. While agriculture is a permitted use within the RM District, the extended Phase 1 project area is not designated by the General Plan for agricultural land use and no agricultural uses exist on the site. The property is not subject to a Williamson Act contract. As discussed in the SFPUC's 1999 Draft Environmental Impact Report (EIR) for its Watershed Management Plan, the Bay Area Ridge Trail is currently proposed on the edge of Skylawn's property along its eastern boundary. The project as proposed would not conflict with this. The revised project would not conflict with the approved Environmental Protection Zone (EPZ) on the property. No open space easements exist or are planned within the revised project area.</p> <p>Conclusion: The revised project would have a less than significant impact to an existing Open Space Easement, and no impacts to a Williamson Act contract and existing zoning for agricultural use.</p> <p>Source: Bay Area Ridge Trail Map (Source: http://www.ridgetrail.org); County Assessor's Office GIS Database; 2011 MND.</p>				
<p>2.c. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use?</p>				<p>X</p>

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Discussion: The 2011 MND determined that there are no impacts associated with agricultural or forestland resources. The revised project area has not been and is not currently farmed, as the cemetery facility has operated at the site since 1955. The revised project site does not contain forestland.

Conclusion: The revised project would have no impact on farmland or forestland.

Source: Google Earth; 2013; 2011 MND.

2.d. For lands within the Coastal Zone, convert or divide lands identified as Class I or Class II Agriculture Soils and Class III Soils rated good or very good for artichokes or Brussels sprouts?				X
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Discussion: The 2011 MND determined that there would be no impacts associated with lands within the Coastal Zone. The project site is not located in the Coastal Zone. No proposed work would occur outside the boundaries of the revised project area.

Conclusion: The revised project would have no impact to lands rated good or very good for artichokes or Brussels sprouts within the Coastal Zone.

Source: County Zoning Maps; 2011 MND.

2.e. Result in damage to soil capability or loss of agricultural land?				X
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Discussion: The 2011 MND determined that the project would have no impact on soil capability or loss of agricultural land. The Skylawn property has operated as a cemetery facility since 1955. Furthermore, the new project site is considered "Urban and Built-up Land" and "Grazing Land" by the California Department of Conservation Farmland Mapping and Monitoring Program (FMMP). FMMP land classifications that surround the project site are "Grazing" and "Other" (non-agriculture) land. These soil types are not suitable to support agriculture.

Conclusion: The revised project would have no impact to soil capability or agricultural land.

Source: County Prime Soil Maps; Google Earth; 2013; 2011 MND.

2.f. Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X
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Note to reader: This question seeks to address the economic impact of converting forestland to a non-timber harvesting use.

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Discussion: The Skylawn property is zoned Resource Management (RM) by the County's Zoning Map, which allows such uses as hotels, restaurants, commercial recreation facilities and cemeteries upon securing a use permit and RM Development Review Permit. The revised project site does not contain forestland or timberland; it is currently used as a cemetery facility. Operational conditions of the revised project would not change its current use of the site.

Conclusion: The revised project would have no impact of zoning for forestland or timberland, or timberland zoned Timberland Production.

Source: County Zoning Maps; Site Observation; 2011 MND.

3. **AIR QUALITY.** Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
3.a. Conflict with or obstruct implementation of the applicable air quality plan?			X	

Discussion: The Bay Area 2010 Clean Air Plan (Plan), created by the Bay Area Air Quality Management District (BAAQMD), is the applicable air quality plan for San Mateo County. The Plan includes specific measures and actions focusing on improving air quality, and protecting public health and our climate. The San Francisco Bay Area Basin is currently in non-attainment for ozone and particulate matter (PM_{2.5} and PM₁₀).

In 2009, the BAAQMD set quantitative significance thresholds for construction emissions and new thresholds for operations emissions of Reactive Organic Gases (ROG), Nitrous Oxide (NO_x), particulate matter less than ten microns in size (PM₁₀), and particulate matter less than 2.5 microns in size (PM_{2.5}). These thresholds are identified in **Table 4, BAAQMD CEQA Thresholds of Significance**. As a conservative approach to this analysis, the project's construction impacts to air quality were evaluated using these proposed significance thresholds.

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Table 4 BAAQMD CEQA Thresholds of Significance			
Criteria Air Pollutants and Precursors	Construction Related	Operational Related	
	Max. Daily Emissions (pounds/day)	Max. Daily Emissions (pounds/day)	Annual Emissions (tons per year)
ROG	54	54	10
NO _x	54	54	10
PM ₁₀	82	82	15
PM _{2.5}	54	54	10
Fugitive Dust	Best Management Practices	54	10
Criteria Air Pollutants and Precursors (Local CO)	None	9.0 ppm (8-hour average), 20.0 ppm (1-hour average)	

Source: Illingworth & Rodkin, 2013.

As currently proposed, an additional approximate 7 acres of disturbance would be added to the Phase I Project. **Table 5** below presents construction emissions for both the original and currently proposed project, involving a total of 42 acres of land disturbance.

Table 5 Maximum Daily Emissions in Pounds per Day for Phase 1 Construction					
Scenario	ROG	NO _x	PM ₁₀	PM _{2.5}	CO ₂
Phase 1 Project	3.1	25.1	1.3	1.2	2,349
Revised Project (includes an additional 7 acres)	3.7	30.2	1.6	1.5	2,826
Construction Emission Significance Thresholds (BAAQMD)	54	54	82	54	N/A
Threshold Exceeded (yes/no)	No	No	No	No	N/A

Source: Illingworth & Rodkin, 2013.

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As can be seen in **Table 5**, emissions from the revised project would be well below the significance thresholds and would thus be consistent with the Plan. Although the project would increase the amount of construction emissions at the project site, the increase is not considered substantial. As a result, emissions from grading would be less than significant.

Conclusion: The revised project would have less than significant impacts associated with the applicable air quality plan.

Source: 2011 MND; BAAQMD; Project Plans; Illingworth & Rodkin, 2013.

3.b. Violate any air quality standard or contribute significantly to an existing or projected air quality violation?		X		
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Discussion: The 2011 MND determined that as a result of construction and operation, pollutant emissions would be generated. During construction, air emissions would be generated from the use of heavy-duty diesel construction equipment, site grading, and construction worker vehicles. The largest contribution of emissions would be from mobile sources, specifically vehicles coming to and leaving the site. The revised project's construction impacts to air quality were evaluated using the BAAQMD significance thresholds. Based on the URBEMIS 2007 model for the project (included as **Appendix B**), it was concluded that the temporary construction emissions would not exceed the BAAQMD significance thresholds, even if the entire revised Phase 1 area was graded over a short period of time, and that they would be temporary and localized in nature.

After the construction phase is complete, the 2011 MND noted that normal cemetery operations would still have the potential to generate pollutants that could violate BAAQMD standards. BAAQMD screening criteria require that a detailed air quality analysis be conducted for projects generating more than 2,000 vehicle trips per day. Implementation of the Phase 1 Project was estimated to generate a maximum of 108 trips per day, well below the BAAQMD threshold requiring an air quality assessment. It was determined that no additional mitigation would be required.

According to the BAAQMD CEQA Guidelines, the primary pollutant of concern during construction is particulate matter from fugitive dust. While the BAAQMD does not require quantification of dust emissions during construction, it does emphasize implementation of all feasible control measures to minimize the generation of fugitive dust. The BAAQMD has provided a list of dust control measures in their CEQA Guidelines that, when fully implemented, would significantly reduce fugitive dust during construction activities.

Mitigation Measure 20, identified in the 2011 MND and described below, would reduce fugitive dust emissions associated with the proposed project. The application of this mitigation measure would apply to the currently proposed project. This measure is anticipated to represent best management practices for minimizing these emissions.

Mitigation Measure 1 (2011 MND Mitigation Measure 20): The applicant shall submit a dust control plan to the Planning and Building Department prior to any Phase 1 grading or construction activities. The approved measures shall be implemented prior to beginning any grading and/or construction activities and shall be maintained for the duration of the project grading and/or construction activities. The plan shall, at minimum, include all the "Basic Control Measures" listed in Table 2 4 of the BAAQMD CEQA Guidelines (see Appendix D):

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- a. Water all active construction areas at least twice daily.
- b. Cover all trucks hauling soil, sand and other loose materials or require all trucks to maintain at least 2 feet of freeboard.
- c. Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
- d. Sweep daily (with water sweepers) all paved access roads, parking areas and staging areas at construction sites.
- e. Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.

Additional measures may be required in order to ensure that construction-related activities do not generate elevated levels of dust particulates at any point throughout the duration of the project.

See discussion in Section 3.a above regarding construction emissions.

Conclusion: With the implementation of the above mitigation measure, the revised project would have a less than significant impact to air quality standards and violations.

Source: 2011 MND; BAAQMD; Project Plans; Illingworth & Rodkin, 2013.

3.c. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
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Discussion: Air pollution in general can be considered a cumulative impact by its very nature. No single project by itself is sufficient in size to result in non-attainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. If a projects' contribution to the cumulative impact is considerable, then the project's impact on air quality would be considered significant. As can be seen above in **Table 5 in Section 3.a**, emissions from the revised project would be well below the significance thresholds defined by the BAAQMD. Although the project would increase the amount of construction emissions at the project site, the increase is not considered substantial. As a result, project emissions would be less than significant and would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under the applicable Federal or State ambient air quality standard.

Conclusion: The revised project would have a less than significant impact to attainment of ambient air quality standards.

Source: BAAQMD CEQA Guidelines, 2010; Project Plans; Illingworth & Rodkin, 2013; 2011 MND.

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<p>3.d. Expose sensitive receptors to significant pollutant concentrations, as defined by BAAQMD?</p>		X		
<p>Discussion: The revised project may result in short-term, grading-related emissions and dust associated with the land disturbance of approximately 42 acres of land. Implementation of Mitigation Measure 1 would reduce fugitive dust emissions associated with the project to a less than significant level. Additionally, the site is in a remote rural location with no sensitive receptors located within the project vicinity.</p> <p>Conclusion: With the implementation of Mitigation Measure 1, the revised project would have a less than significant impact to sensitive receptors.</p> <p>Source: Project Plans; County Assessor's Office GIS Database; 2011 MND.</p>				
<p>3.e. Create objectionable odors affecting a significant number of people?</p>				X
<p>Discussion: The project mainly consists of grading and re-landscaping for the preparation of future burial sites. No objectionable odors, such as those typically associated with industrial land uses (i.e., wastewater treatment facilities or landfills) would be omitted pre- or post-construction.</p> <p>Conclusion: The revised project would have no impact involving objectionable odors.</p> <p>Source: Project Plans; County Assessor's Office GIS Database; 2011 MND.</p>				
<p>3.f. Generate pollutants (hydrocarbon, thermal odor, dust or smoke particulates, radiation, etc.) that will violate existing standards of air quality on-site or in the surrounding area?</p>		X		
<p>Discussion: The 2011 MND determined that the original project would result in less than significant impacts to air quality standards with the implementation of mitigation measures. See discussion in 3.a and 3.b above regarding emissions and air quality impacts associated with the revised project.</p> <p>Conclusion: The revised project would have a less than significant impact to air quality standards with the implementation of Mitigation Measure 1 above.</p> <p>Source: BAAQMD; Project Plans; County Assessor's Office GIS Database; Illingworth & Rodkin, 2013; 2011 MND.</p>				

4. BIOLOGICAL RESOURCES. Would the project:				
	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
4.a. Have a significant adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		X		
<p>Discussion: The 2011 MND provided a detailed discussion of the biological resources present in the original Phase 1 area, and a description of the plant communities in the extended Phase 1 area was provided earlier in this document (see <i>Existing Conditions</i>). The 2011 MND determined that special-status plant and wildlife species could be impacted by construction activities, but that impacts would be reduced to a less than significant level with the implementation of the required mitigation measures. A summary of the impacts to special-status plant and wildlife species identified by the 2011 MND, as well as a discussion of relevant changes to mitigation measures of the 2011 MND due to the proposed revisions of the Phase 1 Development Area, are provided below:</p> <p><u>Special-Status Plants</u></p> <p><i>Summary of 2011 MND Findings</i></p> <p>No special-status plant species were identified during focused botanical surveys conducted by Vollmar Consulting in 2009. Based on these survey results, it is not expected that special-status plant species occur in the original Phase 1 Development Area. However, as rare plant surveys are generally only considered valid for up to three years, the 2011 MND concluded that Phase 1 construction activities commencing after 2012 could result in the loss of rare plants and related impacts would be considered significant. The 2011 MND required mitigation measures to reduce related impacts to a less than significant level.</p> <p><i>Changes Due to Proposed Revisions to Phase 1 Development Area</i></p> <p>The proposed Near-Term Development Area (Figure 5) includes heavily disturbed weedy habitats, which do not provide suitable habitat for special-status plant species. The project applicant commissioned a rare plant survey of the Near-Term Development Area by Jane Valerius Environmental Consulting on June 28, 2013. No special-status plant species were observed and it was noted by the botanist that the site is highly disturbed and comprised of ruderal (i.e., weedy), non-native plants, many of which are noxious weeds. Jane Valerius Environmental Consulting (July 2013) concluded that no further surveys for rare plants are recommended for the Near-Term Development Area. This recommendation is based on the negative survey results, the absence of habitat types associated with locally occurring special-status plant species, and the highly disturbed condition of the area.</p>				

Updated surveys for rare plants were not conducted in the Long-Term Development Area because construction activities are not immediately planned for that area, and any surveys conducted now would be outdated when construction activities commence in that area (see **Mitigation Measures 6 and 7**, below).

Special-Status Wildlife

Summary of 2011 MND Findings

The 2011 MND found that the following special-status wildlife species have the potential to occur in the Phase 1 area: California red-legged frog, San Francisco garter snake, Bay checkerspot butterfly, San Francisco dusky-footed woodrat, and hoary bat. Raptors and other common bird species protected by the Migratory Bird Treaty Act and/or California Fish and Game Code could also nest on or near the site. The 2011 MND concluded that impacts to these species would be less than significant with implementation of the mitigation measures below:

Changes Due to Proposed Revisions to Phase 1 Development Area

The proposed Near-Term Development Area consists only of areas that have been subject to a high level of disturbance, including an equipment storage area, an area used to store grave spoils, and very weedy and highly disturbed grasslands. The focus on development in the Near-Term Development Area is biologically beneficial for the following reasons:

- Wetlands are not present in the Near-Term Development Area;
- Wetland habitat that may be used for refuge by federally listed species (i.e., California red-legged frog, San Francisco garter snake) does not occur within approximately 200 feet of the Near-Term Development Area;
- There is a large distance between the Near-Term Development Area and sensitive biological resources (e.g., native grasslands, coastal scrub habitat, Pilarcitos Creek); and
- The Near-Term Development Area only contains disturbed and weedy habitats.

Due to these factors, construction activities in the Near-Term Development Area would not impact Bay checkerspot butterfly because suitable habitat (i.e., native grassland) is not present. Construction activities in the Near-Term Development Area would also be less likely to impact the California red-legged frog and San Francisco garter snake because construction would not occur in or near wetlands, and habitat disturbance would be limited to highly disturbed, weedy habitats. Additionally, the San Francisco dusky-footed woodrat would be less likely to be harmed by activities in the Near-Term Development Area due to the absence of dense coastal scrub habitat.

As shown in **Figure 5**, wetlands are also not present in the Long-Term Development Area, which would reduce the potential for project impacts to the California red-legged frog and San Francisco garter snake in that area.

However, in the absence of avoidance and minimization measures, the revised project has potential to harm the California red-legged frog, San Francisco garter snake, Bay checkerspot butterfly, San Francisco dusky-footed woodrat, hoary bat, and nesting birds. Therefore, consistent with the findings of the 2011 MND, and in the absence of mitigation measures, impacts to special-status wildlife are potentially significant.

Mitigation Measures

The mitigation measures from the 2011 MND that apply to the Near-Term Development Area of the revised project, along with changes to strengthen mitigation measures, are included below:

Mitigation Measure 2 (2011 MND Mitigation Measure 12): Prior to initial vegetation removal and/or grading activities in the upland portions of the construction zone, Phase 1 area, a pre-construction clearance surveys shall be conducted for the California red-legged frog and San Francisco garter snake by a qualified biologist. Should either species be identified, construction activities shall be immediately halted until the frog or snake leaves the construction zone on its own, or is removed by a qualified biologist in possession of an appropriate permit and authorized by the USFWS. The USFWS shall be immediately notified if either species is observed.

Additionally, following the pre-construction clearance survey and prior to any construction-related grading or excavation activities, vegetation will be mowed to eliminate cover habitat for wildlife. A biological monitor would walk in front of the mower to ensure that the California red-legged frog and San Francisco garter snake are not present.

Mitigation Measure 3 (2011 MND Mitigation Measure 17): No earlier than 30 days prior to the commencement of any construction activities in coastal scrub or woodland habitats, a survey shall should be conducted to determine if active woodrat nests (stick houses) with young are present within the disturbance zone or within 50 feet of the disturbance zone. If active woodrat nests with young are identified, a fence shall should be erected around the nest site at a distance adequate to provide the woodrat sufficient foraging habitat at the discretion of a qualified biologist. Clearing and construction within the fenced area would be postponed or halted until young have left the nest. A qualified biologist should serve as a construction monitor during those periods when disturbance activities will occur near active nest areas to ensure that no inadvertent impacts on these nests occur. If woodrats or nests are observed within the disturbance footprint outside of the breeding period, individuals should be relocated to a suitable location within the Environmental Protection Zone by a qualified biologist in possession of a scientific collecting permit. This will be accomplished by dismantling woodrat nests (outside of the breeding period), to allow individuals to relocate to suitable habitat within the adjacent Environmental Protection Zone. The Environmental Protection Zone contains large expanses of suitable woodrat habitat that would be protected.

Mitigation Measure 4 (2011 MND Mitigation Measure 18): If trees or structures are to be removed during the breeding season of native bat species (generally April 1 through August 31 in California), the presence of active bat maternity roosts should be evaluated by a qualified biologist. If the trees/structures to be removed are determined to provide potential bat roosting habitat, a focused survey should then be conducted to determine if an active maternity roost of a special-status bat species is bats are present. Should an active maternity roost of a special-status bat species be identified, the roost should not be disturbed until the roost is vacated and juveniles have fledged, as determined by the biologist. Once all young have fledged, the tree/structure may be removed.

Mitigation Measure 5 (2011 MND Mitigation Measure 19): If a construction project would commence anytime during the nesting/breeding season of native bird species potentially nesting on the site (typically February through August in the project region), a pre-construction survey of the project vicinity for nesting birds shall be conducted. This survey shall be conducted by a qualified biologist (i.e., experienced with the nesting behavior of bird species of the region) within two weeks of the commencement of construction activities. The intent of the survey

would be to determine if active nests of special-status bird species or other species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present within the construction zone or within 500 feet of the construction zone. The survey area would include all trees and shrubs in the construction zone and a surrounding 500-foot area. The survey should be timed such that the last survey is concluded no more than two weeks prior to initiation of construction. If ground disturbance activities are delayed following a survey, then an additional pre-construction survey should be conducted such that no more than two weeks will have elapsed between the last survey and the commencement of ground disturbance activities.

If active nests are found in areas that could be directly affected or are within 500 feet of construction and would be subject to prolonged construction-related noise, a no-disturbance buffer zone shall be created around active nests during the breeding season or until a qualified biologist determines that all young have fledged. The size of the buffer zones and types of construction activities restricted within them will be determined through consultation with the CDFG, taking into account factors such as the following:

- a. Noise and human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity;
- b. Distance and amount of vegetation or other screening between the construction site and the nest; and
- c. Sensitivity of individual nesting species and behaviors of the nesting birds.

Limits of construction to avoid an active nest shall should be established in the field with flagging, fencing, or another appropriate barrier, and construction personnel should be instructed on the sensitivity of nest areas. The biologist shall should serve as a construction monitor during those periods when construction activities would occur near active nest areas of special-status bird species to ensure that no impacts on these nests occur.

Mitigation Measure 6 (2011 MND Mitigation Measure 9): An updated rare plant survey shall be conducted by a qualified botanist prior to any construction activities commencing ~~after spring of 2012 in the Long-Term Development Area.~~ Should any rare plant species be identified, these populations should be avoided to the extent practical. If removal of special-status plant species is required, transplanting to a suitable location in the Environmental Protection Zone will be considered as the first option. Given that the rare plant species of primary concern are evergreen shrubs or lilies, transplanting should be feasible. Prior to the transplanting of any rare plant species, a plant relocation plan shall be developed by a qualified botanist. At a minimum, the plan shall demonstrate the feasibility of replacing the number of individual plants to be removed at a 1:1 ratio. ~~The~~ This plan shall, at a minimum, specify the following: (1) the location of mitigation sites in the Environmental Protection Zone or other suitable locations; (2) methods for harvesting seeds and salvaging and transplantation of individual bulbs/plants to be impacted; (3) site preparation procedures for the mitigation site; (4) a schedule and action plan to maintain and monitor the mitigation area; (5) a list of criteria and performance standards by which to measure success of the mitigation site(s); and ~~(6) measures to exclude unauthorized entry into the mitigation areas; and (7) contingency measures in the event that mitigation efforts are not successful.~~ The plan shall be subject to the approval of the Planning and Building Department prior to the removal of any special-status plant species.

Mitigation Measure 7 (2011 MND Mitigation Measure 10): Prior to any grading or construction activities within or adjacent to the Land and Water Management Zones, a qualified botanist shall conduct a survey of the immediate work areas to determine whether any rare plant species

are present. If any such species are identified, the botanist shall consult with the Planning and Building Department staff to determine how to proceed. No grading or construction activities shall occur in the area until the botanist and County staff have agreed on an appropriate course of action that will minimize adverse impacts to special-status plant species in the area.

