From:	Kimberly Rible
To:	Adrian Fernandez
Cc:	Fred Gaines
Subject:	Green Acres - Groundwater
Date:	Wednesday, March 02, 2016 12:42:45 PM
Attachments:	image007.png SUSBIZHUB-A16030110140.pdf

Dear Adrian,

The purpose of this email is to respond to your February 23, 2016 email requesting that Green Acres provide the City of Malibu with information regarding "potential contaminations as a result of toxic chemicals from coffins, embalming and body decomposition." Our office, along with members of the Green Acres' project team and its experts, have obtained information to support a finding of no significant environmental impact on hydrology/water quality.

Project Characteristics

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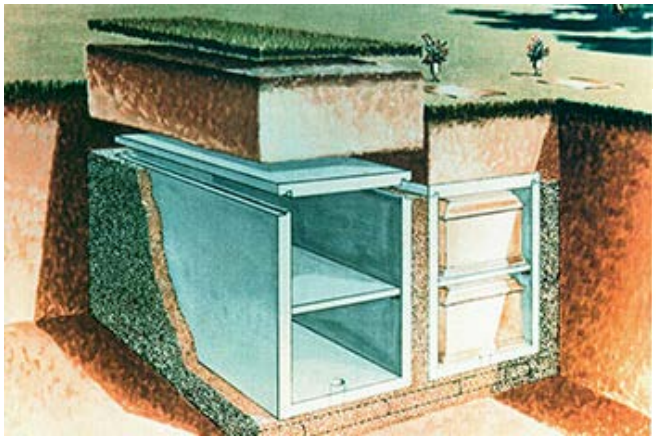
All embalming is to be conducted off-site. Furthermore, the proposed project will provide a variety of internment and entombment options, only a small percentage of which is expected to involve embalmed remains (embalming is not required by State law).

Construction of the memorial park involves the pre-placement of specialty concrete vaults. More specifically, prior to actual interment, sections of the memorial park will have pre-installed concrete vaults ready to accept a variety of burial caskets. Below are some images to provide an example of the type of materials and methods used to house and place caskets.



Introducing The

POLY-CRETE

WHY A POLY-CRETE BURIAL VAULT?

The Poly-Crete vault offers a unique feature and patent pending design. The introduction of high density polypropylene technology combined with concrete is the first of its kind within the burial vault industry. The polypropylene offers qualities of strength, protection, and permanence unsurpassed by other polymers. It's impervious to chemicals and combined with it's water resistant properties bring a new level of comfort as an option for long term interment.

"A noble purpose inspires sacrifice, stimulates innovation and encourages perseverance."

THE ULTIMATE IN STRENGTH AND PROTECTION

The Poly-Crete name was selected for this burial vault as a result of combining concrete, a time-tested industry favorite and placing it between two layers of high density polymer, creating a unique hybrid vault of unparalleled strength, performance and quality. As a funeral professional, you can feel confident in offering the Poly-Crete "twice". The ultimate value for protection and permanence.

Life is divided into three terms - that which was, which is, which will be. Let us learn from the past to profit by the present, and from the present, to live better in the future.

William Wordsworth

A double lined polymer vault infused with concrete.

POLY-CRETE

Is offered in a variety of colors

THE VALUE OF OFFERING A PROFESSIONAL FINISH

Most consumers appreciate the beauty and added value of a professional painted finish. Nothing provides a more prestigious image than that of a high gloss metallic finish. Applying a quality finish dramatically increases the value of the vault.

Colonial White, Triple Black, Imperial Gold, Autumn Bronze, Velvet Silver, Rich Burgundy, Mystic Blue and Royal Lavender

