AMADOR COUNTY BOARD OF SUPERVISORS

COUNTY ADMINISTRATION CENTER
BOARD OF SUPERVISORS CHAMBERS
810 Court Street
Jackson, CA 95642

Public hearing items will commence no sooner than the times listed on the agenda. Closed Session agenda items may be heard before or after scheduled public hearings, dependent upon progression of the agenda.

TO PARTICIPATE REMOTELY BY CALLING IN USING THE FOLLOWING NUMBER:
+1-669-900-6833 (alternate phone numbers listed on amadorgov.org)
Access Code: 758 573 6084#
YOU MAY ALSO VIEW AND PARTICIPATE IN THE MEETING USING THIS LINK:
https://zoom.us/j/7585736084
If all Board Members are present in person, public participation by Zoom is for convenience only. If the zoom feed is lost/hacked for any reason, the meeting may nevertheless go forward at the discretion of the Chair. The only assurance of live comments being received by the Board is to attend in person. The Chair will call the meeting to order and after Board input, will invite the public to comment in person and online.

SPECIAL MEETING AGENDA

DATE: Tuesday, November 10, 2026
TIME: 10:15 AM
LOCATION: COUNTY ADMINISTRATION CENTER
BOARD OF SUPERVISORS CHAMBERS
810 Court Street
Jackson, CA 95642

CLOSED SESSION **9:30 a.m.** may be called for labor negotiations (pursuant to Government Code Â§54957.6), personnel matters (pursuant to Government Code Â§54957), real estate negotiations/acquisitions (pursuant to Government Code Â§54956.8), and/or pending or potential litigation (pursuant to Government Code Â§54956.9).

1. CONFERENCE WITH REAL PROPERTY NEGOTIATORS: County Negotiators: Charles T. Iley, County Administrative Officer; Glenn Spitzer, General Services Director

1.a CONFERENCE WITH REAL PROPERTY NEGOTIATORS APN: 012-040-040 (59.43 acres of unimproved land within unincorporated area of Amador County). Agency negotiator: Glenn Spitzer Negotiating Parties: Erik Christeson and Richard Lynch Under negotiation: lease and option terms
Suggested Action: Discussion only

1.b CONFERENCE WITH REAL PROPERTY NEGOTIATORS Property: Unspecified Hangar at Westover Field. Agency negotiators: Erik Anderson and Glenn Spitzer Negotiating party: Phil Gibboney Under negotiation: all lease terms.
Suggested Action: Discussion only

REGULAR SESSION **10:15 a.m.**

CALL TO ORDER:

PLEDGE OF ALLEGIANCE:

PUBLIC MATTERS NOT ON THE AGENDA: Discussion items only, no action to be taken. Any person may address the Board at this time upon any subject within the jurisdiction of the Amador County Board of Supervisors; however, any matter that requires action may be referred to staff and/or Committee for a report and recommendation for possible action at a subsequent Board meeting. Please note - there is a three (3) minute limit per topic.

APPROVAL OF AGENDA: Approval of agenda for this date; any and all off-agenda items must be approved by the Board (pursuant to Government Code section 54954.2

APPROVAL OF ITEMS ON THE CONSENT AGENDA: Items listed on the consent agenda are considered routine and may be enacted by one motion. Any item may be removed for discussion and possible action, and made a part of the regular agenda at the request of a Board member(s).

2. PUBLIC HEARING: **10:30 A.M.**

2.a Appeal of Planning Commissionâ€™s decision to deny Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery, which proposes 1832 graves sites divided among 7 blocks on the north end of the property. The 46-acre parcel is zoned R1A, Single-family Residential and Agriculture and has an MRZ, Mineral Resource Zone General Plan Designation. Proposed improvements include driveway parking for up to 100 cars, and a parking lot with 64 permanent spaces, and permanent restrooms. Proposed number of funerals is 60 funerals a month with a limit of 50 attendees per event. APN: 001-220-013
Suggested Action: Possible Board Action(s): 1) Determination on the adequacy of the proposed environmental document, a Mitigated Negative Declaration, or as amended; 2) Decision to approve or deny the Use Permit (with the recommended conditions of approval, mitigation measures, and findings included in the staff report), or as amended.
Staff Report- UP-22;2-3 Gardens of Noor BOS Appeal.pdf
Gardens of Noor Cemetery Appeal Letter.pdf
BOS NOTICE UP-22;2-3 Gardens of Noor Cemetery11-10-26.pdf
PC Meeting Minutes 09-08-26.final draft.pdf
Planning Commission 9.8.26 Item 1 UP-22;2-3 Gardens of Noor - comments removed.pdf
Comments-combined 11.04.26.pdf
26.11.04 Ltr FINAL.pdf
Video_Comments-_link_in_document.pdf

3. CONSENT AGENDA: Items listed on the consent agenda are considered routine and may be enacted by one motion. Any item may be removed for discussion and possible action, and made a part of the regular agenda at the request of a Board member(s).

3.a Social Services - Resolution Appointing Melissa T. Chavez as Deputy Public Administrator/Guardian/Conservator (PAGC)
Suggested Action: Approval
Memo Appointment of Deputy PAGC.docx
Amador County PAPGPC Resolution Draft.docx

3.b Social Services and Juvenile Probation: Child Welfare System Improvement Plan
Suggested Action: Review and approve the Amador County Child Welfare Services System Improvement Plan.
Memo - Child Welfare System Improvement Plan.pdf

Amador SIP 2024-2029.pdf
SIP Signature Page (2).pdf

3.c Correction to Staffing Action - Reclassification Deputy County Counsel I to II
Suggested Action: Approve
Memo - Correction CC I-II.doc

3.d Revised job description and salary adjustment for Human Resources Technician classification.
Suggested Action: Approve
Memo - HR Technician.doc
Human Resources Technician (DRAFT) 11-26.doc
Human Resources Technician (FINAL) 11-26.docx

3.e Resolution Regarding Salaries and Fringe Benefits for Confidential Employees.
Suggested Action: Approve.
Confidential DRAFT 10.26.26.pdf
Confidential_Resolution_DRAFT_11.10.26.docx

ADJOURNMENT: UNTIL TUESDAY, NOVEMBER 17, 2026 AT 9:00 A.M. (CLOSED SESSION BEGINS AT 8:30 A.M.)

In compliance with the Americans with Disabilities Act, if you are a disabled person and you need a disability-related modification or accommodation to participate in this meeting, please contact the Clerk of the Board staff, at (209) 223-6470 or (209) 257-0619 (fax). Requests must be made as early as possible and at least one-full business day before the start of the meeting. Assisted hearing devices are available in the Board Chambers for public use during all public meetings.

Pursuant to Government Code 54957.5, all materials relating to an agenda item for an open session of a regular meeting of the Board of Supervisors which are provided to a majority or all of the members of the Board by Board members, staff or the public within 72 hours of but prior to the meeting will be available for public inspection, at and after the time of such distribution, in the office of the Clerk of the Board of Supervisors, 810 Court Street, Jackson, California 95642, Monday through Friday, between the hours of 8:00 a.m. and 5:00 p.m., except for County holidays. Materials distributed to a majority or all of the members of the Board at the meeting will be available for public inspection at the public meeting if prepared by the members of the Board or County staff and after the public meeting if prepared by some other person. Availability of materials related to agenda items for public inspection does not include materials that are exempt from public disclosure under Government Code sections 6253.5, 6254, 6254.3, 6254.7, 6254.15, 6254.16, or 6254.22.

Board of Supervisors Agenda Item Report

Submitting Department: General Services Administration
Meeting Date: November 10, 2026

SUBJECT
CONFERENCE WITH REAL PROPERTY NEGOTIATORS APN: 012-040-040 (59.43 acres of unimproved land within unincorporated area of Amador County). Agency negotiator: Glenn Spitzer Negotiating Parties: Erik Christeson and Richard Lynch Under negotiation: lease and option terms

Recommendation:
Discussion only

4/5 vote required:
No

Distribution Instructions:
Glenn Spitzer

Board of Supervisors Agenda Item Report

Submitting Department: Airport
Meeting Date: November 10, 2026

SUBJECT
CONFERENCE WITH REAL PROPERTY NEGOTIATORS Property: Unspecified Hangar at Westover Field. Agency negotiators: Erik Anderson and Glenn Spitzer Negotiating party: Phil Gibboney Under negotiation: all lease terms.

Recommendation:
Discussion only

4/5 vote required:
No

Distribution Instructions:
Glenn Spitzer

Board of Supervisors Agenda Item Report

Submitting Department: Planning
Meeting Date: November 10, 2026

SUBJECT
Appeal of Planning Commissionâ€™s decision to deny Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery, which proposes 1832 graves sites divided among 7 blocks on the north end of the property. The 46-acre parcel is zoned R1A, Single-family Residential and Agriculture and has an MRZ, Mineral Resource Zone General Plan Designation. Proposed improvements include driveway parking for up to 100 cars, and a parking lot with 64 permanent spaces, and permanent restrooms. Proposed number of funerals is 60 funerals a month with a limit of 50 attendees per event. APN: 001-220-013

Recommendation:
Possible Board Action(s): 1) Determination on the adequacy of the proposed environmental document, a Mitigated Negative Declaration, or as amended; 2) Decision to approve or deny the Use Permit (with the recommended conditions of approval, mitigation measures, and findings included in the staff report), or as amended.

4/5 vote required:
No

Distribution Instructions:
Planning

ATTACHMENTS
- Staff Report- UP-22;2-3 Gardens of Noor BOS Appeal.pdf
- Gardens of Noor Cemetery Appeal Letter.pdf
- BOS NOTICE UP-22;2-3 Gardens of Noor Cemetery11-10-26.pdf
- PC Meeting Minutes 09-08-26.final draft.pdf
- Planning Commission 9.8.26 Item 1 UP-22;2-3 Gardens of Noor - comments removed.pdf
- Comments-combined 11.04.26.pdf
- 26.11.04 Ltr FINAL.pdf
- Video_Comments-_link_in_document.pdf

STAFF REPORT TO: AMADOR COUNTY BOARD OF SUPERVISORS
FOR MEETING OF: NOVEMBER 10, 2026

Appeal of Planning Commission's decision to deny Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery, which proposes 1832 graves sites divided among 7 blocks on the north end of the property. The 46-acre parcel is zoned R1A, Single-family Residential and Agriculture and has an MRZ, Mineral Resource Zone General Plan Designation. Proposed improvements include driveway parking for up to 100 cars, and a parking lot with 64 permanent spaces, and permanent restrooms. Proposed number of funerals is 60 funerals a month with a limit of 50 attendees per event. APN: 001-220-013

Applicants: Mounir Kaddoura
Supervisorial District: 5
Location: 16630 Lambert Rd., Ione, CA 95640 and 857 Carbondale Rd., Ione, CA 95640

Possible Board Action(s):

1) **Determination on the adequacy of the proposed environmental document, a Mitigated Negative Declaration, or as amended;**
2) **Decision to approve or deny the Use Permit (with the recommended conditions of approval, mitigation measures, and findings included in the staff report), or as amended.**

A. General Plan Designations: MRZ, Mineral Resource Zone

B. Zoning Districts: R1A, Single-family Residential

C. Acreage Involved: ±46 acres

D. Background: On May 7, 2026, the Amador County Technical Advisory Committee (TAC) reviewed this application and found the application complete. A second TAC meeting was held on June 11, 2026, at which time TAC completed the CEQA Initial Study and prepared a recommendation to the Planning Commission, along with draft Conditions of Approval. TAC has no technical objections to the adoption of a Mitigated Negative Declaration for the project subject to the Conditions, Mitigation Measures, and Findings included in the staff report.

E. Planning Commission Action: The Planning Commission, following a public hearing on September 8, 2026, found that the Mitigated Negative Declaration was not adequate to address the project's potential environmental impacts, and denied the request use permit for the project.

F. Possible Board Action: Following the public hearing, the Board may:

1) Make a determination on the adequacy of the proposed environmental document, a Mitigated Negative Declaration; and

2) Make a decision to approve or deny the Use Permit. If the Board moves to approve the Use Permit, the Conditions and Mitigation Measures included in the staff report are recommended for inclusion with the motion to approve, along with the following Findings.

   a. A review of the proposal was conducted by staff and the Technical Advisory Committee who, through their own research, found that the project will not have a significant effect on the environment with incorporation of the Conditions and Mitigation Measures included in the staff report;

b. There are no project-specific significant, unmitigated effects which are peculiar to the project or its site;

c. The proposed use is consistent with the County Code Section 19.28.020(E) for Additional Uses (Cemeteries) permitted with a Use Permit, allowed in any district unless otherwise prohibited.

d. Maintenance or operation of the project applied for will not under the circumstances of the particular case be detrimental to the health, safety, peace, morals, comfort and general welfare of persons residing or working in the neighborhood of such proposed use or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the county with the implementation of the proposed Conditions of Approval and Mitigation Measures.

e. On the basis of the administrative record presented, the Board of Supervisors finds that there is no substantial evidence that the project will have a significant impact to the environment and that the Mitigated Negative Declaration included in the Staff Report reflects the Board's independent judgement and analysis.

GARDENS OF NOOR CEMETERY

16630 Lambert Road, Ione, California 95640 | (209) 429-1543 | mounirkad@yahoo.com

September 9, 2026



VIA HAND DELIVERY
Clerk of the Board of Supervisors
County of Amador
810 Court Street
Jackson, California 95642

RE: FORMAL APPEAL OF PLANNING COMMISSION DENIAL – USE PERMIT UP-22;2-3, GARDENS OF NOOR CEMETERY

Applicant: Mounir Kaddoura
APN: 001-220-013
Project Location: 857 Carbondale Road and 16630 Lambert Road, Ione, CA 95640
Zoning / General Plan: R1A (Single-Family Residential and Agricultural); MRZ (Mineral Resource Zone) General Plan designation
Planning Commission Action Appealed: Denial on September 8, 2026

Honorable Members of the Amador County Board of Supervisors:

Pursuant to Amador County Code section 19.56.050, I hereby timely appeal the Amador County Planning Commission's September 8, 2026 denial of Use Permit UP-22;2-3 for the Gardens of Noor Cemetery. This letter is intended to constitute the written appeal required by the County Code. I respectfully request that the Clerk accept and file this appeal, collect the applicable appeal fee, and provide a file-stamped copy for my records.

The appeal challenges both the evidentiary basis for the denial and the fairness of the proceeding. In particular, the record raises substantial concerns that the denial was not supported by substantial evidence addressing the project-specific technical and environmental record and that religious bias expressed during the hearing compromised the impartiality required of a quasi-judicial land-use proceeding.

I. THE BOARD SHOULD REVIEW THE DENIAL DE NOVO UNDER AMADOR COUNTY CODE SECTION 19.56.050

County Code section 19.56.050 provides that an interested person may appeal a Planning Commission action in writing to the Board of Supervisors within ten days, with the required fee filed with the Clerk of the Board. The same section provides that the Board's hearing is de novo and that, after the hearing, the Board may grant, deny, or grant the requested use permit subject to conditions it deems just and appropriate. This appeal is filed the day after the Planning Commission's action and is therefore timely.

II. THE DENIAL SHOULD BE RECONSIDERED IN LIGHT OF THE PROJECT-SPECIFIC TECHNICAL AND ENVIRONMENTAL RECORD

The Gardens of Noor proposal is a use-permit application for a cemetery on the subject parcel. The County's project record includes extensive technical and agency review addressing matters such as access, traffic, groundwater, fire protection, environmental impacts, and proposed conditions of approval. To the extent the Planning Commission relied primarily on generalized community opposition, fear, or speculation rather than substantial project-specific evidence, the denial should not stand. See Harris v. City of Costa Mesa (1994) 25 Cal.App.4th 963 (reviewing a conditional-use-permit denial and the requirement that the administrative decision be supported by substantial evidence).

At the de novo hearing, I respectfully request that the Board independently review the complete administrative record, including the final environmental document, staff reports, technical studies, agency comments, conditions of approval, hearing recordings, minutes, and all evidence presented for and against the project. The Board should make its own findings based on the evidence in that record and any additional evidence properly received at the appeal hearing.

III. THE HEARING RECORD RAISES A SERIOUS PROCEDURAL DUE PROCESS AND IMPARTIALITY CONCERN

A Planning Commission considering an individual use-permit application acts in a quasi-judicial capacity and must provide a fair hearing before impartial decision-makers. California authority recognizes that an administrative land-use decision may be invalid where a decision-maker's conduct creates an unacceptable probability of actual bias. See Nasha L.L.C. v. City of Los Angeles (2004) 125 Cal.App.4th 470.

During the September 8, 2026 hearing, a member of the Commission serving as Vice Chair made statements on the record concerning Muslims, including statements that "Muslims are sneaky and cannot be trusted" and that "the Qur'an teaches Muslims to not be honest." If the official recording or transcript confirms these statements, they constitute direct evidence of religious prejudice relevant to the fairness and integrity of the Commission's decision-making process. I respectfully request that the Board review the official recording and minutes as part of the appellate record and determine the legal effect of those statements on the denial.

IV. FEDERAL RELIGIOUS-LAND-USE PROTECTIONS REQUIRE NEUTRAL, NONDISCRIMINATORY TREATMENT

The Religious Land Use and Institutionalized Persons Act of 2000 ("RLUIPA"), 42 U.S.C. § 2000cc et seq., includes protections against land-use decisions that discriminate against a religious assembly or institution on the basis of religion or religious denomination. The United States Department of Justice has specifically enforced RLUIPA in a matter involving an Islamic cemetery. The statements described above therefore warrant careful review in determining whether the challenged denial was reached through a neutral, nondiscriminatory process.

V. REQUEST FOR RELIEF

For the foregoing reasons, I respectfully request that the Board of Supervisors:

1. Accept this letter as a timely written appeal under Amador County Code section 19.56.050;
2. Set the matter for the de novo public hearing required by section 19.56.050;
3. Include the complete Planning Commission and environmental-review record, including the September 8, 2026 hearing recording and minutes, in the record before the Board;
4. Independently determine whether the denial is supported by substantial evidence and whether the proceeding satisfied the requirements of due process and religious neutrality; and
5. Grant the appeal and approve Use Permit UP-22;2-3, with lawful and appropriate conditions if necessary, or provide such other relief as the Board determines is warranted after de novo review.

Please provide written confirmation that this appeal has been filed, the amount of the required appeal fee, and notice of the date, time, and place of the Board's appeal hearing.

Respectfully submitted,

Mounir Kaddoura
Applicant, Gardens of Noor Cemetery
(209) 429-1543
mounirkad@yahoo.com

CC: Amador County Counsel; Amador County Planning Department

OFFICE OF THE
BOARD OF SUPERVISORS
810 COURT STREET * JACKSON, CA 95642 (209) 223-6470 * FAX (209) 257-0619

NOTICE OF RESCHEDULED PUBLIC HEARING

NOTICE IS HEREBY GIVEN that the BOARD OF SUPERVISORS of the County of Amador, State of California, has received an application for the project described in this notice.

PROJECT DESCRIPTION: RESCHEDULED Appeal of the Planning Commission's denial of Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery, which proposes 1832 graves sites divided among 7 blocks on the north end of the property. The 46-acre parcel is zoned R1A, Single-family Residential and Agriculture and has an MRZ, Mineral Resource Zone General Plan Designation. Proposed improvements include driveway parking for up to 100 cars, and a parking lot with 64 permanent spaces, and permanent restrooms. Proposed number of funerals is 60 funerals a month with a limit of 50 attendees per event.
APN: 001-220-013

OWNER/APPLICANT: Mounir Kaddoura
SUPERVISORIAL DISTRICT: 5
LOCATION: 16630 Lambert Rd., Ione, CA 95640 and 857 Carbondale Rd., Ione, CA 95640

ENVIRONMENTAL REVIEW PROCESS: In accordance with the California Environmental Quality Act (CEQA), the lead agency, the Amador County Board of Supervisors shall be required to review the project's proposed environmental document. The Planning Commission rejected the proposed Mitigated Negative Declaration, and denied the project on the basis of multiple findings including both environmental and project-specific factors. If, during the processing of this application, it is determined that are issues which cannot be found to be insignificant or adequately mitigated through standard conditions, it may be found by the Board of Supervisors that an Environmental Impact Report (EIR) is required or the project may be denied.

PUBLIC HEARING: Notice is hereby given said Board of Supervisors will hold a public hearing on this application at the County Administration Center, Board of Supervisors Chambers, 810 Court Street, Jackson, California, on **November 10, 2026 at 10:30 a.m.** or as soon thereafter as can be heard. Anyone having comments on the project may attend and be heard.

The Chairperson will invite the public to comment via phone/online. Public comment will also be accepted by email at boardofsupervisors@amadorcounty.gov. All emails must be received prior to the start of the meeting and will be included in the record of the meeting. Emails received after those already included in the meeting materials will be printed and distributed to the Supervisors and available to the public, and shall be subject to the same rules as would otherwise govern speaker comments at the Board meeting.

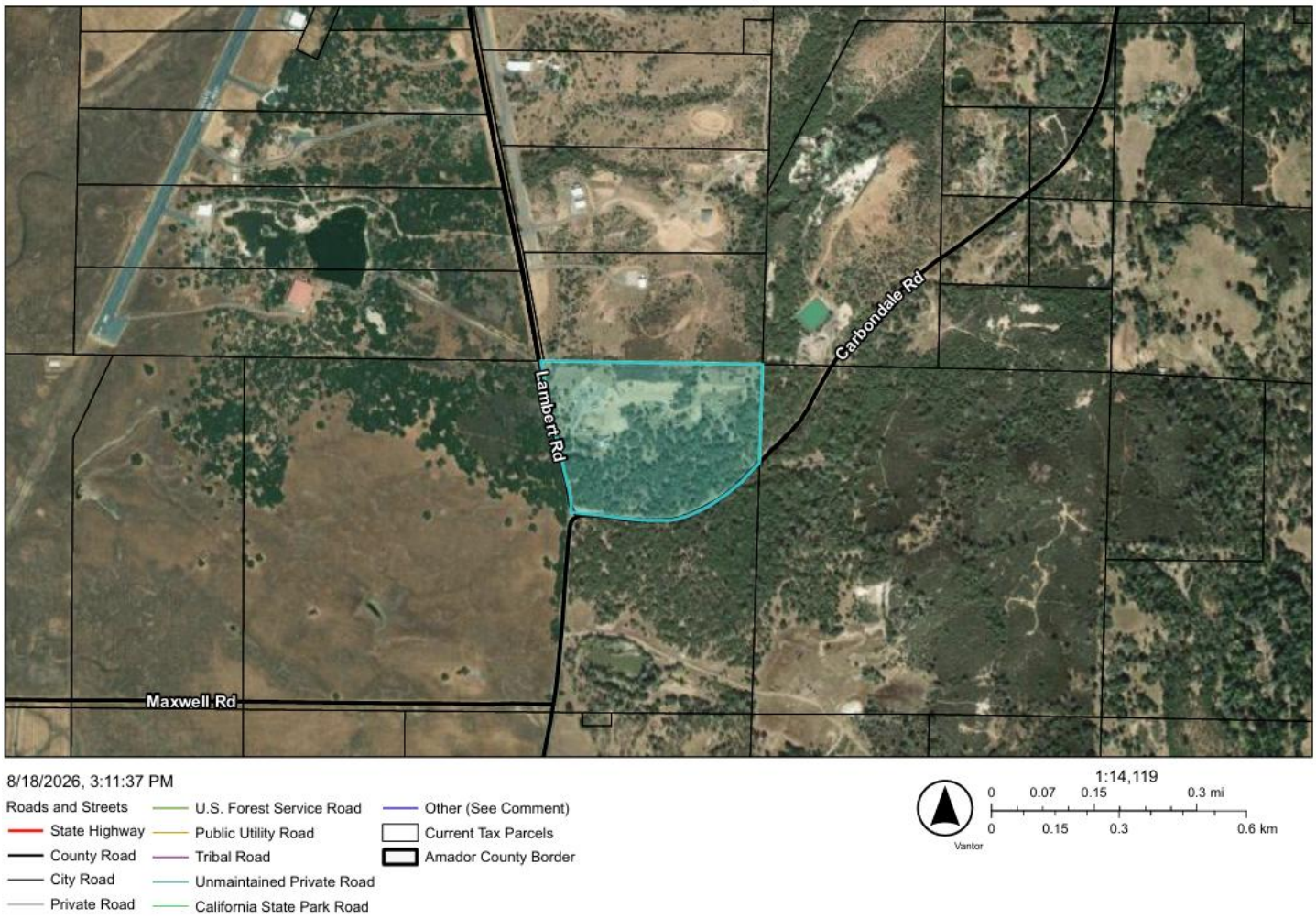
Letters of comment regarding this matter received by the County prior to the publication of the Staff Report will be sent to each Supervisor as part of the agenda packet. The Staff Report will be published online at www.amadorcounty.gov in the "Agendas and Minutes" section. Letters received after the Staff Report has been published will be copied and circulated to each Supervisor prior to the public hearing. Be advised that due to time constraints, the Supervisors may not be able to give letters submitted after the Staff Report is published as detailed a review as those received earlier. Therefore, it may be to your benefit to attend the hearing and summarize your concerns orally. Letters will not be read aloud at the public hearing. If you have any questions or desire more information, please contact this office.