Mitigation Measure 8 (2011 MND Mitigation Measure 16): The outer limits of the stand of native grassland located within the Land and Water Management Zone adjacent to Phase-1 development area the Long-Term Development Area shall be identified by a qualified biologist and marked with wooden stakes or other equivalent markers. Development activities would not occur within this area. Land management activities shall not be allowed within the identified area, unless the timing and nature of the activity is found to not pose a threat to bay the Bay checkerspot butterfly by a qualified biologist.

Mitigation Measure 9 (2011 MND Mitigation Measure 13): Prior to the commencement of construction activities within 50 feet of a wetland or riparian woodland, a pre-construction clearance survey of the area shall be conducted by a qualified biologist for the California red-legged frogs and San Francisco garter snake. Should either species be identified, construction activities should be halted until the animal leaves the construction zone on its own, or is removed by a qualified biologist in possession of an appropriate permit and authorized by the USFWS. If it is determined that no red-legged frogs or garter snakes are present, temporary exclusionary fencing shall then be installed around the perimeter of the wetland/riparian woodland and adjacent construction areas. The fencing shall be maintained throughout the duration of construction activities near the wetland/riparian area. The adequacy of the fencing to prevent frogs and snakes from entering the construction zone shall be approved by a qualified biologist prior to the commencement of construction activities and shall be inspected daily to ensure it continues to operate effectively.

Mitigation Measure 10 (2011 MND Mitigation Measure 14): In order to prevent the accidental removal of wetland habitat (and potentially damaging the habitat of an endangered wildlife species), a qualified biologist shall determine and mark in the field the extent of all wetland areas in and adjacent to Phase-1 development zones near the Long-Term Development Area (see Figure 5). Any grading or construction activities within 50 feet of any wetland habitat shall be referred to and reviewed by the United States Fish and Wildlife Service (USFWS) prior to commencement of any construction activities. Prior to any disturbance within 50 feet of wetland habitats, proof of consultation with and approval by the USFWS shall be submitted to the Planning and Building Department.

Mitigation Measure 11 (2011 MND Mitigation Measure 15): The San Francisco garter snake is a California Fully Protected Species, which means that the California Department of Fish and Game (CDFG) cannot authorize the take of the species and needs to ensure the adequacy of the avoidance measures to be implemented. Therefore, the CDFG shall be consulted prior to the implementation of construction activities within 50 feet of a wetland habitats and any further recommended avoidance measures shall be implemented. Prior to any disturbance within 50 feet of wetland habitats, proof of consultation with and approval by the CDFG shall be submitted to the Planning and Building Department.

Condition of Approval 30 (No Longer Proposed): This condition of approval required that the project applicant must obtain an Incidental Take Permit from the United States Fish and Wildlife Service and provide proof of such authorization to the Planning and Building Department. For the reasons discussed below, this condition has been deleted for projects occurring within the currently proposed Phase 1 Development Area (Refer to **Appendix C**).

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Justification: As shown in Figure 5, there is a jurisdictional wetland in the original Phase 1 Development Area. There are no wetlands within the currently proposed Phase 1 Development Area. As a wetland impact would no longer occur, permits for fill of a wetland from the Army Corps of Engineers (ACOE) are not required. However, by eliminating the wetland impact, meeting the requirements of *Condition of Approval 30* to obtain an Incidental Take Permit has become infeasible.

To clarify, the USFWS may only issue a Take Permit under Section 7 of the Federal Endangered Species Act (ESA) if there is a federal nexus (e.g., a permit is required from another federal agency or federal funds are being used). As the proposed project no longer includes disturbance of a wetland, there is no longer the need to obtain a permit from a federal agency (i.e., Section 404 permit from the ACOE) and, therefore, there is no longer a federal nexus that would allow the USFWS to issue an Incidental Take Permit pursuant to Section 7 of ESA. The only other mechanism allowing the USFWS to issue a Take permit would be through Section 10 of the ESA, which requires the preparation of a Habitat Conservation Plan (HCP). The proposed project is not an appropriate candidate for an HCP because the currently proposed Phase 1 Development Area includes heavily disturbed and highly weedy grassland areas, and the potential for "take" to occur could be avoided through the implementation of standard avoidance measures (see mitigation measures, above).

Conclusion: With the implementation of the above mitigation measures, the revised project would have a less than significant impact on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

Source: Jane Valerius Environmental Consulting (July 2013); 2011 MND; Pacific Biology (October 2013, July 2013).

4.b. Have a significant adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?		X		
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Discussion: The 2011 MND found that the native grassland habitat could be impacted. Mitigation Measure 8 (2011 MND mitigation measure 16) (see above) was required to protect the native grasslands from disturbance.

Changes Due to Proposed Revisions to Phase 1 Development Area

There are no sensitive plant communities (i.e., native grasslands, riparian areas, wetlands) in the Near-Term Development Area. As discussed above (see 4.a) and shown in **Figure 5**, there is a small native grassland in the Long-Term Development Area. Mitigation Measure 8 (see above) would be implemented to protect this native grassland area.

Conclusion: With implementation of Mitigation Measure 8 (see above), impacts to riparian habitat or other sensitive natural communities would be less than significant.

Source: Project Plans; 2011 MND; Jane Valerius Environmental Consulting (July 2013); 2011 MND; Pacific Biology (October 2013, July 2013).

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<p>4.c. Have a significant adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?</p>			X	
<p>Discussion: As shown in Figure 5, there is a jurisdictional wetland in the original Phase 1 Development Area. It was anticipated that the wetland would be disturbed and that the acquisition of permits from regulatory agencies would be required.</p> <p><i>Changes Due to Proposed Revisions to Phase 1 Development Area</i></p> <p>As shown in Figure 5, the Phase 1 Development Area has been revised to exclude wetland habitat. Therefore, the revised project would not result in the fill of a jurisdictional wetland and related impacts would be less than significant. Additionally, Mitigation Measure 10 (see above) would be implemented to protect the wetland near the Long-Term Development Area during construction and grading activities.</p> <p>Conclusion: The revised project would have a less than significant impact on federally protected wetlands.</p> <p>Source: Project Plans; 2011 MND; Jane Valerius Environmental Consulting (July 2013); 2011 MND; Pacific Biology (October 2013, July 2013).</p>				
<p>4.d. Interfere significantly with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?</p>			X	
<p>Discussion: The 2011 MND did not identify any impacts associated with restricting a wildlife movement corridor.</p> <p><i>Changes Due to Proposed Revisions to Phase 1 Development Area</i></p> <p>The currently proposed Phase 1 Development Area is also not part of an expected regional wildlife movement corridor.</p> <p>Conclusion: The revised project would have less than significant impacts associated with the movement of native or migratory fish or wildlife species.</p> <p>Source: Project Plans; 2011 MND; Jane Valerius Environmental Consulting (July 2013); 2011 MND; Pacific Biology (October 2013, July 2013).</p>				

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4.e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (including the County Heritage and Significant Tree Ordinances)?		X		
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Discussion: While the 2011 MND did not identify any project conflicts with local policies or ordinances protecting biological resources, the 2011 MND identified potentially significant impacts related to potential damage or removal to significant or heritage trees in the original project area during project grading and construction activities.

Changes Due to Proposed Revisions to Phase 1 Development Area

Development within the currently proposed Phase 1 Development Area would not result in any new impacts to biological resources and also would not conflict with local policies or ordinances protecting biological resources. It is also not anticipated that tree removal would be required. However, Mitigation Measure 11 of the 2011 MND has been retained to reduce the risk of damage or removal of such trees to a less than significant level.

Mitigation Measure 12 (2011 MND Mitigation Measure 11): Prior to the commencement of construction activities, a tree survey shall be conducted by a qualified arborist indicating all the trees that could be removed or otherwise harmed during Phase 1 construction. At a minimum, the survey shall identify the size (diameter at breast height), species, and condition of the trees. The survey shall also identify which of these trees are considered protected, significant, or heritage trees. If any such trees are identified by the arborist within Phase 1 Project areas, the project applicant shall implement tree protection measures to ensure said trees are not damaged during construction. These measures may include protective fencing, prohibiting construction/grading activities within the dripline of trees to be preserved, or other appropriate measures approved by the Planning and Building Department.

Conclusion: With implementation of Mitigation Measure 12, the project would result in a less than significant impact to significant and heritage trees.

Source: Project Plans; 2011 MND.

4.f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or State habitat conservation plan?				X
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Discussion: The 2011 MND did not identify any project conflicts with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, or State habitat conservation strategy.

Changes Due to Proposed Revisions to Phase 1 Development Area

Development within the currently proposed Phase 1 Development Area would also not conflict with the provisions of an adopted Habitat Conservation Plan or other approved local, regional, or State habitat conservation strategy.

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Conclusion: As the project area is not covered by an HCP or equivalent plan, the revised project would have no impact associated with an adopted Habitat Conservation Plan, Natural Conservation Community Plan, other approved local, regional, or State habitat conservation plan.

Source: Project Plans; 2011 MND; Jane Valerius Environmental Consulting (July 2013); 2011 MND; Pacific Biology (October 2013, July 2013).

4.g. Be located inside or within 200 feet of a marine or wildlife reserve?				X
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Discussion: The original Phase 1 Development Area is not located inside or within 200 feet of a marine or wildlife reserve.

Changes Due to Proposed Revisions to Phase 1 Development Area

The currently proposed Phase 1 Development Area is also not located inside or within 200 feet of a marine or wildlife reserve.

Conclusion: The revised project would have no impact associated with a marine or wildlife reserve.

Source: Project Plans; 2011 MND; Jane Valerius Environmental Consulting (July 2013); 2011 MND; Pacific Biology (October 2013, July 2013).

4.h. Result in loss of oak woodlands or other non-timber woodlands?				X
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Discussion: The 2011 MND did not identify any impacts associated with the loss of oak woodlands or other non-timber woodlands.

Changes Due to Proposed Revisions to Phase 1 Development Area

There are no woodlands located within the boundaries of the currently proposed Phase 1 Development Area. Therefore, there would be no loss of oak woodlands or other non-timber woodlands.

Conclusion: The revised project would have no impact associated with the loss of oak woodlands or other non-timber woodlands.

Source: Project Plans; 2011 MND.

5. CULTURAL RESOURCES. Would the project:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
5.a. Cause a significant adverse change in the significance of a historical resource as defined in CEQA Section 15064.5?		X		

Discussion: The 2011 MND determined that there would be no significant impacts to historical structures for the Phase 1 Project. Holman and Associates completed an Archaeological Reconnaissance and Initial Evaluation of the extended Phase 1 project Area in 2013 in order to identify any cultural resources on the project site (see **Appendix E**). According to the review, there have been six cultural resource studies that cover approximately 20 percent of the project site. As stated in the 2011 MND, a review of historical maps indicates roadways/fence lines on the Skylawn property as early as 1859, and several buildings are depicted in the 1915 topographic maps. The 1956 San Mateo topographic maps also indicate a quarry, four buildings, and one globe wireless receiving station, all within the property. Although the formal inventories conducted for the project have not identified recorded cultural resources, these unrecorded buildings/structures meet the Office of Historic Preservation minimum age standard that buildings, structures, and other objects 45 years or older may be of historical value.

The National Historic Preservation Act (NHPA) and CEQA require government agencies to take into consideration the potential effects of proposed undertakings on cultural resources listed on or determined eligible for inclusion in the national and/or state historical resources databases. A historic property may be a row of stores having cast-iron fronts, a water tower, a city park, a railroad station, an ethnic neighborhood, or the archaeological remains of a prehistoric Indian village. It may be of value to the Nation as a whole, or important only to the community in which it is located. Even absent of a formal eligibility determination, a lead agency is required to consider a resource to be "historically significant" if the resource meets the following criteria:

- Associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- Associated with the lives of persons important in our past.
- Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- Has yielded, or may be likely to yield, information important in prehistory or history.

The California Office of Historic Preservation (OHP) is committed to developing an increasingly comprehensive and integrated system for managing information about all types of historical resources in order to accommodate this holistic view of the historical landscape. The following broad threshold has been set for the kinds of resources that may be recorded for inclusion in the OHP's filing system: *Any physical evidence of human activities over 45 years old may be recorded for purposes of inclusion in the OHP's filing system.* This threshold is designed to encompass resources that have been formally evaluated, as well as those whose importance has not yet been determined. Documentation of resources less than 45 years old also may be filed if those resources have been formally evaluated, regardless of the outcome of the evaluation.

Within the revised project area, there is a vacant two-story building and associated ancillary structures (i.e., small sheds), located in the eastern ridges, approximately 1,000 feet north of the existing cemetery land uses (see **Figure 6**). As shown in the figure, the building appears to be relatively intact. The historical significance of the building is unknown; however, the building has unofficially been referred to as an old Coast Guard post. Grading activities and re-organization of the "Maintenance Area" within the revised project area could potentially impact this structure. Because of the age of this building, the proposed improvements would be considered a significant impact to a potential historical resource. Therefore, the following

mitigation measures apply to the revised project, and were not previously included in the 2011 MND.

Mitigation Measure 13 (New Mitigation Measure): In accordance with the Secretary of the Interior's Standards and Guidelines, the identification of historical resources shall be undertaken for the purpose of locating historic properties on the project site, and shall be composed of a number of activities which include, but are not limited to, archival research, informant interviews, field survey and analysis. Such report shall be provided to the Current Planning Section, prior to any alteration of the two-story building. Any alteration is subject to the review and approval of the Community Development Director and, depending on the scope of alteration, may require a building permit. Combinations of these activities may be selected and appropriate levels of effort assigned to produce a flexible series of options. A qualified archaeologist shall be retained to conduct the identification of historical resources within the extended Phase 1 project area.

Mitigation Measure 14 (New Mitigation Measure): Should significant historical resources be identified within the revised project site, the following preservation, rehabilitation, restoration, and reconstruction mitigations would reduce project impacts to a less than significant level.

- a. The project applicant shall preserve and retain any architectural resources eligible for listing on the California Register of Historical Resources (CRHR) in their original setting, or rehabilitate the resources according to the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995). New construction near each resource should be consistent with their historic character.
- b. The project applicant shall preserve and relocate any architectural resources eligible for listing on the CRHR to a different location in the vicinity of their existing locations, or to a different location within the project site appropriate to their historic character, or rehabilitate the resources according to the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995). New construction near each building should be consistent with their historic character.
- c. The project applicant shall integrate and reuse architectural resources eligible for listing on the CRHR into the new cemetery development, or rehabilitate the resources according to the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings, or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (1995). New construction near each building should be consistent with its historic character.

Conclusion: The revised project would have less than impacts to historical resources with implementation of the above-mentioned mitigation measures. Therefore, the revised project would not substantially increase the potential severity of the previously identified impacts in the 2011 MND.

Source: Archaeological Reconnaissance of the Phase 1 North Extension Project Area at Skylawn Memorial Park, Holman & Associates (2013); 2011 MND.

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5.b. Cause a significant adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?		X		
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Discussion: The 2011 MND determined that there would be less than significant impacts to unknown archaeological resources with mitigation.

As previously mentioned, archaeological reconnaissance was conducted covering the Skylawn property. No cultural or archaeological resources were reported by either search for the site. As part of the report, a pedestrian archaeological survey was conducted on all accessible areas within the extended Phase 1 project area, as well as along the section of existing service road to be improved. No evidence of archaeological resources of any kind was found within the project area, or along the existing service road that would be improved. All of these areas showed abundant evidence of previous disturbance including grading, quarrying, filling, stripping of vegetation and topsoil, and being covered by imported roadway materials and various other sorts of materials and items.

Recognized Native American tribes and individual representatives were solicited for information and comments on the project. As of August 14, 2013, no responses had been received.

The extended Phase 1 project area contains no evidence of prehistoric archaeological resources, either previously recorded or found during the survey. No additional historical resource research or evaluation is recommended prior to project implementation. It should be noted that it is possible that subsurface deposits may exist or that evidence of such resources has been obscured by more recent natural or cultural factors, primarily the extensive rearranging of the landscape and installation of modern features.

The following 2011 MND mitigation measure would be applicable during project grading and construction:

Mitigation Measure 15 (2011 MND Mitigation Measure 24): If archaeological and/or cultural resources are encountered during grading or construction activities, work shall be temporarily halted ~~in the vicinity~~ within 30 feet of the discovered materials and workers shall avoid altering the materials and their context until a qualified professional archaeologist has evaluated the situation and provided appropriate recommendations. The project applicant or archaeologist shall immediately notify the Current Planning Section of any discoveries made and shall provide the Current Planning Section with a copy of the archaeologist's report and recommendations prior to any further grading or construction activity in the vicinity.

The following mitigation measure would be applicable during project grading and construction, and was not included in the 2011 MND:

Mitigation Measure 16 (New Mitigation Measure): Prior to the issuance of the grading permit "hard card," the applicant shall submit an archaeological study of the project site (with the exception of those areas determined not to have cultural resources). The study shall also show the results of attempts to contact local Native American tribe(s) regarding traditional, cultural, and religious heritage values.

Conclusion: Implementation of the above mitigation measures would reduce potential project impacts to archaeological resources to a less than significant level within the revised project area. Therefore, the revised project would have a less than significant impact with mitigations incorporated.

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Source: Archaeological Reconnaissance of the Phase 1 North Extension Project Area at Skylawn Memorial Park, Holman & Associates (2013); 2011 MND.

5.c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

X

Discussion: Due to the significant level of earthwork associated with project implementation, the revised project has the potential to directly or indirectly destroy a unique paleontological resource on the new site. The following general mitigation measures, as provided by the Tribal Energy and Environmental Information Clearinghouse, Office of Indian Energy and Economic Development, have been included to mitigate any potential impact to paleontological resources to a less than significant level. These mitigation measures were not previously identified in the 2011 MND, and are new measures.

Mitigation Measure 17 (New Mitigation Measure): A discovery of a paleontological specimen during any phase of the project shall result in a work stoppage in the vicinity of the find until it can be evaluated by a professional paleontologist. Should loss or damage be detected, additional protective measures or further action (e.g., resource removal), as determined by a professional paleontologist, shall be implemented to mitigate the impact.

Mitigation Measure 18 (New Mitigation Measure): Use existing roads to the maximum extent feasible to avoid additional surface disturbance.

Mitigation Measure 19 (New Mitigation Measure): During all phases of the project, keep equipment and vehicles within the limits of the previously disturbed areas of the project site. All areas to remain undisturbed shall be delineated on the Erosion Control Plan and the plan shall include measures, such as a fence or other kind of barrier, to demarcate the "limit of disturbance." The property owner shall demonstrate the implementation of these measures prior to issuance of the grading permit "hard card."

Conclusion: Implementation of the above mitigation measures would reduce potential project impacts to paleontological resources to a less than significant level.

Source: Tribal Energy and Environmental Information Clearinghouse Website: <http://teeic.anl.gov/wind/mitigation/paleo/index.cfm>; 2011 MND.

5.d. Disturb any human remains, including those interred outside of formal cemeteries?

X

Discussion: Due to the significant level of earthwork associated with project construction, the project has the potential to disturb any interred human remains, including those interred outside of formal cemeteries. **Mitigation Measure 20**, below, requires the property owner, applicant, and contractors to comply with the requirements of California State law with regard to the discovery of human remains during construction, whether historic or prehistoric. The implementation of this mitigation measure would mitigate any potentially significant impact to interred human remains to a less than significant level. This mitigation measure was not previously identified in the 2011 MND, and is a new measure.

Mitigation Measure 20 (New Mitigation Measure): The property owner, applicant, and contractors must be prepared to carry out the requirements of California State law with regard to the discovery of human remains during construction, whether historic or prehistoric. In the event that any human remains are encountered during site disturbance, all ground-disturbing

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work shall cease immediately and the County coroner shall be notified immediately. If the coroner determines the remains to be Native American, the Native American Heritage Commission shall be contacted within 24 hours. A qualified archaeologist, in consultation with the Native American Heritage Commission, shall recommend subsequent measures for disposition of the remains.

Conclusion: Implementation of **Mitigation Measure 20**, above, would reduce potentially significant project impacts to human remains to a less than significant level.

Source: California Native American Heritage Commission; California Health and Safety Code: <http://www.nahc.ca.gov/has.html>; 2011 MND.

6. GEOLOGY AND SOILS. Would the project:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
a. Expose people or structures to potential significant adverse effects, including the risk of loss, injury, or death involving the following, or create a situation that results in:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other significant evidence of a known fault? <i>Note: Refer to Division of Mines and Geology Special Publication 42 and the County Geotechnical Hazards Synthesis Map.</i>			X	

Discussion: The 2011 MND determined that the project may be located on, or adjacent to a known earthquake fault; however, the impacts would be less than significant.

The Alquist-Priolo Earthquake Fault Zoning Act of 1972 prohibits the construction of buildings used for human occupancy on active surface faults and specifies, in part, that new habitable building structures maintain a minimum 50-foot set back from all known active faults. The Pilarcitos Fault, branches of which are shown in regional maps as transecting the property, is considered a potentially active fault (active within the Quaternary period). The revised project area is not located within 50 feet of the Pilarcitos Fault.

Conclusion: The revised project would not be located on or adjacent to a known earthquake fault; impacts would be less than significant.

Source: E.T. Easter and Craig Harwood, C.E.G. (2010); 2011 MND.