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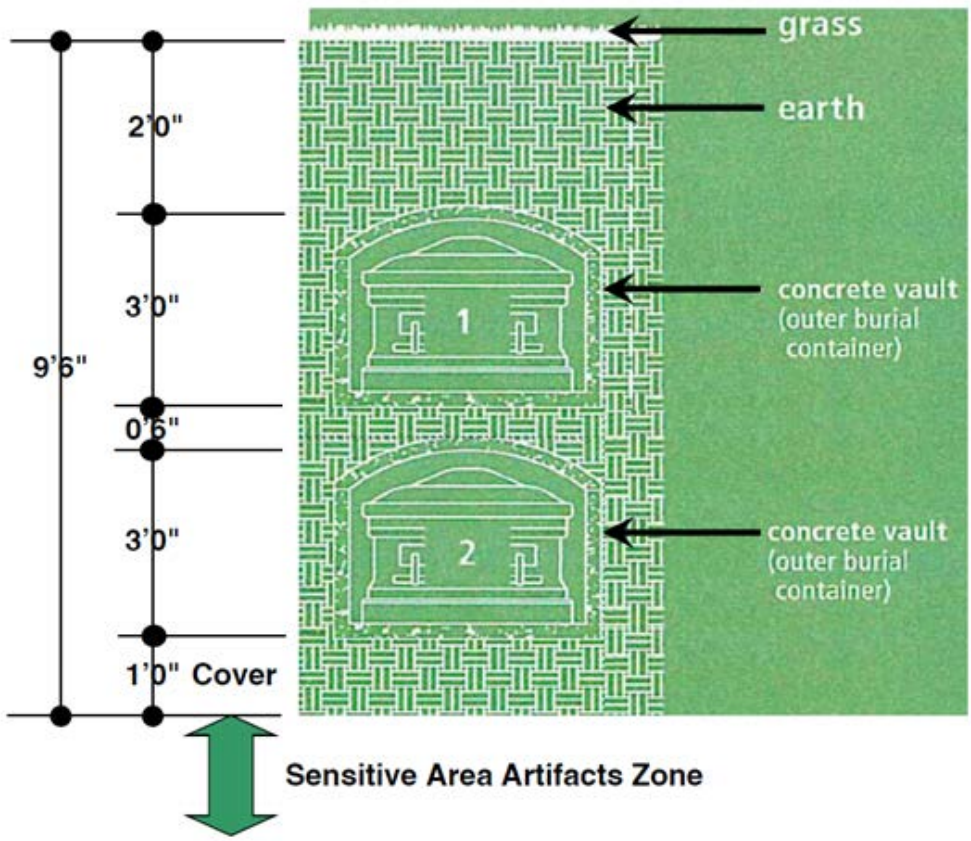

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CEQA Analysis

We have conducted review of the way in which potential groundwater contamination has been dealt with in other memorial park/cemetery projects. In short, environmental analyses of similar projects are either silent on the issue or conclude that there is "no impact" on hydrology/water quality.

Highlighted for you below are excerpts from the respective hydrology/water quality analyses of recently adopted Mitigated Negative Declarations/Environmental Assessments for similar memorial park/cemetery projects.

Example A: "Central Coast Veterans Cemetery Project – Phase 1 Mitigated Negative Declaration (June 2014)"

http://www.ecorpconsulting.com/Client_Docs/Public_review/CCC_Veterans_Cemetery/Draft_IS_MND_EA.pdf

"The location of Alternative 1 would be generally the same as the Proposed Project. However, Alternative 1 would include in-ground burials with 6-7 foot deep concrete-lined gravesite vaults. The LUC's described in Mitigation Measures HM-1 thru HM-3 would require a UXO technician for each gravesite excavated; thus, imposing additional costs for each in-ground burial. With the additional earthwork, groundwater contamination is not expected to occur during construction, due to the relatively shallow onsite excavation, the porous soils, and the design of the concrete-lined vaults. Infiltration water is reportedly deflected around concrete burial vaults and caskets, implying that infiltration water would not come into contact with embalming chemicals. As discussed above, the impact of routine transport, use, or disposal of hazardous materials would be less than significant with implementation of mitigation measures HM-1, HM-2, and HM-3."* *See pages 4-90, 4-100 of hyperlink.*

** Note: The mitigation measures referenced relate to Army/military rules and potential burial of explosives, so they would be inapplicable here.*

Example B: "National Veterans Burial Ground Environmental Assessment (December 2015)"

"Based on standard modern burial practices, it is unlikely that embalming fluid or other decomposition

byproducts would be released into the soil and/or groundwater. The standard NCA design incorporates (for full casket burials) sub-surface concrete crypts, an entire section of which would be installed during site construction. Using this technique, the caskets are not buried directly in the soil, but are rather set in a pre-placed concrete crypt (established turf and soil temporarily removed, crypt lid removed, casket placed, followed by the reverse process to complete). Modern embalming fluids are markedly less toxic as the primary active ingredients are no longer arsenic based. Additionally, as selection of either cremain interment or columbaria* placement increase, the potential for soil or groundwater contamination commensurately decreases as no embalming fluids are used." *See pages 22-23 of attachment.*

**Note: A columbarium is a structure of vaults lined with recesses for cinerary urns (urns holding ashes of cremated remains).*

We hope that this information is helpful to the City and to Impact Sciences in moving forward with the Initial Study and the hydrology/water quality analysis. If there is anything else you need from us, please do not hesitate to let us know.

Best regards,

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