In compliance with the Americans with Disabilities Act, if you need a disability-related modification or accommodation to participate in this meeting, please contact the Clerk of the Board, at (209) 223-6470, or by email to boardofsupervisors@amadorcounty.gov. Requests must be made as early as possible, and at least two business days before the start of the meeting.

NOTE: If you do not comment at the public hearing or send in written comments and later decide to challenge the nature of this proposed action in court, you may be limited to raising only those issues you raised at the public hearing or have given in written correspondence delivered to the public entity conducting the hearing at, or prior to, the Public Hearing.

AMADOR COUNTY BOARD OF SUPERVISORS
Date of this notice: October 13, 2026

SUBJECT PARCEL(S) SHOWN BELOW



The Planning Commission of the County of Amador met on September 8, 2026, in the Board Chambers at the County Administration Center, 810 Court Street, Jackson, California. The meeting was called to order at 6:02 p.m. by Vice-Chair Bennett.

COMMISSIONERS PRESENT WERE: John Gonsalves, Chair, District 1
Steve Christman, District 2
Justin Reese, District 3
Jerry Poore, District 4
Mark Bennett, Vice-Chair, District 5

COMMISSIONERS ABSENT WERE: None

STAFF: Sabrina Pierce, Deputy County Counsel
Chuck Beatty, Planning Director
Krista Ruesel, Planner III
Mary Ann Manges, Recording Secretary

NOTE: The Staff Report packet prepared for the Planning Commission is hereby incorporated into these minutes by reference as though set forth in full. Any Staff Report, recommended findings, mitigation measures, conditions or recommendations which are referred to by Commissioners in their action motions on project decisions which are contained in the Staff Reports are part of these minutes. Any written material, petitions, packets, or comments received at the hearing also become a part of these minutes. The recording tapes of this meeting are hereby incorporated into these minutes by reference and are stored in the Amador County Planning Department.

A. **Call to Order.** The meeting was called to order by Vice-Chair Bennett at 6:02 p.m. with Chair Gonsalves attending via teleconference at home with no one else in the room over the age of 18 with him.

B. **Pledge of Allegiance:**

C. **Approval of Agenda:**

MOTION: It was moved by Commissioner Poore, seconded by Commissioner Reese, and unanimously carried to approve the agenda.

D. **Minutes:** August 11, 2026

MOTION: It was moved by Commissioner Poore, seconded by Commissioner Reese, and unanimously carried to approve the August 11, 2026, minutes.

E. **Correspondence:** Letters from Robinson, Wardall, Carey, Woodhouse, West, Evatt, Bohall, Avila, Rodgers, Flynn, Advis & Cucchi, Unknown, and Citizens in Opposition; videos from Woodhouse.

F. **Public Matters not on the Agenda:** None

G. **Recent Board Actions:** Mr. Beatty shared that the Board of Supervisors certified the Final EIR for the Wicklow Way Specific Plan and adopted the plan.

H. Agenda Items:

Public Hearings:

Item 1 - Request for Use Permit Application UP-22;2-3 for Gardens of Noor Cemetery, which proposes 1832 graves sites divided among 7 blocks on the north end of the property. The 46-acre parcel is zoned R1A, Single-family Residential and Agriculture and has an MRZ, Mineral Resource Zone General Plan Designation. Proposed improvements include driveway parking for up to 100 cars, and a parking lot with 64 permanent spaces, and permanent restrooms. Proposed number of funerals is 60 funerals a month with a limit of 50 attendees per event. (APN: 001-220-013)

Applicant: Mounir Kaddoura
Supervisorial District: 5
Location: 16630 Lambert Road, Ione, CA 95640 and 857 Carbondale Road, Ione, CA 95640

Vice-Chair Bennett stated that with regret, due to the large number of people in attendance, the 3-minute speaking limit will need to be adhered to in order to give everyone the opportunity to speak. He added that Planning staff will time the 3 minutes.

Ms. Ruesel shared the staff report, which is hereby incorporated by reference into these minutes as though set forth in full. She noted that mitigation measure BIO-6 did not make it into the uploaded draft conditions and is found within the CEQA Initial Study but was not called out separately among the mitigations in the Initial Study, nor in Chapter 21. She stated that if the project is approved it is staff's recommendation to amend the final conditions of approval and the final Initial Study to include that mitigation measure. She explained that mitigation is specific to oak tree preservation and follows the recommendations of the biologist selected by the applicant.

Mounir Kaddoura, applicant, thanked everyone for their hard work and reviewing the application, offered to correct any mistakes on his side and to respond to every neighbor's concern. He said that he will agree to and will fulfill all the conditions.

Wesley David Wardall shared that they bought and built the airport which he said is the biggest in the County and able to take a Boeing 757. He added that it is a recreational activity that falls under CEQA guidelines. He shared that they had a volunteer CEQA specialist from Calaveras County review and report on the Amador County report. He said that the report is 443 pages long and shows all the problems. He commented that the applicant's application is full of errors, omissions, and problems and that specialists in the audience are present. He stated that they did not get any water out there after drilling 10 wells as deep as 700 feet on the property and 5 wells on the east side of Lambert. He said for fire protection that they put in a 6-inch water main over 7 miles that is capable of about 490 gallons a minute and shared that lines in their subdivision go to each house with wharf hydrants. He stressed that their connections are at capacity and there is no excess water. He said that they had to drill 4 producing wells to get their subdivision and voiced that it is unacceptable and unfair to relax the requirements for the applicant and allow a will-serve letter from the water agency.

Mr. Wardall stated that the County ignored the vehicle threshold limits of 110 trips per day from the Governor's Office of Planning and Research and staff at the Planning Department told the applicant to lessen the numbers to 20 cars and 50 people to get their foot in the door. He shared that their calculations come up to 300 trips per day exceeding the trip limit by 200% and questioned the adequacy of a 500-gallon septic tank with 450 people visiting when his own ranch septic is 1,500 gallons. He commented that the Islamic community has a practice of going on social media and asking all the community to attend a funeral whether they know the deceased or not.

Deputy County Counsel Pierce advised Mr. Wardall to address his comments to the Commission and not the public.

Mr. Wardall shared that their CEQA specialist volunteer will be speaking and that he was told by email from Chair Gonsalves that the speakers' minutes could be donated and has the minute donation forms, if desired.

Deputy County Counsel Pierce advised Vice-Chair Bennett that as chair of the meeting, it is at his discretion to abide by the advertised 3-minute time limit. She said that it is best practice to enforce a 3-minute limit universally and understands there might be another arrangement. She added that it also within his discretion to advise that the audience limit side talk so individual commenters can be heard.

Vice-Chair Bennett stated that in consideration of the number of people present, and to hear as many people as possible, a 3-minute limit is needed.

Peggy Flynn asked for 15 minutes.

Vice-Chair Bennett said that people have given their time so that Ms. Flynn can have her 15 minutes.

Ms. Flynn said that she spoke on her behalf and the citizens who have joined the Eagles Nest Estates Homeowners Association in opposition to the adoption of the Initial Study and proposed Mitigated Negative Declaration (MND) for the project. She stated that this project on this parcel served by this road network, water, wastewater, fire access, drainage, and groundwater has not received the level of environmental review that CEQA requires. She said that the Initial Study and proposed MND do not provide substantial evidence that impacts will be less than significant and leave major project impacts unquantified, unsupported, deferred to later review, or excluded by defining the project too narrowly. She added that the record presents substantial evidence supporting a fair argument that this project may have significant environmental effects and under CEQA requires an Environmental Impact Report (EIR). She asked the Commission to decline to adopt the MND and the required use permit findings and to direct staff to prepare an EIR that evaluates the whole project. She pointed out that an EIR is required due to:

Piecemealing an entitlement application since 2022; the original application was for a dramatically larger development and reduced the scope from 50,000 gravesites and large assembly use to 1832 grave plots over 1.7 acres but same 46-acre parcel; the applicant has not placed a recorded restriction on remaining land; stage 1 & stage 2 is on applicant's own engineering sheets; the applicant at the September 18, 2025, Technical Advisory Committee (TAC) meeting stated that he intended to apply for another addition in approximately 6 months

with future proposals later.

The Vehicle Miles Travelled (VMT) analysis is not supported as there are no actual quantified trip generation analysis and does not disclose total cumulative trips over the actual internment capacity. The traffic assumptions do not match project description and do not meaningfully analyze the physical safety questions and there is no monitoring mechanism for traffic impacts.

The site's physical setting has unstudied impacts, and the use of FEMA mapping is not a substitute for site-specific analysis of actual on the ground drainage conditions. The applicant's geotechnical report found groundwater actively seeping and there are previous concerns about water contamination from shallow burials stated by County Counsel and Environmental Health Department stated at prior TAC meetings. The area has uncontrolled feral swine, and the water supply, wastewater, and fire protection are not feasible with an AWA limitation of 400 gallons per day and a proposed supplemental well at 2 gpm.

Amador County Code Section 19.56.040 must be supported by evidence and requires the Commission to make affirmative findings that the proposed use will not be detrimental to the health, safety, peace, comfort, and general welfare of persons in the neighborhood and not injurious to property or the general welfare of the County.

Ms. Flynn stated that the record supports that there is a fair argument that this project may cause significant environmental impacts and if there is no outright denial of the project that the remedy is the preparation of an EIR and would provide all information CEQA requires before the County commits to an approval. She said that this is good planning and requested that the Planning Commission:

- decline to adopt the Initial Study and proposed mitigation and negative declaration
- find that substantial evidence supports a fair argument of potentially significant environmental effects
- direct the preparation of a full EIR, addressing the entire reasonably foreseeable project and all connecting phases
- decline to make the use permit findings required by County Code Section 19.56.040 until the County has a complete, legally adequate environmental record.

Mark Carey, 800 Eagles Ranch Road, asked for confirmation that he could still have 9 minutes. He shared that has been a civil engineer for 36 years and has experience in roadway drainage and highway design with the bulk of his experience in water supply; wastewater treatment; dealing with groundwater treatment and groundwater wells; with an emphasis on supporting failing systems. He voiced concern about impacts to underlying groundwater with an unknown loading that could be increased over time for the septic system and with not addressing the macro-leachate associated with cemeteries. He shared that there are downgradient impacts including a downstream neighbor with a pond and a neighbor with a well 1,400 feet away. He commented that he does not think that the California Regional Water Quality Board has been notified.

Ms. Ruesel said that they have been notified and all agency comments have been posted to CEQAnet.

Mr. Carey continued that he would like to see their formal response and mentioned that Sacramento County Environmental Health is a mile away. He voiced concern that water is running over the roadways after a storm and that County crews cannot go out and deal with it. He stated that the tax base from the applicant is not going to pay for fixing the road, but the people present are. He said it is well documented that property values will decrease with a cemetery at the entrance to the neighborhood. He shared that there are general plans because we have inadequate infrastructure and cannot support traffic loads, water, and wastewater everywhere. He added that the Commission is mandated to make sure that the health, safety, peace, morals, and comfort and convenience of the people of Amador County are addressed and that there are CEQA issues, this is a discretionary approval, and that the people should be the final arbiters.

Ron Woodhouse said he was asked to ask if the applicant could be seen and centered on the screen. He shared that he owns a ranch off Lambert Road and asked for those opposed to the project to stand up. He asked to refer to a picture of Ione Manzanita taken on his property that is about 25 feet from the applicant's property. He said it is extremely rare and protected by the Federal government, the California Endangered Species Act and the California Native Plant Society. He stated that the Moore Biological Report talks about foxtails and clover and does not mention the federally endangered Ione Manzanita, Ione Buckwheat, Irish Hill Buckwheat, Bisbee Peak Rush Rose, and Parry's Horkelia. He said that the applicant talks about destroying the chaparral when they go into Phase 2 of the grave sites and has already gone in and taken those out. He stressed that he is going to knock out the Ione Manzanita and take out ½ of the oak canopy which is a blue oak zone which the report contradicts by saying that interior live oak is the only species of oak observed on the property. He said that if the endangered species are not mitigated the California Department of Fish and Wildlife will sue via the Attorney General's Office of California. He asked to show a video of feral pigs running from the vernal pools across from the project headed for the cemetery. He stressed the biological report did not address any of the endangered species.

Thomas McCaffrey asked what reports will be used to make a decision and who will be responsible if a decision is made with erred reports. He voiced that taxpayers do not want to pay for a lawsuit if the County ends up getting sued. He asked if a group could be responsible for it instead and if the public would be informed of what information was used.

Deputy County Counsel Pierce responded that applicants must sign an indemnity agreement and as far as the validity of the evidence, the Commission is tasked with reviewing the substantial evidence in the record and making an informed decision based on what is presented before them. He stated that if there is contradicting evidence it can be added to the project record.

Mr. McCaffrey said that he understands that evidence showing it is inaccurate will be able to be shown before it is passed.

Deputy County Counsel Pierce continued that the public comment portion of this public hearing is the public portion of the application review, and contradicting evidence is part of the administrative record.

Mike Preskar, 17901 Lambert Road, said he lives in the immediate vicinity and asked to show videos of flooding several days after the rain coming off the property. He commented that it

would seem reasonable to expect the issuance of a use permit to be of some benefit to the local community or at least to Amador County. He shared that the applicant stated on the application that the need for the project is to meet the growing needs of the Muslim community of Amador County. He shared that a demographic search shows that the Muslim population in Amador County is about 400 persons and said he assumes the applicant plans for this project to be a destination cemetery. He said there is no financial benefit to Amador County but to the applicant and it would likely require more of the County's resources. He shared that there are 40 cemeteries in the County and after calling Amador Memorial, Sunset View, and Ione Public Cemeteries that space is available with room for expansion, can accommodate a green burial and the direction of the burial. He added that there already is an active Muslim-only cemetery near Highway 16 and Eagles Nest Road in Sacramento. He stressed that the cemetery will disrupt the peace, harmony, and tranquility of their quiet rural neighborhood and their daily lives for all residents of the area and those to be born for the next 100 years. He said that per code 19.56.040 the applicant must enter into a contract with the County to pay for any injury and to pay for all road maintenance and repairs before any use permit is issued. He added that there are 12 miles of narrow pothole infested roads leading to the site. He commented that he does not think that Amador County Groundwater Management Authority GSA has done an EIR and addressed the effect of 720 unembalmed green burials per year on the quality of local groundwater which they are obligated to do by SGMA.

Mrs. Preskar shared her background which included being a survivor of a heart attack and an accident at the corner of Ione and Carbondale roads. She said that this contributed to her insight into the importance of rapid emergency response and the mental and physical wellbeing of residents. She questioned whether a destination cemetery is acceptable for a use permit and cited two court cases where they have been denied with both cases treating increased traffic as a risk and a grounds for denial. She added that home values can be reduced by both traffic and the presence of a cemetery and that courts have upheld bans when a county already has sufficient burial capacity. She also stated that there are physiological changes from anxiety and psychosocial stress and that authoritative bodies make clear that the proposed permit threatens lifesaving response time and the overall health of the neighborhood. She questioned that only 50 will be attending the burials when there is a principle of collective obligation. She asked that the Commission reject the proposal which is supported by 450 signatures and uphold code 19.46.040.

Jim Wirfel shared that he is a property owner at Eagles Ranch, has concern for fire protection for the residents, and that the pipeline they put in is already overtaxed. He asked the Commission to consider the commercial application and that a minimum of 1,000 gallons per minute per NFPA Chapter 13 tables for any commercial operation is required. He asked what solution the applicant offers and proposed that the first possible solution is a 120,000-gallon storage tank questioning how it would get filled; a well with a study that shows that wells in that area previously could not produce water. He stressed that a project should not be approved first.

Dan Pippin, Jackson, said that he worked at the fire service for 30 years and is a retired Fire Chief. He shared that he has given presentations based on his articles on Wildland Urban Interface (WUI) fires. He shared that he toured the area and saw that the roads are in poor condition with no shoulders and saw dense rows of dead branches on the borders of the subject property. He said that fire can spread rapidly in chapparal and oak savannahs with heavier fuel loads and spot fires can be created. He shared that he was told while visiting the AFPD Station

121 in Willow Springs that they or the station in Ione would respond to a medical call with an ambulance from Plymouth. He added that response times vary but under ideal conditions takes about 10 minutes. He shared that the fire severity zone at the property is high hazard with a portion and the area east of the property rated very high hazard. He voiced that there are some serious life safety concerns due to this as well as from increased response times and medical aid calls from the funeral processions; increased traffic and people in the area who may be unfamiliar with the area; and trucks and trailers from local ranches evacuating livestock. He provided several examples of recent fires where fires overran stopped vehicles evacuating.

Nita Patel, Amador County resident, asked to consider the full life of a cemetery and stressed that the people who will live with this decision 50 years from now cannot speak at this meeting. She said that families may return on birthdays, anniversaries, holidays, and festivals and asked if a nearly full cemetery with ordinary visitors and multiple services has been analyzed; what the total site limit is and who enforces it; who pays for the next 50 years when the last gravesite is sold; who pays for maintenance, drainage, restroom security, fire prevention; who is responsible if the operator changes or the organization closes. She urged the Commission to vote no and said that this is not about questioning anyone's rights to a dignified burial but applying careful, consistent standards to a lasting land use decision and plan Amador County's future.

Tom McCleary, Eagle's Nest Airport, shared that the applicant's property is within one half mile of the airport. He said this is a safety conflict and that the Federal Aviation Administration regulations stipulate that an aircraft must maintain a minimum altitude of 1,000 feet above the highest obstacle over any congested area of a city, town, or settlement or over any open-air assembly of people. He stated that the Initial Study should have analyzed the project's proximity to the airport because it involves outdoor gatherings and that the historical plans include a large assembly facility. He said the project constrains lawful flight operations while at low level over an assembly of people, places the assembled people beneath takeoff and landing operations, and raises compatibility concerns. He said that questions cannot be avoided by describing the current filing only as a cemetery and leaving future uses unresolved. He stated that Eagle's Nest Airport has proven to be an asset for first responders; has been used with air ambulance operations and staging site training for firefighters; as a landing site by Cal FIRE for tankers and helicopters; and has a designated refueling area for helicopters. He asked the Commission to understand the full emergency context of the site, the surrounding transportation network, emergency concerns, and reject the project.

Diane Bennett, Fiddletown, said that she is a history teacher, and has helped with animal evacuations during wildfires. She shared that the applicant has begun groundwork and asked if he got a permit voicing concern about environmental impacts to protected species. She said that most people would get fined if not first approved by the County and that rules should be followed by everyone. She shared that a massive El Nino is expected this year and that the County had to put out signs last year saying the road is flooded. She stated that she has been out on those roads and shared that much loved Daffodil Hill was lost due to traffic congestion and concerns about fire and medical response. She stated she is concerned about response times for medical and fire and asked to deny the project in its entirety.

Colleen Santos commented that they have researched and found disturbing facts that provide a questionable operational history for Mr. Kaddoura. She said that he previously applied for a mosque and 45,000 burial sites and the Sacramento County Consumnes Community Planning Advisory Committee (CPAC) denied the application in 2018. She shared that at the August 4,

2022, TAC meeting Mr. Kaddoura arrived by Zoom 34 minutes late and stated that he wanted a maximum of 400 attendees for each funeral and then reduced the number after the advice from staff to 50. She continued that at the June 11, 2026, TAC meeting that Ron Woodhouse, Ione resident, shared the failed permit history in Sacramento and Amador counties and that Mr. Kaddoura has said that he never applied for a use permit in Sacramento County. She said that during the TAC meeting Mr. Wardall stated that Mr. Kaddoura filed for a CPAC use permit and provided copies of the document to staff and TAC members. She added that on May 14, 2025, the Yuba County Board of Supervisors imposed $43,913.42 fine for property code violations pertaining to an electrical panel and other problems. She shared that on April 29, 2025, that the California Cemetery and Funeral Bureau imposed a $500 fine for untagged bodies and/or a lack of a facility room. She said that these facts indicate a history of not complying with existing laws, codes, and rules in Sacramento, Yuba, and Amador counties and they are concerned that Mr. Kaddoura will not comply with Amador County use permit provisions.

Vice-Chair Bennett left the dais.

Deputy County Counsel Pierce apologized for interrupting Ms. Santos and asked Vice Chair Bennett if a recess was needed. There was a 15-minute recess.

After the recess. Vice-Chair Bennett continued the meeting.

Ms. Santos continued that Mr. Kaddoura also has a criminal history that includes charges for driving without insurance and a license and a criminal misdemeanor for violence against an intimate partner. She said these things along with what she previously cited indicate somebody who is not trustworthy either in his personal life or business and that bringing in a business that is run in this way and with previous citations is going to pose harm to Amador County.

Commissioner Poore said that he believes that there has been a lot of testimony and information and that there is no way in good conscience that he is going to be able to approve the adequacy of the environmental document. He stated that he believes it is a good time for discussion amongst the Commission and that he thinks that an EIR is needed.

Deputy County Counsel Pierce announced that before the public hearing is closed if there is no one else in the room that wishes to be heard that the applicant has had is hand raised and should be able to respond to any comments.

Commissioner Poore asked to hear from the applicant.

Mr. Kaddoura said that he had no application in Consumnes communities nor any land in Sacramento County, did not propose a cemetery nor a mosque in Sacramento, and is not that lucky. He stated that as far as driving without a license if that was done, he is sure he paid his dues. He shared that as far as domestic violence his wife decided to retire and went to court with the case dismissed after 2 or 3 years because they knew it was just an accusation. He said that regarding the use of the storage area the regulations of the state have changed and they previously allowed the usage of a religious facility which he had. He shared that he has two places where the deceased can be kept for a brief time. He said that they changed the regulation and charged him $500; told him to get a commercial property for the storage of the deceased and is in the process of doing that; and that there are no outstanding issues with it. He said these are personal issues which should not affect the operation of a cemetery for it is

regulated. He said he wants this to be successful for him and the neighbors and is under the Commission and neighbors' direction.

Commissioner Poore asked to close public hearing.

Mr. Wardall said that the applicant is lying about never being in Sacramento County, would put all his licenses on the line, and that he previously gave counsel and all the TAC members the information on the application through Cosumnes CPAC. He handed Ms. Manges, Recording Secretary, a copy of the statement of facts on Mr. Kaddoura for the record.

Vice-Chair Bennett said that he does not want to deny anyone the right to speak but he does not think that any new information will be heard.

Mr. Kaddoura asked Mr. Wardall for the address where he proposed the mosque or cemetery was located and asked if he can call Mr. Wardall.

Mr. Woodhouse shared that Mr. Kaddoura said that he did not own the property but that does not mean that he did not apply for the mosque and the cemetery and that he did the same thing in Amador County for the first proposal when he did not own it. He added that he knows people on the Committee in Wilton who said it was turned down.