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ii. Strong seismic ground shaking?			X	
<p>Discussion: The 2011 MND determined that impacts associated with strong seismic shaking would be less than significant.</p> <p>There is a high probability that the revised project area would be subject to violent ground shaking from an earthquake during the life of the project. The revised project, however, would not result in any permanent residents on the site, nor would it construct any new buildings that would house employees.</p> <p>Conclusion: The revised project would have less than significant impacts associated with strong seismic shaking.</p> <p>Source: E.T. Easter and Craig Harwood, C.E.G. (2010); 2011 MND.</p>				
iii. Seismic-related ground failure, including liquefaction and differential settling?		X		
<p>Discussion: According to analysis contained in the 2011 MND and preliminary geotechnical analysis conducted for the Phase 1 Project, uplift, erosion, and subsequent re-deposition of sedimentary rocks within the project region have been driven by the strike-slip movement of the tectonic plates and the associated northeast oriented compressional stress. Bedrock is the predominant base rock within the project vicinity, and is blanketed by Quaternary sedimentary deposits. The primary soils in the project vicinity recognized by the United States Department of Agriculture (USDA) soil identification system are of the Gazos series. The Gazos series consist of gently sloping to very steep upland soils that are well drained to somewhat excessively drained. Due to the fact that the revised project site is located on a high ridge, has a lack of shallow groundwater, and is underlain by hard bedrock, the potential for liquefaction to occur is generally low. However, additional instability of underlying units may be attributed to differential settlement, soil creep, or the triggering of localized slumps or landslides in response to grading at the site. Deep fills that are planned for the project area may induce some differential settlement in the underlying native materials. This impact is considered potentially significant prior to mitigation. Implementation of the following mitigation measures would reduce the impacts of development on potentially unstable geological or soil units in the extended Phase 1 project area to a less than significant level. Mitigation Measure 21 was not previously identified in the 2011 MND, and is a new measure.</p> <p><u>Mitigation Measure 21 (New Mitigation Measure):</u> <u>Prior to any project grading, a subsurface investigation, including exploratory borings, shall be conducted in the area of the fill in order to determine the thickness of the material, as well as the subsurface conditions beneath the fill. This information will be necessary to guide future corrective grading and guidance for construction, drainage, etc. The report shall be submitted to the San Mateo County Planning and Building Department for review by the County Geologist prior to commencement of any grading or construction activities.</u></p> <p>The following mitigation measures were included in the 2011 MND, and will be applied to the revised project:</p> <p><u>Mitigation Measure 22 (2011 MND Mitigation Measure 1):</u> A design level geotechnical investigation of the Phase 1 Area shall be performed prior to any project grading. The report shall include a static and seismic slope stability analysis of the Phase 1 Area to be graded and</p>				

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developed. The specific mitigation measures to be utilized in order to stabilize identified landslides and areas of potential seismically induced landslides in the Phase 1 Area shall be presented in the report. The report shall be submitted to the San Mateo County Planning and Building Department for review by the County Geologist prior to commencement of any grading or construction activities.

Mitigation Measure 23 (2011 MND Mitigation Measure 6): Any fills used at the project site shall be properly placed with keyways and subsurface drainage, and adequately compacted following the recommendations of the final geotechnical report and geotechnical engineer, in order to significantly reduce fill sediment. Underground utilities shall be designed and constructed using flexible connection points to allow for differential settlement.

Mitigation Measure 24 (2011 MND Mitigation Measure 7): Foundation plans shall be submitted to the Planning and Building Department for review prior to issuance of building permits. All foundation excavations shall be observed during construction by the geotechnical engineer to ensure that subsurface conditions encountered are as anticipated. As-built documentation shall also be submitted to the Planning and Building Department.

Conclusion: Implementation of the above mitigation measures would reduce potential impacts of the revised project associated with seismic-related ground failure to a less than significant level.

Source: E.T. Easter and Craig Harwood, C.E.G. (2010); 2011 MND.

iv. Landslides?		X		
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Discussion: The 2011 MND determined that there would be less than significant impacts associated with landslides with the implementation of mitigation measures.

According to analysis contained in the 2011 MND, and based on preliminary geotechnical analysis conducted for the extended Phase 1 project area, landslides have occurred in portions of the project site, and some landslides on-site have been repaired through geotechnical measures. Based on the geotechnical assessment, the potential for slope instability exists at the project site. Project-related grading activities could activate or reactivate landslides on that portion of the project site. This is considered a potentially significant impact prior to mitigation.

Conclusion: Implementation of **Mitigation Measures 21-24** above in **Section 6.iii** would reduce impacts of slope stability and associated landslides to a less than significant level.

Source: E.T. Easter and Craig Harwood, C.E.G. (2010); 2011 MND.

v. Coastal cliff/bluff instability or erosion? <i>Note to reader: This question is looking at instability under current conditions. Future, potential instability is looked at in Section 7 (Climate Change).</i>				X
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Discussion: The revised project area is not located on or adjacent to a coastal cliff or bluff. The revised project site is over 4 miles from the coast, and no significant cliffs, bluffs, or other unstable land formations exist near the revised project area.

Conclusion: The revised project would have no impacts associated with coastal cliff/bluff instability or erosion.

Source: Google Earth, 2013; 2011 MND.

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6.b. Result in significant soil erosion or the loss of topsoil?		X		
<p>Discussion: The 2011 MND determined that there would be less than significant impacts associated with soil erosion with the implementation of mitigation measures.</p> <p>The revised project involves a significant amount of earthwork, involving a total of approximately 145,000 cy of cut and fill. Of that, 45,000 cy is associated with the extended Phase 1 Project area, and 1000,000 cy is associated with the Phase 1 Project. There is the potential for sedimentation within on-site areas downslope from the project area if precipitation would occur during project grading or construction. The applicant proposes a Conceptual Erosion Control Plan which includes measures that would contain and slow runoff, while allowing for natural infiltration. The following mitigation measures were included in the 2011 MND, and will be applied to the revised project:</p> <p>Mitigation Measure 25 (2011 MND Mitigation Measure 2): The applicant shall obtain a grading permit hard card from the Planning and Building Department prior to commencement of any grading or construction activities.</p> <p>Mitigation Measure 26 (2011 MND Mitigation Measure 3): Prior to beginning any construction activities, the applicant shall submit an Erosion and Sediment Control Plan to <u>include the proposed measures of the Conceptual Erosion Control Plan and additional measures as follows</u> for review and approval by the San Mateo County Planning and Building Department. The plan must be fully implemented and inspected by County Planning and Building Department staff prior to the commencement of any construction and/or grading activities and shall be maintained throughout the duration of the project. Erosion control measure deficiencies, as they occur, shall be immediately corrected. The goal is to prevent sediment and other pollutants from leaving the project site and to protect all exposed earth surfaces from erosive forces. Said plan shall adhere to the San Mateo Countywide Water Pollution Prevention Program (<u>SMCWPPP</u>) "General Construction and Site Supervision Guidelines," including:</p> <ol style="list-style-type: none"> a. Stabilizing all denuded areas and maintaining erosion control measures continuously between October 45¹ and April 45³⁰. Stabilizing shall include both proactive measures, such as the placement of hay bales or coir netting, and passive measures, such as revegetating disturbed areas with plants propagated from seed collected in the immediate area. b. Storing, handling, and disposing of construction materials and wastes properly, so as to prevent their contact with stormwater. c. Controlling and preventing the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges to storm drains and watercourses. d. Using sediment controls or filtration to remove sediment when dewatering the site and obtaining all necessary permits. e. Avoiding cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated. f. Delineating with field markers clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees and drainage courses. 				

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- g. Protecting adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers or filters, dikes, mulching, or other measures as appropriate.
- h. Performing clearing and earth-moving activities only during dry weather.
- i. Limiting and timing applications of pesticides and fertilizers to prevent polluted runoff.
- j. Limiting construction access routes and stabilizing designated access points.
- k. Avoiding tracking dirt or other materials off-site; cleaning off-site paved areas and sidewalks using dry sweeping methods.
- l. The contractor shall train and provide instructions to all employees and subcontractors regarding the construction best management practices. Additional best management practices in addition to those shown on the plans may be required by the Building Inspector to maintain effective stormwater management during construction activities. Any water leaving the site shall be clear and running slowly at all times.
- m. Show storm drain inlets in the project vicinity and proposed protection of inlets.
- n. Stabilized construction entrance shall utilize a minimum 3"-4" fractured aggregate over geo-textile fabric.
- o. Provide a designated area for parking of construction vehicles, using aggregate over geo-textile fabric.
- p. Show areas for stockpiling. Cover temporary stockpiles using anchored-down plastic sheeting. For longer storage, use seeding and mulching, soil blankets or mats.
- q. Show location of garbage and/or debris dumpster(s), and portable toilets.

Failure to install or maintain these measures will result in stoppage of construction until the corrections have been made and fees paid for staff enforcement time. Revisions to the approved erosion and sediment control plan shall be prepared and signed by the engineer and reviewed by the Department of Public Works and the Community Development Director.

Mitigation Measure 27 (2011 MND Mitigation Measure 4): The applicant shall submit a grading and drainage plan (including calculations) to the Planning and Building Department and the Department of Public Works prior to the issuance of any project-related grading or building permits. The grading and drainage plan shall include all requirements listed in Grading Ordinance Section 8604.1.a.5 (*Application Requirements*). The drainage plan shall also include a narrative describing the type, size, and location of all permanent stormwater controls to be utilized in order to ensure compliance with the County's Drainage Policy, the San Mateo Countywide Water Pollution Prevention Plan (SMCWPPP) "General Construction and Site Supervision Guidelines," and National Pollutant Discharge Elimination System (NPDES) Permit Provision C.3.

Mitigation Measure 28 (2011 MND Mitigation Measure 5): Unless approved in writing and in advance by the Community Development Director, no grading shall be allowed during the winter season (October 15¹ to April 15³⁰) to avoid potential soil erosion. The applicant shall submit a letter to the Current Planning Section, ~~prior to the issuance of the grading hard card, which illustrates the approximate grading schedule, including start and end dates~~ at least two (2) weeks prior to commencement of grading, stating the date when erosion controls will be installed, date when grading operations will begin, anticipated end date of grading operations, and date of revegetation. All submitted schedules shall represent the work in detail and shall

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project the grading operations through to completion. (*Includes minor changes to increase the level of mitigation).

These measures require compliance with the SMCWPPP, NPDES, and limit project grading to the dry season (May 1 to September 30).

In addition, the measure below has been included to require monitoring of erosion control measures by the project civil engineer. This mitigation measure was not previously identified in the 2011 MND. It is a new measure.

Mitigation Measure 29 (New Mitigation Measure): It shall be the responsibility of the engineer of record to regularly inspect the erosion control measures for the duration of all grading activities, especially after major storm events, and determine that they are functioning as designed and that proper maintenance is being performed. Deficiencies shall be immediately corrected, as determined by and implemented under the observation of the engineer of record.

Conclusion: Implementation of **Mitigation Measures 25-29** would reduce the potential impacts related to soil erosion to a less than significant level.

Source: E.T. Easter and Craig Harwood, C.E.G. (2010); 2011 MND.

6.c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, severe erosion, liquefaction or collapse?		X		
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Discussion: The 2011 MND determined that there would be less than significant impacts associated with geological instability with the implementation of mitigation measures.

Potential for landslides in the revised project area is discussed in **Section 6.a.iv** above, potential for significant erosion is discussed in **Section 6.b** above, and potential for seismic-related ground failure, including liquefaction and collapse, is discussed in **Section 6.a.iii** above. The revised project area is not located in an area with an identified risk for lateral spreading or subsidence.

Conclusion: Implementation of **Mitigation Measures 21-29** above would reduce the impacts associated with geological instability to a less than significant level.

Source: E.T. Easter and Craig Harwood, C.E.G. (2010); 2011 MND.

6.d. Be located on expansive soil, as noted in the 2010 California Building Code, creating significant risks to life or property?		X		
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Discussion: According to Easter and Harwood (2010), expansive soils can develop within areas underlain by some units within the Franciscan Complex, such as serpentine and mélangé, both of which are present to some degree at the extended Phase 1 project area. These soils can develop into expansive soils as they weather. Geotechnical studies revealed soils with moderately high expansion potential near the project site; therefore, it is reasonable to assume

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that some areas within the project area will have soils of a moderate to moderately high expansion potential.

Conclusion: Implementation of **Mitigation Measure 21** above (**Section 6.a.iii**) requires a subsurface investigation report and will address expansive soils and recommended mitigations (if necessary), thus reducing impacts associated with expansive soils to a less than significant level. Therefore, the revised project would have less than significant impacts with implementation of mitigation measures.

Source: E.T. Easter and Craig Harwood, C.E.G. (2010); 2011 MND.

6.e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
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Discussion: The revised project would not involve the construction or use of septic tanks or alternative wastewater disposal systems.

Conclusion: The revised project would have no impacts associated with soil capability to adequately support septic tanks or alternative wastewater disposal systems. Therefore, the revised project would have no impact.

Source: Project Plans; 2011 MND.

7. CLIMATE CHANGE. Would the project:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
7.a. Generate greenhouse gas (GHG) emissions (including methane), either directly or indirectly, that may have a significant impact on the environment?			X	

Discussion: The proposed grading associated with the revised project would result in the temporary generation of greenhouse gas (GHG) emissions at the revised project site. In general, construction involves GHG emissions mostly due to exhaust from vehicle trips (e.g., construction vehicles and personal cars of construction workers). Due to the rural location of the project site, and assuming construction vehicles and workers are based in urban areas, potential project GHG emission levels would increase slightly. Vehicle trips would be minimized since the project does not involve the disposal or distribution of grading spoils to any off-site location.

According to the traffic study conducted by CH2MHill (**Appendix F**), the revised project is expected to generate approximately 69 trips per weekday peak hour, and 130 trips per Saturday peak hour (refer to **Section 16, Transportation/Traffic**). This represents a 20 percent increase from the previously approved Phase 1 Project trip generation estimates.

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According to the BAAQMD CEQA Guidelines (2011), the GHG threshold of significance for project-related carbon dioxide (CO₂) emissions is 1,100 metric tons of carbon dioxide equivalents (CO₂e) per year. The revised project is projected to generate a maximum of approximately 2,826 pounds of CO₂ per day (refer to **Table 5 in Section 3.a**), which is about 468 metric tons per year¹, well below the GHG threshold of significance. The BAAQMD CEQA Guidelines determined that anything below this threshold would have a less than significant impact to greenhouse gas emission generation.

Conclusion: The revised project would have less than significant impacts associated with GHG emissions.

Source: BAAQMD CEQA Guidelines (2011); CH2MHill, Traffic and Transportation (2013); Illingworth & Rodkin, 2013; Project Plans; 2011 MND.

7.b. Conflict with an applicable plan (including a local climate action plan), policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?		X		
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Discussion: The proposed 145,000 cy of grading would result in the temporary generation of GHG emissions along the haul route and at the rural project site. In general, construction involves GHG emissions mainly from exhaust from vehicle trips (e.g., construction vehicles and personal cars of construction workers). Due to the site's rural location and assuming construction vehicles and workers are based in urban areas, potential project GHG emission levels from construction would be increased from general levels. However, the proposal includes measures that would reduce vehicle trips and associated GHG emissions, as the project does not involve the disposal or distribution of grading spoils to any off-site location (72,500 cy of balanced cut and fill). The project does not involve the removal of protected trees (trees over 55" in circumference).

To ensure new development projects are compliant with the County's Energy Efficiency Climate Action Plan (EECAP), the County provides the EECAP Development Checklist. Planning staff has reviewed the proposal with the criteria of the checklist and found Criteria 15.1 pertaining to the idling of construction vehicles to be applicable to the project (no other criteria were applicable for the project). This criteria has been added as Mitigation Measure 30, below.

Mitigation Measure 30 (New Mitigation Measure): Idling grading or construction equipment shall to comply with best management practices from Bay Area Air Quality Management District guidance. Specifically, idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

Conclusion: With the implementation of Mitigation Measure 30, the project complies with the EECAP.

Source: Project Plans; San Mateo County Energy Efficiency Climate Action Plan (EECAP); Bay

¹ (2,826 lbs CO₂) x (365 days) = 1,031,490 lbs CO₂ per year, converted to metric tons = 468 metric tons per year.

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Area Air Quality Management District, California Environmental Quality Act, Air Quality Guidelines, Updated May 2011.				
7.c. Result in the loss of forestland or conversion of forestland to non-forest use, such that it would release significant amounts of GHG emissions, or significantly reduce GHG sequestering?				X
<p>Discussion: The revised project area does not contain any forest land, and very few trees are located within the revised project area. It should be noted that, with the implementation of Mitigation Measure 12, any damage to existing trees will be reduced to a less than significant level. On-site habitats are best described as ruderal vegetation communities and weedy non-native forb and grassland species.</p> <p>Conclusion: The revised project would have no impact associated with the loss of forestland.</p> <p>Source: Valerius, 2013; Google Earth, 2013; 2011 MND.</p>				
7.d. Expose new or existing structures and/or infrastructure (e.g., leach fields) to accelerated coastal cliff/bluff erosion due to rising sea levels?				X
<p>Discussion: The project site is not located on or adjacent to a coastal cliff or bluff. The Skylawn property is located in an unincorporated portion of San Mateo County that is bordered to south by Highway 92. Undeveloped lands, managed by the San Francisco Public Utility Commission (SFPUC), border the property to the north and east. Privately-owned land that is generally undeveloped (with the exception of limited agricultural uses) borders a portion of the property to the west. The project site is located 400 to 1,000 feet above sea level and is approximately 5 miles from the Pacific Ocean and the San Francisco Bay. According to the Pacific Institute's California Flood Risk: <i>Sea Level Rise for the San Mateo Quadrangle</i>, projected sea level rise would not impact the project site.</p> <p>Conclusion: The revised project would have no impact associated with sea level rise and coastal cliff/bluff erosion.</p> <p>Source: Google Earth, 2013; Pacific Institute, 2009; 2011 MND.</p>				
7.e. Expose people or structures to a significant risk of loss, injury or death involving sea level rise?				X
<p>Discussion: See response in Section 7.d above.</p> <p>Conclusion: The revised project would have no impacts associated with sea level rise.</p> <p>Source: Google Earth, 2013; Pacific Institute, 2009; 2011 MND.</p>				
7.f. Place structures within an anticipated 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood				X

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Insurance Rate Map or other flood hazard delineation map?				
<p>Discussion: The 2011 MND determined that there would be no impacts associated with flood hazards. According to the Flood Insurance Rate Maps (FIRM) produced by the Federal Emergency Management Agency (FEMA), the revised project site is not located in a flood hazard zone, and is not in an area that may be inundated by a 100-year flood.</p> <p>The extended Phase 1 Project area is contained within the same zone as the Phase 1 Project according to the FIRM. The current project site is located in Zone X, an area of minimal flood hazard, usually depicted on FIRMs as above the 500-year flood level. Additionally, the project does not involve the construction of any structures, only earthwork related to the creation of burial sites.</p> <p>Conclusion: The revised project would have no impacts associated with a 100-year flood hazard area.</p> <p>Source: FEMA, 2012; 2011 MND.</p>				
7.g. Place within an anticipated 100-year flood hazard area structures that would impede or redirect flood flows?				X
<p>Discussion: See response in Section 7.f above.</p> <p>Conclusion: The revised project would have no impact associated with a 100-year flood hazard area.</p> <p>Source: FEMA, 2012; 2011 MND.</p>				

8. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
8.a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (e.g., pesticides, herbicides, other toxic substances, or radioactive material)?		X		
<p>Discussion: The 2011 MND identified significant impacts associated with the use of small amounts of hazardous materials for the general maintenance of the cemetery lawns and facilities, as well as body embalming. The impacts can be reduced to less than significant levels through implementation of the mitigation measures identified in the 2011 MND, which will be included in the revised project. These measures involve complying with requirements set forth by the County Environmental Health Division and the development of a safety plan for Phase I development. Furthermore, the revised project does not directly involve the use or storage of</p>				

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hazardous materials. The project involves the creation and use of burial sites within an already existing cemetery.

The following mitigation measures were included in the 2011 MND, and will also apply to the revised project.

Mitigation Measure 31 (2011 MND Mitigation Measure 21): The applicant shall comply with and follow all guidelines and regulatory requirements as stipulated by the County Environmental Health Division with regard to their use and disposal of all chemicals and fluids resulting from the embalming processes that occur at the Skylawn mortuary.

Mitigation Measure 32 (2011 MND Mitigation Measure 22): The project applicant (or authorized contractor) shall submit a safety plan for the development of Phase 1. The safety plan shall include measures to reduce and minimize accidents on-site and measures that address the proper procedures to clean up and contain spills. The safety plan shall be approved by the County Building Inspection Section prior to the start of any construction or grading activity on the site.

Conclusion: The revised project would not substantially increase the severity of the previously identified hazards and hazardous material impacts identified in the 2011 MND. Implementation of the above mitigation measures would reduce any impacts related to the public or environment associated with hazardous materials to a less than significant level.

Source: Project Plans; 2011 MND.

8.b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?		X		
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Discussion: The 2011 MND identified potentially significant impacts associated with construction activities, resulting from vehicles operated by gasoline and diesel, as well as minor amounts of other hazardous material that may be present at the site during construction activities. These potential impacts can be reduced to less than significant levels through implementation of the mitigation measures identified in the 2011 MND. **Mitigation Measures 31 and 32** above (**Section 8.a**) would be implemented and the revised project does not directly involve the use or storage of hazardous materials.

Conclusion: The revised would not substantially increase the severity of the previously identified hazards and hazardous material impacts identified in the 2011 MND. Implementation of the above mitigation measures would reduce any impacts related to the public or environment associated with hazardous materials to a less than significant level.

Source: Project Plans; 2011 MND.

8.c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
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Discussion: The revised project area is not located within a quarter mile of an existing or proposed school. See **Section 8.a** for a discussion of impacts related to the use of hazardous materials at the site.

Conclusion: The revised project would have no impact to existing or proposed schools within one quarter mile of the project site.

Source: Project Plans; Google Earth, 2013; 2011 MND.

8.d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
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Discussion: The revised project site is not listed on a hazardous materials site.

Conclusion: The revised project would not have any impact to the public or the environment resulting from being located on a hazardous materials site. Therefore, the revised project would not result in a new significant impact not identified in the 2011 MND.

Source: California Department of Toxic Substances Control's (DTSC's) Hazardous Waste and Substances Site List: http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm. Accessed 8/12/2013.

8.e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, result in a safety hazard for people residing or working in the project area?				X
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Discussion: The revised project site is not located within an area regulated by an airport land use plan, nor is it located within 2 miles of a public airport or public use airport. The Half Moon Bay Airport is located 6.8 miles west of the revised project area, and San Francisco International Airport is located over 8 miles to the north.