Mr. Kaddoura said he owns property in Sacramento but did not own land in Sacramento or apply for a cemetery or mosque in the Sacramento area.

Mr. Wardall said when he gets home, he can provide the address and that the property fronts Dillard Road He added that the physical address is on Meiss Road and the applicant's name is on the application for the CPAC.

Deputy County Counsel Pierce advised that it is within Vice-Chair Bennett's authority to remind public commenters to direct their comments and questions directly to the Planning Commission and to address the Commission on matters within their jurisdiction to the extent that they are relevant to this application and not to previous applications in other jurisdictions.

Ms. Ruesel asked the applicant if he has any comments related to the current submitted application.

Mr. Kaddoura responded that he had no comment.

Linda Woodhouse stated that she was not planning to speak but that the meeting was announced as being from 6:00 p.m. to 10:00 p.m. and thinks it is disrespectful to cut it off short.

Commissioner Poore reminded the Commissioners that he has a motion pending and that he thinks it is time for them to discuss his motion to deny the environmental document and request a full EIR along with a variety of conditions.

A member of the public voiced that they could speak and said that in that case she will speak to the public.

Deputy County Counsel Pierce announced that if the woman is not going to abide by the conditions of the public hearing that she will be removed from the room. She said she can address her comments to the Commission but at this time that they are discussing a motion.

Walter Roberts stated that he wants to address the Commission.

Deputy County Counsel Pierce provided the same advisement she gave to the woman to Mr. Roberts.

Mr. Roberts said that he would like to address the Commission and their obvious attempts at silencing the opposing views of the people, especially Deputy County Counsel Pierce trying to silence people who just want to talk.

Vice-Chair Bennett stated that he does not think anyone is trying to be silenced and that he does not think there is going to be any new information given and that is why a motion was proposed.

Commissioner Poore asked for a roll call to his previous motion.

Vice-Chair Bennett asked for a roll call.

Stanley Sella, Amador County resident, interjected and thanked Deputy County Counsel Pierce for doing a wonderful job providing due process for everybody and commented that when your enemy speaks let them talk so they can make fools of themselves. He said that the Commission has been compelling and that he has no doubt that each of the Commissioners have heard the words that have been said and have been compelled to look into this further. He stated that this motion should be a sign of victory because otherwise they would go home with no answer.

Mr. Wardall shared that he has put up with this hell for four years and that there are a lot of people present. He stressed that he does not want to kick the can down the road with an EIR and asked for the Commission to amend their motion and terminate the project.

MOTION: It was moved by Commissioner Poore, seconded by Commissioner Reese, and carried to close the public hearing.

AYES: Gonsalves, Poore, Reese
NOES: Christman, Bennett

Vice-Chair Bennett said that the last thing he wants to do is silence anyone but does not think anyone is saying anything new. He stated that he has read every page of the packet and everyone on the Commission is fully informed of all the problems with this. He emphasized that this is cattle grazing area, we are short cattle, and that beef prices are rising. He said that more importantly, this is a mineral resource zone; minerals are where they are found; cemeteries can be almost anywhere; and that protecting mineral resources benefits everyone including the proponents. He shared that what lies underground is unknown, but it is known that rare earth critical minerals are imported and critical minerals such as lithium change over time. He said that we do not want to repeat mistakes and cover deposits under things. He thanked those who prepared materials documenting the project and shared that he attended two TAC meetings and the process has dragged on for four years. He commented that the project has been marked by

ambiguity, distortions, accusations, lying, and many other cited and related factors including the current piecemeal approach. He stated that deception of this sort is in the Quran and spelled the word t-a-q-i-y-y-a. He said that, according to Sharia, this is not only permitted but obligatory and that deception is of fundamental importance to Islam, especially in the modern era. He shared that practically every Islamic sect agrees with this and practices it, and the practice of deception is mainstream in Islam according to a website of the Middle East Forum. He said that in the eyes of Islam, we are an infidel county.

Commissioner Poore stated that he would like to propose a full EIR study and that his intention is to fully represent the people. He commented that he has heard and read the thorough and compelling report from Ms. Flynn which has aided in bringing him to this conclusion. He said the EIR needs to review impacts on traffic, water, roads, the airport, adjacent mining operations, and all phases of the project.

Commissioner Christman said there is a lot of property out there and believes the property is not suitable for this application after everything they have heard. He said that he has a contractor background and that the groundwater and roads are bad and asked why this is being done there.

Commissioner Poore stated that if the application is denied at this meeting the applicant has a right to appeal and that it just goes right past the Commission. He said he would like to have all the environmental information before making a decision and is not trying to kick the can down the road but seal the can tightly.

Deputy County Counsel Pierce reminded Mr. Wardall, approaching the podium, that the public hearing has been closed.

Mr. Wardall commented that if this goes to an EIR that he will appeal to the Board of Supervisors.

Commissioner Poore said that he has that option.

Vice-Chair Bennett commented that if the project is denied they have right to appeal and wants to make sure that the applicant understands that to appeal, he needs to go to the Clerk of the Board and wants to avoid future lawsuits. He said that he believes there is enough evidence that the project is not feasible and is in a poor location.

Chair Gonsalves initiated a motion that the mitigated negative declaration is inadequate for the project. Commissioner Christman made a second.

Deputy County Counsel Pierce advised that if the motion is to deny the mitigated negative declaration that substantial evidence in the record to support a fair argument needs to be articulated that the project may have potentially significant impacts which would necessitate a higher level of review, an EIR.

Mr. Wardall commented that he objects.

Chair Gonsalves asked why Mr. Wardall is objecting.

Mr. Wardall stated that he objects to Deputy County Counsel's wording that an EIR is needed.

Deputy County Counsel Pierce advised Mr. Wardall that the public hearing is closed and repeated her advisement directed at the Chair.

Mr. Wardall said that it is perfect, but having an EIR is unacceptable.

Chair Gonsalves advised Mr. Wardall that he did not ask for an EIR in his motion.

Deputy County Counsel Pierce clarified that the legal implications of the motion are that the denial of a mitigated negative declaration automatically implies that a higher-level environmental review is needed.

Chair Gonsalves said that his motion is to deny the mitigated negative declaration based on significant environmental impacts.

Commissioner Christman seconded the motion.

Vice-Chair Bennett commented that the mitigated negative declaration is inadequate, but all the problems such as floods, endangered species, and roads will not change. He stated that it will be a waste of everyone's time including the applicant's time to have an EIR.

Chair Gonsalves addressed Vice-Chair Bennett advising that this is just the first of two motions.

MOTION: It was moved by Chair Gonsalves, seconded by Commissioner Christman, and unanimously carried that the mitigated negative declaration is not adequate due to significant environmental impacts that necessitate a higher level of review.

Deputy County Counsel Pierce advised that there can be no approval of the project today since there is no environmental document and said that any action of the Planning Commission requires findings, that proposed additional findings are included, and that findings must be based on substantial evidence in the record.

MOTION: It was moved by Chair Gonsalves, seconded by Commissioner Christman, and unanimously carried to deny UP-22;2-3 because it is not conducive to the environment or appropriate for this community and based on the finding of a lack of adequate environmental document.

Ms. Ruesel stated that the Planning Commission has denied UP-22;2-3 and the mitigated negative declaration has been found inadequate. Anyone wishing to appeal these decisions may do so by filing a written appeal with the Clerk of the Board of Supervisors along with applicable fees by September 18, 2026, at 5:00 p.m.

MOTION: It was moved by Commissioner Poore, seconded by Commissioner Christman, and unanimously carried to adjourn the meeting until the next regularly scheduled meeting October 13, 2026.

_____

Mark Bennett, Vice-Chair
Amador County Planning Commission

_____

Mary Ann Manges, Recording Secretary
Amador County Planning Department

_____

Chuck Beatty, Planning Director
Amador County Planning Department

STAFF REPORT TO: AMADOR COUNTY PLANNING COMMISSION
FOR MEETING OF: SEPTEMBER 8, 2026

ITEM 1 **Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery, which proposes 1832 graves sites divided among 7 blocks on the north end of the property. The 46-acre parcel is zoned R1A, Single-family Residential and Agriculture and has an MRZ, Mineral Resource Zone General Plan Designation. Proposed improvements include driveway parking for up to 100 cars, and a parking lot with 64 permanent spaces, and permanent restrooms. Proposed number of funerals is 60 funerals a month with a limit of 50 attendees per event. APN: 001-220-013**

Applicants: Mounir Kaddoura
Supervisorial District: 5
Location: 16630 Lambert Rd., Ione, CA 95640 and 857 Carbondale Rd., Ione, CA 95640

Possible Planning Commission Action(s):

1) **Determination on the adequacy of the proposed environmental document, a Mitigated Negative Declaration;**
2) **Decision to approve or deny the Use Permit (with the recommended conditions of approval, mitigation measures, and findings included in the staff report)**

A. General Plan Designations: MRZ, Mineral Resource Zone

B. Zoning Districts: R1A, Single-family Residential

C. Acreage Involved: ±46 acres

D. Background: On May 7, 2026, the Amador County Technical Advisory Committee (TAC) reviewed this application and found the application complete. A second TAC meeting was held on June 11, 2026, at which time TAC completed the CEQA Initial Study and prepared a recommendation to the Planning Commission, along with draft Conditions of Approval. TAC has no technical objections to the Planning Commission approving the project subject to the Conditions, Mitigation Measures, and Findings included in the staff report.

E. Planning Commission Action: The Planning Commission's actions include opening the Public Hearing; determining the adequacy of the proposed environmental document, a Mitigated Negative Declaration; and making a decision to approve or deny the Use Permit, including the recommended conditions of approval, mitigation measures, and findings contained in the staff report.

F. Recommendation(s) and Findings: If the Planning Commission approves the Use Permit, the following statement is recommended for the record, along with the findings below:

1. A review of the proposal was conducted by staff and the Technical Advisory Committee who, through their own research, found that the project will not have a significant effect on the environment;

2. There are no project-specific significant, unmitigated effects which are peculiar to the project or its site;

3. The proposed use is consistent with the County Code Section 19.28.020(E) for Additional Uses (Cemeteries) permitted with a Use Permit, allowed in any district unless otherwise prohibited.

4. Maintenance or operation of the project applied for will not under the circumstances of the particular case be detrimental to the health, safety, peace, morals, comfort and general welfare of persons residing or working in the neighborhood of such proposed use or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the county with the implementation of the proposed Conditions of Approval and Mitigation Measures.

5. On the basis of the administrative record presented, the Planning Commission finds that there is no substantial evidence that the project will have a significant impact to the environment and that the Mitigated Negative Declaration included in the Staff Report reflects the Commission's independent judgement and analysis.

CONDITIONS OF APPROVAL & MITIGATION MONITORING AND REPORTING PROGRAM

For USE PERMIT: UP-22;2-3 Gardens of Noor Cemetery

APPLICANT: Mounir Kaddoura

PROJECT LOCATION: 857 Carbondale Rd./16630 Lambert Rd. Ione, CA 95640 (APN: 001-220-013)

PROJECT DESCRIPTION: Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery. The 46-acre parcel is zoned R1A, Single-family Residential and Agriculture and has an MRZ, Mineral Resource Zone General Plan Designation. Maximum capacity is 1832 graves divided among 7 blocks on the northern 1.2 acres of the property. Included in the project proposal are funeral events for up to 50 people each, with up to two a day, and hours of operation are sunrise to sunset. Proposed infrastructure includes permanent parking for up to 64 cars and restrooms for attendees. APN: 001-220-013

ENVIRONMENTAL DOCUMENT: Mitigated Negative Declaration

PLANNING COMMISSION APPROVAL DATE:

NOTICE OF DETERMINATION DATE:

NOTE A: It is suggested the project applicant contact the Environmental Health, Public Works, and Planning Departments and any other agencies involved prior to commencing these requirements. Improvement work shall not begin prior to the review and submission of the plans and the issuance of any applicable permits by the responsible County Department(s). The Inspector must have a minimum of 48 hours' notice prior to the start of any construction.

NOTE B: Information concerning this project can be obtained through the Amador County Planning Department, 810 Court Street, Jackson, CA 95642 (209) 223-6380.

CONDITIONS OF APPROVAL

1. **FISH AND GAME FEES: No permits shall be issued, fees paid, or activity commence, as they relate to this project, until such time as the Permittee has provided the Planning Department with the Department of Fish and Game Filing Fee for a Notice of Determination or a Certificate of Fee Exemption from Fish and Game.** THE PLANNING DEPARTMENT SHALL MONITOR THIS REQUIREMENT.

2. Applicant shall submit signed conditions to the Planning Department. THE PLANNING DEPARTMENT SHALL MONITOR THIS REQUIREMENT.

3. This Use Permit is granted for the use(s) described (see attached application) on the condition that the establishment, maintenance, or operation of the proposed use(s) will not be detrimental to the health, safety, peace, morals, comfort, and general welfare of the persons residing or working in the neighborhood of such proposed use(s) or be detrimental or injurious to property and improvements or the general welfare of the County. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

4. The issuance of this Use Permit is expressly conditioned upon the permittee's compliance with all the provisions contained herein and if any of the provisions contained herein are violated, this Use Permit may be subject to revocation proceedings as set forth in Amador County Code. THE PLANNING DEPARTMENT SHALL MONITOR THIS REQUIREMENT.

5. Building Permits: The permittee shall acquire all necessary building permits for all facilities and any related equipment. Construction and location shall be substantially the same as submitted plans and as stated in the approved project description. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION IN CONJUNCTION WITH THE BUILDING DEPARTMENT.

6. Waste Disposal: Prior to activation of the use permit, the applicant must submit a will serve statement stating that the current solid waste disposal service is sufficient to serve the intended use and maintain compliance with Amador County regulations regarding solid waste disposal for the life of the use permit. THE WASTE MANAGEMENT DEPARTMENT SHALL MONITOR THIS CONDITION.

7. Days and Hours of Operation: Operating hours shall be as listed in the application, with public access to the property shall be limited to sunrise to sundown. Maintenance shall also be performed during these hours. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

8. Funeral Events: There shall be a maximum of 50 people allowed to attend any funeral event, with a limitation of two such events on any one day. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

9. Temporary Storage of Human Remains: Consistent with the application, no human remains shall be stored on site and no preparation of human remains shall take place on site. Remains shall be transported directly to the site for internment the same day. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

10. Internment of Human Remains: Method and manner of internment shall be consistent with that stated by the application. This cemetery allows for "green burials" with fully decomposable materials with the exception of allowing for caskets in some cases. Burial sites shall consist of vaulted chambers, with the bodies laid within as exhibited in the project application. No embalming fluids may be used in the preparation of any bodies interned at this site. Any change in the manner of burials or preparation of bodies shall require an amendment to this use permit. THE PLANNING DEPARTMENT AND ENVIRONMENTAL HEALTH DEPARTMENT SHALL MONITOR THIS CONDITION.

11. Landscaping Materials and Maintenance: Property Owner shall ensure that the project is landscaped in a manner consistent with the approved application, maintaining existing vegetation types. Deviation from the listed landscaping materials and maintenance procedures shall require an amendment to this Use Permit. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

12. Eagle's Nest Airport Overlay Zone: This property is located within the Eagle's Nest Airport Overlay Zone, which limits development densities, building heights, and incompatible uses within the vicinity of the Eagle's Nest Private Airport. This project is located approximately .58 miles from the airport runway therefore the property owner must obtain an Avigation Easement for the right to flight, exhaust noise, fumes, lights, vibration, and particulate matter. Within two miles of the outermost edge of the Eagle's Nest Airport runway schools, churches, and other places of assembly as defined by Section 13143(a) of the California Health and Safety Code, are prohibited. As such, any funeral events associated with this property must take place outside of a building. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

MITIGATION MONITORING AND REPORTING PROGRAM

13. Commercial Light and Glare (AES-1): Any lighting installations must be compliant with County regulations, and be conditioned to incorporate measures to reduce light and reflectance pursuant to Amador County General Plan Mitigation Measure 4.1-4. This includes measures to reduce light and reflectance including limitation of all installed lighting with this project to full-cutoff, fully-shielded fixtures directed downwards with color correlative temperature (CCT) less than or equal to 3000K. Motion sensors and automatic shutoffs shall be used to limit all lighting fixtures in use after facility is closed to the public or after 10:00 p.m. THE PLANNING DEPARTMENT AND BUILDING DEPARTMENT SHALL MONITOR THIS CONDITION.

14. Visual Impact (AES-2): Measures shall be taken to mitigate aesthetic impact to nearby properties. These measures may include, but are not limited to the inclusion landscape buffers along the residential bordering property lines, security fencing with a color palette consisting of neutral color(s) or color(s) matching adjacent structures, and screening of the proposed utility and ancillary other improvements related to the construction and/or operation

of the facilities.. THE PLANNING DEPARTMENT AND BUILDING DEPARTMENT SHALL MONITOR THIS CONDITION.

15. Air Quality Best Management Practices (BMPs)(AIR-1): Permittee shall meet requirements that may be deemed necessary by the Air District based upon site conditions and operations. The project shall require that idling times for vehicles be limited to a maximum of 5 minutes to reduce operational emissions of criteria pollutants per General Plan Mitigation Measure 4.3-2a. THE AMADOR AIR DISTRICT SHALL MONITOR THIS REQUIREMENT.

16. Special-Status Species (BIO-1): Animals- Special-status animal species should be avoided to the maximum extent practicable. If complete avoidance is infeasible, project impacts will need to be quantified and mitigation developed to reduce the impacts to a less-than-significant level. Mitigation may include preservation and enhancement of on and/or off-site populations, transplanting individuals to a preservation area, or other actions, subject to the approval of CDFW, USFWS, or CNPS. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

17. Ground Disturbance Timing for Nesting Birds (BIO-2): To avoid impacts to nesting bird species or birds protected under the Migratory Bird Treaty Act, all ground disturbing activities conducted between February 1 and September 1 must be preceded by a pre-construction survey for active nests, to be conducted by a qualified biologist. This survey should be conducted within two weeks prior to any construction activities. The purpose of this survey is to determine the presence or absence of nests in an area to be potentially disturbed. If nests are found, a buffer depending upon the species and as determined by a qualified biologist in consultation with the California Department of Fish and Wildlife and shall be demarcated with bright orange construction fencing. Any vegetation clearing should be schedule outside of the avian nesting season (February 1 through August 31) or survey should be conducted immediately prior to vegetation removal. If active nests are found, vegetation removal should be delayed until the young fledge. No ground disturbing or other construction activities shall occur within this buffer until the County-approved biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Nesting bird surveys are not required for ground disturbing activities occurring between September 2 and January 31. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

18. Special-Status Species Plants- (BIO-3): Special-status plant populations should be avoided to the maximum extent practicable. If complete avoidance is infeasible, project impacts will need to be quantified and mitigation developed to reduce the impacts to a less-than-significant level. Mitigation may include preservation and enhancement of on and/or off-site populations, transplanting individual plants to preservation area, or other actions, subject to the approval of CDFW, USFWS, or CNPS. Prior to any construction activity, a biological and/or rare plant survey may be required to be conducted to determine if there are any special-status plants within the project area and which may potentially be disturbed. If special-status species are identified, avoidance zones may be established around plant populations to clearly demarcate areas for avoidance. Where avoidance is infeasible, and the plant subject to removal or potential damage from construction, the project applicant shall develop and implement a mitigation plan pursuant to State and Federal regulation. The mitigation plan shall provide for no net loss of habitat and shall include, but is not limited to, relocation of the affected plants, replanting, and monitoring of relocated and planted specimens, or any other BMPs or conservation practices established by CDFW or USFWS. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

19. Plant Survey (BIO-4): Prior to any construction activity related to any discretionary project, a biological and/or rare plant survey shall be conducted to determine if there are any special-status plants within the project area and which may potentially be disturbed. Surveys shall be timed according to the blooming period for the target species, and known reference populations will be visited prior to surveys to confirm the species is blooming

where known to occur. If special-status species are identified, avoidance zones may be established around plant populations to clearly demarcate areas for avoidance. Avoidance measures and buffer distances may vary between species, and the specific avoidance zone distance will be determined in coordination with the appropriate resource agencies. For individual specimens, highly visible temporary construction fencing shall be placed at least 10 ft. away from the drip line of the plant. No construction activity or grading would be permitted within the buffer zone. Where avoidance is infeasible, and the plant subject to removal or potential damage from construction, the project applicant shall develop and implement a mitigation plan pursuant to State and Federal regulation. The mitigation plan shall provide for no net loss of habitat and shall include, but is not limited to, relocation of the affected plants, replanting, and monitoring of relocated and planted specimens. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

20. Wetland and Riparian Habitat (BIO-5): Compete avoidance of wetlands is conservatively recommended to ensure compliance with wetland laws. Site development shall implement erosion control plans, and best management practices (BMPs) that prevent the discharge of sediment into nearby drainage are found, a buffer depending upon the species and as determined by a qualified biologist in consultation with the California Department of Fish and Wildlife and shall be demarcated with bright orange construction fencing.. No ground disturbing or other construction activities shall occur within this buffer until the County and CDFW approved biologist has confirmed that there is no unmitigated impact to existing riparian or wetland habit. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

21. Historic and Cultural Resources (CULTR-1) (CULTR-2): In the event the permittee encounters any historic, archaeological, paleontological, or tribal resource (such as chipped or ground stone, fossil-bearing rock, large quantities of shell, historic debris, building foundations, or human bone) during any construction undertaken to comply with these Use Permit conditions, permittee shall stop work immediately within a 100 ft. radius of the find and retain the services of a qualified professional for the purpose of recording, protecting, or curating the discovery as appropriate. The qualified professional shall be required to submit to the Planning Department a written report concerning the importance of the resource and the need to preserve the resource or otherwise reduce impacts of the project. The permittee shall notify the Amador County Planning Department of the find and provide proof to the Planning Department that any/all recommendations and requirements of the qualified professional have been complied with. Additionally in the case that unregistered or unexpected human remains are discovered on site, the following steps must be taken in accordance with Amador County General Plan Mitigation Measure 4.5-15 Cultural Resources, per Section 7050.5 of the California Health and Safety Code. The Amador County Coroner shall, within two working days:

    i. Determine if an investigation of cause of death is required;
    ii. Determine if the remains are most likely that of Native American origin, and if so suspected, the coroner shall notify the California Native American Heritage Commission (NAHC) within 24 hours of making his or her determination.
    iii. The descendants of the deceased Native Americans shall make a recommendation to the operator/ permittee for the means of handling the remains and any associated grave goods as provided in Public Resources Code (PRC) Section 5097.98.
    iv. The NAHC shall immediately notify those persons it believes to be most likely descended from the deceased Native American.
    v. The descendants may, with the permission of the landowner or their representative, inspect the site of the discovered Native American remains and may recommend possible treatment or disposition within 24 hours of their notification.
    vi. Whenever the NAHC is unable to identify a descendent, or the descendent identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendent and the mediation provided for in subdivision (k) of PRC Section 5097.94 fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.

THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

22. Sewage Disposal (GEO-1): Retain the services of a qualified professional (a registered professional engineer, registered environmental health specialist, or licensed engineering geologist experienced in on-site sewage disposal system design) to review the existing on-site wastewater treatment system that is to serve the project. This qualified professional shall evaluate existing and proposed wastewater flows and assess the current condition of the system. He or she shall then either: 1) Certify that the existing onsite wastewater treatment system may be expected to provide acceptable service for the proposed use, or 2) specify any modification, expansion, replacement or treatment that would be needed for such certification to be possible. THE ENVIRONMENTAL HEALTH DEPARTMENT SHALL MONITOR THIS CONDITION.

23. Hazardous Materials Upset and Release (HAZ-1): Prior to activation of the use permit, the applicant shall provide documentation to the Amador County Environmental Health Department that the site is in full compliance with the requirements of the Unified Program regarding hazardous materials business plan requirements, hazardous waste generation, treatment or storage, aboveground petroleum storage, and underground tanks. If a hazardous materials business plan is required, the emergency response portion shall include a plan for the evacuation of visitors in the event of a hazardous materials incident. The applicant shall substantially comply with all requirements of the Unified Program throughout the life of the Use Permit. THE ENVIRONMENTAL HEALTH DEPARTMENT SHALL MONITOR THIS CONDITION.

24. Grading Permits and Erosion Control (HYD-1)**:** Prior to the issuance of permits for site-specific development, drainage and grading permits shall be prepared by a licensed civil engineer and submitted to the Amador County Building Department for approval. Drainage plans shall demonstrate that new development would not increase peak storm flows and that adequate capacity exists downstream to accommodate increased stormwater volume. All site-specific development shall implement appropriate stormwater runoff best management practices (BMPs) and design features to protect receiving water quality consistent with Amador County standards, and any required National Pollution Discharge Elimination System (NPDES) permits administered by the State Water Resources Control Board (SWRCB) must be obtained prior to project execution. THE AMADOR COUNTY BUILDING DEPARTMENT SHALL MONITOR THIS CONDITION.

25. Best Management Practices for Internment of Human Remains (HYD-2): The property owner would be required to adhere to any required regulations regarding the internment of Human Remains to avoid contamination of groundwater resources. This requires the applicant require any applicable permits from the Regional Water Quality Control Board (RWQCB) and adhere to practices established through the State Cemetery Board rules and regulations regarding cemetery operations. THE ENVIRONMENTAL HEALTH DEPARTMENT SHALL MONITOR THIS CONDITION.

26. Noise Buffers (NOI-1): Conditions of approval shall include a requirement that, when feasible, noise buffers shall be implemented (landscaping, fencing etc.) and permittee shall maintain adhere to County Code Section 9.44 regarding nuisance noise. Noise limitations shall reflect the established thresholds listed in the Amador County General Plan. There shall be no amplified sound or music that shall exceed established those thresholds. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

27. Fire Protection Services (PUB-1): To mitigate the impact on fire protection services, in accordance with Amador County Ordinance No. 1640 (County Code 17.14.020)4, the developer shall participate in the annexation to the County's Community Facilities District No. 2006-1 (Fire Protection Services), including execution of a "waiver and consent" to the expedited election procedure, the successful completion of a landowner-vote election authorizing an annual special tax for fire protection services, to be levied on the subject property by means of the

County's secured property tax roll, and payment of the County's cost in conducting the procedure. THE AMADOR FIRE PROTECTION DISTRICT SHALL MONITOR THIS CONDITION

28. Access and Encroachments (TRA-1): The property must maintain a primary access onto a County road and obtain all necessary encroachment permits (Chapter 12.10) required for the proposed uses, as regulated by the Amador County Department of Transportation and Public Works. Additionally, the proposed project would require the payment of a traffic mitigation fee as determined adequate by the Transportation and Public Works Department to offset road maintenance costs of improvements relative to the property's increased use through this project. THE BUILDING DEPARTMENT AND AMADOR FIRE PROTECTION DISTRICT SHALL MONITOR THIS CONDITION.

29. Fire and Life Safety (TRA-2): The project applicant/permittee shall comply with Chapter 15.30 Fire and Life Safety Ordinance. The applicant will be required to have all roads, gates and access ways on the property meet 15.30 standards and any future buildings will require a fire water supply. THE BUILDING DEPARTMENT AND AMADOR FIRE PROTECTION DISTRICT SHALL MONITOR THIS CONDITION

30. Property Access Restrictions (TRA-3): To minimize traffic impacts to nearby properties, the property owner/operator shall provide assurances that the Lambert Rd. entrance to the property only be accessed from Carbondale Rd. This includes notifying all guests that they will be required to navigate to the property along routes to avoid utilization of Maxwell Rd., Claypit Rd., and Mustang Alley. THE TRANSPORTATION DEPARTMENT AND PLANNING DEPARTMENTS SHALL MONITOR THIS CONDITION.

31. Sewage Disposal and Wastewater Systems (GEO-1 and UTL-1): Any future structures intended to have plumbing shall be provided wastewater disposal in compliance with Chapter 14.12 of Amador County Code, and the regulations adopted pursuant to that Code. An on-site sewage disposal system shall be designed by a qualified consultant, such as a registered professional engineer, registered environmental health specialist, or licensed engineering geologist experienced in on-site sewage disposal system design. The design must be approved by, and constructed under permit from, the Amador County Environmental Health Department. THE ENVIRONMENTAL HEALTH DEPARTMENT SHALL MONITOR THIS REQUIREMENT.

32. Well Water Quality (UTL-2): Well Service/Water Supply: In accordance with Section 14.06.055 of Amador County Code, the well that is to serve the project shall be evaluated by a registered professional engineer, who is to submit an evaluation for review and approval by the Environmental Health Department. This evaluation shall describe estimated water demand and whether or not the water well may be expected to serve the proposed use. If needed, the engineer shall propose storage or other design features that must be implemented to ensure an adequate water supply. THE ENVIRONMENTAL HEALTH DEPARTMENT SHALL MONITOR THIS REQUIREMENT.

Amador County Planning Commission Chairperson	Date .
Project Applicant	Date

ENDORSED
FILED

AUG 19 2026

KIMBERLY L. GRADY, County Clerk
AMADOR COUNTY
By M. CANALE Deputy

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION
CALIFORNIA ENVIRONMENTAL QUALITY ACT

PROJECT TITLE: Use Permit UP-22;2-3 Gardens of Noor Cemetery

LEAD AGENCY: County of Amador

PROJECT LOCATION: 16630 Lambert Rd., Ione, CA 95640 and 857 Carbondale Rd., Ione, CA 95640

PROJECT DESCRIPTION: Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery, which proposes 1832 graves sites divided among 7 blocks on the north end of the property. The 46-acre parcel is zoned R1A, Single-family Residential and Agriculture and has an MRZ, Mineral Resource Zone General Plan Designation. Proposed improvements include driveway parking for up to 100 cars, and a parking lot with 64 permanent spaces, and permanent restrooms. Proposed number of funerals is 60 funerals a month with a limit of 50 attendees per event. APN: 001-220-013

MITIGATED NEGATIVE DECLARATION: A copy of the Mitigated Negative Declaration, proposed rule, and supporting documents are available for review on the current projects page on the Planning departments web site at https://www.amadorgov.org/departments/planning/current-projects and at the Planning department at 810 Court Street, Jackson CA, 95642. The required environmental review and comment period for this project will commence from August 19, 2026 until 5:00 pm on September 8, 2026. Comments may also be sent by fax to (209) 257-6254 or by email to planning@amadorcounty.gov.

PUBLIC HEARING: The Amador County Planning Commission will conduct a public hearing on the matter on September 8, 2026 at 6:00 p.m. in the Board Chambers of the County Administration Center, 810 Court Street, Jackson, CA, 95642. Anyone having comments on the project may attend and be heard. Information on file with the Amador County Planning Department, 810 Court Street, Jackson, CA 95642; (209) 223-6380; File No. UP-22;2-3 Gardens of Noor Cemetery

CB

Chuck Beatty, Planning Director

8-19-2026
Date:

File No. 0

Posted On 08/19/2026

Posting Removed _____

MITIGATED NEGATIVE DECLARATION
CALIFORNIA ENVIRONMENTAL QUALITY ACT

PROJECT: UP-22;2-3 Gardens of Noor Cemetery

LEAD AGENCY: County of Amador

PROJECT LOCATION: 16630 Lambert Rd., Ione, CA 95640 and 857 Carbondale Rd., Ione, CA 95640

PROJECT DESCRIPTION: Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery, which proposes 1832 graves sites divided among 7 blocks on the north end of the property. The 46- acre parcel is zoned R1A, Single-family Residential and Agriculture and has an MRZ, Mineral Resource Zone General Plan Designation. Proposed improvements include driveway parking for up to 100 cars, and a parking lot with 64 permanent spaces, and permanent restrooms. Proposed number of funerals is 60 funerals a month with a limit of 50 attendees per event. APN: 001-220-013

PUBLIC HEARING: The Amador County Planning Commission conducted a public hearing on the matter on September 8, 2026 at 6:00 p.m. in the Board Chambers of the County Administration Center, 810 Court Street, Jackson, CA, 95642.

PROJECT FINDINGS:

1. A review of the proposal was conducted by staff and the Technical Advisory Committee who, through their own research, found that the project will not have a significant effect on the environment;
2. There are no project-specific significant, unmitigated effects which are peculiar to the project or its site;
3. The proposed use is consistent with the County Code Section 19.28.020(E) for Additional Uses (Cemeteries) permitted with a Use Permit, allowed in any district unless otherwise prohibited.
4. Maintenance or operation of the project applied for will not under the circumstances of the particular case be detrimental to the health, safety, peace, morals, comfort and general welfare of persons residing or working in the neighborhood of such proposed use or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County with the implementation of the proposed Conditions of Approval and Mitigation Measures.
5. On the basis of the administrative record presented, the Planning Commission finds that there is no substantial evidence that the project will have a significant impact to the environment and that the Mitigated Negative Declaration included in the Staff Report reflects the Commission's independent judgement and analysis.

PREPARATION OF STUDY: Information on file with the Amador County Planning Department, 810 Court Street, Jackson, CA 95642; (209)223-6380; File No. UP-22;2-3 Gardens of Noor Cemetery

_____ _____

Chairperson Date:

File No. _____

Posted On _____

Posting Removed _____

CEQA INITIAL STUDY

Use Permit: UP-22;2-3 Gardens of Noor Cemetery
APN: 001-220-013

June 2026

Prepared by:
Krista Ruesel, Planner
Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380

This Page is Intentionally Left Blank

Table of Contents

Project Overview **5**
PROJECT DESCRIPTION **5**
ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: **8**
DETERMINATION: (To be completed by the Lead Agency) **8**
Figure A: Proposed Site Plan; Gardens of Noor Cemetery Project- Design Plan 1 9
Figure A-2: Proposed Site Plan; Gardens of Noor Cemetery Project- Design Plan 2 10
Figure A-3: Proposed Site Plan; Gardens of Noor Cemetery Project- Design Plan 3 11
Figure A-4: Proposed Site Plan; Gardens of Noor Cemetery Project- Driveway Detail 13
Figure B: Context Map 14
Figure C: Site Map- Aerial 15
Figure D: Zoning District(s) Map **16**
Figure F: General Plan Designation **17**
Chapter 1. AESTHETICS **18**
Chapter 2. AGRICULTURE AND FOREST RESOURCES **20**
Chapter 3. AIR QUALITY **22**
Chapter 4. BIOLOGICAL RESOURCES **24**
Figure 4a: Migratory Birds List (IPAC 2020) 26
Figure 4b: California Native Plant Society Database Query 26
Figure 4d: Wetlands Mapper (National Wetlands Inventory, FWS) 27
Chapter 5. CULTURAL RESOURCES **29**
Chapter 6. ENERGY **31**
Chapter 7. GEOLOGY AND SOILS **32**
Figure 7: Soil Map 34
Chapter 8. GREENHOUSE GAS EMISSIONS **36**
Chapter 9. HAZARDS AND HAZARDOUS MATERIALS **37**
Chapter 10. HYDROLOGY AND WATER QUALITY **40**
Chapter 11. LAND USE AND PLANNING **42**
Chapter 12. MINERAL RESOURCES **43**
Figure 12a: CGS Geologic Map of California (CGS- webportal) 43
Chapter 13. NOISE **44**
Chapter 14. POPULATION AND HOUSING **46**
Chapter 15. PUBLIC SERVICES **47**

Chapter 16. RECREATION **48**
Chapter 17. TRANSPORTATION / TRAFFIC **49**
Chapter 18. TRIBAL CULTURAL RESOURCES **52**
Chapter 19. UTILITIES AND SERVICE SYSTEMS **54**
Chapter 20. WILDFIRE **56**
Chapter 21. MANDATORY FINDINGS OF SIGNIFICANCE **58**
Attachment 1

Project Overview

Project Title:	Use Permit: UP-22;2-1 Gardens of Noor Cemetery
Project Location:	857 Carbondale Rd./16630 Lambert Rd., Ione, CA 95640 APN: 001-220-013
Property Owner(s)/Representative	Mounir Kaddoura
Zoning(s):	R1A, Single-family Residential and Agriculture
General Plan Designation(s):	MRZ, Mineral Resource Zone
Lead Agency Name and Address:	Amador County Planning Department 810 Court Street, Jackson, Ca 95642
Contact Person/Phone Number:	Chuck Beatty, Planning Director 209-233-6380
Date Prepared:	August 2026
Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)	

PROJECT DESCRIPTION

Project Location

This project site is located in the southwestern end of Amador County near the Amador-Sacramento County Border. The 46-acre parcel lies within the northern fork of the intersection of Lambert Rd. and Carbondale Rd, the former of which leads northward to the Eagle's Nest Subdivision and Airport. The property is located within Amador County District 2, approximately 4 miles northwest of Ione City limits, and approximately 3.5 miles south of Highway 16, and approximately 3.5 miles north of Highway 104. The property is entirely within the unincorporated County and outside the boundaries or the sphere of influence of any incorporated municipality.

Site Characteristics

The existing site is a single ±46-acre parcel. There is an existing 1500 sq. ft. barn and an existing gravel roadway. The area is largely disturbed and characterized by open areas and chaparral including manzanita, chamise, and oak thickets.

There are no existing structures or improvements on the property and proposed improvements would include the following:

- 7 blocks of grave sites (1832 total) distributed throughout the northern 1.2 acres of the property
- paved encroachment and on-site circulation and parking areas,
- perimeter security fencing
- identification signage (complying with Amador County Code 19.32 Signage)

- Security lighting and monitoring equipment
- Landscaping and other forms of visual screening
- A restroom to serve guests
- A storage/utility building accessory to the cemetery use for equipment storage
- Utilities and ancillary improvements or accessory structures related to the construction and/or operation of the above facilities.

Land Use

Amador County Code permits cemeteries in any zoning district subject to a use permit. The property is zoned R1A, Single-family Residential and Agriculture which includes by-right residential uses and limited agricultural uses, with additional conditional uses allowed subject to a conditional use permit. These uses are further described by County Code Section 19.24.045 (R1A District Regulations). The property is currently graded and vacant in the majority of the northern 50% of the site, and retains natural vegetation along the Carbondale frontage. There is one storage building on-site.

Surrounding Land Uses

Surrounding property uses include low-density residential surrounding the site with a low-density residential subdivision of Eagle's Nest to the north, along with a private airport associated with that development. The nearest city is the City of Ione, approximately 5 miles to the southeast. The project site is located approximately 1.1 miles east of the western Amador-Sacramento County Line.

Lead Agency

The lead agency is the public agency that has the principal responsibility for carrying out or approving a project that may have a significant effect upon the environment. In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15051(b)(1), "the lead agency will normally be the agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose." Amador County is the lead agency for this project.

PROBABLE ENVIRONMENTAL EFFECTS AND SCOPE OF MITIGATED MND/MMRP

The Initial Study (IS) will analyze a broad range of potential environmental impacts associated with the proposed project. Information will be drawn from the Amador County General Plan, technical information provided by the applicant to date, and any other reputable information pertinent to the project area. This information includes existing Environmental Laws and Executive Orders, Coordination with other agencies and authorities. In the case that no immitigable, significant impacts are identified through the IS, a Mitigated Negative Declaration (MND) will be filed pursuant to CEQA requirements. Mitigation measures proposed serve to aid in the avoidance, minimization, rectification, reduction or elimination of impacts.

In the case that through the Environmental Assessment/Initial Study, it is determined that there will be significant, immitigable impacts, an Environmental Impact Report (EIR) may be required prior to project approval. Consistent with CEQA and the requirements of Amador County, each environmental chapter will include an introduction, technical approach, environmental setting, regulatory setting, standards of significance, identification of environmental impacts, the development of mitigation measures and monitoring strategies, cumulative impacts and mitigation measures, and level of significance after mitigation measures.

EVALUATION OF ENVIRONMENTAL IMPACTS PER CEQA:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based

on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c) (3) (D). In this case, a brief discussion should identify the following:

a) Earlier Analysis Used. Identify and state where they are available for review.

b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

a) The significance criteria or threshold, if any, used to evaluate each question; and

b) The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Geology / Soils
☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials	☐ Hydrology / Water Quality
☐ Land Use / Planning	☐ Mineral Resources	☐ Noise
☐ Population / Housing	☐ Public Services	☐ Recreation
☐ Transportation / Traffic	☐ Utilities / Service Systems	☐ Mandatory Findings of Significance
☐ Wildfire	☐ Energy	☐ Tribal Cultural Resources

DETERMINATION**: (To be completed by the Lead Agency)**

On the basis of the 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 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.

_____ Planning Department

_____ Date

Figure A: Proposed Site Plan; Gardens of Noor Cemetery Project- Design Plan 1 (Updated 8.11.26)

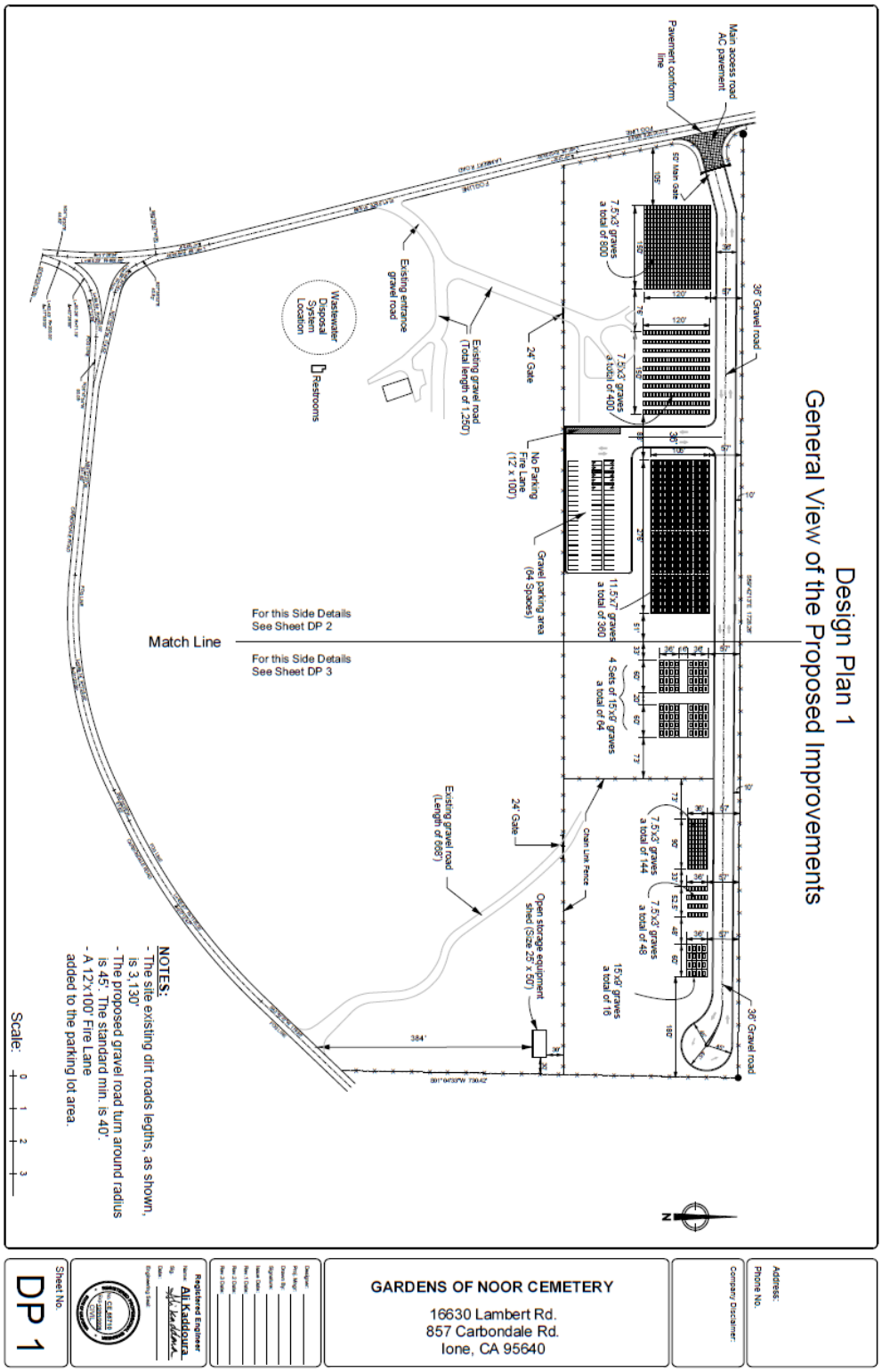


Figure A-2: Proposed Site Plan; Gardens of Noor Cemetery Project- Design Plan 2 (Updated 8.11.26)

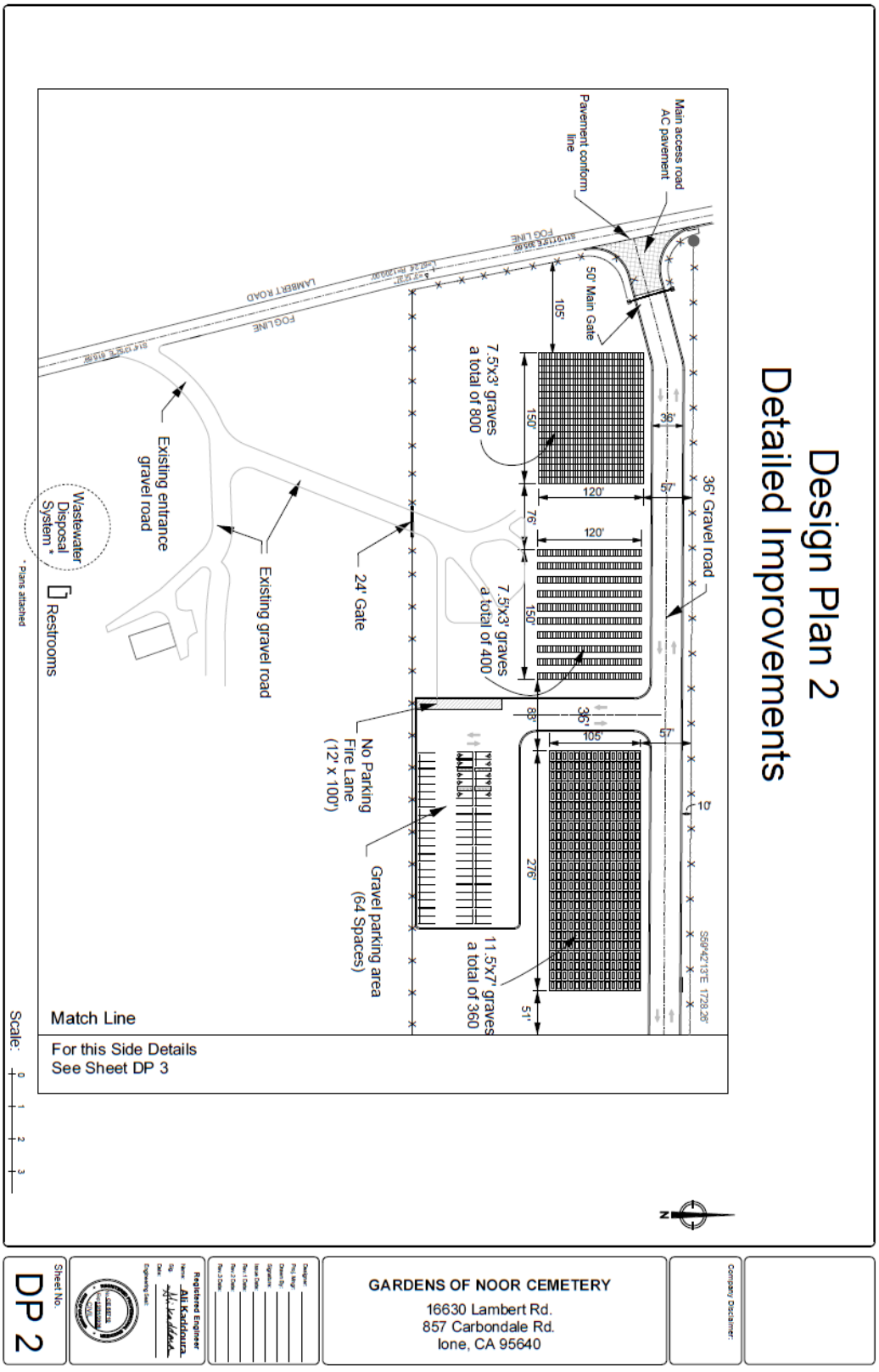


Figure A-3: Proposed Site Plan; Gardens of Noor Cemetery Project- Design Plan 3 (Updated 8.11.26)