Conclusion: The revised project would have no impact to people residing or working in the project area resulting from its vicinity to a public airport or public use airport.

Source: Google Earth, 2013; 2011 MND.

8.f. For a project within the vicinity of a private airstrip, result in a safety hazard for people residing or working in the project area?				X
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Discussion: Should the project site be within the vicinity of a private airstrip, the project would not result in a new safety hazard as the project involves the creation and use of burial sites in an already existing cemetery.

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<p>Conclusion: The revised project would have no impact to people residing or working in the project area resulting from its vicinity to a private airstrip.</p> <p>Source: Google Earth, 2013; 2011 MND.</p>				
8.g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
<p>Discussion: The 2011 MND determined that there would be no impacts to an adopted emergency response plan or emergency evacuation plan since implementation of the original project would not change the circulation or configuration of existing roadways, and access to the project site would be provided by the existing roadways.</p> <p>According to the traffic study conducted by CH2MHill (see Appendix F), the project will not involve any redesign of geometric features on public roadways and will maintain emergency access. Emergency vehicles concurrently access the site without any difficulty; therefore, public safety will not be jeopardized by the construction of the project.</p> <p>Conclusion: Implementation of the revised project would have no impact to an adopted emergency response plan or emergency evacuation plan.</p> <p>Source: Project Plans; 2011 MND; Traffic Study by CH2MHill.</p>				
8.h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?				X
<p>Discussion: The revised project site is designated as a moderate fire hazard safety zone by the Fire and Resource Assessment Program, California Department of Forestry and Fire Protection (FRAP). The area contains mostly grasslands, although it may be flammable during dry seasons, it does not have significant fuel content to sustain a fire that may be started.</p> <p>Furthermore, the revised project would not result in the introduction of housing at the site. Visitors would be on the property during ceremonies or during visiting hours, and typically would remain on the property for an hour or two.</p> <p>Conclusion: The revised project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.</p> <p>Source: Project Plans; FRAP 2007; 2011 MND.</p>				
8.i. Place housing within an existing 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X

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<p>Discussion: See response in Section 7.f above.</p> <p>Conclusion: The revised project would not place housing within a 100-year flood hazard area as mapped on a Flood Insurance Rate Map.</p> <p>Source: FEMA, 2012; 2011 MND.</p>				
8.j. Place within an existing 100-year flood hazard area structures that would impede or redirect flood flows?				X
<p>Discussion: See response in Section 7.g above.</p> <p>Conclusion: The revised project would not place structures within a 100-year flood hazard area as mapped on a Flood Insurance Rate Map.</p> <p>Source: FEMA, 2012; 2011 MND.</p>				
8.k. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?				X
<p>Discussion: See responses in Sections 7.f and 7.g.</p> <p>According to Chapter 4.7 in the San Mateo General Plan Update Draft Environmental Impact Report (2009), there are six dams within the City of San Mateo, none of which would have any impact to the project site during a major seismic event. These include Crystal Springs, San Andreas, Laurel Creek, East Laurel Creek (2), and Tobin Creek in Hillsborough. Seismic safety studies conducted in 1977 concluded that the risk of structural damage to the Crystal Springs Dam associated with a maximum magnitude 8.3 on the Richter scale earthquake is low. Seismic safety studies conducted in 1979 and 1983 indicated that the San Andreas Dam would likely remain stable during strong seismic shaking. The most recent reports by the California Division of Safety of Dams (DSOD) indicate that the Laurel Creek Dam is structurally safe and will perform without failure during a major seismic event. East Laurel Creek and Tobin Creek Dams are too small to be regulated by the DSOD, and seismic stability is unknown. All of the dams are located at a lower elevation than the revised project site; in the event of a failure, it is unlikely that the revised project site would be affected.</p> <p>Conclusion: The revised project would not place structures within a 100-year flood hazard area as mapped on a Flood Insurance Rate Map nor would it be affected by the failure of a dam or levee.</p> <p>Source: San Mateo General Plan Update Draft Environmental Impact Report (2009), page 4.7-3/4; FEMA, 2012; 2011 MND.</p>				
8.l. Inundation by seiche, tsunami, or mudflow?				X

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Discussion: The project is not located on or adjacent to a coastal cliff or bluff. The project site is located 400 to 1,000 feet above sea level, and is approximately 5 miles from the Pacific Ocean and the San Francisco Bay. Undeveloped lands, managed by the San Francisco Public Utility Commission (SFPUC), border the property to the north and east. Privately-owned land that is generally undeveloped (with the exception of limited agricultural uses) borders a portion of the property to the west.

Conclusion: The revised project site would not be inundated by a seiche, tsunami, or mudflow given its proximity to the ocean. Therefore, the revised project would have no impact.

Source: Google Maps, 2013; 2011 MND.

9. HYDROLOGY AND WATER QUALITY. Would the project:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
9.a. Violate any water quality standards or waste discharge requirements (consider water quality parameters such as temperature, dissolved oxygen, turbidity and other typical stormwater pollutants (e.g., heavy metals, pathogens, petroleum derivatives, synthetic organics, sediment, nutrients, oxygen-demanding substances, and trash)?		X		

Discussion: No defined drainage system is present in the revised project area. Surface water runoff, including irrigation, flows along the natural topography of the site (sheet flow) and eventually infiltrates into the soil or enters into the natural channels on other portions of the Skylawn property. The revised project includes stormwater management strategies that would minimally impact the configuration of the natural drainage channels so as to achieve minimal change to the quantity and quality of water entering the channels. Where any grade alterations are made by project improvements, vegetated slope retention systems would be used to transition to existing grade, if possible. The project's applicant goal is to provide clean water to the natural drainage channels at the same rate and quantity at which they receive water in the current, pre-development state. The County requires post-construction stormwater control systems as part of their obligations under Provision C.3 of the Municipal Regional Stormwater NPDES Permit (MRP) adopted by the State Water Resources Control Board in October 2009. As such, all project stormwater management strategies would be designed in accordance with County's requirements mandated under Provision C.3. This would ensure that post-construction water runoff would not violate water quality standards. The revised project would not generate wastewater. As discussed in **Section 6.b**, there is potential for construction-related stormwater pollution impacts due to proposed grading activities. These impacts would be reduced to a less

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than significant level with the implementation of mitigation measures as shown in **Section 6.b.** Therefore, no wastewater discharge requirements would be violated.

Conclusion: With the implementation of mitigation measures listed in **Section 6.b.**, the revised project would have a less than significant impact to water quality standards or wastewater discharge.

Source: Project Plans; 2011 MND.

<p>9.b. Significantly deplete groundwater supplies or interfere significantly with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?</p>				<p>X</p>
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Discussion: The 2011 MND determined that implementation of the Phase 1 Project would not interfere substantially with groundwater recharge such that it would result in a deficit in aquifer volume or lowering of the local groundwater table. Water is supplied to the site by two sources: an existing water well and water from the Coastside County Water District (District). The District supplies non-potable water to the project site for irrigation of the burial lawns and associated landscape.

The private water well, located near the old quarry site, provides potable water to the funeral home, reception building, and the old administrative building, which are all uses located outside of the revised project area. As the revised project would not include improvements that require potable water, there would not be an increase demand for this well water as a result of the revised project.

Conclusion: The revised project would have no impact on groundwater supplies or groundwater recharge.

Source: Project Plans; 2011 MND.

<p>9.c. Significantly alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in significant erosion or siltation on- or off-site?</p>		<p>X</p>		
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Discussion: Slopes on the project site range from 0 percent to over 30 percent. If uncontrolled, construction-related activities on steep slopes could result in erosion and sedimentation into nearby drainages and result in hydrograph modification to Pilarcitos Creek and its tributaries. Erosion and sedimentation could adversely affect the biological value of nearby creeks and other habitats by filling pools (in drainages), creating conditions favorable to non-native plant species,

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and other factors. Therefore, impacts from construction activities on steep slopes are considered potentially significant. The 2011 MND determined that there would be less than significant impacts to the existing drainage pattern of the site with the implementation of Mitigation Measure 8 identified in the 2011 MND:

Mitigation Measure 33 (2011 MND Mitigation Measure 8): The project applicant shall file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and shall submit proof of filing said NOI to the Planning and Building Department prior to beginning any grading or construction activities. The applicant and all grading/construction contractors shall adhere to all conditions and regulations associated with the State General Construction Activity NPDES Permit.

Compliance with the above regulations (Provision C.3) for the revised project site is mandatory and would ensure that drainage patterns are not significantly altered and would prevent a significant increase in the rate or amount of surface runoff. As described in **Section 6.b; Geology and Soils**, best management practices will be implemented during construction in adherence with local regulations to protect water quality to local waterways. Additionally, all project storm management strategies would be designed in accordance with the County's requirements mandated under Provision C.3. Implementation of Mitigation Measures 26-29 and 33 will ensure that impacts related to soil erosion and sedimentation during project construction and operation would not be significant.

Conclusion: The revised project would have less than significant impacts to the existing drainage pattern of the site with the implementation of the above mitigation measures.

Source: Project Plans; 2011 MND.

9.d. Significantly alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or significantly increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?		X		
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Discussion: See response in **Section 9.c** above.

Conclusion: The revised project would have less than significant impacts to the existing drainage pattern of the site with the implementation of **Mitigation Measure 27** above.

Source: Project Plans; 2011 MND.

9.e. Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide significant additional sources of polluted runoff?		X		
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Discussion: See responses in **Sections 9.a and 9.c** above.

The revised project would result in new impervious surface and associated run-off at the Phase 1 Project and extended Phase 1 Project area; however, the applicant proposes to construct new stormwater drainage facilities, as required by Provision C.3 of the Municipal Regional Permit. Construction of these facilities would prevent impacts to existing or planned stormwater drainage systems or creation of significant additional sources of polluted runoff.

Conclusion: The revised project would have less than significant impacts associated with runoff with the implementation of **Mitigation Measures 26-29 and 33** above.

Source: Project Plans; 2011 MND.

9.f. Significantly degrade surface or groundwater water quality?		X		
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Discussion: See response in **Section 9.c** above.

Compliance with the County's Drainage Policy and Provision C.3 of the San Francisco Bay Region Municipal Regional Permit is mandatory and would prevent significant degradation of surface water quality after construction. Implementation of **Mitigation Measures 26-29 and 33** would reduce construction-related stormwater impacts to a less than significant level.

Although localized springing of groundwater occurs at some areas within the project area, based on a review of historical aerial photos, and the geologic mapping and reconnaissance of the site, these occurrences are judged to be the result of focused seepage in closely spaced fractures within the Franciscan complex sandstone. The site is located on a high ridge underlain at shallow depths by hard bedrock, and is not located in an area known to have a shallow groundwater table. Furthermore, the Gazos soil series mapped at the site is characterized as having no known occurrences of high groundwater associated within them. Water wells on Cahill Ridge typically draw water from hundreds of feet below the ground surface. The project involves earth excavation, with cut depths not exceeding 20 feet in depth.

Conclusion: The revised project would have less than significant impacts associated with surface or groundwater water quality with the implementation of **Mitigation Measures 26-29 and 33** above.

Source: E.T. Easter and Craig Harwood, C.E.G. (2010); 2011 MND.

9.g. Result in increased impervious surfaces and associated increased runoff?		X		
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Discussion: See responses in **Sections 9.c and 9.e**.

Conclusion: The revised project would have less than significant impacts associated with increased impervious surfaces and runoff with the implementation of **Mitigation Measures 26-29 and 33** above.

Source: Project Plans; 2011 MND.

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10. LAND USE AND PLANNING. Would the project:				
	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
10.a. Physically divide an established community?				X
<p>Discussion: The revised project includes the addition of 7 acres to the approved Phase 1 Project. No land uses, other than the existing cemetery, exist around the revised project area. Therefore, implementation of the revised project would not physically divide an established community.</p> <p>Conclusion: The revised project would have no impact to an established community.</p> <p>Source: Project Plans; 2011 MND.</p>				
10.b. Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X
<p>Discussion: The cemetery facility has operated with a County-issued Use Permit since 1955. The 2011 MND determined that the project would be consistent with the lawful land use designation for the site.</p> <p>The revised project does not involve the introduction of any land uses not already lawfully occurring on the subject property. The expansion of cemetery facilities is not expected to result in any changes in land use either on or off the project site.</p> <p>Conclusion: The revised project would have no impact associated with applicable land use plans, policies, or regulations.</p> <p>Source: Project Plans; 2011 MND.</p>				
10.c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				X
<p>Discussion: See discussion above in Section 4.f.</p> <p>The Bay Area Ridge Trail is a long-distance, continuous trail extending over 340 miles throughout the Bay Area, and connects over 75 parks and open spaces. It provides a protected greenbelt corridor for habitat and wildlife. In San Mateo County, it meanders along the eastern side of Skyline Ridge, along a portion of Pilarcitos Road. The revised project site is approximately 0.5 miles away from the closest point of this trail. With the Project, access to the</p>				

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Fifield-Cahill Ridge Trail will be maintained via Cahill Ridge Road. This existing service/circulation road will continue to provide public multi-use access between SR-92 and the Fifield-Cahill Ridge Trail through the Skylawn Memorial Park. Future plans for Cahill Ridge Road include a new trail alignment/designation as part of the Bay Area Ridge Trail network. Existing portions of the road within the park will remain under Skylawn Memorial Park ownership, while portions of the trail outside of Skylawn property will be owned and maintained by the San Francisco Water Department. The improvements proposed under the revised project would not conflict with the Bay Area Ridge Trail or access to the trail.

Conclusion: The revised project would not conflict with an HCP, or any other approved local, regional, or State habitat conservation plan.

Source: Bay Area Ridge Trail Map: <http://www.ridgetrail.org>. Accessed 8/12/2013; 2011 MND.

10.d. Result in the congregating of more than 50 people on a regular basis?			X	
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Discussion: The 2011 MND determined that there would be less than significant impacts associated with congregation resulting from project implementation.

The current number of memorial services is approximately 600 burials per year. Attendance at these services is extremely variable, but can result in the congregation of more than 50 people on a regular basis. This type of attendance is typical of the existing cemetery development. Furthermore, the cemetery has operated with a County-issued Use Permit since 1955, with congregation of more than 50 people on a regular basis since that time.

The extended Phase 1 area would not significantly increase the number or size of burials, and no physical impact would be expected to occur to the existing environment from the intermittent congregation of more than 50 people. Furthermore, the revised project is expected to only add an estimated 12 vehicle trips in the weekday midday peak hour and an estimated 22 vehicle trips in the Saturday midday peak hour, from the previously approved 2011 MND². As stated in **Section 16.a**, project traffic would not result in a significant impact.

Conclusion: The revised project would have less than significant impacts associated with the congregation of more than 50 people.

Source: CH2M Hill, 2013; Project Plans; 2011 MND.

10.e. Result in the introduction of activities not currently found within the community?				X
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Discussion: The 2011 MND determined that there would be no impacts to the current activities found within the community.

The revised project involves the expansion of the existing cemetery use within the Skylawn Memorial Park property. While the project would result in the expansion of the Skylawn facility, it would not result in any new or expanded public utilities, new industry, or new commercial facilities. Implementation of Phase 1 development would result in new roadways to provide access to new cemetery burial areas on the site. However, these roadways would be private

² In the 2011 MND, weekday midday peak hour trips were estimated at 57 and Saturday midday peak hours were estimated at 108.

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and would not provide access to other portions of the County and are, therefore, not considered growth inducing. The project would not introduce activities not currently found within the community.

Conclusion: The revised project would have no impact to activities taking place within the community.

Source: Project Plans; 2011 MND.

10.f. Serve to encourage off-site development of presently undeveloped areas or increase development intensity of already developed areas (examples include the introduction of new or expanded public utilities, new industry, commercial facilities or recreation activities)?				X
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Discussion: The 2011 MND determined that there would be no impacts to undeveloped or developed areas, nor would there be introduction of new or expanded public utilities, industry, commercial facilities, or recreation activities.

Development of the revised project would not introduce or encourage new or expanded public utilities, new industry, commercial facilities, or recreation activities off site. The revised project includes an additional 7 acres to an already approved use (i.e., cemetery facility) on the site. No off-site growth or development would occur as result of project implementation.

Conclusion: The revised project would have no impact to undeveloped or developed off-site areas, nor would there be introduction of new or expanded public utilities, industry, commercial facilities, or recreation activities.

Source: Project Plans; 2011 MND.

10.g. Create a significant new demand for housing?			X	
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Discussion: The revised project would increase the Phase 1 Project area by approximately 7 acres. The revised project includes the preparation of the land for future burials and access improvements. No permanent residences would reside on the site upon project implementation. The revised project is anticipated to result in minimal job creation, such that a significant new demand for housing is unlikely.

Conclusion: The revised project would have a less than significant impact to housing demand.

Source: Project Plans; 2011 MND.

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11. MINERAL RESOURCES. Would the project:				
	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
11.a. Result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the State?				X
<p>Discussion: Limestone is a sedimentary rock consisting mainly of calcium carbonate and is a useful material that is quarried and used directly as a building material. It is also an important raw material in the manufacture of cement and glass and iron. Like lime, it is a safe agrichemical to use on the land and does not produce the controversial side effects of artificial fertilizers, herbicides and pesticides, etc. The small abandoned quarry or "borrow pit" located in the northern portion of the Skylawn Memorial Park exposes a highly fractured, sheared and very hard limestone that occurs as a thin, northwest trending band through the northwestern portion of the site. In this area, the limestone is in contact with highly sheared, and fractured greenstone and sandstone of the Franciscan Complex. In fact, the quarry appears to have removed much of the limestone and exposes the contact with the sandstone to the east. The highly fractured nature of this material suggests it was borrowed for use as construction fill. The limited aerial extent of the deposit and other factors involving the difficulty of extraction (i.e., ripability, etc.) and transportation to the market area may deem it less than viable economically. Furthermore, as discussed in the 2011 MND, the mineral deposits on the project site are not designated as an available resource recovery site option.</p> <p>Conclusion: The revised project would have no impact on the availability of a known mineral resource.</p> <p>Source: E.T. Easter and Craig Harwood, C.E.G. (2010); 2011 MND.</p>				
11.b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X
<p>Discussion: See response in Section 11.a above.</p> <p>Conclusion: The revised project would have no impact on the availability of a locally important mineral resource recovery site.</p> <p>Source: E.T. Easter and Craig Harwood, C.E.G. (2010); 2011 MND.</p>				

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12. NOISE. Would the project result in:				
	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
12.a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		

Discussion: The 2011 MND determined that the Phase 1 Project would have less than significant impacts associated with noise levels in excess of standards established in the local noise ordinance with the implementation of mitigation measures. The project site is located in a rural area atop a coastal ridge and is far removed from any potential sources of significant noise that would be in excess of the County Noise Ordinance.

The extended Phase 1 Project area would also take place within the same vicinity described above. Moderate traffic from the nearby roadways is the main source of any noise on the revised project site. These roadways are at least 400 feet from any location within the revised project site; any traffic-related noise attenuates to a less than significant level by the time it reaches the ears of the cemetery patrons. Implementation of the revised project would generate temporary noise associated with grading and construction; however, such noises would be temporary, where volume and hours are regulated by the County Ordinance Code. Implementation of **Mitigation Measure 23** from the 2011 MND (**Mitigation Measure 34** below) has been updated to reflect recent changes in the County's Noise Ordinance would reduce any impacts to a less than significant level.

Mitigation Measure 34 (2011 MND Mitigation Measure 23): Noise levels produced by proposed construction activities shall comply with the San Mateo County Noise Ordinance contained in Chapter 7.30 (Noise Regulations) Chapter 4.88 (Noise Control) of the County Ordinance Code at all times (this measure has been updated in alignment with San Mateo County Noise Ordinance). Construction activities shall be limited to the hours from 7:00 a.m. to 6:00 p.m. 7:00 p.m., Monday through Friday, and 9:00 a.m. 8:00 a.m. to 5:00 p.m. on Saturday, ~~construction operations shall be prohibited on Sunday and any national holiday and 12:00 p.m. to 4:00 p.m. on Sundays and Holidays, or at such other hours as may be authorized or restricted by the permit, if at least one of the following noise limitations are met:~~

- a. No individual piece of equipment shall produce a noise level exceeding 90 dB at a distance of 25 feet. If the device is housed within a structure or trailer on the property, the measurement shall be made outside the structure at a distance as close to 25 feet from the equipment as possible.
- b. The noise level at any point outside of the property plane of the project shall not exceed 90 dB.
- c. The operation of leaf blowers shall additionally comply with Chapter 10.80 "Operation of Leaf Blowers" (Ordinance 2004-16 Section 1, 2004).

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Conclusion: The revised project would have a less than significant impact associated with noise levels in excess of standards established in the local noise ordinance with implementation of the above updated mitigation measure from the 2011 MND.

Source: Project Plans; 2011 MND; County's Noise Ordinance.

12.b. Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?		X		
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Discussion: The revised project would generate some ground-borne vibration and noise associated with grading during construction activities; however, these noises and vibration will be temporary and regulated by implementation of **Mitigation Measure 34** above.

Conclusion: The revised project will have a less than significant impact related to the generation of ground-borne vibrations or noise levels with the implementation of the above updated mitigation measure from the 2011 MND.

Source: Project Plans; 2011 MND.

12.c. A significant permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
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Discussion: The 2011 MND determined that there would be less than significant impacts associated with a permanent increase in ambient noise levels in the Phase 1 Project vicinity above levels existing without the project. The extended Phase 1 Project includes construction activities on an additional 7 acres of land north of the Phase 1 Project area.

The revised project would generate temporary noise associated with grading and construction. The project would not result in a significant permanent increase in ambient noise levels in the project vicinity, as the project would only result in noise associated with the operation of an already existing cemetery, and a minimal increase in traffic volume.

Regarding noise impacts related to project operation, the Phase 1 Project was expected to generate an estimated 57 trips in the weekday peak hour and 108 trips in the Saturday midday peak hour. According to CH2MHill (2013) (included as **Appendix F**) the revised project is anticipated to generate an estimated 69 trips in the weekday midday peak hours and an estimated 130 daily vehicle trips in the Saturday midday peak hour. This is an additional 12 trips in the weekday midday peak hour as an additional 22 trips in the Saturday midday peak hour from the Phase 1 Project, which would be distributed throughout the local roadways in the project vicinity. This minimal increase in traffic volume associated with the revised project would not result in a perceptible increase in ambient noise on or off the project site. Internal roadways would have reduced speed limits between 5 and 10 miles per hour (mph). As such, internal traffic would not generate a significant amount of noise on the project site. Therefore, after the construction phase is complete, normal cemetery operations are not expected to result in significantly elevated noise within or surrounding the project site.

Conclusion: The revised project would have a less than significant impact associated with a permanent increase in ambient noise levels in the project vicinity above levels existing without the project.

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Source: Project Plans; CH2MHill, Traffic and Transportation (2013); 2011 MND.				
12.d A significant temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?		X		
<p>Discussion: The 2011 MND determined that the Phase 1 Project would have less than significant impacts associated with a temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.</p> <p>See discussion in Sections 12.a and 12.c above.</p> <p>Conclusion: The revised project would have a less than significant impact associated with a temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project with the implementation of updated Mitigation Measure 34 above from the 2011 MND.</p> <p>Source: Project Plans; 2011 MND.</p>				
12.e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, exposure to people residing or working in the project area to excessive noise levels?				X
<p>Discussion: The revised project site is not located within an area regulated by an airport land use plan nor is it located within 2 miles of a public airport or public use airport. The Half Moon Bay Airport is located 6.8 miles west of the revised project area, and San Francisco International Airport is located over 8 miles to the north. Given the distance of the nearby airports, and the lack of residences in the area and on the project site, there would be no significant exposure to people residing or working in the revised project area to excessive noise levels.</p> <p>Conclusion: The revised project would have no noise impacts related to an airport land use plan, a public airport, or a public use airport.</p> <p>Source: Google Earth 2013, Project Plans; 2011 MND.</p>				
12.f. For a project within the vicinity of a private airstrip, exposure to people residing or working in the project area to excessive noise levels?				X

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Discussion: Should the project border private airstrip(s), noise levels from these uses are minimal as the major noise source in the area is highway traffic (which is discussed in **Section 12.a** above). Therefore, implementation of the revised project is likely to have no impact related to the exposure of people walking in the project area to noise sources from any private airstrips. No residences exist on-site.

Conclusion: The revised project would have no impacts related to a private airstrip.

Source: Google Earth 2013, Project Plans; 2011 MND.

13. POPULATION AND HOUSING. Would the project:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
13.a. Induce significant population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X

Discussion: The 2011 MND determined that the Phase 1 Project would have no impact on population and housing with the project vicinity.

The revised project does not include the construction of any residential units. The expansion of the developed areas of the existing cemetery is not likely to result in significant job creation that would create a significant population growth in the area. The revised project involves the extension of an existing road within the cemetery that would not be available for public use nor would it provide access to other portions of the County, and therefore, would not be considered growth inducing.

Conclusion: The revised project would have no impacts on population and housing.

Source: Project Plans; 2011 MND.

13.b. Displace existing housing (including low- or moderate-income housing), in an area that is substantially deficient in housing, necessitating the construction of replacement housing elsewhere?				X
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Discussion: See discussion in **Section 13.a** above.

Conclusion: The revised project would have no impacts on housing.

Source: Project Plans; 2011 MND.

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14. **PUBLIC SERVICES.** Would the project result in significant adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
14.a. Fire protection?				X
14.b. Police protection?				X
14.c. Schools?				X
14.d. Parks?				X
14.e. Other public facilities or utilities (e.g., hospitals, or electrical/ natural gas supply systems)?				X

Discussion: The 2011 MND determined that there would be less than significant impacts to public services. Minor increases in employment and visitors associated with the Phase 1 development project would not encourage any significant increase in population that would affect public transit usage, the capacity of nearby schools, parks, hospitals, public utilities, nor would it substantially increase demand for emergency services or increase the frequency of emergency response calls to the project site.

While the project would result in the expansion of the Skylawn facility, it would not result in any new or expanded public utilities, new industry, or new commercial facilities. Similarly, the extended Phase 1 Project area would not necessitate new or physically altered government facilities, nor would it affect service ratios, response times, or other performance objectives for any of the public services.

Conclusion: The revised project would have no impacts to public services.

Source: Project Plans; 2011 MND.

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15. RECREATION. Would the project:				
	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
15.a. Increase the use of existing neighborhood or regional parks or other recreational facilities such that significant physical deterioration of the facility would occur or be accelerated?				X
<p>Discussion: See discussion in Section 14.a above.</p> <p>The extended Phase 1 Project area would involve the preparation of land for future burials and access improvements in the revised project area. Implementation of the revised project involves the extension of burial uses within an already existing cemetery, which will not induce significant population growth that would utilize recreational facilities. Furthermore, visitors to the revised project area would attend burial ceremonies and are not likely to use any recreational facilities in the area. The revised project would not result in increased usage of existing neighborhood or regional parks, or other recreational facilities.</p> <p>Conclusion: The revised project would have no impact on existing neighborhood or regional parks or other recreational facilities.</p> <p>Source: Project Plans; 2011 MND.</p>				
15.b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
<p>Discussion: See discussion in Sections 14.a and 15.a above.</p> <p>The revised project does not include recreational facilities or require the construction or expansion of recreational facilities.</p> <p>Conclusion: The revised project would have no impact on recreational facilities.</p> <p>Source: Project Plans; 2011 MND.</p>				

16. TRANSPORTATION/TRAFFIC. Would the project:				
	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
16.a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including, but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			X	

Discussion: The Skylawn property is located adjacent to and north of SR-92 at the junction of SR-35 (Skyline Boulevard). Regional access to the property is provided from the east by I-280. SR-92 provides direct access to the property from the northeast and west. Skyline Boulevard provides direct access to the property from the south and the north. The Skylawn property has one main entry driveway on eastbound SR-92, which shares the same centerline as Skyline Boulevard.

The *City/County Association of Governments of San Mateo County 2011 Congestion Management Program (C/CAG, 2011)* has identified the freeways, streets, highways and intersections in San Mateo County that should be monitored traffic-wise. This document also sets traffic Level of Service standards (LOS) on Congestion Management Program (CMP) roadways. LOS E³ was set to be the desired standard on the SR-92 segment between SR-1 and I-280. The two intersections within the project vicinity, SR-92/Skyline Boulevard and SR-92/Skylawn Memorial Park Driveway, are not designated as CMP intersections.

Existing Traffic Conditions and Level of Service Analysis

The intersection analysis includes two intersections: SR-92/Skyline Boulevard and SR-92/Skylawn Memorial Park Driveway. Both are unsignalized intersections. The intersection analysis was conducted using Synchro, Version 8, which incorporates the most recent Highway Capacity Manual methodology. Existing weekday (Friday) midday peak hour and Saturday midday peak hour turning movement counts were collected on Friday May 15, 2009, and Saturday May 16, 2009, respectively.

Although the field counts were taken in 2009, they are assumed to represent existing year (2013) conditions. Based on historical average annual daily traffic volumes gathered on California state highways since 2008, traffic has decreased slightly. Between the year of the

³ Level of Service (LOS) is a qualitative measure of operating conditions within a traffic stream, where LOS A represents free-flow activity and LOS F represents overcapacity operation.

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count data (2009) and 2012, daily traffic decreased by approximately 1 percent. Because average annual traffic within the state has shown a general trend of contraction in the recent past, analyzing 2009 field counts as the existing year condition is reasonable.

The resulting delay is expressed in terms of Level of Service (LOS), where LOS A represents free-flow activity and LOS F represents overcapacity operation. The relationship of delay and LOS at unsignalized intersections is summarized in **Table 6**. The *City/County Association of Governments of San Mateo County Final Congestion Management Program for 2011 (C/CAG, 2011)* identified SR-92 as a CMP roadway. LOS E was set to be the desired standard on the SR-92 segment between SR-1 and I-280. The two intersections studied were not designated as CMP intersections; therefore, the focus of the analysis will be on the SR-92 segments through these intersections.

LOS	Unsignalized Intersection Control Delay (seconds per vehicle)
A	≤10.0
B	>10.0 and ≤15.0
C	>15.0 and ≤25.0
D	>25.0 and ≤35.0
E	>35.0 and ≤50.0
F	>50.0

Source: Highway Capacity Manual 2010 Exhibit 19-1.

The results of the analysis are presented in **Table 6**. Both intersections operate at an acceptable LOS A overall when considering volume on all approaches.

Table 7 Intersection LOS - Existing Conditions					
	Overall Intersection Operation		Worst-Case Movement		
	Average Delay*	LOS	Movement	Average Delay	LOS
Friday Peak Hour					
1. Skylawn Memorial Park Driveway / SR-92	0.41	A	Southbound Left	38.6	E
2. Skyline Boulevard / SR-92	1.60	A	Northbound Left	42.0	E
Saturday Peak Hour					
1. Skylawn Memorial Park Driveway / SR-92	1.39	A	Southbound Left	113.3	F
2. Skyline Boulevard / SR-92	4.26	A	Northbound Left	149.9	F
<p>*Average Delay is a weighted average of all movements' delays. Reporting intersection LOS as a whole is not the standard methodology described in the HCM 2010 for unsignalized intersections, and is reported for comparison purposes only. Source: CH2MHill, Traffic and Transportation (2013).</p>					

During the Friday peak hour, the motorists exiting the project site and turning left onto eastbound SR-92 will experience acceptable delays. Vehicles turning left from Skyline Boulevard onto westbound SR-92 will experience delays and would operate at LOS E. During the Saturday peak hour, the motorists exiting the project site and turning left onto eastbound SR-92, as well as those turning left from Skyline Boulevard onto westbound SR-92, will experience LOS F delays; however, motorists traveling through on SR-92 will not be affected by those delays.

Impact Analysis

The results of the analysis are presented in **Table 7**. Overall, both intersections operate at an acceptable LOS. During the Friday and Saturday peak hours, the motorists exiting the project site and turning left onto eastbound SR-92, as well as those turning left from Skyline Boulevard onto westbound SR-92 will experience long delays and LOS F operating conditions; however, motorists traveling on SR-92 will not be affected by these delays.

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Table 8 Intersection LOS - 2030 No-Build Scenario					
	Overall Intersection Operation		Worst-Case Movement		
	Average Delay*	LOS	Movement	Average Delay	LOS
Friday Peak Hour					
1. Skylawn Memorial Park Driveway / SR-92	0.52	A	Southbound Left	64.7	F
2. Skyline Boulevard / SR-92	3.01	A	Northbound Left	88.1	F
Saturday Peak Hour					
1. Skylawn Memorial Park Driveway / SR-92	3.09	A	Southbound Left	319.7	F
2. Skyline Boulevard / SR-92	19.62	C	Northbound Left	787.1	F
*Average Delay is a weighted average of all movements' delays. Reporting intersection LOS as a whole is not the standard methodology described in the HCM 2010 for unsignalized intersections, and is reported for comparison purposes only. Source: CH2MHill, Traffic and Transportation (2013).					

As shown in **Table 8**, operations at the two intersections, SR-92/Skyline Boulevard and SR-92/Skylawn Memorial Park Driveway, were found to remain acceptable (LOS A-C) during peak weekday and weekend traffic hours for project implementation through 2030. Motorists traveling eastbound or westbound on SR-92 would continue to experience little or no delays due to the project, which is consistent with the CMP.

There are currently no sidewalks or crosswalks along SR-92 near the entrance of Skylawn Memorial Park. The project is expected to generate vehicular traffic only. Based on the foregoing, the expansion of Skylawn will not likely increase pedestrian traffic, nor create change in existing pedestrian patterns. New pedestrian and bicycle facilities are still in the planning phases, and it is expected that the traffic growth observed will be taken into account when the improvement projects are developed and implemented.

Given the above, the revised project would not substantially increase the severity of potential traffic (including vehicle, pedestrian, and bicycle traffic) impacts identified in the 2011 MND, and would remain consistent with the CMP.

Conditions During Construction

According to the traffic study conducted by CH2M HILL (see **Appendix F**), construction of the revised project is expected to have little to no effect on traffic conditions on SR-92 during peak hours. Large construction equipment and vehicles required for the revised project are anticipated to arrive on the site at the start of construction during two days of mobilization, and

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will remain on-site throughout the 130-day construction duration. At the end of construction, equipment would be removed from the site over the course of just one or two days. During mobilization and demobilization, ingress and egress of these large construction vehicles is not anticipated to affect operations during peak hours. Large material deliveries are not expected, and all earthwork is anticipated to be balanced on-site. While the occasional light-duty delivery truck may be required, they are expected to be infrequent, and would likely occur outside of peak traffic hours. Approximately ten personnel and staff are expected to access the site daily; however, they are not expected to arrive or depart during peak traffic hours.

Trip Generation

Trip rates published by the Institute of Transportation Engineers (ITE), *Trip Generation*, 8th Edition, 2008 were used to estimate the traffic generated by the proposed Project's additional 42 acres of burial site. Although the 42 acres would be fully built by 2070, a very conservative approach was taken, and the trips associated with the additional 42 acres of burial sites were analyzed with existing year traffic and 2030 traffic forecasts.

Weekday midday peak hour ITE trip rates were not available; therefore, the weekday p.m. peak hour rate was used instead. The direction of the trips ("in" and "out" of the project site) were based on actual observations, rather than based on ITE's sample observations. The traffic generation results are presented below in **Table 9**.

Land Use	Weekday Midday Peak Hour				Saturday Midday Peak Hour			
	Rate	In	Out	Total	Rate	In	Out	Total
Cemetery (42 Acres)	1.64	87%	11%	100%	3.09	65%	35%	100%
Number of Trips	-	60	9	69	-	84	46	130

Source: Institute of Transportation Engineers, *Trip Generation*, 8th Edition, 2008 (Land Use: 566 – Cemetery) and CH2MHill, *Traffic and Transportation* (2013).

As part of the revised project, up to four parking stalls will be provided within the Skylawn Memorial Park property and reserved for public access to the surrounding Bay Area Ridge Trail system. Up to 2,000 trail users annually could be expected to access these trails via park property, but it is unlikely that peak trail use would coincide with peak hour traffic operations of Skylawn Memorial Park.

Vehicles destined for the trailhead would likely arrive at the Skylawn Memorial Park property prior to and depart after the Friday weekday or Saturday weekend midday analysis peak hour. As a conservative assumption, two trips in and two trips out of the Skylawn Memorial Park property were added to the peak hour Project trip generation to represent trail users who would not otherwise visit the memorial park.

Trip Distribution

Trips generated were distributed following the same proportions as those observed when existing turning movement counts were conducted.

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Impact Analysis

The results of the intersection impact analysis are presented in **Table 10**. Overall operations at both intersections are acceptable during the Friday and Saturday peak hours, and in the existing and future conditions. Motorists traveling eastbound or westbound on SR-92 would continue to experience little or no delays due to the revised project, which is consistent with the CMP's policy.

At Skylawn Memorial Park Driveway/SR-92, the project would add delays to the worst case movement, which is the southbound left turn made by motorists exiting the private driveway to eastbound SR-92. At Skyline Boulevard/SR-92, the project has very little impact on the average vehicle delay for the worst-case movement. At both intersections, eastbound or westbound through movements on SR-92 are essentially unaffected; therefore, no significant impacts are created by the revised project.

**Table 10
Intersection LOS - With Project Scenario**

Intersection	Overall Intersection Operation				Movement	Worst-Case Movement			
	Average Delay*		LOS			Average Delay		LOS	
	No Project	With Project	No Project	With Project		No Project	With Project	No Project	With Project
Existing Year (2013) Without and With Project Trips									
Friday Peak Hour									
1. Skylawn Memorial Park Driveway / SR-92	0.41	0.63	A	A	Southbound Left	38.6	41.6	E	E
2. Skyline Boulevard / SR-92	1.60	1.60	A	A	Northbound Left	42.0	42.8	E	E
Saturday Peak Hour									
1. Skylawn Memorial Park Driveway / SR-92	1.39	7.18	A	A	Southbound Left	113.3	274.7	F	F
2. Skyline Boulevard / SR-92	4.26	4.41	A	A	Northbound Left	149.9	160.4	F	F
Future Year (2030) Without and With Project Trips									
Friday Peak Hour									
1. Skylawn Memorial Park Driveway / SR-92	0.52	0.84	A	A	Southbound Left	64.7	73.1	F	F
2. Skyline Boulevard / SR-92	3.01	3.01	A	A	Northbound Left	88.1	88.1	F	F
Saturday Peak Hour									
1. Skylawn Memorial Park Driveway / SR-92	3.09	18.21	A	C	Southbound Left	319.7	854.7	F	F
2. Skyline Boulevard / SR-92	19.62	19.85	C	C	Northbound Left	787.1	787.1	F	F
*Overall operation average delay is a weighted average of all movements' delays. Reporting intersection LOS as a whole is not the standard methodology described in the HCM 2010 for unsignalized intersections, and is reported for comparison purposes only. Source: CH2MHill, Traffic and Transportation (2013).									

Skylawn Memorial Park Subsequent Proposed MND/IS

<p>Conclusion: The revised project would have less than significant impacts associated with an applicable plan, ordinance, or policy.</p> <p>Source: CH2MHill, Traffic and Transportation (2013); Project Plans; 2011 MND.</p>				
16.b. Conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the County congestion management agency for designated roads or highways?			X	
<p>Discussion: See discussion in Section 16.a above.</p> <p>Conclusion: The revised project would have less than significant impacts associated with a CMP.</p> <p>Source: CH2MHill, Traffic and Transportation (2013); Project Plans; 2011 MND.</p>				
16.c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in significant safety risks?				X
<p>Discussion: The revised project site is not located in the vicinity of a public airport or public use airport. The Half Moon Bay Airport is located 6.8 miles west of the revised project area, and San Francisco International Airport is located over 8 miles to the north. Furthermore, the revised project involves the creation and use of burial sites in an already existing cemetery; none of which would affect air traffic patterns and levels, or result in associated safety risks.</p> <p>Conclusion: The revised project would have no impact to air traffic patterns.</p> <p>Source: Google Earth, 2013; Project Plans; 2011 MND.</p>				
16.d. Significantly increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
<p>Discussion: The entryway to Skylawn Memorial Park, located off SR-92 just east of the junction with SR-35 was first identified as potentially problematic (e.g., "design feature hazard") relative to entry and exit issues in the 2011 MND. In that case, CalTrans had commented on the entry and exit from Skylawn in response to the 2011 MND. In response (while not as a mitigation measure), County staff added the following condition of approval (No. 45) to the Planning Commission's August 11, 2011 decision letter to approve the Phase 1 Project:</p>				

"The project applicant shall prepare a plan that involves repaving, striping, and, if deemed necessary, additional signage to improve access to and exiting from the Skylawn facility onto Highways 35 and 92. This plan shall be submitted to both CalTrans and the County Planning and Building Department staff for review and approval. The plan shall be implemented and completed prior to the completion of the next interment project as anticipated in the Master Use Permit and including the completion of the Eternity Gardens project, the second phase of which is yet to be initiated. No new signage is to be installed until reviewed and approved by the Planning and Building Department and/or CalTrans (if proposed within CalTrans right-of-way). This use permit does not authorize the use of temporary signage or banners on the Skylawn property or within the CalTrans right-of-way. The applicant shall obtain, retroactively, the necessary building and planning permits for the new "Skylawn" sign located near Skylawn Memorial Park's entrance at the junction of Highways 35 and 92" (Condition No. 45 of Planning Commission's August 11, 2011 decision letter to approve the Phase 1 Project).

While the previous discussion of traffic counts and LOS delays on SR-92 does not affect (nor are they made significantly worse by) traffic coming to and leaving Skylawn, the status of the progress on the applicant's compliance with this condition was raised relative to this MND. In response to the need to follow up on the condition's intent, staff met with Skylawn administrative staff, Skylawn's traffic consultant (CH2M Hill), and several CalTrans staff at the Skylawn entrance (off of SR-92) on August 21, 2013. At that meeting, some critical background issues and improvement constraints were indicated, as summarized by Skylawn's consultant as follows:

- CalTrans indicated that they had no immediate plans in process for any studies for a SR-35/SR-92 interchange, new signal or grade separation and that the accident data at this location has not indicated that this area/intersection is presently of concern.
- CalTrans does not allow signage of commercial property within their state right-of-way.
- The approved Phase 1 Project predates the installation of additional shoulder paving in the westbound direction, which since that time provides more room for westbound travelers seeking entry to Skylawn to transition out of the westbound travel lane and onto the entry apron leading to the Skylawn's main entrance driveway.
- Skylawn hires traffic control to assist with egress during special events.
- The 'Lifemark Road' sign may be substandard but is a requirement by the County Fire Authority (Cal-Fire) to remain.

The following issues and possible entry/exit improvements were discussed:

- The entrance to Skylawn from westbound SR-92 could be better delineated with right-turn and additional signage.
- The entrance to Skylawn from eastbound SR-92 has left-turn storage past the perpendicular intersection and requires a U-turn in.
- Trucks traveling westbound currently pull onto the shoulder to allow vehicles to pass before merging with the through lane in front of Skylawn's entrance. CalTrans does not want the addition of a right-turn lane to preclude trucks from using this movement.
- Exit to westbound SR-92 is right-turn only from the perpendicular intersection.

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- Exit to eastbound SR-92 is at an acute angle. To see vehicles coming from the westbound direction, exiting vehicles need to look to their right and over the hill. A short median storage is provided for cars before merging with eastbound traffic.