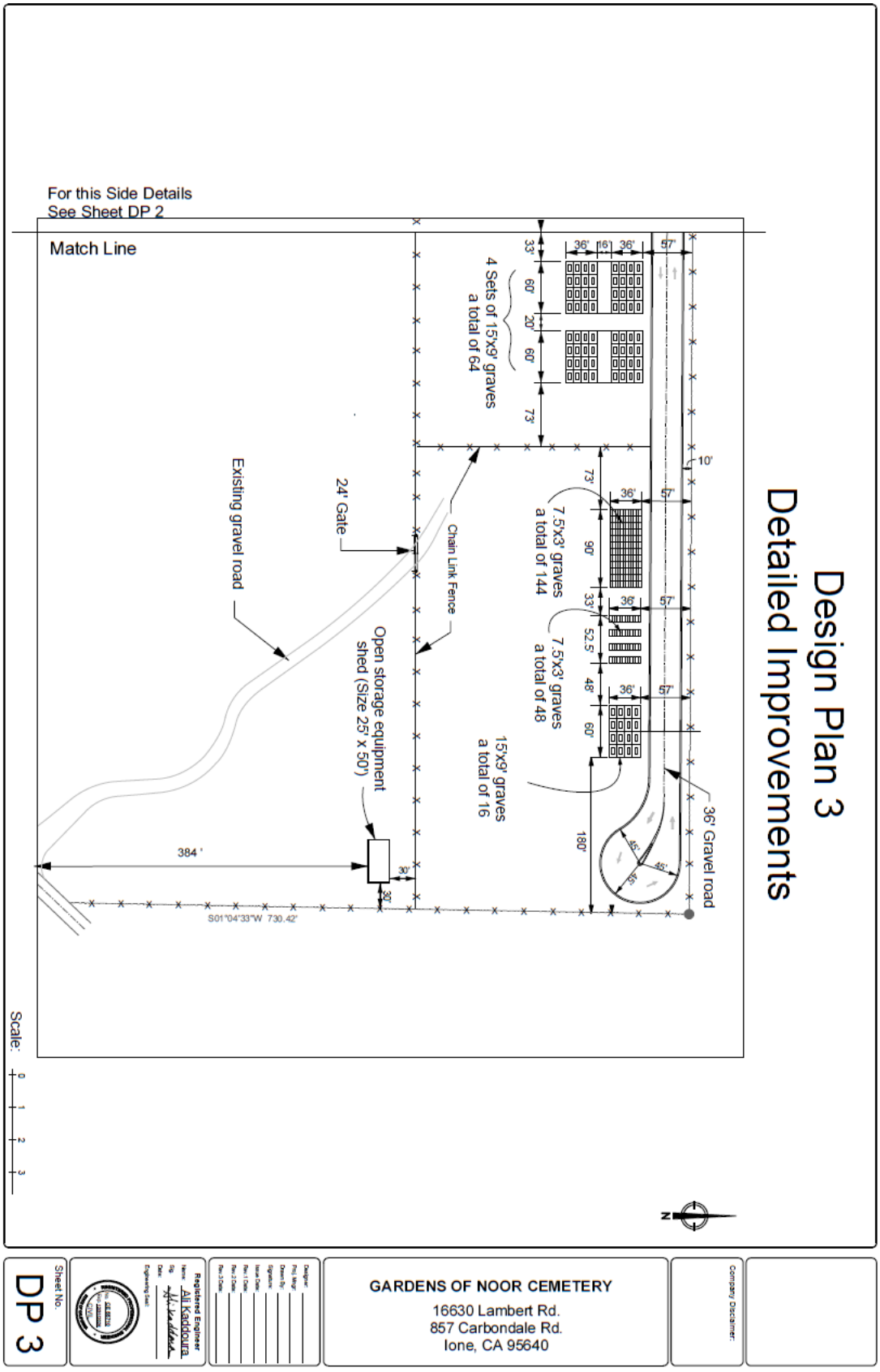


Figure A-4: Proposed Site Plan; Gardens of Noor Cemetery Project- Gravel Roads Tire Load Dispersion Detail

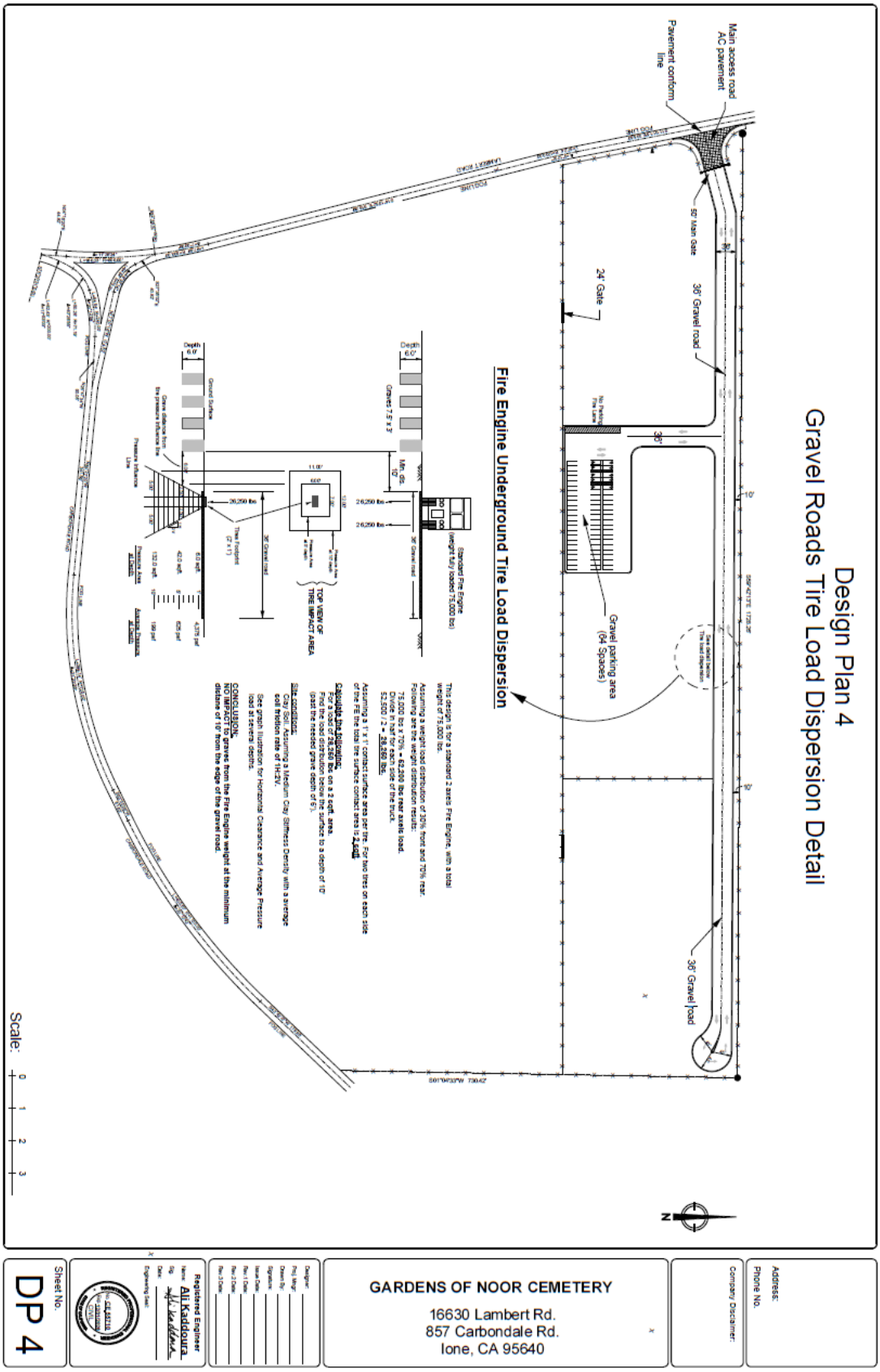


Figure A-5: Proposed Site Plan; Gardens of Noor Cemetery Project- Driveway Detail

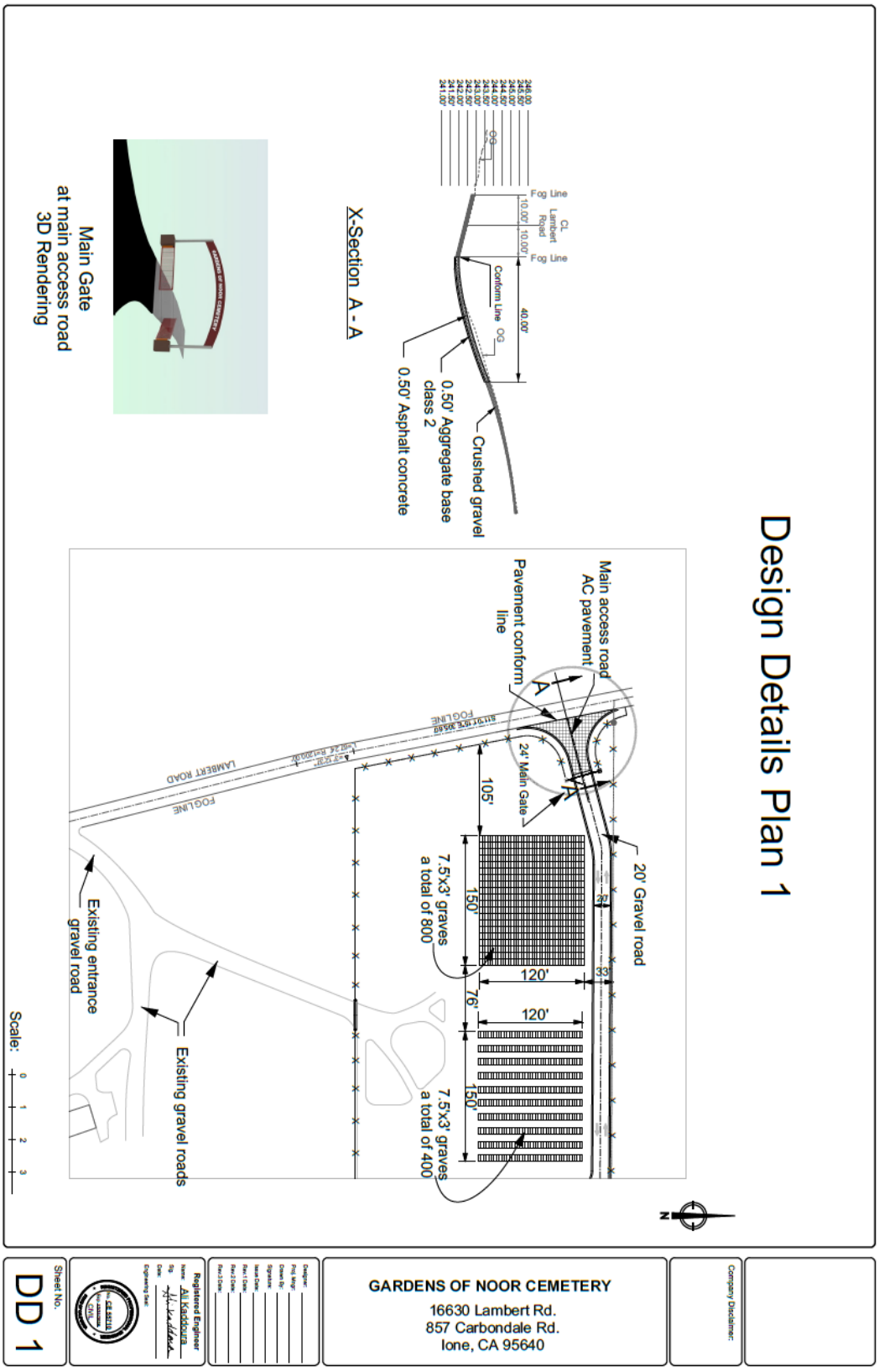


Figure B: Context Map

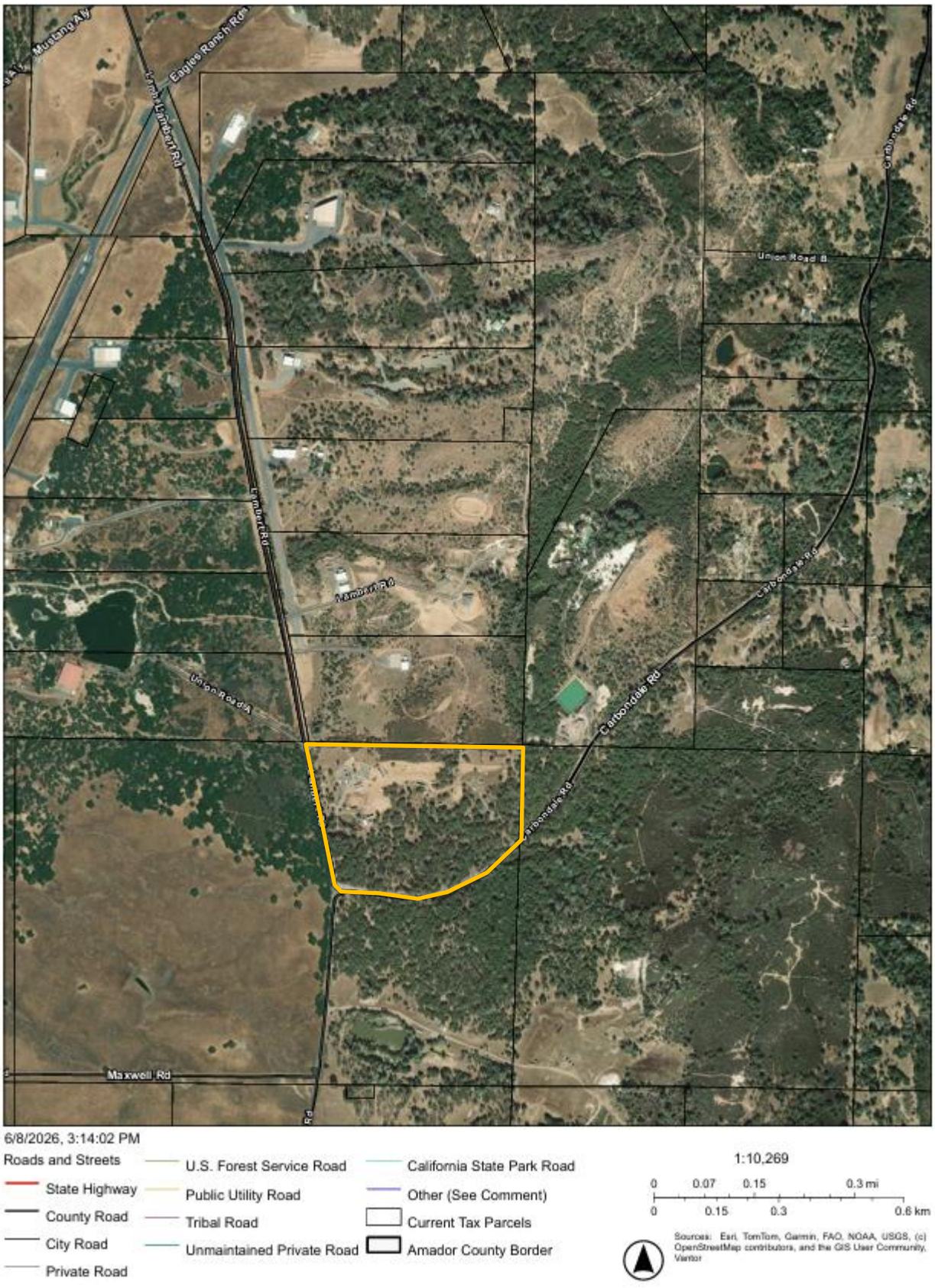


Figure C: Site Map- Aerial



Figure D: Zoning District(s) Map

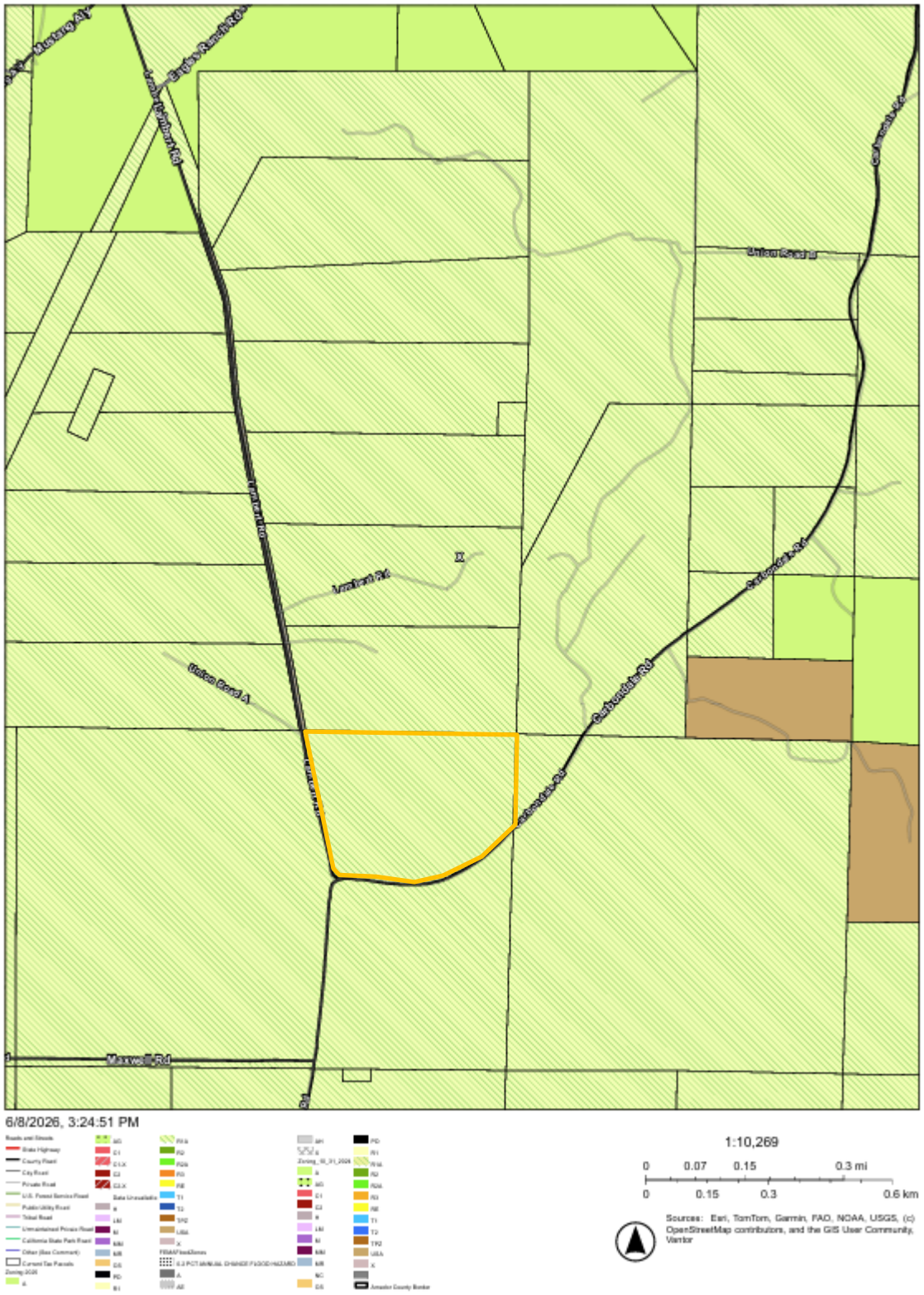
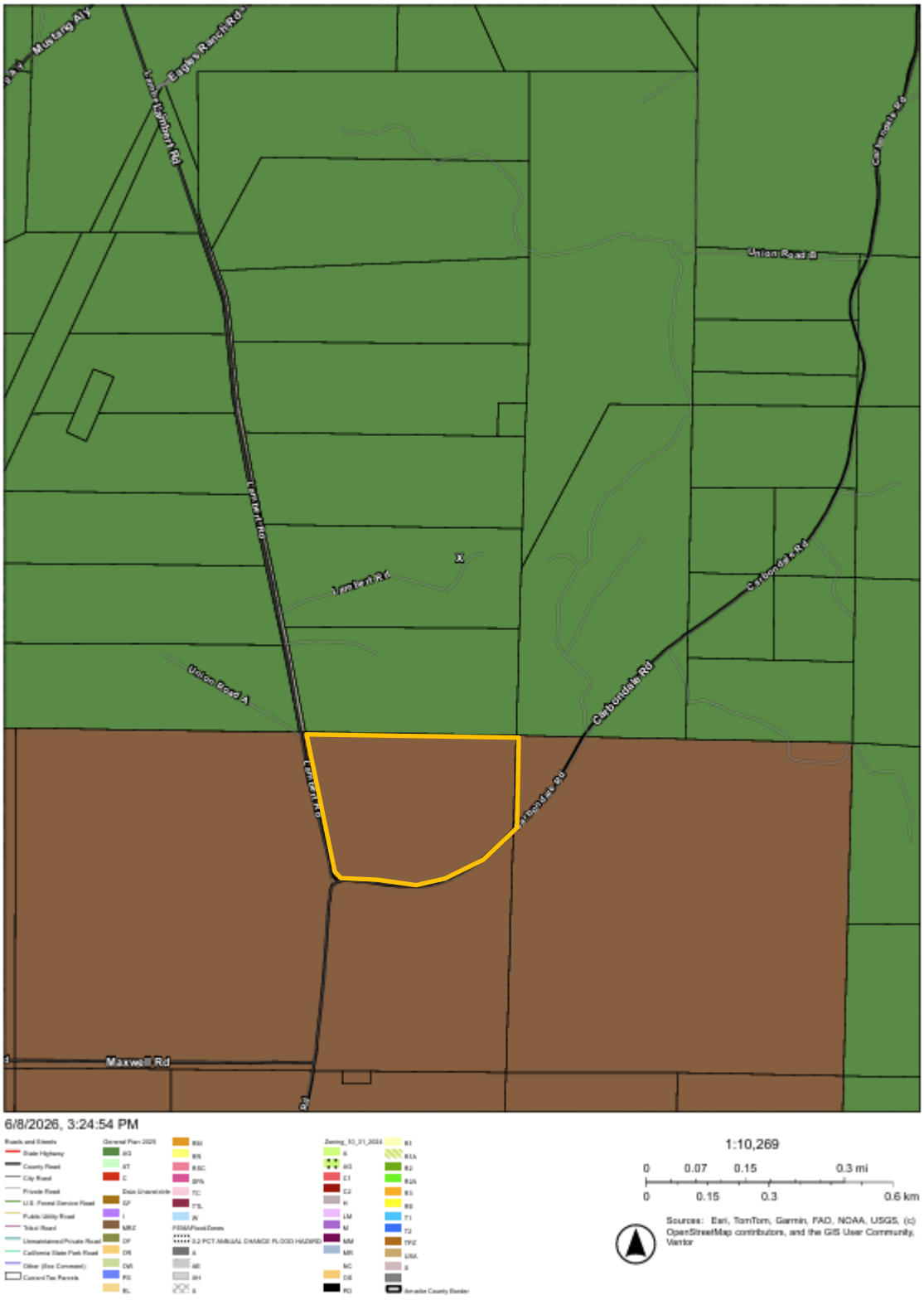


Figure F: General Plan Designation



Chapter 1. AESTHETICS

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). Would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☒	☐	☐

Discussion/Conclusion/Mitigation:

A. Scenic Vistas: For the purposes of determining significance under CEQA, a scenic vista is defined as a viewpoint that provides expansive views of a highly valued landscape for the benefit of the general public. A substantial adverse impact to a scenic vista would be one that degrades the view from such a designated location. No governmentally designated scenic vista has been identified within the project area. In addition, no specific scenic view spot has been identified in the project area. Therefore, there is **no impact.**

B. Scenic Highways: The project is not located within a designated scenic highway corridor. There is **no impact.**

C. There are no officially designated scenic vistas in the project area, and the proposed uses are fairly low intensity aside from public gatherings. The property is approximately 46 acres, and largely undeveloped however the property is fairly disturbed. Current uses allowed by-right under the R1A, Single-family Residential and Agriculture zoning district include various residential and agricultural uses which include both active and passive uses which may affect short-ranged views however, determination whether these effects are considered negative or positive is subjective and unquantifiable. **Mitigation Measure AES-1** addresses lighting and glare that may be introduced by commercial uses of the property, with limitations on the proposed security lighting and monitoring equipment to reduce impacts to neighboring properties. **Mitigation Measure AES-2** recommends that additional conditions of approval be added to mitigate aesthetic impact to nearby properties, primarily to address the conveyance of human remains to the various gravesite areas. While, due to the property size, the conveyance of bodies to the gravesites would be unlikely to be visibly along the eastern, western, and southern property lines, it is recommended that areas be screened along the northern property line through property fencing or landscape buffers. The proposed impacts are **less than significant impact with mitigations incorporated**.

D. Existing sources of light are from nearby residences and other various agricultural or residential uses, as well as traffic along the roadways. The project may result in additional lighting accessory to the proposed cemetery and

additional site visitation and parking. Lighting may be required for funerary events, as well as security lighting among the gravesites and near or on the building. The facility's hours of operation proposed are sunrise to sunset which limits use of lights for funerary services to within those set hours. Any lighting outside of those hours shall be mitigated consistent with AES-1 and be utilized for security and safety of the facility. Any additional light introduced through the uses proposed by this project shall be limited by the proposed hours of operation and otherwise comply with the Amador County General Plan. **Mitigation Measures AES-1 and AES-2** address visual impacts and lighting. There is a **less than significant impact with mitigations incorporated.**

Mitigation Measures:

AES-1 **Commercial Light and Glare:** Any lighting installations must be compliant with County regulations, and be conditioned to incorporate measures to reduce light and reflectance pursuant to Amador County General Plan Mitigation Measure 4.1-4. This includes measures to reduce light and reflectance including limitation of all installed lighting with this project to full-cutoff, fully-shielded fixtures directed downwards with color correlative temperature (CCT) less than or equal to 3000K. Motion sensors and automatic shutoffs shall be used to limit all lighting fixtures in use after facility is closed to the public or after 10:00 p.m. THE PLANNING DEPARTMENT AND BUILDING DEPARTMENT SHALL MONITOR THIS CONDITION.

AES-2 **Visual Impact:** Measures shall be taken to mitigate aesthetic impact to nearby properties. These measures may include, but are not limited to the inclusion landscape buffers along the residential bordering property lines, security fencing with a color palette consisting of neutral color(s) or color(s) matching adjacent structures, and screening of the proposed utility and ancillary other improvements related to the construction and/or operation of the facilities.

Source: Amador County Planning Department, Amador County General Plan and Final Environmental Impact Report (FEIR).

Chapter 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 Dept. 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 CA Dept. of Forestry and Fire Protection regarding the state's inventory of forest land, 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:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the CA Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC §12220(g)), timberland (as defined in PRC §4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) 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 forest land to non-forest use?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

A. Farmland Conversion: The project site is occupied entirely by areas classified as Other Land as determined by the USDA Department of Conservation (2016). The proposed project includes the addition of a cemetery and funeral events. This proposed expansion of uses does not convert agricultural lands nor introduce additional uses which would detract from any existing agricultural uses, nor would this project convert any agricultural areas to non-agricultural uses. The USDA-designated land classification of Other Land is not determined as unique agricultural resources. There is **no impact.**

B. The property is not enrolled under the California Land Conservation (Williamson) Act nor does it qualify under the income requirements for inclusion into a contract. As the property does not qualify prior to the proposed project, this project would not affect the property's ability to qualify and therefore there is **no impact.**

C. The area is not zoned for forest land or timberland nor utilized for forest land or timber production, therefore there is **no impact**.

D. The area is not considered forest land, or zoned as forest land or timberland, therefore there is **no impact**.

E. This project does not introduce any additional use or impact that would introduce significant changes to nearby property uses. There is **no impact** to farmland or forest land through this project.

Source: California Important Farmland: 1984-2016 Map, California Department of Conservation; Amador County General Plan; Amador County Planning Department; CA Public Resources Code.

Chapter 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:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard, result in substantial increase of any criteria pollutant, or substantially contribute to an existing or projected air quality violation under an applicable local, federal, or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☐	☒
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒
d) Result in other emissions (example: Odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

A. The project site is within the jurisdiction of the Amador Air District. Amador Air District is responsible for attaining and maintaining compliance with the NAAQS and CAAQS in the Mountain Counties Air Basin (MCAB) through the regulation of pollution emissions from stationary and industrial sources. As there is no proposed change in use through this Use Permit, there is **no impact** to implementation of any applicable air quality plans.

B. The proposed project would not generate a significant increase in operational or long-term emissions. The existing development climate of the area is a combination of agricultural and residential uses. The project will not introduce any additional uses or uses beyond what is described within the application for the Conditional Use Permit applied for through this project, which is consistent with uses allowed under the existing R1A zoning district. Future development of the property would be required to comply with the General Plan regarding construction emissions and related project-level emissions. **Mitigation Measure AIR-1** is included to minimize vehicle idling times to reduce air quality impacts. There is a **less than significant impact with mitigation(s) incorporated** relative to air quality standards.

C. Sensitive receptors are uses that have an increased sensitivity to air pollution or environmental contaminants. Sensitive receptor locations include schools, parks and playgrounds, day care centers, nursing homes, hospitals, and residential dwelling units. The nearest incorporated city is Ione, located approximately four-and a half (4.5) miles to the southeast. Eagles Nest residential subdivision is directly north of the parcel, and the overall area is characterized by scattered residences and open space. Though there may be sensitive receptors a short distance from the project site, the project itself does not introduce any significant increases of air pollution or environmental contaminants which would affect the surrounding populations. For these reasons, there would be no substantial increase the exposure of sensitive receptors to substantial pollutant concentrations. There is **a less than significant impact**.

D. The proposed project would not generate any significantly objectionable odors beyond that which is permitted under the existing uses and this project would not introduce an increase of objectionable odors discernable at property boundaries. Grave sites would be prepared subject to environmental health and state regulations, and preparation of the deceased would take place off site, therefore eliminating potential impacts to the site product of the preparation and handling of dead bodies. There would be no storage of bodies on site beyond the final internment of the bodies in designated grave sites. This project results in **a less than significant impact.**

Mitigation Measure(s)

AIR-1 Permittee shall meet requirements that may be deemed necessary by the Air District based upon site conditions and operations. The project shall require that idling times for vehicles be limited to a maximum of 5 minutes to reduce operational emissions of criteria pollutants per General Plan Mitigation Measure 4.3-2a

Source: Amador Air District, Amador County Planning Department, Amador County General Plan Mitigation Measure 4.3.

Chapter 4. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial 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 CA Dept. of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CA Dept. of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial 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?	☐	☒	☐	☐
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

A. The Information for Planning and Consultation (IPAC) database provided through the U.S. Fish and Wildlife Service was reviewed to determine if any special status animal species or habitats occur on the project site or in the project area. The National Marine Fisheries Service Habitat Conservation Map from NOAA did not identify any Habitat Areas of Particular Concern (HAPC) nor EFH Protected Areas within the project area. The Marine Fish and Wildlife Bios did not identify any State Marine Projected Areas (MPAs) Areas of Special Biological Significance.

CDFW IPAC database identified potential habitat area for three (3) endangered species, the Conservancy fairy Shrimp (*Branchinecta conservatio*), the Vernal Pool Tadpole Shrimp (*Lepidurus* packardi), and the Ione (including Irish Hill) Buckwheat (*Eriogonum apricum* (including *var*. *prostrtum*). Potential habitat was identified for seven (7) species including the Northwestern Pond Turtle (*Actinemys marmorata*), California Tiger

Salamander (*Ambystoma californiense*), Western Spadefoot (*Spea hammondii*), Monarch Butterfly (*Danaus plexippus*), Valley Elderberry Longhorn Beetle (*Desmocerus californicus dimorphus*), Vernal Pool Fairy Shrimp (*Branchinecta lynchi*), and Ione Manzanita (*Arctostaphylos myrtifolia*). **Mitigation Measures BIO-1**, **BIO-2**, **BIO-3, BIO-4**, and **BIO-5** are required in order to ensure that impacts are **less than significant with mitigations incorporated** with any future development of the site**.** In the case that any of these species are found on the project site and which would experience potential impacts through future site development, the proper authorities shall be notified and all construction and/or ground disturbing activity halted so that additional mitigation measures may be prescribed. No Critical Habitat was determined to be located within the project site.

The California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants identified two (2) plants found in Quad 38120d8 (Irish Hill) where the property is located. These plants are shown in Figure 5a, below. CNDDB Bios- NLCD Land Cover (2016) identified "Shrub/Scrub" areas within and around the property area with "Herbaceous" areas and "Cultivated Crops" in the greater area surrounding the property. As the proposed project would include ground disturbing activity, the above listed mitigation measures would be implemented to reduce impacts to **less than significant with mitigations incorporated.**

B. Riverine Community: CDFW IPAC and the US Fish and Wildlife National Wetlands mapper identified 4.069 acres of R4SBC (Riverine, Intermittent, Streambed, Seasonally Flooded) Riverine community located within the project area. Any part of this project which would affect seasonal flows or surface waters would be subject to regulation under Section 404 of the Clean Water Act or other State/Federal statutes, according to the US Fish and Wildlife Service (IPAC, BIOS**). Mitigation Measure HYD-1** requires erosion control and runoff management to be consistent with county code and thus avoid impacts to existing surface water off-site and on other nearby properties. **Mitigation Measure HYD-**2 addresses specific requirements relative to the internment of bodies within this habitat community. There is a less **than significant impact with mitigations incorporated.**

C. Federally Protected Wetlands (National Wetland Inventory (NWI)): The project site does not include any federally protected wetlands according to the National Wetlands Inventory. Any part of this project which would affect wetlands found off-site would potentially be subject to regulation under Section 404 of the Clean Water Act or other State/Federal statutes, according to the US Fish and Wildlife Service (IPAC, BIOS). There is a **less than significant impact with mitigations incorporated.**

D. Movement of Fish and Wildlife: The project site contains potential habitat for fifteen (15) migratory bird species, listed in Figure 4a. In the event that any of the special-status species are found within the project site, the proper authorities shall be notified and all construction and/or ground disturbing activity halted so that additional mitigation measures may be prescribed. **Mitigation Measures BIO-1, BIO-2, and BIO-**5 are required to render impacts **less than significant with mitigation incorporated**.

E. The proposed project would not conflict with local policies adopted for the protection biological resources. An Oak Woodlands Study was performed for this project conducted by Moore Biological Consultants. This study consisted of a site visit and mapping of oak woodlands and other vegetation communities on site. The field survey and quantification methods and results are included in the report accompanying the application project, which determined the presence of three distinct vegetation communities consisting of Oak Woodland, Chaparral, and Ruderal Grassland. The proposed project is expected to involve the removal of less than 2 acres of oak woodlands, which is determined by the consultant to be less than significant. Mitigation measure BIO-6 includes the following recommendation prescribed by Moore Biological Consultants:

"It is recommended that burial plots in the oak woodlands be situated no closer than 5 feet from the trunk of any oak with a DBH (Diameter at Breast Height) greater than 12 inches. It is also recommended that burial plot development should not involve excavation in excess of 50% of the area under the canopy of any oak tree with a DBH greater than 12 inches." (Moore Biological Consultants, 2022)

The impacts to oak woodlands are seen as **less than significant with mitigations incorporated.**

F. Amador County does not have an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plans. **No impact** would result.

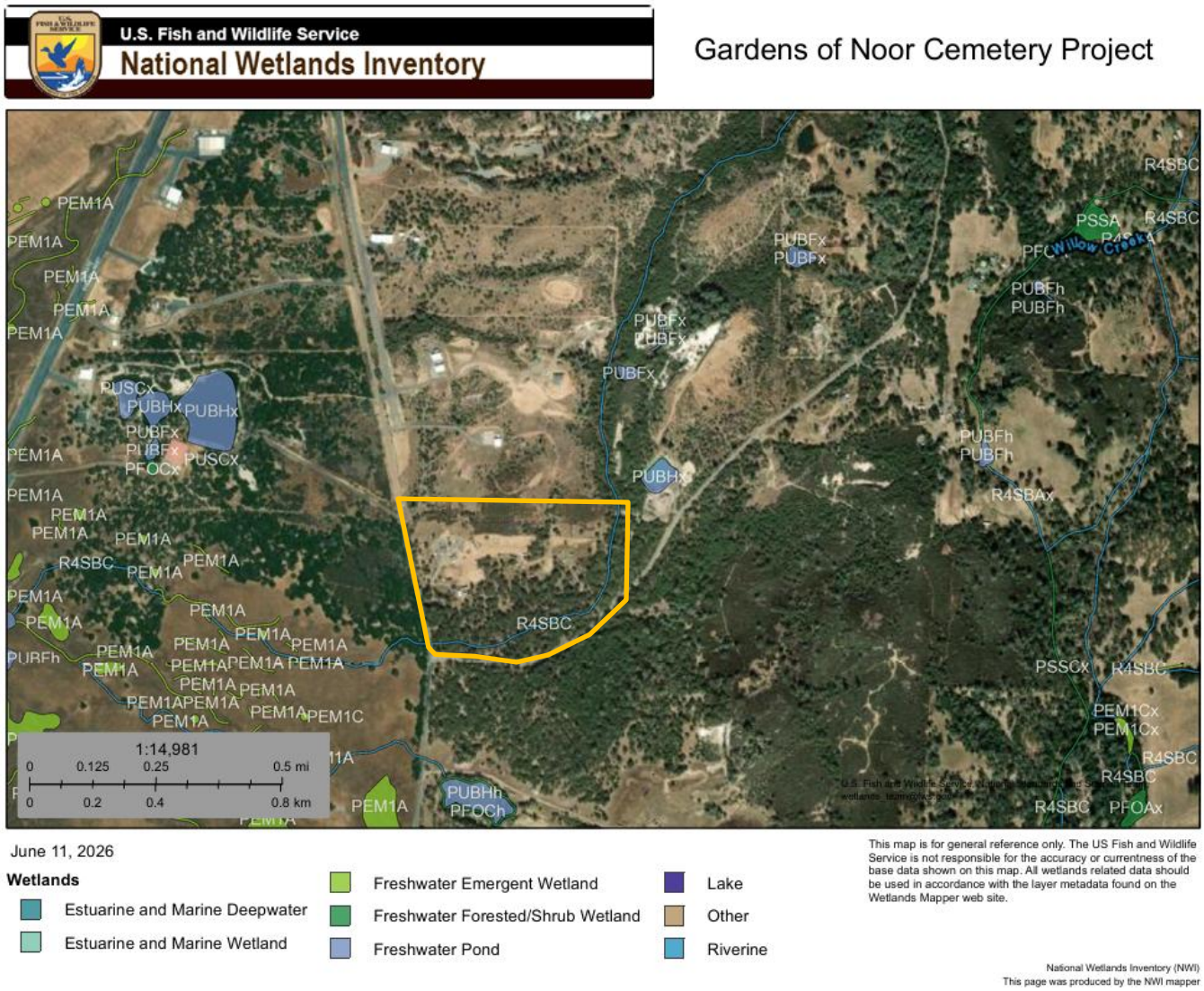
Figure 4a: Migratory Birds List (IPAC 2020)

Species Name	Common Name	Birds of Conservation Concern Listed	Other Conservation List
Haliaeetus leucocephalus	Bald Eagle	Non-BCC Vulnerable	Bald and Golden Eagle Protection Act
Passerculus sandwichensis beldingi	Belding's Savannah Sparrow	BCC-BCR	
Icterus bullockii	Bullock's Oriole	BCC-BCR	
Larus californicus	California Gull	BCC Rangewide (CON)	
Toxostoma redivivum	California Thrasher	BCC Rangewide (CON)	
Aquila chrysaetos	Golden Eagle	Non-BCC Vulnerable	Bald and Golden Eagle Protection Act
Spinus lawrencei	Lawrence's Goldfinch	BCC Rangewide (CON)	
Circus hudsonmius	Northern Harrier	BCC-BCR	
Dryobates nuttallii	Nuttall's Woodpecker	BCC-BCR	
Baeolophus inornatus	Oak Titmouse	BCC Rangewide (CON)	
Melospiza melodia graminea	Santa Barbara Song Sparrow	BCC-BCR	
Agelaius tricolor	Tricolored Blackbird	BCC Rangewide (CON)	
Megascops kennicottii cardonensis	Western Screech Owl	BCC-BCR	
Chamaea fasciata	Wrentit	BCC Rangewide (CON)	
Pica nuttalli	Yellow-Billed Magpie	BCC Rangewide (CON)	

Figure 4b: California Native Plant Society Database Query

Species Name	Common Name	Family	Lifeform	Bloom Period	Global/Fed/State Rank	CA Rare Plant Rank	CA Endemic	Date Added
Arctostaphylos myrtifolia	Ione Manzanita	Ericaceae	Perrenial evergreen shrub	Nov-Mar	G1/F1/S1	1B.2	Y	1974
Eryngium pinnatisectum	Tuolomne Button-celery	Apiaceae	Annual/perrenial shrub	May-Aug	None/G2/S2	1B.2	Y	1974

Figure 4c: Wetlands Mapper (National Wetlands Inventory, FWS)



Mitigation Measures:

BIO-1 **Special-Status Species – Animals**- Special-status animal species should be avoided to the maximum extent practicable. If complete avoidance is infeasible, project impacts will need to be quantified and mitigation developed to reduce the impacts to a less-than-significant level. Mitigation may include preservation and enhancement of on and/or off-site populations, transplanting individuals to a preservation area, or other actions, subject to the approval of CDFW, USFWS, or CNPS. Prior to ground disturbing activity, a Biological Resource Analysis shall be prepared to document the presence of any special status species, and the project site plan shall be modified to avoid disturbance to those species as determined necessary by the County and CDFW, USFWS, or CNPS.

BIO-2 **Ground Disturbance Timing for Nesting Birds-** To avoid impacts to nesting bird species or birds protected under the Migratory Bird Treaty Act, all ground disturbing activities conducted between February 1 and September 1 must be preceded by a pre-construction survey for active nests, to be conducted by a qualified biologist. This survey should be conducted within two weeks prior to any construction activities. The purpose of this survey is to determine the presence or absence of nests in an area to be potentially disturbed. If nests are

found, a buffer depending upon the species and as determined by a qualified biologist in consultation with the California Department of Fish and Wildlife and shall be demarcated with bright orange construction fencing. Any vegetation clearing should be schedule outside of the avian nesting season (February 1 through August 31) or survey should be conducted immediately prior to vegetation removal. If active nests are found, vegetation removal should be delayed until the young fledge. No ground disturbing or other construction activities shall occur within this buffer until the County-approved biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Nesting bird surveys are not required for ground disturbing activities occurring between September 2 and January 31.

BIO-3 **Special-Status Species – Plants-** Special-status plant populations should be avoided to the maximum extent practicable. If complete avoidance is infeasible, project impacts will need to be quantified and mitigation developed to reduce the impacts to a less-than-significant level. Mitigation may include preservation and enhancement of on and/or off-site populations, transplanting individual plants to preservation area, or other actions, subject to the approval of CDFW, USFWS, or CNPS.

BIO-4 **Plant Survey-** Prior to any construction activity related to any discretionary project, a biological and/or rare plant survey shall be conducted to determine if there are any special-status plants within the project area and which may potentially be disturbed. Surveys shall be timed according to the blooming period for the target species, and known reference populations will be visited prior to surveys to confirm the species is blooming where known to occur. If special-status species are identified, avoidance zones may be established around plant populations to clearly demarcate areas for avoidance. Avoidance measures and buffer distances may vary between species, and the specific avoidance zone distance will be determined in coordination with the appropriate resource agencies. For individual specimens, highly visible temporary construction fencing shall be placed at least 10 ft. away from the drip line of the plant. No construction activity or grading would be permitted within the buffer zone. Where avoidance is infeasible, and the plant subject to removal or potential damage from construction, the project applicant shall develop and implement a mitigation plan pursuant to State and Federal regulation. The mitigation plan shall provide for no net loss of habitat and shall include, but is not limited to, relocation of the affected plants, replanting, and monitoring of relocated and planted specimens.

BIO-5 Wetland and Riparian Habitat (BIO-5): Compete avoidance of wetlands is conservatively recommended to ensure compliance with wetland laws. Site development shall implement erosion control plans, and best management practices (BMPs) that prevent the discharge of sediment into nearby drainage are found, a buffer depending upon the species and as determined by a qualified biologist in consultation with the California Department of Fish and Wildlife and shall be demarcated with bright orange construction fencing.. No ground disturbing or other construction activities shall occur within this buffer until the County and CDFW approved biologist has confirmed that there is no unmitigated impact to existing riparian or wetland habit.

Source: California Department of Fish and Wildlife BIOS, U.S. Fish and Wildlife Service IPAC, California Native Plant Society (CNPS) California Department of Fish and Wildlife Habitat Conservation Planning, Migratory Bird Treaty Act, NOAA, National Wetlands Inventory, 2019, Amador County Planning Department,

Chapter 5. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site?	☐	☒	☐	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

Discussion/Conclusion/Mitigation:

(A.)(B.)(C.)(D.)

Cultural resources include prehistoric and historic period archaeological sites; historical features, such as rock walls, water ditches and flumes, and cemeteries; and architectural features. Cultural resources consist of any human-made site, object (i.e., artifact), or feature that defines and illuminates our past. Prehistoric resources sites are found in foothill areas, areas with high bluffs, rock outcroppings, areas overlooking deer migratory corridors, or above bodies of water. Grading and other soil disturbance activities of previously undisturbed land on the project site have the potential to uncover historic or prehistoric cultural resources. Due to the nature of the proposed project (a cemetery related improvements) there will be eventual ground-disturbing activity in the case that this project is approved. In the case that any ground disturbing or construction activity is proposed in the future which does encroach onto any previously undisturbed land not covered by this study, additional environmental review may be necessary including but not limited to requiring the developer to halt construction upon the discovery of as-yet undiscovered significant prehistoric sites, documenting and/or avoiding these resources, informing the County Planning Department, and consultation with a professional archeologist.

Discretionary permits for projects "that could have significant adverse impacts to prehistoric or historic-era archeological resources" in areas designated by the Amador County General Plan as being moderate-to-high cultural resource sensitivity are required to have a Cultural Resource Study prepared prior to project approval, per Mitigation Measures 4.5-1a, 4.5-1b, and 4.5-2 of the Amador County Implementation Plan. The project site is located in an area of moderate cultural resource sensitivity.

A Cultural Resources Study was prepared for this project performed by Windmilller Consulting, which builds upon existing data referenced within the Cultural Resources Assessment for this project. The records search and field survey did not locate cultural or archaeological resources 50 years old or older identified at the project location. A previous similar study was performed in 1994 for a location 0.5 miles northeast. Following the Archaeological Survey conducted for this project, no archaeological resources older than 50 years were encountered and it was recommended by Windmilller Consulting that if cultural resources 50 years old or older are encountered during construction or future ground-disturbing activity, further study may be required. This includes the notification of the find to the County which . with recommendations as follows: "In the unlikely event that buried archaeological resources are encountered during any ground-disturbing activity, all work in the immediate vicinity of the find must cease and the permitting agency

notified for further instruction. If human remains or other evidence of a grave is encountered outside of that is performed by the project operator, all work must stop and the County Coroner notified immediately in accordance with California law" (Windmiller). Proposed mitigations **CULTR-1** and **CULTR-2** are included and will require additional study to be performed in the case that this use requires any ground-disturbing activity, consistent with the recommendations made in the study. There is **a less than significant impact with mitigations incorporated** to cultural resources.