Conclusion: The revised project would have less than significant impacts associated with design feature hazards or incompatible uses. While the impact does not warrant a mitigation measure, Skylawn's traffic consultant intends to follow through with a proposed plan (possible striping plan for the Skylawn property entrance included as Figure 7) to improve accessibility to/from the Skylawn property. Staff will revise the condition cited above to reflect the requirement that this plan be submitted and reviewed by CalTrans for the required encroachment permit.

Source: Communication among County Planning Staff, the Applicant, and CalTrans Staff at a Meeting Held on August 21, 2013; CH2MHill, Traffic and Transportation (2013); Project Plans; 2011 MND.

16.e. Result in inadequate emergency access?				X
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Discussion: The revised project involves the extension and widening of existing private roads within the cemetery. The new road segments would not result in inadequate emergency access. Emergency vehicles would be able to access the site without any difficulty.

Conclusion: The revised project would have no impact to emergency access.

Source: CH2MHill, Traffic and Transportation (2013); Project Plans; 2011 MND.

16.f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?			X	
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Discussion:

Pedestrian/Bicycle Facilities

The Bay Area Ridge Trail is a multi-use regional trail that runs along the ridges around the San Francisco Bay. A feasibility study was conducted in 2008 to determine the feasibility of constructing a new portion of the trail to close the gap that exists between SR-92 and Huddart County Park. The Fifield-Cahill Ridge Trail is a 13-mile subsection of the Bay Area Ridge Trail that extends between Pacifica and SR-92 Skyline Quarry Road. Access to Fifield-Cahill Ridge Trail is provided via an internal circulation road (Cahill Ridge Road) within Skylawn Memorial Park.

The Highway 92 Trail is a proposed trail route that would extend from I-280 to Half Moon Bay. This highway corridor would accommodate a multi-use trail as well as bike lanes on the highway.

The *San Mateo County Comprehensive Bicycle Route Plan*, addresses the plans and policies that guide the development of a comprehensive bicycle route plan. Short- to mid-term recommended projects include the Coastsides Bicycle Project, which is a corridor improvement along SR-92 between Half Moon Bay and SR-35. This includes improvements to the SR-92/SR-35 intersection immediately west of I-280, which is problematic for bicyclists because of the

Skylawn Memorial Park Subsequent Proposed MND/IS

high speed traffic, and limited visibility and room for bicyclists, especially those transitioning from eastbound, SR-92 to northbound SR-35/Skyline Boulevard. Planned and potential improvements include new 7-foot shoulders along the entire length of SR-92 from SR-35 to SR-1, and a new pathway along the southwest side of SR-92 between the SR-35 intersection and the I-280 bike/pedestrian overcrossing.

Transit

SamTrans Bus Route 294 has a stop near the project site entrance. This bus route links Linda Mar Park-and-Ride lot to Hillsdale Shopping Center. Service is provided on weekdays only between 5:30 a.m. and 9:00 p.m. The route operates in both directions of SR-92 with headways of approximately 90 minutes.

The 2011 MND determines that the development of the Phase 1 Project, which currently has little or no pedestrian traffic, would result in minor increases in pedestrian visits to newly created burial facilities. Visitors would be served by newly paved roadways and dedicated pedestrian pathways that meander through the newly developed Phase 1 area. Furthermore, internal roadways within the new cemetery development would be safe for bicyclists and motorists to share.

The revised project would not substantially increase the number of visitors to Skylawn Memorial Park. There are currently no sidewalks or crosswalks along SR-92 near the entrance of the site. The project is expected to generate minor vehicular traffic only. The expansion will likely not substantially increase pedestrian traffic, nor create a change in existing pedestrian patterns. Additional pedestrian and bicycle facilities are still in the planning stages and thus would not be affected by the project. Access to Fifield-Cahill Ridge Trail will be maintained by Cahill Ridge Road. This existing service/circulation road will continue to provide public multi-use access between SR-92 and the Fifield-Cahill Ridge Trail through the Skylawn property. Future plans for Cahill Ridge Road include a new trail alignment/designation as part of the Bay Area Ridge Trail network. Existing portions within the park will remain under Skylawn Memorial park ownership, while portions of the trail outside of Skylawn property will be owned and maintained by the San Francisco Water Department.

SamTrans Bus Route 294 provides service on weekdays between 5:30 a.m. and 9:00 p.m. connecting Linda Mar Park-and-Ride lot to Hillsdale Shopping Center. This service offers one stop near the Skylawn Memorial Park entrance. It is unlikely that this service would be affected by the revised project as minimal additional pedestrians are expected to result from implementation.

Conclusion: The revised project would have a less than significant impact to public transit, bicycle, and/or pedestrian facilities.

Source: CH2MHill, Traffic and Transportation (2013); Project Plans; 2011 MND.

16.g. Cause noticeable increase in pedestrian traffic or a change in pedestrian patterns?			X	
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Discussion: The 2011 MND determined that there would be less than significant impacts to pedestrian traffic and/or patterns.

See discussion in **Section 16.f** above.

Skylawn Memorial Park Subsequent Proposed MND/IS

Conclusion: The revised project would have a less than significant impact to pedestrian traffic and/or patterns. Therefore, the revised project would not result in a new significant impact not identified in the 2011 MND.

Source: CH2MHill, Traffic and Transportation (2013); Project Plans; 2011 MND.

16.h. Result in inadequate parking capacity?				X
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Discussion: The 2011 MND does not discuss impacts associated with parking capacity; however, it does state that parking would be accommodated along both existing and proposed cemetery roads except where needed to insure adequate handicapped accessibility.

The revised project involves the on-site expansion of the developed areas and includes provisions for parking along Lifemark Road, which is being widened from 12 feet to 26 feet in width. The project would include sufficient parking capacity within its on-site internal road systems to accommodate anticipated traffic and avoid queues backing onto public roadways (e.g., SRs 92 and 35).

Conclusion: The revised project would have no impacts associated with parking capacity.

Source: CH2MHill, Traffic and Transportation (2013); Project Plans; 2011 MND.

17. UTILITIES AND SERVICE SYSTEMS. Would the project:

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
17.a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	

Discussion: The extended Phase 1 Project is adding approximately 7 acres to the previously approved Phase 1 Project. The revised project involves preparing land for future burials as well as the construction of access improvements. The revised project would not require additional wastewater services as no permanent residences would be constructed, and visitor would use the restroom facilities already in place at Skylawn. Furthermore, the cemetery relies on a private septic system on-site. The project has been reviewed and approved by the Environmental Health Division and would not exceed the wastewater treatment requirements of the applicable Regional Water Quality Control Board.

Conclusion: The revised project would have a less than significant impact associated with wastewater treatment standards.

Source: Environmental Health Division; Project Plans; 2011 MND.

17.b. Require or result in the construction of new water or wastewater treatment facilities or			X	
--	--	--	---	--

Skylawn Memorial Park Subsequent Proposed MND/IS

expansion of existing facilities, the construction of which could cause significant environmental effects?				
<p>Discussion: The 2011 MND determined that there would be less than significant impacts to wastewater treatment facilities.</p> <p>See response in Section 17.a above.</p> <p>Conclusion: The revised project would have a less than significant impact to wastewater treatment facilities.</p> <p>Source: Environmental Health Division; Project Plans; 2011 MND.</p>				
17.c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?		X		
<p>Discussion: While the Phase 1 Project would result in the construction of new stormwater drainage facilities, which would mitigate run-off created by the new impervious surface, it would not cause significant environmental effects. Furthermore, the revised project would not require the construction of additional stormwater drainage facilities beyond what is proposed for Phase 1. For further discussion of stormwater drainage facilities, please see response in Section 9.a above.</p> <p>Conclusion: The revised project would have less than significant impacts associated with the construction of new stormwater drainage facilities.</p> <p>Source: Project Plans; 2011 MND.</p>				
17.d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			X	
<p>Discussion: The 2011 MND determined that there would be less than significant impacts to water supplies.</p> <p>Water is supplied to the site by two sources: an existing water well, and water from the Coastside County Water District (District). The District supplies non-potable water to the project site for irrigation of burial lawns and associated landscape. The District operates through California Water Service contracts, and obtains water from the Hetch Hetchy and Crystal Springs Reservoir. The Phase 1 Project would require a total of 15 acres of irrigated landscape, which would increase the cemetery's water demand by 7.4 million gallons of water per year (mgy). Incorporating the extended Phase 1 Project would increase the water demand of the revised project to a total of 7.7 mgy. The 2011 MND determined that the increased demand for water from the District (7.4 mgy) would not result in an increased extraction of groundwater resources in the area.</p> <p>The private water well, located near the old quarry site, provides potable water to the funeral</p>				

Skylawn Memorial Park Subsequent Proposed MND/IS

home, reception building, and the old administration building (that is not currently in use). The well has capacity to provide 6 to 16 gallons of water per minute (gpm), and feeds a 10,000-gallon tank that in turn supplies the potable water system. The current capacity needed for the existing facilities is 6 gpm. As the revised project would not include improvements that require potable water, there would not be increased demand for this well water.

Conclusion: The revised project overall requires only a minimal increase in non-potable water demand for irrigation. The revised project has been reviewed by CCWD and approved by the Environmental Health Division and found to not require new or expanded entitlements. Therefore, the revised project would have a less than significant impact.

Source: E.T. Easter, Inc. (2013); Environmental Health Division; 2011 MND.

17.e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				X
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Discussion: See discussion in **Section 17.a** above.

Conclusion: The revised project would have no impacts associated with wastewater treatment capacity.

Source: Environmental Health Division; 2011 MND.

17.f. Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	
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Discussion: The 2011 MND determined that there would be less than significant impacts associated with landfill capacity.

The project site is contracted with Allied Waste to dispose of all non-hazardous solid waste, which includes green debris such as tree branches and floral bouquets, concrete and granite, paper, and general garbage. Approximately two large dumpsters (about 400 cubic feet total) of solid waste are hauled off on a monthly basis. As the project would not significantly increase the frequency of memorial services on the project site, it is not anticipated that the proposed improvements would significantly increase the amount of solid waste generated by the cemetery. The waste collected from the project site is ultimately hauled to the Ox Mountain Landfill in Half Moon Bay. Ox Mountain Landfill has a permit from the California State Integrated Waste Management Board to operate until 2018, with a total permitted capacity of 35.9 million cubic yards. The maximum daily waste tonnage that it is permitted to receive is 3,598 tons, which is approximately 1.3 million tons per year. The amount of waste generated by the project on a yearly basis would be insignificant when compared to the total amount of solid waste the landfill is permitted to accept. Therefore, no impact would occur.

Furthermore, the extended Phase 1 Project involves reconsolidating fill in a 7-acre area for in-ground burials, involving 22,463 cy of balanced cut and fill (or approximately 45,000 cy of grading). Overall, the revised project would involve approximately 145,000 cy of grading, and

Skylawn Memorial Park Subsequent Proposed MND/IS

no excess earth would be off-hauled to a landfill. After completion of grading, project operation as part of existing cemetery operations would result in a negligible increase in solid waste disposal needs. The nearby Ox Mountain Landfill has sufficient permitted capacity to serve these operations.

Conclusion: The revised project would have a less than significant impact associated with landfill capacity.

Source: Project Plans; 2011 MND.

17.g. Comply with Federal, State, and local statutes and regulations related to solid waste?				X
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Discussion: The 2011 MND did not discuss Federal, State, or local statutes and regulations related to solid waste.

The revised project would comply with all applicable statutes and regulations associated with solid waste. Furthermore, no excess earth from excavation and grading would be off-hauled to a landfill. After completion of grading, project operation as a part of existing cemetery operations would result in negligible increase in solid waste disposal needs.

Conclusion: The revised project would have no impacts associated with Federal, State, or local statutes and regulations related to solid waste.

Source: Project Plans; 2011 MND.

17.h. Be sited, oriented, and/or designed to minimize energy consumption, including transportation energy; incorporate water conservation and solid waste reduction measures; and incorporate solar or other alternative energy sources?				X
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Discussion: The 2011 MND did not evaluate impacts associated with energy, water, or waste consumption.

The revised project does not involve the construction of any new buildings and would not result in significant new sources of energy consumption, water use, or solid waste generation. The project involves balanced grading that reduces solid waste generation. All new irrigation would utilize recycled water sources.

Conclusion: The revised project minimizes solid waste generation and water consumption. No mitigation measures are required.

Source: Project Plans; 2011 MND.

17.i. Generate any demands that will cause a public facility or utility to reach or exceed its capacity?			X	
--	--	--	---	--

Discussion: The 2011 MND determined that there would be less than significant impacts to public facilities or utilities.

Skylawn Memorial Park Subsequent Proposed MND/IS

The revised project involves the on-site expansion of the developed areas of an existing cemetery and does not include the construction of any new buildings. The revised project would not result in a significant increase in population or demand that will cause a public facility or utility to reach or exceed its capacity.

Conclusion: The revised project would have less than significant impacts to public facilities and utilities.

Source: Project Plans; 2011 MND.

18. MANDATORY FINDINGS OF SIGNIFICANCE.

	<i>Potentially Significant Impact</i>	<i>Less Than Significant Impact With Mitigation Incorporated</i>	<i>Less Than Significant Impact</i>	<i>No Impact</i>
18.a. Does the project have the potential to degrade the quality of the environment, significantly reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
<p>Discussion: The currently proposed Phase 1 Development Area consists only of areas that have been subject to a high level of disturbance, including an equipment storage area, an area used to store grave spoils, and very weedy and highly disturbed grasslands (Figure 5).</p> <p>Given that impacts to wetlands and sensitive habitats have significantly decreased, the potential for impacts to occur to special-status and other wildlife species has been reduced. Therefore, with the implementation of the required mitigation measures, the currently proposed project also would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal, or eliminate important examples of the major periods of California history or prehistory.</p>				
18.b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental		X		

Skylawn Memorial Park Subsequent Proposed MND/IS

<p>effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)</p>				
<p>Discussion: A cumulative impact refers to a proposed project's incremental effect together with other closely related past, present, and reasonable foreseeable future projects whose impact may compound or increase the incremental effect of the proposed project. No list of approved project to be built in 2010 in the general area of the Skylawn property is available at this time. Nonetheless, the cumulative contexts for the environmental topics discussed in this Addendum are considered to have a less than significant impact. The revised project would not result in individual impacts to air quality, noise, traffic, and other areas that would result in broader regional impacts. The traffic forecasts developed with the C/CAG models should capture the potential growth in the area, and therefore, take into account any potential cumulative effect. The project would potentially result in site specific impacts to biology, geology, and cultural resources. However, the incorporation of mitigation measures would reduce impacts to a less than significant level.</p> <p>Conclusion: Given that there are no significant impacts associated with the revised project and all potential impacts are reduced to a less than significant level through mitigation, there would not be any cumulatively considerable impacts.</p>				
<p>18.c. Does the project have environmental effects which will cause significant adverse effects on human beings, either directly or indirectly?</p>		<p>X</p>		
<p>Discussion: The revised project would increase the acreage of burial lands on an existing cemetery and would not introduce new land use next to sensitive receptors. This would involve some grading activities and road infrastructure improvements.</p> <p>Conclusion: As previously discussed, the project could result in environmental impacts that could both directly and indirectly cause impacts on human beings. However, implementation of mitigation measures included in this document would adequately reduce project impacts to a less than significant level.</p>				

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Figure 7

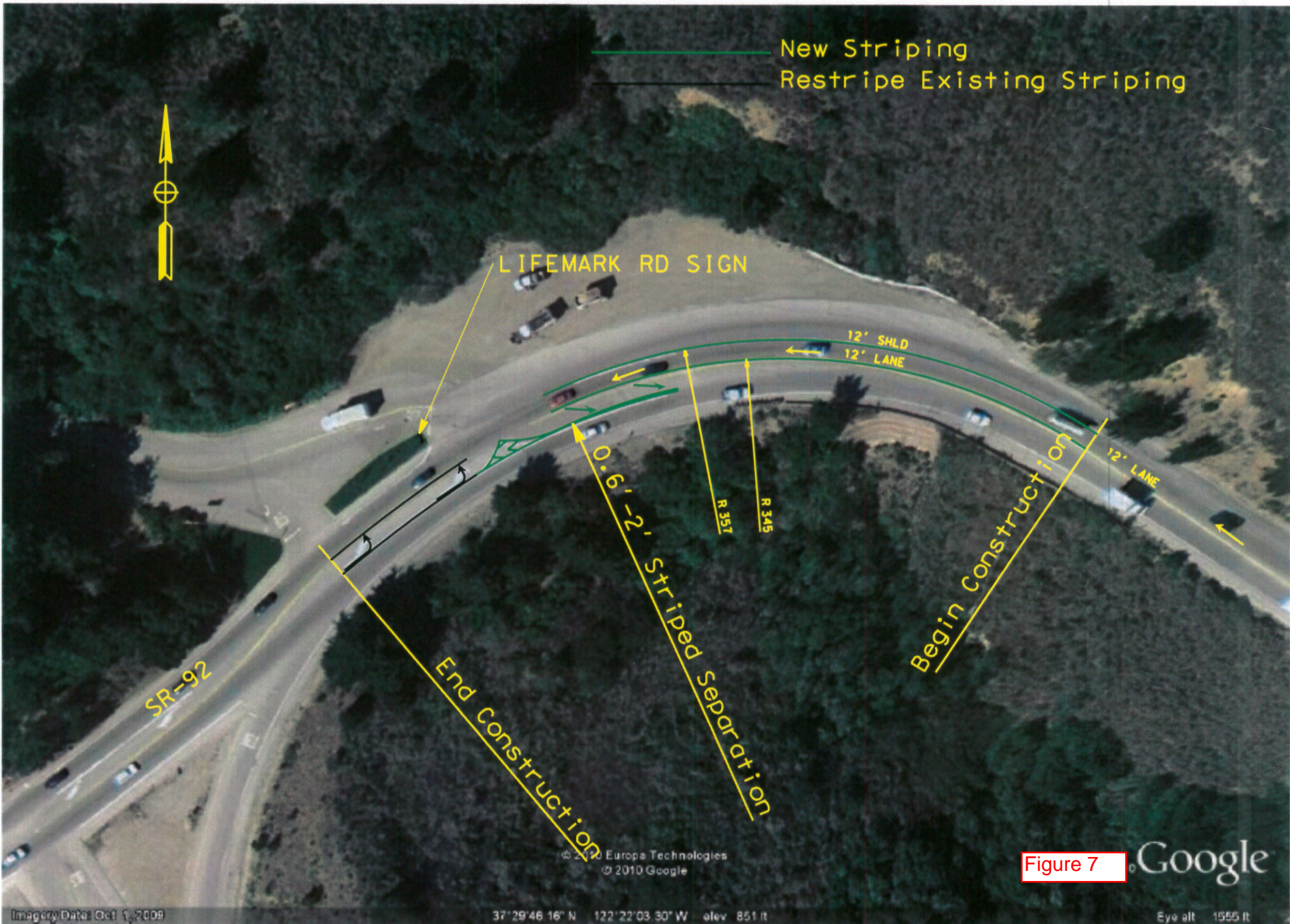


Figure 7



PACIFIC BIOLOGY



635 Carmel Avenue • Albany, California 94706 • Phone/Fax: (510) 527-1008

October 2, 2013

To whom it may concern,

Pacific Biology prepared a memo on July 11, 2013 titled *Request for Waiver of Condition of Approval 30 and Condition of Approval 31/Mitigation Measure 9 - Revised Phase 1 Project at Skylawn Memorial Park*.

Since that memo was prepared, the terminology describing portions of the Phase 1 Development Area has changed, but the conclusions of the memo remain valid. The area referred to in the memo as the "revised Phase 1 Development Area" corresponds to the area referred to in the 2013 Subsequent Initial Study as the "Near Term Development Area". The 2013 Subsequent Initial Study also includes a portion of the original Phase 1 Development Area referred to as the "Long Term Development Area"; this area was not specifically addressed in the July 11, 2013 memo but is addressed in the 2013 Subsequent Initial Study.

In regards to the request to waive Condition of Approval 30, the reasons for the request outlined in the memo apply to both the Near Term Development Area and the Long Term Development Area (as described in the 2013 Subsequent Initial Study).

In regards to the request to waive Condition of Approval 31 /Mitigation Measure 9, the reasons for the request outlined in the memo apply to the Near Term Development Area, but not to the Long Term Development Area (as described in the 2013 Subsequent Initial Study).

Sincerely,

A handwritten signature in black ink, appearing to read "Josh Phillips".

Josh Phillips
Principal Biologist

PACIFIC BIOLOGY



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Josh Phillips
Principal Biologist

PACIFIC BIOLOGY



635 Carmel Avenue, Albany, CA 94706
Telephone/Fax: (510) 527-1008

TO: David Montgomery
FROM: Josh Phillips, Principal Biologist
DATE: July 11, 2013
SUBJECT: Request for Waiver of Condition of Approval 30 and Condition of Approval 31/Mitigation Measure 9 - Revised Phase 1 Project at Skylawn Memorial Park

As requested by the San Mateo County Planning and Building Department, this memo provides an explanation of why several Conditions of Approval and Mitigation Measures included in the *Final Skylawn Memorial Park Master Land Use Permit MND* (2011) are no longer relevant to the currently proposed project. This memo specifically addresses Condition of Approval 30 and Condition of Approval 31/Mitigation Measure 9; these measures and their feasibility and necessity are discussed in detail below.

Condition of Approval 30

"Prior to commencement of any Phase 1 project, Skylawn must obtain an Incidental Take Permit from the United States Fish and Wildlife Service and provide proof of such authorization to the Planning and Building Department. All recommended mitigation/avoidance measures must be implemented prior to beginning any Phase 1 grading or construction activities and must be maintained throughout the duration of the project."

Background Information

When the *Skylawn Memorial Park Master Land Use Permit MND* was approved in 2011, the project applicant anticipated that the disturbance of a jurisdictional wetland would be required. The wetland in question is located southwest of the existing service road, and to the west of the existing Imperial Gardens area. However, since the approval of the MND, additional geotechnical studies have revealed that 4.2 acres of the approved Phase 1 Development Area (including the jurisdictional wetland) are not suitable for burial purposes due to unstable soils and steeper than expected slopes. Given these unanticipated constraints, the applicant has proposed to revise the boundaries of the Phase 1 Development Area to

exclude the unsuitable 4.2 acres, while including 7.3 acres of additional land that was not included in the original Phase 1 Development Area.