Mitigation Measures

CULTR-1 During ground-disturbing activity, if paleontological, historic or pre-historic resources such as chipped or ground stone, fossil-bearing rock, large quantities of shell, historic debris, building foundations, or human bone are inadvertently discovered, the operator/permittee shall immediately cease all such activities within 100 feet of the find and notify the applicable agency. A qualified archaeologist shall be contracted by the operator/permittee to assess the significance of the find and prepare an evaluation, avoidance or mitigation plan, as appropriate, which shall be implemented before resuming ground disturbing activities.

CULTR-2 Immediately cease any disturbance of the area where such unexpected suspected remains are discovered and any nearby areas reasonably suspected to overlie adjacent remains until the Amador County Coroner is Amador County General Plan FEIR AECOM County of Amador 4.5-15 Cultural Resources contacted, per Section 7050.5 of the California Health and Safety Code,. The coroner shall, within two working days:

Determine if an investigation of cause of death is required;

1. Determine if the remains are most likely that of Native American origin, and if so suspected, the coroner shall notify the California Native American Heritage Commission (NAHC) within 24 hours of making his or her determination.
2. The descendants of the deceased Native Americans shall make a recommendation to the operator/ permittee for the means of handling the remains and any associated grave goods as provided in Public Resources Code (PRC) Section 5097.98.
3. The NAHC shall immediately notify those persons it believes to be most likely descended from the deceased Native American.
4. The descendants may, with the permission of the landowner or their representative, inspect the site of the discovered Native American remains and may recommend possible treatment or disposition within 24 hours of their notification.
5. Whenever the NAHC is unable to identify a descendent, or the descendent identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendent and the mediation provided for in subdivision (k) of PRC Section 5097.94 fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall reinter the human remains and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance.

Source: Amador County Planning Department, Amador County General Plan Environmental Impact Report, Amador County Implementation Plan 2016, California Health and Safety Code, California Native American Heritage Commission (NAHC), CA Office of Historic Preservation, State of California Resources Agency Department of Parks and Recreation Primary Records (DPR 523A), Records Search Results for APNs: 015-220-065 NCIC, Amador County Planning Department, Windmiller Consulting Inc. Cultural Resources Assessment Gardens of Noor Cemetery (2022).

Chapter 6. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

A. Long-term project construction or long-term operational changes resulting in substantial energy use shall conform to the Amador County General Plan energy use requirements, and any other applicable requirements under the State of California. There is a **less than significant impact.**

B. The only local energy plan is the Energy Action Plan (EAP) which provides incentives for homeowners and business owners to invest in higher-efficiency energy services. The project would not conflict with or obstruct any state or local plan for energy management, therefore there is **no impact.**

Sources: Amador County EAP, Amador County Planning Department.

Chapter 7. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
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 substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geological 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, liquefaction or collapse?	☐	☐	☐	☒
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☒	☐	☐
f) Directly or indirectly destroy a unique geological site or feature?	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

A. The project site is not located within an Alquist-Priolo Earthquake Fault Zone and no active faults are located on or adjacent to the property, as identified by the U.S. Geologic Survey mapping system. Therefore, **no impact** would occur. The State Geologist has determined there are no known sufficiently active or well-defined faults or areas subject to strong ground shaking, liquefaction, landslides, or other ground failure in Amador County as to constitute a potential hazard to structures from surface faulting or fault creep. The project location has not

been evaluated for liquefaction hazards or seismic landslide hazards by the California Geological Survey. There is **no impact**.

B. According to the project location as mapped in *Figure 7: Soil Map* by the Natural Resources Conservation Service (NRCS, 2017), the property where the project is located is characterized by 23 acres of Firebrick-Mokelumne complex and 16.3 acres of Red Bluff-Mokelumne complex. Grading Permits are required for any earthmoving of 50 or more cubic yards, and are reviewed and approved by the County in accordance with Ordinance 1619 (County Code 15.40) with conditions/requirements applied to minimize potential erosion. Presence of the above listed soil types does not require additional regulatory action nor does it indicate special circumstance requiring any under County code. The property will include grading which, with the implementation of **Mitigation Measures GEO-1, HYD-1, and BIO-1, 2, 3, and 4**, is a **less than significant impact.**

C. Slopes most susceptible to earthquake-induced failure include those with highly weathered and unconsolidated materials on moderately steep slopes (especially in areas of previously existing landslides). The actuators of landslides can be both natural events, such as earthquakes, rainfall, and erosion, and human activities. Those induced by man are most commonly related to large grading activities that can potentially cause new slides or reactivate old ones when compacted fill is placed on potentially unstable slopes. Conditions to be considered in regard to slope instability include slope inclination, characteristics of the soil materials, the presence of groundwater and degree of soil saturation. This project will not impact the stability of existing geological units or soil, nor impact potential landslides, lateral spreading, subsidence, liquefaction or collapse. There is **no impact** of this project on the aforementioned conditions.

D. Expansive or collapsible soils are characterized by the ability to undergo significant volume change (shrink and swell) as a result of variation in soil moisture content. Soil moisture content can change due to many factors, including perched groundwater, landscape irrigation, rainfall, and utility leakage. Requirement of a grading permit requires building inspection and grading permit issuance for any substantial earthmoving or construction of structures, and as it is unlikely that even if expansive soils are found at the project site, that there would be impacts detrimental to the project, property, or current uses with the current regulation implemented through construction. There is **no impact.**

E. Soil conditions within the project site must be determined to be suitable for on-site sewage systems permissible for this type of land division. **Mitigation Measure GEO-1** requires compliance with Amador County Code regarding sewage disposal requirements for projects of this nature. **Mitigation Measure UTL-1** requires review and approval of the existing wastewater treatment system utilized by this project. There is a **less than significant impact with mitigation incorporated.**

F. The proposed project would not destroy or greatly impact any known unique geological site or feature. There is **a less than significant impact.**

Mitigation Measure:

GEO-1 **SEWAGE DISPOSAL:** Retain the services of a qualified professional (a registered professional engineer, registered environmental health specialist, or licensed engineering geologist experienced in on-site sewage disposal system design) to review the existing on-site wastewater treatment system that is to serve the project. This qualified professional shall evaluate existing and proposed wastewater flows and assess the current condition of the system. He or she shall then either: 1) Certify that the existing onsite wastewater treatment system may be expected to provide acceptable service for the proposed use, or 2) specify any modification, expansion, replacement or treatment that would be needed for such certification to be possible.

Figure 7a: Soil Map

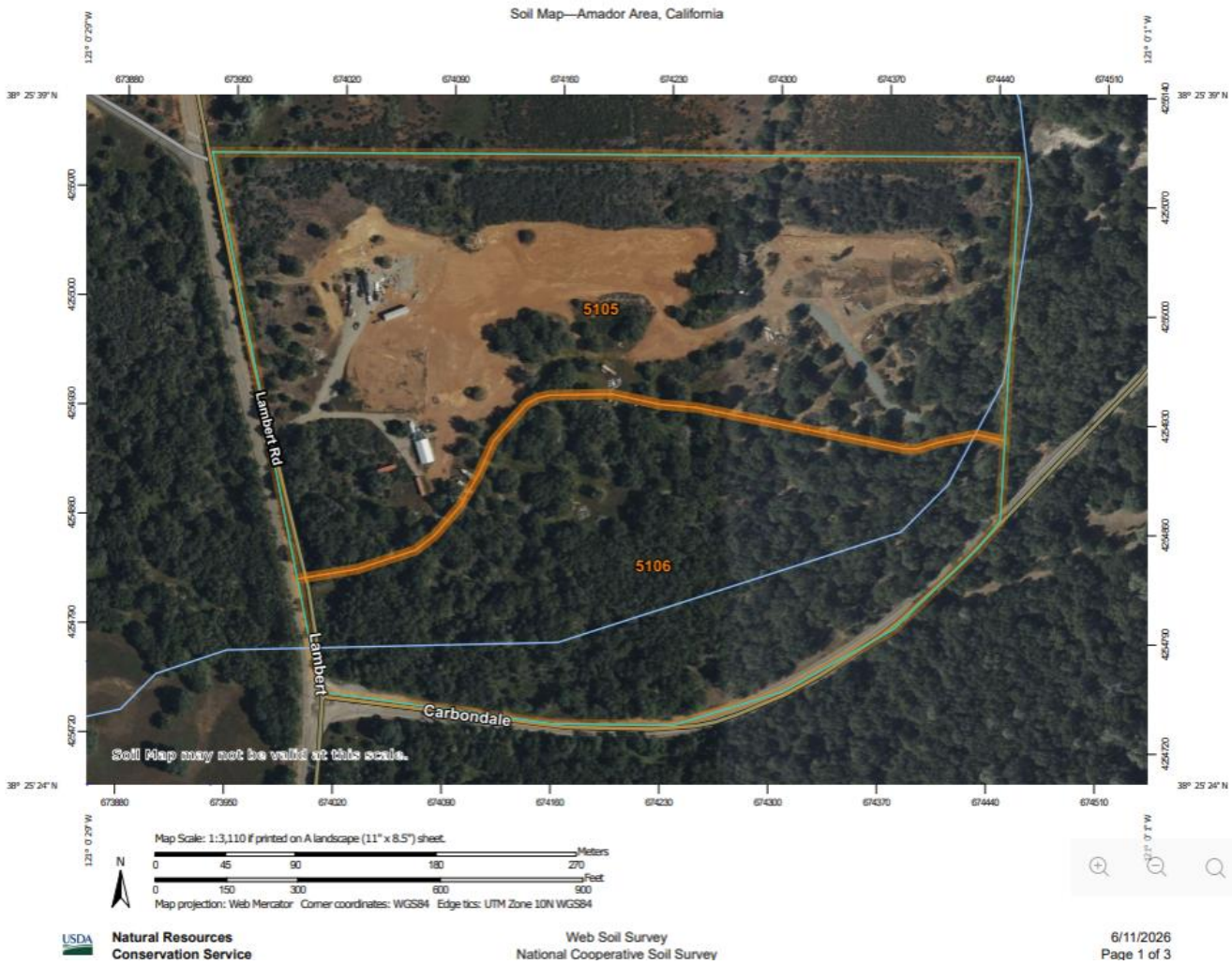


Figure 7b: Soil Map Legend

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
5105	Firebrick-Mokelumne complex, 2 to 30 percent slopes	23.7	59.3%
5106	Red Bluff-Mokelumne complex, 3 to 15 percent slopes	16.3	40.7%
Totals for Area of Interest		**40.0**	**100.0%**

Figure 7c: USGS CGS Geologic Map of California 1:750k (2010)

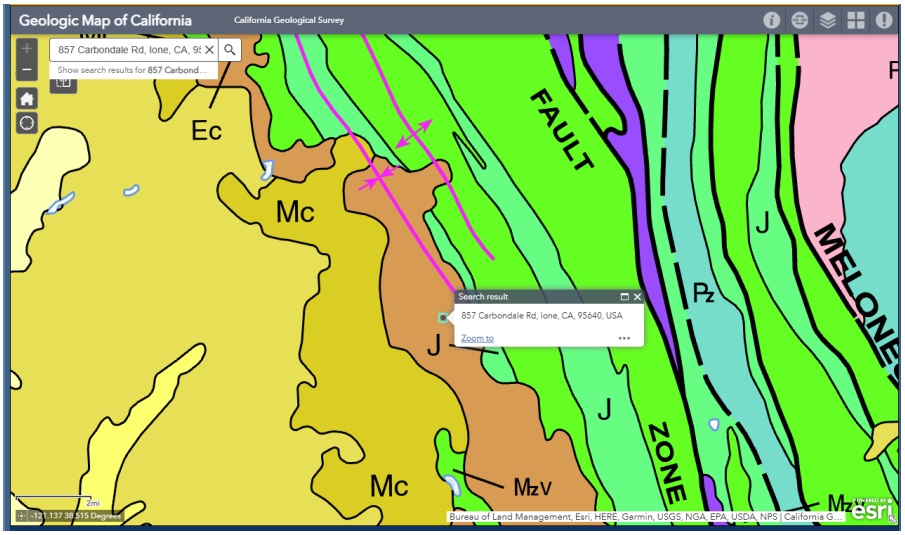


Figure 7d: USGS CGS Key



Sources: Soil Survey-Amador County; Amador County Planning Department, Environmental Health Department, National Cooperative Soil Survey, Amador County General Plan EIR, California Geologic Survey: Alquist-Priolo Earthquake Fault Zones Maps.

Chapter 8. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒	☐	☐
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

A. This project is not anticipated to generate substantial increase in emissions. The project would not generate significant greenhouse gas emissions or result in significant global climate change impacts, with the implementation of **Mitigation Measure AIR-1**, limiting vehicular idling times. There is **a less than significant impact with mitigation incorporated.**

B. There is no applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Any increase in emissions would comply with regulations and limits established by the California Air Resources Board (CARB) and Amador Air District. Therefore there is **no impact.**

Sources: Amador County General Plan, Amador Air District, Amador County Municipal Codes, Assembly Bill 32 Scoping Plan- California Air Resources Board (CARB), Amador County General Plan EIR.

Chapter 9. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
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, or otherwise introduce potential hazards to residents or property?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment? Or otherwise be influenced by other notable hazards?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

A. Hazardous Materials Transport and Handling: The project does not significantly increase risk to the public or the environment through the routine transport, use, or disposal of hazardous materials. Any human remains would be prepared off-site at a licensed facility. The operator would be responsible for following any and all required guidelines established by the State Cemetery Board and/or Regional Water Quality Control Board regarding the handling of and internment of human remains. There is **a less than significant impact.**

B. Hazardous Materials Upset and Release: Potential impacts of hazardous material handling, transport, or release through this project is mitigated by oversight of the Amador County Environmental Health department

pursuant to state law. There may be storage of hazardous materials associated with the operation and maintenance of the facility therefore the property owner will be responsible for keeping and maintaining a Hazardous Materials Business Plan, subject to approval by the Environmental Health Department and included as **Mitigation Measure HAZ-1**. There is a **less than significant impact with mitigations incorporated.**

C. The nearest public schools are located more than 1 mile away. Schools would not be exposed to hazardous materials, substances, or waste due to the project, and there would be **no impact**.

D. Pursuant to Government Code Section 65962.5, the project site was queried for past-to-current records regarding information collected, compiled, and updated by the Department of Toxic Substances Control and Secretary for Environmental Protection (EPA) evaluating sites meeting the "Cortese List" requirements. The project site also was also searched on the California EPA's Superfund Enterprise Management System (SEMS) database and the US EPA Facility Registry Service (FRS) however there were no specific flags for the project on either site. CalEPA GeoTracker identified no potential hazardous materials within the project area or near vicinity (1 mile radius), with the nearest site being located approximately 2 miles away (Mule Creek St. Prison), which's case has been closed according to the site. Therefore there is a **less than significant impact.**

E The nearest public use airport to the project site is the Westover Field Airport located in Martell, located approximately 5 miles away. The proposed project is located outside the safety compatibility zones for the area airports, and due to the significant distance from the project site, there is **no impact** to people working on the project site.

F The nearest private airport to the project site is located at Eagle's Nest Airport, less than a mile away from the project location. This property is located within the Eagle's Nest Airport Overlay Zone, which limits development densities, building heights, and incompatible uses within the vicinity of the Eagle's Nest Private Airport. This project is located approximately .58 miles from the airport runway therefore the property owner must obtain an Avigation Easement for the right to flight, exhaust noise, fumes, lights, vibration, and particulate matter, which is included as a condition of this project. Within two miles of the outermost edge of the Eagle's Nest Airport runway schools, churches, and other places of assembly as defined by Section 13143(a) of the California Health and Safety Code, are prohibited. As such, any funeral events associated with this property must take place outside of a building. The proposed use will not negatively affect the airport or airport usage, and the requirement of an avigation easement ensures that the property owner is aware of any potential impacts of the proposed use relative to the project's proximity to an active airport. There is **a less than significant impact,** relative to safety hazards associated with airport operations that are anticipated to affect people working or residing within the project site.

G The proposed project is located directly off Carbondale Rd., a county-maintained minor collector. Amador County has an adopted Local Hazard Mitigation Plan (LHMP), updated in January of 2014. The proposed project does not include any actions that physically interfere with any emergency response or emergency evacuation plans. There is **a less than significant impact.**

Mitigation Measure(s)

HAZ-1 Hazardous Materials Upset and Release: Prior to activation of the use permit, the applicant shall provide documentation to the Amador County Environmental Health Department that the site is in full compliance with the requirements of the Unified Program regarding hazardous materials business plan requirements, hazardous waste generation, treatment or storage, aboveground petroleum storage, and underground tanks. If a hazardous materials business plan is required, the emergency response portion shall include a plan for the evacuation of

visitors in the event of a hazardous materials incident. The applicant shall substantially comply with all requirements of the Unified Program throughout the life of the Use Permit.

Sources: Amador County Planning Department, Superfund Enterprise Management System database (SEMS), Department of Toxic Substances Control Envirostor database, Geotracker, California State Water Control Board (CA SWRBC), California Stormwater Quality Association (CASQA), Local Hazard Mitigation Plan (LHMP).

Chapter 10. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially 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 or 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)?	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site?	☐	☒	☐	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☒	☐	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☒	☐	☐
iv. Impede or redirect flood flows or place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☒	☐
d) In a flood hazard, tsunami, or seiche zone, risk release of pollutants due to project inundation or increase risk of such inundation?	☐	☐	☒	☐
e) Otherwise substantially degrade water quality?	☐	☒	☐	☐
f) 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?	☐	☐	☒	☐
g) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

A The proposed project would increase the impermeable surfaces on-site but would not result in a significant increase in urban storm water runoff. The County requires a grading permit (County Code Chapter 15.40) for any earthmoving in excess of 50 cubic yards. This requirement is included as **Mitigation Measure HYD-1.** The impacts are **less than significant with mitigation incorporated.**

B The proposed project would not significantly require the use of, or otherwise interfere with, available groundwater supplies with the implementation of **Mitigation Measure HYD-1.** There is **a less than significant impact with mitigations incorporated.**

Ci-ii The proposed project is not projected to significantly contribute to any increase in erosion, siltation, surface runoff, or redirection of flood flows with implementation of **Mitigation Measure HYD-1**. There is a **less than significant impact with mitigation incorporated.**

C iii The project would not contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems with implementation of **Mitigation Measure HYD-1**. There is a **less than significant impact with mitigation incorporated.**

C iv The project is located in Flood Zone X, meaning that the northern portion of the site is outside of the Standard Flood Height Elevation and of minimal flood hazard (Zone X). The proposed project does not involve the construction of housing on the property. **Impact are less than significant** with respect to placing housing within a 100-year flood hazard area for this project.

D There is no known risk mapped on the California Department of Conservation CGS Information Warehouse regarding landslides. This parcel map is a division of land which does not propose changes of use or additional development therefore **a less than significant impact** to/from flood flows.

E The project would not substantially degrade water quality through its operation. Conditions of additional project approval include submission of plans to the Amador County Environmental Health Department, obtainment of a Grading Permit through the Amador County Building Department, included as **Mitigation Measure HYD-1**. **Mitigation Measure UTL-2** addresses the water quality of on-site wells. There is **a less than significant impact with mitigations incorporated** regarding water quality resulting from this project.

F It is highly unlikely that the project would be subject to inundation by seiche, tsunami, or mudflow as the project site is not in any FEMA mapped DFIRM Flood Zones. There would not be substantial risk for property or people through the failure of levees or dams introduced by this project, therefore there is **a less than significant impact** regarding risk or loss.

G There is no existing water quality control plan or sustainable groundwater management plan in the vicinity of this project. Compliance with SGMA would be required for future water usage. There is a **less than significant impact**.

Mitigation Measures

HYD-1 Grading Permits and Erosion Control: Prior to the issuance of permits for site-specific development, drainage and grading permits shall be prepared by a licensed civil engineer and submitted to the Amador County Building Department for approval. Drainage plans shall demonstrate that new development would not increase peak storm flows and that adequate capacity exists downstream to accommodate increased stormwater volume. All site-specific development shall implement appropriate stormwater runoff best management practices (BMPs) and design features to protect receiving water quality consistent with Amador County standards, and any required National Pollution Discharge Elimination System (NPDES) permits administered by the State Water Resources Control Board (SWRCB) must be obtained prior to project execution.

HYD-2 Best Management Practices for Internment of Human Remains: The property owner would be required to adhere to any required regulations regarding the internment of Human Remains to avoid contamination of groundwater resources. This requires the applicant require any applicable permits from the Regional Water Quality Control Board (RWQCB) and adhere to practices established through the State Cemetery Board rules and regulations regarding cemetery operations.

Sources: Amador County Planning Department, California State Water Resources Control Board (CSWRCB), California Stormwater Quality Association (CASQA). CA Department of Conservation, USGS-USDA Forest Service Quad Map, USGS Landslide Hazards Program, CA Department of Conservation CGS Information Warehouse.

Chapter 11. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☒	☐
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?	☐	☒	☐	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

A The subject property is currently vacant. The proposed project would not divide an established community and is consistent with the general zoning of the area. The General Plan designation of MRZ, Mineral Resource Zone would potentially be a source of conflict however the applicant has supplied a comprehensive geotechnical and geological study for the project, which has indicated that there is no presence of uniquely significant minerals on site with which this project would restrict future access to. This project does not propose a significant increase in density and will serve a unique need in the community. There is **a less than significant impact.**

B Proposed uses are commercial and residential and would not inherently introduce significant impacts to the neighboring properties (residential uses). There is a **less than significant impact with the mitigations** incorporated with the project and implementation of the Conditions of Approval for the project.

C The project site is not included in any adopted habitat conservation plans or natural community conservation plans. Therefore, the project would not conflict with any such plans and **no impact** would result.

Sources: Amador County General Plan, Amador County Municipal Codes, Amador County Planning Department.