The revised Phase 1 Development Area consists only of areas that have been subject to a high level of disturbance, including an equipment storage area, an area used to store grave spoils, and very weedy and highly disturbed grasslands. Therefore, the proposed revisions to the Phase 1 Development Area boundaries are biologically beneficial for the following reasons:

- Impacts to wetlands have now been avoided;
- Wetland habitat that may be used for refuge by federally listed species (i.e., California red-legged frog, San Francisco garter snake) will be protected;
- The distance between proposed development and sensitive biological resources (e.g., native grasslands, coastal scrub habitat, Pilarcitos Creek) have been increased; and
- The proposed Development Area now only contains disturbed and weedy habitats.

Changes to Biological Permitting Requirements from Revisions to Project Boundaries

The proposed revision to the Phase 1 Development Area boundaries have eliminated the need to obtain permits for fill of a wetland from the Army Corps of Engineers (ACOE) and the Regional Water Quality Control Board (RWQCB). However, by eliminating the wetland impact, meeting the requirements of Condition of Approval 30 to obtain an Incidental Take Permit has become infeasible.

To clarify, the USFWS may only issue a Take Permit under Section 7 of the federal Endangered Species Act (ESA) if there is a federal nexus (e.g., a permit is required from another federal agency or federal funds are being used). As the proposed project no longer includes disturbance of a wetland, there is no longer need to obtain a permit from a federal agency (i.e., Section 404 permit from the ACOE), and therefore, there is no longer a federal nexus that would allow the USFWS to issue an Incidental Take Permit pursuant to Section 7 of ESA. The only other mechanism allowing the USFWS to issue a Take permit would be through Section 10 of the ESA which requires the preparation of a Habitat Conservation Plan (HCP). The proposed project is not an appropriate candidate for an HCP because the revised Phase 1 Development Area only includes heavily disturbed and highly weedy grassland areas and the potential for "take" to occur could be avoided through the implementation of standard avoidance measures (see below).

Given the revision of the project boundary to only include highly disturbed weedy habitat and to avoid the wetland, and the required avoidance and minimization measures, it is expected that "take" of a federally listed species would be avoided. The required preconstruction clearance survey (Mitigation Measure 2, see below) and limitations on grading during the wet season (Mitigation Measure 7) would all but eliminate the potential for construction-related "take" from occurring. Additionally, Mitigation Measure 2 includes a trigger to contact the USFWS in the unlikely event that a federally listed species is observed during the required clearance survey. As currently written, Mitigation Measure 2 requires the follow:

"Prior to initial vegetation removal and/or grading activities in the upland portion of the Phase 1 Development Area, a pre-construction clearance survey shall be conducted for California red-legged frog and San Francisco garter snake by a qualified biologist. Should either species be identified, construction activities shall be immediately halted until the frog or snake leaves the construction zone on its own, or is removed by a qualified biologist in possession of an appropriate permit and authorized by the USFWS. The property owner shall immediately notify USFWS if either species is observed."

Recommendations

Mitigation Measure 2 could be strengthened to further reduce/eliminate the potential for "take" to occur. This could be accomplished by including the following requirement:

Prior to any construction-related grading or excavation activities in the revised Phase 1 Development Area, vegetation will be mowed to eliminate cover habitat for wildlife. A biological monitor would walk in front of the mower to ensure that California red-legged frogs and San Francisco garter snake are not present. The cleared area would then be surveyed again immediately preceding the commencement of grading or excavation activities.

It is requested that Condition of Approval 30 be waived, and that the supplemental language suggested above be adopted. This, in combination with of the avoidance of wetland habitat (which provides potential refuge habitat for California red-legged frog and San Francisco garter snake), would provide adequate assurances that "take" would not occur during construction activities. In addition, in the very unlikely event that a California red-legged frog or San Francisco garter snake is observed by the biological monitor, construction/mowing activities would be immediately halted and the USFWS would be

contacted for guidance on how to proceed - this would provide further assurance that "take" would not occur.

Condition of Approval 31/Mitigation Measure 9

"An updated rare plant survey shall be conducted by a qualified botanist prior to any construction activities commencing after the spring of 2012. Should any rare plant species be identified, these populations should be avoided to the extent practical. If removal of special-status plant species is required, transplanting to a suitable location in the Environmental Protection Zone will be considered as the first option. Given that the rare plant species of primary concern are evergreen shrubs or lilies, transplanting should be feasible. Prior to the transplanting of any rare plant species, a plant relocation plan shall be developed by a qualified botanist. At a minimum, the plan shall demonstrate the feasibility of replacing the number of individual plants to be removed at a 1:1 ratio. The plan shall specify, at a minimum, the following: (1) the location of mitigation sites in the Environmental Protection Zone or other suitable location; (2) methods for harvesting seeds and salvaging and transplantation of individual bulbs/plants to be impacted; (3) site preparation procedures for the mitigation site; (4) a schedule and action plan to maintain and monitor the mitigation area; (5) a list of criteria and performance standards by which to measure success of the mitigation site; (6) measures to exclude unauthorized entry into the mitigation areas; and (7) contingency measures in the event that mitigation efforts are not successful. The plan shall be subject to the approval of the County prior to the removal of any special-status plant species."

Background Information

Vollmar Consulting conducted surveys for rare plants on the Skylawn property in 2009. The survey area included all areas within the Master Land Use Planning Area, including all areas within the revised Phase 1 Development Area. No special-status plant species were observed during those surveys.

While no special-status plant species were observed during the surveys, the survey report did identify several special-status plant species known from the area that are associated with the following habitat types: coastal scrub, riparian woodland, coastal prairie, and grassland (with clay soils). As the original Phase 1 Development Area contained wetland habitat and development activities along the outer edge of coastal scrub habitat, the *Skylawn Memorial Park Master Land Use Permit MND* required additional rare plant surveys prior to the commencement of construction activities occurring after the spring of 2012.

However, since the MND was approved, the project applicant has proposed to revise the boundaries of the Phase 1 Development Area. The revised development boundaries only include heavily disturbed, weedy habitats, and none of the habitat types listed above and associated with special-status plant species occur within the revised development boundaries.

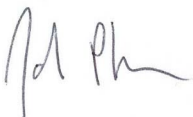
The project applicant commissioned a rare plant survey of the revised Phase 1 Development Area by Jane Valerius Environmental Consulting on June 28, 2013. The survey area included the Garden of Heaven, the Phase 1 North Extension, and the Double Depth Burial Areas (which collectively include all areas within the revised Phase 1 Development Area). No special-status plant species were observed and it was noted by the botanist that the site is highly disturbed and comprised of ruderal, non-native weedy plants, many of which are noxious weeds.

Recommendations

Jane Valerius Environmental Consulting (July 2013) concluded that no further surveys for rare plants are recommended for the revised Phase 1 Development Area. This recommendation is based on the negative survey results, the absence of habitat types associated with locally occurring special-status plant species, and the highly disturbed condition of the revised Phase 1 Development Area. Pacific Biology concurs with the conclusion that no further botanical surveys of the revised Phase 1 Development Area are merited. Given the above, it is requested that Condition of Approval 31 and Mitigation Measure 9 be waived for future activities occurring within the revised Phase 1 Development Area.

I appreciate the opportunity to provide assistance with this project, and please feel free to contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Josh Phillips". The signature is fluid and cursive, with the first name "Josh" and last name "Phillips" clearly distinguishable.

Josh Phillips

JANE VALERIUS
ENVIRONMENTAL CONSULTING
2893A Scotts Right of Way, Sebastopol, CA 95472
Tel: 707-824-1463 ♦ Mobile 707-529-2394
Email: jvalerius@earthlink.net

MEMORANDUM

TO: Josh Phillips, Principal Biologist, Pacific Biology

FROM: Jane Valerius, Botanist, Jane Valerius Environmental Consulting

DATE: July 10, 2013

RE: Skylawn Memorial Park, San Mateo County Plant Survey

A rare plant survey was conducted of the Garden of Heaven, Phase 1 Extension, and Double Depth Lawn Burial Areas (which collectively include all areas within the revised Phase 1 Development Area). The survey was conducted on June 28, 2013. These areas (as well as other portions of the Skylawn property) were previously surveyed for rare plants by Vollmar Consulting and the results were presented in a report dated July 2009. Prior to the site visit the Vollmar Consulting (2009) report was reviewed and Josh Phillips with Pacific Biology provided maps of the area to be surveyed. No rare plants were observed and it was determined that suitable habitat for rare plants does not occur in the survey area due to the highly disturbed and weedy condition of the site, and the absence of habitat types associated with locally occurring rare plants.

Methods

I met with Josh Phillips, Principal Biologist with Pacific Biology on the site on June 28, 2013. Mr. Phillips showed me the areas to be surveyed, specifically the Garden of Heaven site and requested that if there was enough time, that the Phase 1 North Extension and Double Depth Lawn Burial areas also be surveyed. All three of these locations were surveyed by walking transects across the site and also walking the perimeter of the site. As required for special status plant surveys, a list of all plant species identifiable at the time of the survey was recorded. Most of the species found in the survey area had been recorded during the surveys conducted by Vollmar Consulting in 2009. This report provides a list of species not previously recorded for the site. In keeping with the Vollmar Consulting (2009) report, taxonomy was based on The Jepson Manual (Hickman 1993).

Results

No special status plant species were observed in the survey area. The survey area is highly disturbed and dominated by weedy, non-native plant species. Onsite habitats would best be described as ruderal vegetation communities and weedy non-native forb species dominant, although there is also a non-native grassland component.

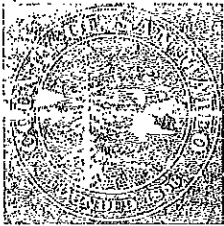
Plant species common in the survey area include non-native weedy herbaceous or forb species such as black mustard (*Brassica nigra*), bristly ox-tongue (*Picris echioides*), poison hemlock (*Conium maculatum*), purple starthistle (*Centaurea calcitrapa*), spiny sow thistle (*Sonchus asper*), woodland forget-me-not (*Myosotis sylvatica*), red sandspurrey (*Spergularia rubra*), bird's-foot trefoil (*Lotus corniculatus*), Canadian horseweed (*Conyza canadensis*), bur clover (*Medicago polymorpha*), English plantain (*Plantago lanceolata*), Italian thistle (*Carduus pycnocephalus*), hairy cat's ear (*Hypochaeris radicata*), bull mallow (*Malva nicaeensis*), cut leaf plantain (*Plantago coronopus*), disc mayweed (*Matricaria discoidea*), milk thistle (*Silybum marianum*), bull thistle (*Cirsium vulgare*), sheep sorrel (*Rumex acetosella*), wild geranium (*Geranium dissectum*), red-stemmed filaree (*Erodium cicutarium*), wild radish (*Raphanus sativus*), bindweed (*Convolvulus arvensis*), common knotweed (*Polygonum aviculare*), and rose clover (*Trifolium hirtum*). Non-native grasses also occur in these areas and include wild oats (*Avena barbata*, *A. fatua*), silvery hairgrass (*Aira caryophylla*), velvet grass (*Holcus lanatus*), Harding grass (*Phalaris aquatica*), soft chess (*Bromus hordeaceus*), ripgut brome (*Bromus diandrus*), purple false brome (*Brachypodium distachyon*), foxtail chess (*Bromus madritensis* ssp. *madritensis*), orchard grass (*Dactylis glomerata*), tall fescue (*Festuca arundinacea*), hare barley (*Hordeum murinum* ssp. *leporinum*), Italian rye grass (*Lolium perenne* ssp. *multiflorum*), and foxtail fescue (*Vulpia myuros*). These types of weedy and non-native species are characteristic of disturbed habitats.

One native grass species common on the site is California brome (*Bromus carinatus* ssp. *carinatus*). Native forb species noted included California poppy (*Eschscholzia californica*), slender tarweed (*Madia gracilis*), wild cucumber (*Marah oreganus*), California figwort (*Scrophularia californica* ssp. *californica*) and pearly everlasting (*Anaphalis margaritacea*). The Garden of Heaven site does border some coastal scrub habitat, which is comprised primarily of the native coyote brush (*Baccharis pilularis*) with some native sticky monkey flower shrubs (*Mimulus aurantiacus* ssp. *aurantiacus*). California figwort and pearly everlasting are also associated with the coastal scrub habitat. Two other native shrub species noted were blue elderberry (*Sambucus nigra* ssp. *cerulea*) and coffeeberry (*Rhamnus californica* ssp. *californica*). Some coast redwood (*Sequoia sempervirens*) trees also occur along the border of the site.

Three non-native species of grass were observed that were not previously recorded onsite, including rescue grass (*Bromus alopecurus*), bent grass (*Agrostis capillaris*), and intermediate wheatgrass (*Elytrigia intermedia* ssp. *intermedia*). Intermediate wheatgrass was probably introduced to the site either from an erosion control seed mix or possibly from a mulch. Two non-native forb species were also added to the overall plant list, including Queen Anne's lace (*Daucus carota*) and dandelion (*Taraxacum officinale*).

Conclusions

The entire survey area is highly disturbed and comprised of ruderal non-native weedy plants, many of which are noxious weeds. No special-status plants were observed during this current survey or during the 2009 surveys. The survey area would not be expected to support special-status plant species given the negative survey results, the disturbed and weedy habitat conditions,



County of San Mateo

Planning & Building Department

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Redwood City, California 94063
650/363-4161 Fax: 650/363-4849

Mail Drop PLN122
plngbidg@co.sanmateo.ca.us
www.co.sanmateo.ca.us/planning

August 12, 2011

Attn: Chuck Hotchkiss
Lifemark Group
P. O. Box 5070
San Mateo, CA 94402

Dear Mr. Hotchkiss:

Subject: **LETTER OF DECISION**
File Number: PLN2010-00026
Location: 100 Lifemark Road
APNS: 056-550-020 and 030

On August 10, 2011 the San Mateo County Planning Commission considered a Master Use Permit (20-year term), Resource Management Permit, and Grading Permit, pursuant to Zoning Regulations Sections 6500 and 6313, and County Ordinance Code Section 8602.1, respectively, and certification of a Mitigated Negative Declaration, pursuant to the California Environmental Quality Act, for the continued operation and expansion of Skylawn Memorial Park, located at 100 Lifemark Road near the intersection of San Mateo Road (Highway 92) and Skyline Boulevard (Highway 35) in an unincorporated area of San Mateo County.

Based on information provided by staff and evidence presented at the hearing, the Planning Commission approved the project, amending Condition No. 45 and adding Condition of Approval No. 46 as listed in Attachment A.

With regard to the Planning Commission's certification of the Negative Declaration, the Planning Commission heard from Bern Smith of the Bay Area Ridge Trail Council. Mr. Smith requested that the response to the initial study *Transportation* category question "Will (or could) this project involve the use of off-road vehicles of any kind (such as trail bikes)?" acknowledge that the eventual trail users could include bicyclists (which could be in the "trail bike" category). Mr. Smith also requested that the response to the initial study *Land Use and General Plans* question: "Will (or could) this project serve to encourage off-site development of presently undeveloped areas or increase development intensity of already developed areas?" acknowledge that the proposed trail would require the use of a few parking spaces and that these spaces could either be accommodated in the mortuary's main parking lot or easily at Skylawn's northern end near the SFPUC property; with the latter location requiring little or no preparation to accommodate a few vehicles.

Attn: Chuck Hotchkiss
Lifemark Group
August 11, 2011
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Staff acknowledged that there is ample parking at the mortuary for such use. With both responses, Mr. Smith did not believe they represented any additional impacts. The Planning Commission agreed and indicated that their certification of the Negative Declaration would include these comments and responses and are made part of the record for the project.

Any interested party aggrieved by the determination of the Planning Commission has the right of appeal to the Board of Supervisors within ten (10) business days from such date of determination. The appeal period for this matter will end at **5:00 p.m. on August 24, 2011.**

If you have questions regarding this matter, please contact Joe Camicia, Project Planner, at 650/363-7833.

Sincerely,



Rosario Fernandez
Planning Commission Secretary
pcd0809V_rf (Lifemark Group)

Enclosure: San Mateo County Survey - An online version of our Customer Survey is also available at: <http://www.co.sanmateo.ca.us/planning/survey>

cc: Department of Public Works
Building Inspection Section
Environmental Health Division
CALFIRE
County Assessor
Chuck Hotchkiss
Bern Smith

Attn: Chuck Hotchkiss
Lifemark Group
August 11, 2011
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Attachment A

County of San Mateo
Planning and Building Department

FINDINGS AND CONDITIONS OF APPROVAL

Permit or Project File Number: PLN 2010-00026

Hearing Date: August 10, 2011

Prepared By: Joe Camicia, Project Planner

Adopted By: Planning Commission

FINDINGS

Regarding the Environmental Review, Found:

1. That the Negative Declaration is complete, correct, and adequate and prepared in accordance with the California Environmental Quality Act (CEQA) and applicable State and County guidelines.
2. That, on the basis of the Initial Study, comments received hereto, and testimony presented and considered at the public hearing, there is no substantial evidence that the project, as mitigated by the mitigation measures contained in the Negative Declaration, will have a significant effect on the environment.
3. That the Negative Declaration reflects the independent judgment of San Mateo County.
4. That the mitigation measures identified in the Negative Declaration, agreed to by the applicant, placed as conditions of approval, and identified as part of this public hearing, have been incorporated into the Mitigation Monitoring and Reporting Plan in conformance with California Public Resources Code Section 21081.6.

Regarding the Use Permit Renewal and Adoption of a 20-year Master Use Permit, Found:

5. That the establishment, maintenance and/or conducting of the proposed use will not, under the circumstances of this particular case, be detrimental to the public welfare or injurious to property or improvements in said neighborhood as the implementation of the mitigation measures and conditions of approval will reduce all potentially significant impacts to a less-than-significant level.
6. That the approval of this Master Use Permit for Skylawn Cemetery is necessary for the public health, safety, convenience or welfare of the community as it provides

unique yet critical services to the residents of San Mateo County in that it is a major interment facility, offering a full array of funeral and burial services at the site.

Regarding the Resource Management Permit, Found:

7. That the project is consistent with the goals, objectives, and regulations of the Resource Management Zoning District, Development Review Procedures, and Development Review Criteria. Specifically, the proposal, as conditioned, is consistent with the Vegetative, Water, Fish, and Wildlife Resources, Soil Resources, and Visual Quality Policies.

Regarding the Grading Permit, Found:

8. That the granting of the permit will not have a significant adverse effect on the environment. Staff performed an Initial Study, pursuant to California Environmental Quality Act (CEQA) regulations, and determined that the project, if undertaken with appropriate mitigation measures, would not have a significant adverse impact on the environment and this Commission agrees with staff's determination for the reasons stated in the staff report. The Mitigated Negative Declaration's mitigation measures have been incorporated into the recommended conditions of approval to ensure that the project will have no adverse impacts to the environment.
9. That the project conforms to the criteria of Chapter 8, Division VII, of the San Mateo County Ordinance Code, including the standards referenced in Section 8605. The project, as proposed and conditioned, conforms to standards in the Grading Ordinance, including those regarding an erosion and sediment control plan, dust control plan, fire safety, and the timing of grading activity.
10. That the project is consistent with the San Mateo County General Plan. The project has been reviewed against the applicable policies of the General Plan and found, as proposed and conditioned, to be consistent with its goals and objectives.

CONDITIONS OF APPROVAL

General Procedural Conditions

1. This approval applies only to the proposal, documents, and plans described in this report and submitted to and approved by the Planning Commission on August 10, 2011. Modifications beyond that which was approved by the Planning Commission will be subject to review and approval by the Community Development Director and may require review at a public hearing. Minor modifications that are consistent with the intent of, and in substantial conformance with, this approval may be approved at the discretion of the Community Development Director.

Attn: Chuck Hotchkiss
Lifemark Group
August 11, 2011
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2. The Master Use Permit, Resource Management Permit, Grading Permit, and Architectural Review Permit approval shall be valid for twenty (20) years (Phase 1) from the date of this approval (i.e., through August 10, 2031). If continuation of this use is desired, the applicant shall file a use permit renewal application with the Planning and Building Department six months prior to the permit's expiration and pay the fees applicable at that time. Any further cemetery development beyond the Phase 1 projects included in this permit shall be reviewed against the regulations in place at the time of application.
3. Skylawn's waste storage and removal plan shall continue to be in compliance with County Environmental Health requirements.
4. Skylawn shall continue to work with the SFPUC, GGNRA, and the Bay Area Ridge Trail Council to accommodate the Bay Area Ridge Trail currently proposed on Skylawn's property along its eastern boundary per the adopted alternative as discussed in the SFPUC's 1999 Draft EIR for its Watershed Management Plan. The site plan of any proposed Skylawn project along or near the trail shall show its actual designated trail boundaries to the degree that they are known at the time of that project's subsequent submittal and review. While Skylawn agrees to cooperate in the trail's development, they shall be under no financial or maintenance obligations associated with the trail acquisition or development as a condition of this permit. The easement and/or agreement for this area must be recorded prior to its inclusion in the Bay Area Ridge Trail.
5. The Environmental Management Zone shall be recorded with the County Recorder's Office prior to the issuance of any Phase 1 grading or building permits.
6. The landscaping installed around the westerly and southerly perimeters of Skylawn's existing mausoleum building shall be maintained so that it achieves its maximum screening ability as required. Other than as recommended by a licensed arborist due to the trees' health (whose report shall be submitted to the Planning Department for review and approval), they shall not be trimmed or topped.
7. All existing or any new exterior lighting located anywhere on Skylawn's property shall be corrected, placed, and designed such that no light glare is visible from any public road or viewing location from within any surrounding scenic corridor. Where necessary or applicable, the applicant shall submit an exterior lighting plan to the Planning and Building Department for review and approval to ensure that this standard is met. Such a plan shall include the location of all exterior lighting elements, including the manufacturer's specifications for type, design, height, and candle-power. Any and all new freestanding light fixtures shall not exceed four (4) feet in height and shall be placed and designed such that no light glare is visible from any public road or viewing location from within any surrounding scenic corridor. Any existing or new exterior lighting fixtures mounted to any building or

structure shall be limited to those required for minimum security and safety purposes at those respective facilities. The glare from such lighting shall not be visible from any public road or viewing location from within any surrounding scenic corridor and shall be confined to those facilities. No existing or future interment projects shall include lighting for after-dark services or visitation except for any such lighting deemed necessary for previously cited minimum safety/security purposes. No up-lighting or display lighting intended to illuminate any building, structure, or surrounding landscaping shall be allowed.

8. All Phase 1 projects shall comply with the Model Water Efficient Landscape Ordinance according to Assembly Bill 1881 (effective January 1, 2010). Prior to issuance of any Phase 1 grading or building permits, the applicant shall submit all applicable studies, analyses, reports, and proposals to the San Mateo County Planning and Building Department for review and approval.

Construction/Grading Conditions

9. This grading permit approval shall act as the master (umbrella) grading permit throughout the 20-year development of Phase 1. Total earthwork quantities for all Phase 1 development shall not exceed 50,000 cubic yards. Prior to commencement of any such grading or land clearing activities, the applicant must obtain a separate grading permit for each individual Phase 1 project. Each grading permit application will be reviewed by Planning and Building Department staff to ensure compliance with the Grading Ordinance, the Mitigated Negative Declaration prepared for this project, and National Pollutant Discharge Elimination System (NPDES) regulations. No site disturbance may occur until a complete "hard card" has been issued for each project.
10. When submitting grading permit applications for each Phase 1 project, the applicant shall submit a grading and drainage plan (including calculations) to the Planning and Building Department and the Department of Public Works prior to the issuance of any project related grading or building permits. The grading and drainage plan shall include all requirements listed in Grading Ordinance Section 8604.1.a.5 (*Application Requirements*). The drainage plan shall also include a narrative describing the type, size, and location of all permanent stormwater controls to be utilized in order to ensure compliance with the County's Drainage Policy, the San Mateo County Water Pollution Prevention Plan (SMCWPPP), and NPDES Provision C.3. Said plan must contain project-specific erosion and sediment control measures that are best suited to address both construction related impacts and ongoing post construction stormwater management. The plan shall adhere to the San Mateo Countywide Stormwater Pollution Prevention Program "General Construction and Site Supervision Guidelines," including:

- a. Stabilizing all denuded areas and maintaining erosion control measures continuously between October 15 and April 15. Stabilizing shall include both proactive measures, such as the placement of hay bales or coir netting, and passive measures, such as revegetating disturbed areas with plants propagated from seed collected in the immediate area.
 - b. Storing, handling, and disposing of construction materials and wastes properly, so as to prevent their contact with stormwater.
 - c. Controlling and preventing the discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, and non-stormwater discharges to storm drains and watercourses.
 - d. Using sediment controls or filtration to remove sediment when dewatering the site and obtaining all necessary permits.
 - e. Avoiding cleaning, fueling, or maintaining vehicles on-site, except in a designated area where wash water is contained and treated.
 - f. Delineating with field markers clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees and drainage courses.
 - g. Protecting adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers or filters, dikes, mulching, or other measures as appropriate.
 - h. Performing clearing and earth-moving activities only during dry weather.
 - i. Limiting and timing applications of pesticides and fertilizers to prevent polluted runoff.
 - j. Limiting construction access routes and stabilizing designated access points.
 - k. Avoiding tracking dirt or other materials off-site; cleaning off-site paved areas and sidewalks using dry sweeping methods.
 - l. The contractor shall train and provide instructions to all employees and subcontractors regarding the construction best management practices.
11. For any Phase 1 project that will disturb more than one (1) acre, the applicant shall file a Notice of Intent (NOI) with the State Water Resources Control Board (SWRCB) and shall submit proof of filing said NOI to the Planning and Building Department prior to beginning of any grading or construction activities. The applicant and all

grading/construction contractors shall adhere to all conditions and regulations associated with the State General Construction Activity NPDES Permit.

12. For all Phase 1 projects, the approved project-specific Erosion and Sediment Control Plan must be fully implemented and the measures inspected by County Planning and Building Department staff prior to the commencement of any construction and/or grading activities and shall be maintained throughout the duration of the project. Erosion control measures shall be routinely inspected and any deficiencies shall be immediately corrected. All erosion and sediment control measures must be maintained in manner that prevents sediment and other pollutants from leaving the project site and protects all exposed earth surfaces from erosive forces to the maximum extent possible.
13. The applicant shall seed all disturbed areas (beyond the improved portions of any new project site) with a native grassland mix applied in conjunction with mulch and tackifier, as directed and overseen by the applicant's landscape architect, as soon as grading or clearing activities are completed in order to minimize the potential establishment and expansion of exotic plant species into newly-graded areas. Where a building permit is required, Planning staff shall confirm that such revegetation/reseeding has been adequately applied prior to the Building Inspection Section's final inspection of the project's respective building permit.
14. The engineer who prepared the approved Grading and Drainage Plan shall be responsible for the inspection and certification of the grading as required by Section 8606.2 of the Grading Ordinance. The engineer's responsibilities shall include those relating to non-compliance detailed in Section 8606.5 of the Grading Ordinance.
15. At the completion of work, the engineer who prepared the approved Grading and Drainage Plan shall certify, in writing, that all grading, lot drainage, and drainage facilities have been completed in conformance with the approved plans, as conditioned, and the Grading Ordinance. Said engineer shall also submit a signed "as-graded" grading plan conforming to the requirements of Section 8606.6 of the Grading Ordinance.
16. The applicant shall submit a dust control plan to the Planning and Building Department prior to the issuance of any Phase 1 grading hard cards. The approved measures shall be implemented and inspected prior to beginning any grading and/or construction activities and shall be maintained for the duration of the project. The plan shall, at minimum, include all the "Basic Control Measures" listed in Table 2 of the BAAQMD CEQA Guidelines:
 - a. Water all active construction areas at least twice daily.

- b. Cover all trucks hauling soil, sand and other loose materials or require all trucks to maintain at least 2 feet of freeboard.
- c. Pave, apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas and staging areas at construction sites.
- d. Sweep daily (with water sweepers) all paved access roads, parking areas and staging areas at construction sites.
- e. Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets.

Additional project-specific measures may be required in order to ensure that construction related activities do not generate elevated levels of dust particulates at any point throughout the duration of the project.

- 17. Unless approved in writing and in advance by the Community Development Director, no grading shall be allowed during the winter season (October 15 to April 15) to avoid potential soil erosion.
- 18. No grading shall commence until a schedule of all grading operations has been submitted to and reviewed and approved by the Department of Public Works and the Planning and Building Department. The submitted schedule shall include a schedule for winterizing the site. If the grading operations timetable calls for the grading to be completed in one grading season, then the winterizing plan shall be considered a contingent plan to be implemented if work falls behind schedule. The applicant shall submit monthly updates of the schedule to the Department of Public Works and the Planning and Building Department. All submitted schedules shall describe the work in detail and shall project the grading operations through completion of the project.
- 19. The applicant shall submit, for review by the Department of Public Works and the appropriate Fire District, a plan and profile of: (1) the existing and proposed access from the nearest publicly maintained roadway to the proposed project site, and (2) any new roadways proposed during Phase 1 development. When appropriate, this plan and profile shall be prepared from elevations and alignment shown on the roadway improvement plans. The roadway plan shall also include and show specific provisions and details for both the existing and the proposed drainage patterns and drainage facilities. All new areas shall meet Cal-Fire access requirements including slope, surface, weight, and width requirements at time of building or grading permit application.
- 20. A design level geotechnical investigation of the Phase 1 area shall be performed prior to any project grading. The report shall include a static and seismic slope

stability analysis of the Phase 1 area to be graded and developed. The specific mitigation measures to be utilized in order to stabilize identified landslides and areas of potential seismically induced landslides in the Phase 1 area shall be presented in the report. The report shall be submitted to the San Mateo County Planning and Building Department for review by the County Geologist prior to the issuance of any grading hard cards.

21. Any fills used at the project site shall be properly placed with keyways and subsurface drainage, and adequately compacted following the recommendations of the final geotechnical report and geotechnical engineer, in order to significantly reduce fill sediment. Underground utilities shall be designed and constructed using flexible connection points to allow for differential settlement.
22. Prior to the issuance of any grading permits, the applicant shall submit, to the Department of Public Works for review and approval, a plan for any off-site hauling operations. This plan shall include, but not be limited to, the following information: (1) size of trucks, (2) haul route, (3) disposal site, (3) dust and debris control measures, and (4) time and frequency of haul trips. As part of the review of the submitted plan, the County may place such restrictions on the hauling operation, as it deems necessary.
23. Pursuant to San Mateo County Ordinance Section 8605.5, all equipment used in grading operations shall meet spark arrester and fire fighting tool requirements, as specified in the California Public Resources Code.
24. Noise levels produced by proposed construction activities shall comply with the San Mateo County Noise Ordinance contained in Chapter 4.88 (Noise Control) of the County Ordinance Code. Construction activities shall be limited to the hours from 7:00 a.m. to 6:00 p.m., Monday through Friday, and 9:00 a.m. to 5:00 p.m. on Saturday. Construction operations shall be prohibited on Sunday and any national holiday.
25. Foundation plans shall be submitted to the Planning and Building Department for review prior to issuance of any Phase 1 building permits. All foundation excavations shall be observed during construction by the geotechnical engineer to ensure that subsurface conditions encountered are as anticipated. As-built documentation shall also be submitted to the Planning and Building Department prior to the permit's final inspection.
26. Where building permits are required, the applicant shall apply for and be issued a building permit prior to beginning any construction activities. Building permits may be required for proposed structures including mausoleum/columbarium facilities, retaining walls, storage tanks, permanent stormwater retention/treatment facilities, etc.

Attn: Chuck Hotchkiss
Lifemark Group
August 11, 2011
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27. The applicant shall comply with the County Green Building Ordinance, Ordinance No. 04411, and any revision thereto in effect at the time of building permit application.
28. Any new electric or telephone utilities serving any new structure or facility throughout Skylawn's property shall be placed entirely underground, leading from the closest existing utility pole to the project site. Such undergrounding shall clearly be indicated on any required building plans.
29. The project applicant (or authorized contractor) shall submit a safety plan for the development of Phase 1. The safety plan shall include measures to reduce and minimize accidents on-site and measures that address the proper procedures to clean up and contain spills. The safety plan shall be approved by the County Building Inspection Section prior to the start of construction activity on the site.

Biological/Resource Protection Conditions

[The following Conditions of Approval (Nos. 30-44) include mitigation measures intended to minimize and/or avoid potentially significant impacts to sensitive habitat areas and protected plant/wildlife species.]

30. Prior to commencement of any Phase 1 project, Skylawn must obtain an Incidental Take Permit from the United States Fish and Wildlife Service and provide proof of such authorization to the Planning and Building Department. All recommended mitigation/avoidance measures must be implemented prior to beginning any Phase 1 grading or construction activities and must be maintained throughout the duration of the project.
31. An updated rare plant survey shall be conducted by a qualified botanist prior to any construction activities commencing after the spring of 2012. Should any rare plant species be identified, these populations should be avoided to the extent practical. If removal of special-status plant species is required, transplanting to a suitable location in the Environmental Protection Zone will be considered as the first option. Given that the rare plant species of primary concern are evergreen shrubs or lilies, transplanting should be feasible. Prior to the transplanting of any rare plant species, a plant relocation plan shall be developed by a qualified botanist. At a minimum, the plan shall demonstrate the feasibility of replacing the number of individual plants to be removed at a 1:1 ratio. The plan shall, at minimum, specify the following: (1) the location of mitigation sites in the Environmental Protection Zone or other suitable locations; (2) methods for harvesting seeds and salvaging and transplantation of individual bulbs/plants to be impacted; (3) site preparation procedures for the mitigation site; (4) a schedule and action plan to maintain and monitor the mitigation area; (5) a list of criteria and performance standards by

which to measure success of the mitigation site(s); (6) measures to exclude unauthorized entry into the mitigation areas; and (7) contingency measures in the event that mitigation efforts are not successful. The plan shall be subject to the approval of the Planning and Building Department prior to the removal of any special-status plant species.

32. Prior to any grading or construction activities within or adjacent to the Land and Water Management Zones, a qualified botanist shall conduct a survey of the immediate work areas to determine whether any rare plant species are present. If any such species are identified, the botanist shall consult with Planning and Building Department staff to determine how to proceed. No grading or construction activities shall occur in the area until the botanist and County staff have agreed on an appropriate course of action that will minimize adverse impacts to special-status plant species in the area.
33. Prior to the commencement of construction activities, a tree survey shall be conducted by a qualified arborist indicating all trees within or adjacent to Phase 1 construction areas. At a minimum, the survey shall identify the size (diameter at breast height), species, and condition of the trees. The survey shall also identify which of these trees are considered protected, significant, or heritage trees. The project applicant shall implement tree protection measures to insure said trees are not damaged during construction. These measures may include protective fencing, prohibiting construction/grading activities within the dripline of trees to be preserved, or other appropriate measures approved by the Planning and Building Department. This use permit does not authorize the removal of any trees and any future tree removal proposals would need to be reviewed against the Zoning Regulations and General Plan policies in place at that time.
34. Prior to initial vegetation removal and/or grading activities in the upland portions of the construction zone, pre-construction clearance surveys shall be conducted for California red-legged frog and San Francisco garter snake by a qualified biologist. Should either species be identified, construction activities shall be immediately halted until the frog (or snake) leaves the construction zone on its own, or is removed by a qualified biologist in possession of an appropriate permit and authorized by the United States Fish and Wildlife Service (USFWS). The USFWS shall be immediately notified if either species is observed.
35. Prior to the commencement of construction activities within 50 feet of a wetland or riparian woodland, a pre-construction clearance survey of the area shall be conducted by a qualified biologist for California red-legged frogs and San Francisco garter snake. Should either species be identified, construction activities should be halted until the animal leaves the construction zone on its own, or is removed by a qualified biologist in possession of an appropriate permit and authorized by the USFWS. If it is determined that no red-legged frogs or garter

snakes are present, temporary exclusionary fencing shall then be installed around the perimeter of the wetland/riparian woodland and adjacent construction areas. The fencing shall be maintained throughout the duration of construction activities near the wetland/riparian area. The adequacy of the fencing to prevent frogs and snakes from entering the construction zone shall be approved by a qualified biologist prior to the commencement of construction activities and shall be inspected daily to ensure it continues to operate effectively.

36. This use permit approval does not authorize any grading or construction activities within any wetland areas. In order to prevent the accidental removal of wetland habitat (and potentially damaging habitat of an endangered wildlife species) a qualified biologist shall determine and mark in the field the extent of all wetland areas in and adjacent to Phase 1 development zones. Any grading or construction activities within 50 feet of any wetland habitat shall be referred to and reviewed by the San Mateo County Planning and Building Department and USFWS prior to commencement of any construction activities. Prior to any disturbance within 50 feet of wetland habitats, proof of consultation with and approval by USFWS shall be submitted to the Planning and Building Department.
37. The San Francisco garter snake is a California Fully Protected Species, which means that the California Department of Fish and Game (CDFG) cannot authorize the take of the species and needs to ensure the adequacy of the avoidance measures to be implemented. Therefore, the CDFG shall be consulted prior to the implementation of construction activities and any further recommended avoidance measures shall be implemented. Prior to any disturbance within 50 feet of wetland habitats, proof of consultation with and approval by CDFG shall be submitted to the Planning and Building Department.
38. The outer limits of the stand of native grassland located within the Land and Water Management Zone adjacent to Phase 1 development area shall be identified by a qualified biologist and marked with wooden stakes or other equivalent markers. Land management activities shall not be allowed within the identified area, unless the timing and nature of the activity is found to not pose a threat to bay checkerspot butterfly by a qualified biologist.
39. No earlier than 30 days prior to the commencement of any construction activities in coastal scrub or woodland habitats, a survey shall be conducted to determine if active woodrat nests (stick houses) with young are present within the disturbance zone or within 50 feet of the disturbance zone. If active woodrat nests with young are identified, a fence shall be erected around the nest site at a distance adequate to provide the woodrat sufficient foraging habitat at the discretion of a qualified biologist. Clearing and construction within the fenced area would be postponed or halted until young have left the nest. A qualified biologist should serve as a construction monitor during those periods when disturbance activities will

- occur near active nest areas to ensure that no inadvertent impacts on these nests occur. If woodrats or nests are observed within the disturbance footprint outside of the breeding period, individuals should be relocated to a suitable location within the Environmental Protection Zone by a qualified biologist in possession of a scientific collecting permit. This will be accomplished by dismantling woodrat nests (outside of the breeding period), to allow individuals to relocate to suitable habitat within the adjacent Environmental Protection Zone. The Environmental Protection Zone contains large expanses of suitable woodrat habitat that would be protected.
40. If trees or structures are to be removed during the breeding season of native bat species (generally April 1 through August 31 in California), the presence of active bat maternity roosts should be evaluated by a qualified biologist. If the trees/structures to be removed are determined to provide potential bat roosting habitat, a focused survey should then be conducted to determine if an active maternity roost of a special-status bat species is present. Should an active maternity roost of a special-status bat species be identified, the roost should not be disturbed until the roost is vacated and juveniles have fledged, as determined by the biologist. Once all young have fledged, the tree/structure may be removed.
 41. If a construction project would commence anytime during the nesting/breeding season of native bird species potentially nesting on the site (typically February through August in the project region), a pre-construction survey of the project vicinity for nesting birds shall be conducted. This survey shall be conducted by a qualified biologist (i.e., experienced with the nesting behavior of bird species of the region) within two weeks of the commencement of construction activities. The intent of the survey would be to determine if active nests of special-status bird species or other species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code are present within the construction zone or within 500 feet of the construction zone. The survey area would include all trees and shrubs in the construction zone and a surrounding 500 feet area. The survey should be timed such that the last survey is concluded no more than two weeks prior to initiation of construction. If ground disturbance activities are delayed following a survey, then an additional pre-construction survey should be conducted such that no more than two weeks will have elapsed between the last survey and the commencement of ground disturbance activities.

If active nests are found in areas that could be directly affected or are within 500 feet of construction and would be subject to prolonged construction-related noise, a no disturbance buffer zone shall be created around active nests during the breeding season or until a qualified biologist determines that all young have fledged. The size of the buffer zones and types of construction activities restricted within them will be determined through consultation with the CDFG, taking into account factors such as the following:

- a. Noise and human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity;
- b. Distance and amount of vegetation or other screening between the construction site and the nest; and
- c. Sensitivity of individual nesting species and behaviors of the nesting birds.

Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or another appropriate barrier and construction personnel should be instructed on the sensitivity of nest areas. The biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas of special-status bird species to ensure that no impacts on these nests occur.

42. If archaeological and/or cultural resources are encountered during grading or construction activities, work shall be temporarily halted in the vicinity of the discovered materials and workers shall avoid altering the materials and their context until a qualified professional archaeologist has evaluated the situation and provided appropriate recommendations. The project applicant or archaeologist shall immediately notify the Current Planning Section of any discoveries made and shall provide the Current Planning Section with a copy of the archaeologist's report and recommendations prior to any further grading or construction activity in the vicinity.
43. Any proposed dry wells exceeding 10 feet in total depth shall comply with the San Mateo County well ordinance.
44. The Department of Fish and Game has determined that this project is not exempt from Department of Fish and Game California Environmental Quality Act filing fees for the Initial Study and Mitigated Negative Declaration pursuant to Fish and Game Code Section 711.4. The applicant shall pay to the San Mateo County Recorder's Office an amount of \$2,094.00 within four (4) days of completion of the appeal period, which period expires on August 25, 2011 unless these permits are appealed to the San Mateo County Board of Supervisors and a new decision date is determined.

Skylawn Memorial Park Access/Roadway Improvements

45. The project applicant shall prepare a plan that involves repaving, striping, and, if deemed necessary, additional signage to improve access to and exiting from the Skylawn facility onto Highways 35 and 92. This plan shall be submitted to both CalTrans and the County Planning and Building Department for review and

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Lifemark Group
August 11, 2011
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approval. The plan shall be implemented and completed prior to the completion of the next interment project as anticipated in the Master Use Permit and including the completion of the Eternity Gardens project, the second phase of which is yet to be initiated. No new signage is to be installed until reviewed and approved by the Planning and Building Department and/or CalTrans (if proposed within CalTrans right-of-way). This use permit does not authorize the use of temporary signage or banners on the Skylawn property or within CalTrans right-of-way. The applicant shall obtain, retroactively, the necessary building and planning permits for the new "Skylawn" sign located near Skylawn Memorial Park's entrance at the junction of Highways 35 and 92.

46. Prior to the submittal of any grading and/or building permits associated with any development of the subject Master (Phase 1) Use Permit, the applicant shall schedule a meeting with the County Community Development Director, or his/her designee, to ensure the project's compliance with all applicable conditions of approval of this permit. This meeting shall include, where necessary, representatives from the County Planning and Building Department, Department of Public Works and Environmental Health Division and the County Fire Authority. The applicant shall be responsible for ensuring the attendance at this meeting of any current or new/future architects, landscape architects, geotechnical/civil engineers, biologist, ongoing or specific project managers and any other applicable consultants. It shall also be the applicant's responsibility to ensure that such project-related personnel and consultants comply with all applicable conditions of approval. Finally, the applicant shall be aware that any development on the subject property or that proposed within the cited Phase 1 area will be subject to the most current versions of County Building, Public Works, Environmental Health, County Fire Authority and/or any State-mandated regulations.