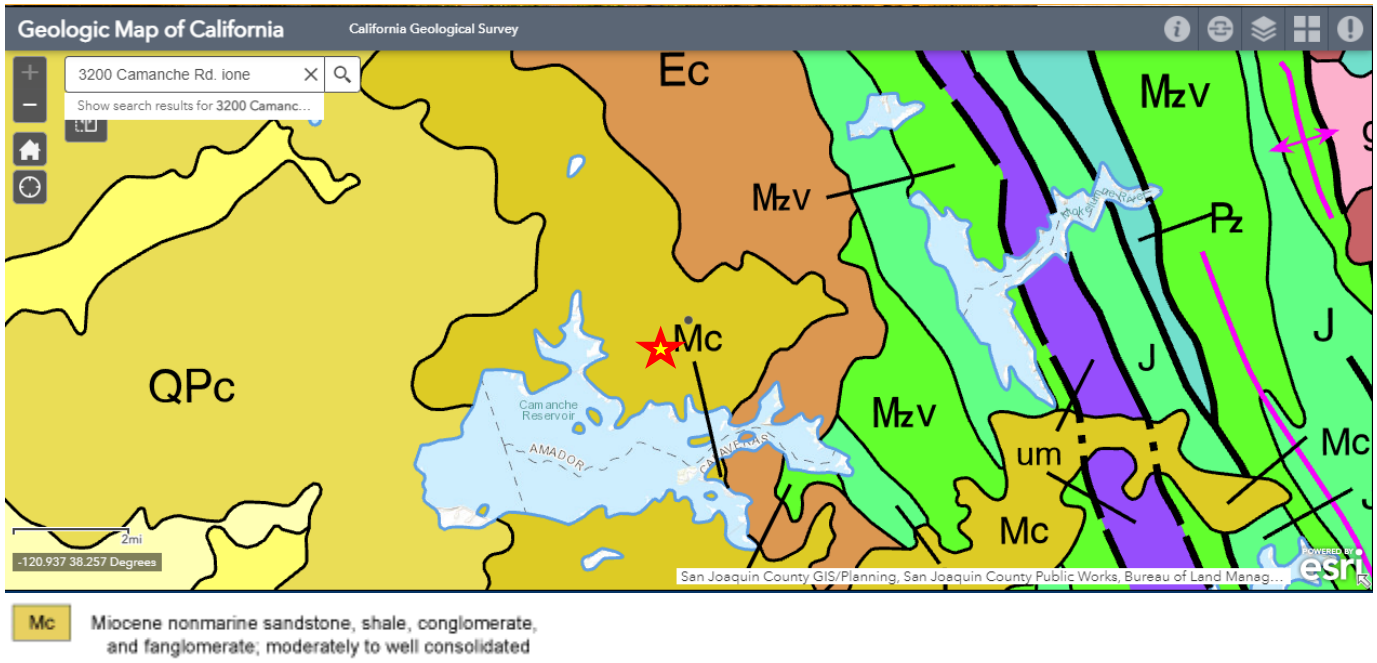
Chapter 12. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐
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?	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

A & B According to the California Division of Mines and Geology Mineral Land Classification Map, this project is located in the Irish Hill 15-Minute Quadrangle which has a reported SMARA Study Area, conducted in 1983. The geologic study performed by Hallenbeck/Allwest determined that this project would not restrict access to any unique mineral resources on site. This project will not encroach onto any of the other properties and therefore not interfere with any present or future access to known mineral resource areas. There are no proposed structures or changes in use, therefore there is **a less than significant impact** to any mineral resources.

Figure 12a: CGS Geologic Map of California (CGS- webportal)



Source: Amador County Planning Department, California Geological Survey https://maps.conservation.ca.gov/cgs/gmc/); Wagner, D.L., Jennings, C.W., Bedrossian, T.L., and Bortugno, E.J.; Geologic map of the Sacramento quadrangle, California, 1:250,000: California Division of Mines and Geology, Geologic Map 1A; 1981.

Chapter 13. NOISE

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c) Contribute to substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
d) Contribute to substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

A The project would result in low levels of noise-related impacts related to the proposed cemetery. Funeral events and traffic to and from the facility, as well as equipment operational noises are expected with the proposed uses. The project would be subject to regulation by the Amador County Code regarding nuisance conditions. **Mitigation Measure NOI-1** is included to further mitigate any additional sounds product of the property's use as a cemetery. There is **a less than significant impact.**

B The proposed project would include the construction activity which may generate ground-borne vibration, noise, or use construction activities. **Mitigation Measure NOI-1** incorporates BMPs for heavy equipment operation which, coupled with the proposed hours of operation for visitation (sunrise to sunset) and limitation of heavy equipment operation during that time, there is **a less than significant impact with mitigations incorporated.**

C & D The presented project will not introduce significant increased noise however noise may arise from increased traffic and heavy equipment operation on-site, mitigated by **Mitigation Measure NOI-1.** Noise levels generated would not exceed applicable noise standards established in the General Plan, and the property would be subject to Amador County noise regulations (Chapter 9.44). There is **a less than significant impact with mitigations incorporated.**

E & F Impacts to the property guests by the nearby airport shall be mitigated through the Eagle's Nest Airport Overlay Zone requirements, which include the requirement of an avigation easement for any new discretionary uses within that zone. It would be the property owner's responsibility to inform guests of potential issues arising from the projects relative proximity to an active airport. A **less than significant impact** would result.

Mitigation Measures:

NOI-1 **Noise Buffers:** Conditions of approval shall include a requirement that, when feasible, noise buffers shall be implemented (landscaping, fencing etc.) and permittee shall maintain adhere to County Code Section 9.44 regarding nuisance noise, consistent with **Mitigation Measure AES-1**. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

Sources: Amador County Planning Department, Amador County General Plan: Noise Element, General Plan Mitigation Measure 4.11., Eagle's Nest Overlay Zone (2023)

Chapter 14. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial 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)?	☐	☒	☐	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

A The project would not significantly increase the developmental density allowed on the affected property. The property is zoned R1A, Single-family Residential and Agricultural which allows for up to two residences to be built by-right. The proposed project does not include an increase in housing, however the existing developmental density of the parcel would not change, as the property owner could still build up to two residences on the parcel in addition to the proposed discretionary use of the cemetery. Establishment of appropriate ingress and egress and compliance with Amador County requirements regarding traffic and encroachments (included as **Mitigation Measure TRA-1**) regulate the proposed traffic increase with the addition of the commercial operation, therefore there is a **less than significant impact with mitigations incorporated.**

B & C The property is currently vacant and no resident housing stock would be depleted through this project. There is **no impact** to available resident housing.

Sources: Amador County Planning Department.

Chapter 15. PUBLIC SERVICES

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental 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:				
a) Fire protection?	☐	☒	☐	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

A The project site is currently served by the Jackson Valley Fire Protection District (JVFPD). The nearest fire station is the Ione Fire Station, located approximately 2 miles away. Mutual aid agreements coordinate protection service between City or Community Fire Protection Jurisdictions, and CalFire. The project requires annexation to Community Facilities District 2006-1, included as **Mitigation measure PUB-1**. A **less than significant impact with mitigations incorporated** related to fire protection services would occur.

B The project site is currently served by the Amador County Sheriff's Department. The nearest Sheriff station is located at 700 Court St., Jackson, which serves the unincorporated area of the County. Proposed improvements would not result in additional demand for sheriff protection services. Mutual aid agreements coordinate police action between City and County police protection service. Ione is located closer to the project site than the Sheriff Department office in Jackson, CA. California Highway Patrol (CHP) also provides police protection associated with the State Highways; the nearest highways to this project are CA State Hwy 88 located northwest of the project site. As these various agencies all provide various police and emergency services, this project would not result in the provision of or need for new or physically altered sheriff or police protection facilities. There is **a less than significant impact** to police protection services.

C&D This project includes the construction of a cemetery. Because the demand for schools, parks, and other public facilities is driven by population, the proposed project would not significantly increase demand for those services at this time as the property is not going to experience any change in zoning or general plan designation. As such, the proposed project would result in **a less than significant impact** on these public services.

E There is no physical change or additional inconsistent uses proposed, therefore would not be significant additional pressure on other solid waste processing/transfer facilities. There is a **less than significant impact.**

Mitigation Measure

PUB-1 Prior to recordation of any final map, the subdivider shall participate in the annexation to the County's Community Facilities District No. 2006-1.

Sources: Amador County Planning Department.

Chapter 16. RECREATION

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

A&B The proposed project would not increase opportunity for residential development therefore, there is no increased demand for parks or recreational facilities. The proposed project would not significantly affect use of existing facilities, nor would it require the construction or expansion of existing recreational facilities at his time**.** The proposed project would have a **less than significant impact** on recreational facilities.

Source: Amador County Planning Department.

Chapter 17. TRANSPORTATION / TRAFFIC

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with an applicable plan, ordinance or policy establishing measure 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?	☐	☐	☒	☐
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?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☒	☐
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
e) Result in inadequate emergency access?	☐	☒	☐	☐
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?	☐	☐	☐	☒
g) Conflict with or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

A&B The proposed project would potentially introduce a substantial increase in traffic if the facility at maximum operational capacity. **Mitigation Measure TRA-1** includes the payment of a Traffic Mitigation Fee to the County Public Works Department and improvement/introduction of an adequate commercial encroachment to address the potential uses would prevent a significant reduction to the existing level of service, and address potential congestion at the intersection of Lambert and Carbondale Rd. Required driveway improvement would require that the proposed project not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system. Caltrans, Amador County Department of Transportation and Public Works, and other applicable transportation agencies have been included in circulation of this project. There would be **a less than significant with mitigations incorporated.**

C The proposed project would not be located within any Westover Airport safety zones (Westover Field Airport Land Use Compatibility Plan Draft 2017). The property is located approximately .5 miles from an existing private use airport however the guest limit of 50 attendees per funeral event with a maximum of two per day limits the density of individuals on site. The project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that would result in a safety risk. **There is a less than significant impact.**

D This project proposes an increase of traffic that would accompany the guest limitation of up to 100 people per day visiting the property for funerary services. **Mitigation Measure TRA-1** includes the requirement that an encroachment permit be obtained for the proposed uses, to the satisfaction of the Public Works Department. Encroachments must conform to the regulations found in Chapter 12.10 of County Code. Grading must conform to Chapter 15.40 (See **Mitigation Measure HYD-1)** there is a **less than significant impact with mitigations incorporated.**

E The proposed project must comply with the Fire and Life Safety Ordinance (Chapter 15.30) with **Mitigation Measure TRA-2**. There is **less than significant impact with mitigation incorporated**.

F The project would not affect alternative transportation. Therefore, the proposed project is consistent with the policies, plans, and programs supporting alternative transportation, and there would be **no impact.**

G Pursuant to CEQA Guidelines §15064.3, subdivision (b) the County's qualitative analysis of this project establishes there are no significant impacts to traffic. Under this code, the criteria for analyzing transportation impacts for land use projects is as follows:

"Land Use Projects. Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact… "

Due to the nature of projects in a rural setting, it is more feasible to evaluate impacts to transportation on a qualitive basis, which is included under the guidelines as follows:

"Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate."

Based on the qualitative analysis of the project as proposed, cemetery use is not a particularly significant use when evaluating for Vehicle Miles Traveled (VMT) based on the infrequency of visitation for particular individuals to these sites. There is **no impact** to the implementation of this project with respects to CEQA Guidelines §15064.3(b).

Mitigation Measures:

TRA-1 The property must maintain a primary access onto a County road and obtain all necessary encroachment permits (Chapter 12.10) and grading permits (Chapter 15.40) required for the proposed uses, as regulated by the Amador County Department of Transportation and Public Works (**Mitigation Measure HYD-1**). Additionally, the proposed project would require the payment of a traffic mitigation fee as determined adequate by the Transportation and Public Works Department to offset road maintenance costs of improvements relative to the property's increased use through this project.

TRA-2 The proposed project must comply with the Fire and Life Safety Ordinance (Chapter 15.30). The applicant will be required to have all roads, gates and access ways on the property meet 15.30 standards and any future buildings will require a fire water supply.

TRA-3 Property Access Restrictions: To minimize traffic impacts to nearby properties, the property owner/operator shall provide assurances that the Lambert Rd. entrance to the property will only be accessed from Carbondale Rd. This includes notifying all guests that they will be required to navigate to the property along routes to avoid utilization of Maxwell Rd., Claypit Rd., and Mustang Alley. THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION.

Sources: Amador County Planning, California Fire and Life Safety (Chapter 15.30), California Environmental Quality Act (CEQA) Guidelines 2019.

Chapter 18. TRIBAL CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	☐	☒	☐	☐
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?	☐	☒	☐	☐
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

Tribal cultural resources" are defined as (1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

(A) Included or determined to be eligible for inclusion in the California Register of Historical Resources.

(B) Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.

These may include non-unique archaeological resources previously subject to limited review under CEQA. Assembly Bill 52, which became effective in July 2015, requires the lead agency (in this case, Amador County) to begin consultation with any California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification and requests the consultation (Public Resources Code Section 21080.3.1[b]).

A As defined by Public Resources Code section 21074 (a) there were no tribal cultural resources identified in the project area therefore the project would not cause a substantial adverse change in any identified tribal cultural resources. Additionally, all tribes requesting notification for discretionary project submissions were notified of this project proposal. Any identified cultural resources or potentially significant resources would be preserved

and avoided by future development consistent with the provisions of **Mitigation Measure CULTR-3.** Impacts to Tribal Cultural Resources on this site are **less than significant with the mitigation measures incorporated in CULTR-3.**

Sources: Amador County Planning Department, California Public Resources Code; National Park Service National Register of Historic Places, North Central Information Center Records, Department of Parks and Recreation Record (2020), UAIC Recommendations (Attachment 1).

Chapter 19. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded systems (causing significant environmental effects):				
i. Water or wastewater treatment facilities	☐	☒	☐	☐
ii. Stormwater drainage facilities	☐	☐	☐	☒
iii. Electric power facilities	☐	☐	☐	☒
iv. Natural gas facilities	☐	☐	☐	☒
v. Telecommunications facilities	☐	☐	☐	☒
b) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
c) Have sufficient water supplies available to serve the project from existing entitlements and resources (for the reasonably foreseeable future during normal, dry, or multiple dry years), or are new or expanded entitlements needed?	☐	☒	☐	☐
d) Result in 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?	☐	☒	☐	☐
e) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs while not otherwise impairing the attainment of solid waste reduction goals?	☐	☐	☐	☒
f) Generate solid waste in excess of state or local standards or in excess of the capacity of local infrastructure?	☐	☐	☐	☒
g) Comply with federal, state, and local statues and regulations related to solid waste?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

A i. As the project proposes additional uses which are dependent on the provision of services support additional uses, the applicant must provide evidence of availability of water and wastewater disposal consistent with the requirements by Amador County Environmental Health, included as **Mitigation Measure UTL-1**. Due to the small scale of the project and lack of changes in use, this project would not require a Stormwater Pollution Prevention Permit (SWPPP) from State Water Resources Control Board. There is **a less than significant impact with mitigation incorporated.**

A ii. Stormwater drainage on site will need to be redirected and will necessitate the project proponent obtain a grading permit (Chapter 15.40) through the Building Department in order to regulate stormwater drainage and runoff. As there is no proposed physical changes of the property proposed with this project there is **no impact.**

Aiii-v. No new or expanded stormwater or drainage facility, electric power facility, natural gas facility, or telecommunications facility would be necessary over the course of this project and therefore would not cause any environmental effects as a result. There is **no impact.**

B. The proposed project would not exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board or result in the expansion of water or wastewater treatment facilities. Therefore, **a less than significant impact** related to these utilities and service systems would occur.

C. The project is not located within the service area of an existing public water system. **Mitigation Measure UTL-1 and UTL-2** require the applicant to verify sufficient water services for the proposed parcels. The impacts are **less than significant with mitigation incorporated.**

D. The project will not increase demands of any wastewater treatment provider beyond what existing systems are prepared to serve. **Mitigation Measure UTL-1** addresses provision of sufficient irrigation improvements required for project approval. There is a **less than significant impact with mitigation incorporated**.

E-G The project will not produce an increase in solid waste disposal needs beyond what would be addressed by County and State requirements therefore. There is a **less than significant impact.**

Mitigation Measure

UTL-1 Wastewater Systems: Applicant retain the services of a qualified professional (a registered professional engineer, registered environmental health specialist, or licensed engineering geologist experienced in on-site sewage disposal system design) to review the existing on-site wastewater treatment system that is to serve the project. This qualified professional shall evaluate existing and proposed wastewater flows and assess the current condition of the system. He or she shall then either: 1) Certify that the existing onsite wastewater treatment system may be expected to provide acceptable service for the proposed use, or 2) specify any modification, expansion, replacement or treatment that would be needed for such certification to be possible. THE AMADOR COUNTY ENVIRONMENTAL HEALTH DEPARTMENT SHALL MONITOR THIS CONDITION.

UTL-2 Well Service/Water Supply: In accordance with Section 14.06.055 of Amador County Code, the well that is to serve the project shall be evaluated by a registered professional engineer, who is to submit an evaluation for review and approval by the Environmental Health Department. This evaluation shall describe estimated water demand and whether or not the water well may be expected to serve the proposed use. If needed, the engineer shall propose storage or other design features that must be implemented to ensure an adequate water supply.

Sources: Amador County Planning Department, Amador County Environmental Health Department, Jackson Valley Irrigation District (JVID).

Chapter 20. WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☒	☐	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒
e) 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?	☐	☐	☐	☒

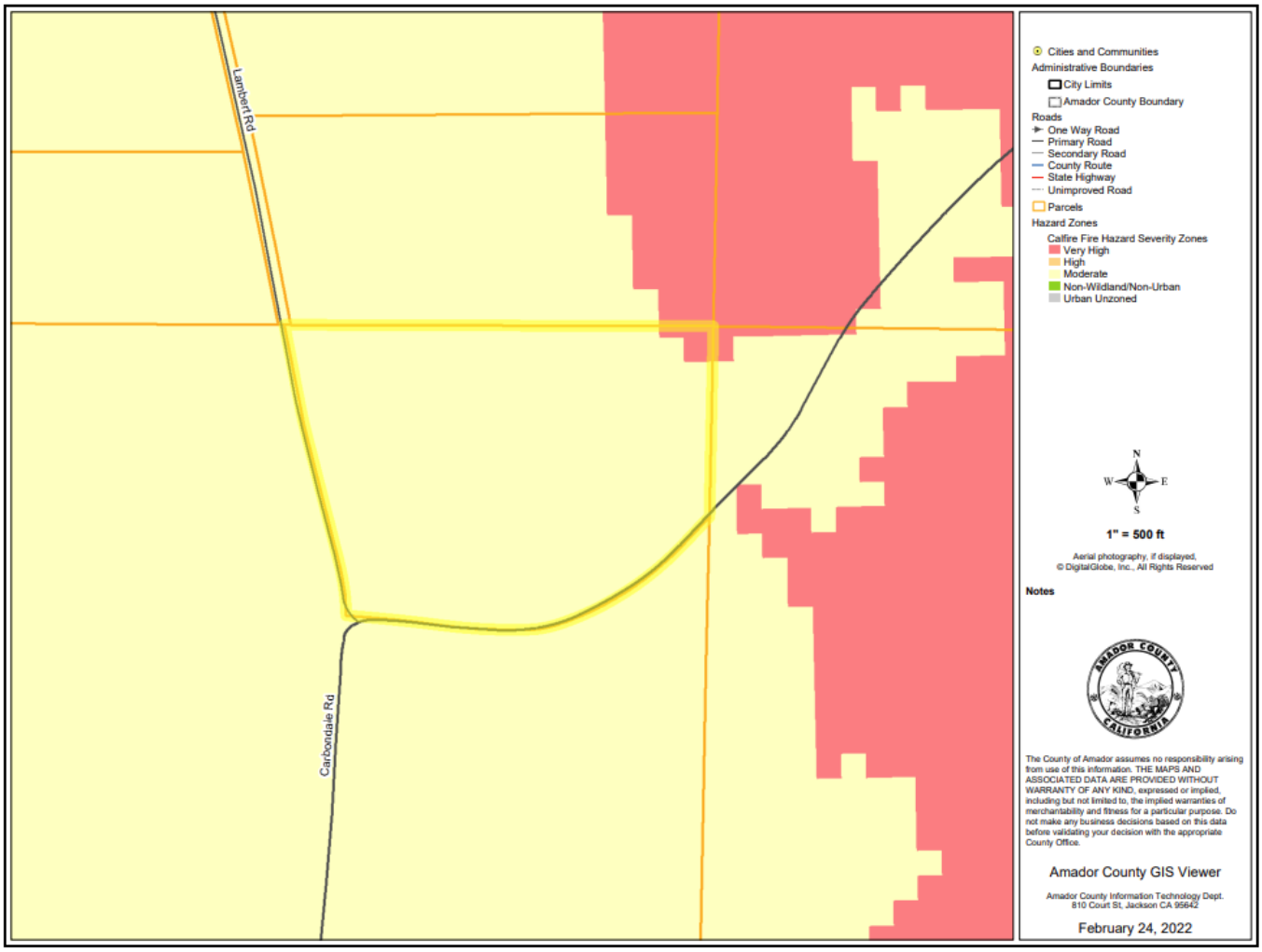
Discussion/Conclusion/Mitigation:

A The project shall not impair any adopted emergency response plan or emergency evacuation plan. The property will be required to remain in conformance with the County's Fire and Life Safety Ordinance (15.30) which will require that there be adequate evacuation and emergency response access to and from the property. There is **a less than significant impact.**

B The project does not exacerbate wildfire risks through significant change in slope, prevailing winds, or other major factors. The project would not require the installation of emergency services and infrastructure that may result in temporary or ongoing environmental risks or increase in fire risk. Therefore there is **no impact.**

C The project shall not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or impact the environment. **Mitigation Measure TRA-1 and TRA-2** requires compliance with 15.30 regarding fire access, therefore there is **no significant impact with mitigation incorporated.**

D&E The project will not expose people or structure to any new significant risks regarding flooding, landslides, or wildland fire risk. The project is located in Moderate Fire Risk Zone and therefore shall conform to all standard Fire Safety Regulations as determined by Amador County Fire Department and California Building Code. The project is located approximately 2 miles from the Ione Fire Station as well as less than a mile from the Camanche and Jackson Valley stations, and therefore will not require any increased fire protection due to this project. There is **no impact.**



Source: Amador County Planning, Amador County Office of Emergency Services, Calfire Fire Hazard Severity Zone Map.

Chapter 21. MANDATORY FINDINGS OF SIGNIFICANCE

Would the Project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to 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 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?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively are considerable? ("Cumulatively considerable" means that the incremental 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)?	☐	☒	☐	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Discussion/Conclusion/Mitigation:

A The project will not degrade the quality of the environment and no habitat, wildlife populations, and plant and animal communities would be significantly impacted by this project. All environmental topics are either considered to have "No Impact," "Less Than Significant Impact," or **"Less than Significant Impacts with Mitigation Incorporated."**

Mitigation measures included with this Initial Study include the following, summarized:

AES-1 Light and Glare shall be mitigated consistent with the Amador County General Plan to avoid unnecessary light pollution onto adjoining properties.

AES-2 Visual Impact- measures shall be taken to mitigate aesthetic impact to nearby properties

AIR-1 Air Quality Best Management Practices- construction equipment idling time limitation

BIO-1 Special Status Animal Species Mitigation plan will reduce biological impacts consistent with BMPs developed with CDFW and USFW;

BIO-2 Ground Disturbance Timing for Nesting Birds, and Survey will be conducted prior to any construction;

BIO-3 Special Status Plant Species Mitigation will be developed in conjunction with regulation by CDFW, USFW, and CNPS;

BIO-4 Plant Survey will be conducted prior to ground disturbance resultant from any discretionary project.

BIO-5 Riverine Habitat best management practices

CULTR-1 Historic/Cultural Resources, if found, shall be protected consistent with General Plan Mitigation Measures 4.5-1 and 4.5-2;

CULTR-2 Human Remains, if discovered, shall be protected consistent with General Plan Mitigation Measure 4.5-3.

GEO-1 Prior to recordation of any final map, the permittee shall demonstrate compliance with Amador County Code Sections 14.12.130 regarding sewage disposal.

HAZ-1 Hazardous Materials Upset and Release

HYD-1 Prior to the issuance of permits for site-specific development, drainage and grading permits shall be prepared by a licensed civil engineer and submitted to the Amador County Building Department for approval.

HYD-2 Best Management Practices for Internment of Human Remains

NOI-1 Noise Buffers

PUB-1 Prior to recordation of any final map, the subdivider shall participate in the annexation to the County's Community Facilities District No. 2006-1.

TRA-1 Project applicant must obtain and maintain a primary access onto a County road and obtain all necessary encroachment permits (Chapter 12.10);

TRA-2 The proposed project must comply with Fire and Life Safety Ordinance (Chapter 15.30 of Amador County Code) (Transportation and Traffic);

TRA-3 Property access restrictions require Lambert Rd. only be accessed by Carbondale.

UTL-1 Applicant must verify sufficient water and wastewater disposal services to meet minimum requirements by Amador County Environmental Health Department;

UTL-2 Applicant must verify sufficient water and well service and quality requirements as determined by Amador County Environmental Health Department;

B In addition to the individually limited impacts discussed in the previous chapters of this Initial Study, CEQA requires a discussion of "cumulatively considerable impacts", meaning the incremental effects of a project in connection with the effects of past, current, and probable future projects. These potential cumulatively considerable impacts may refer to those resulting from increased traffic to and from the general area, overall resource consumption, aesthetic and community character, and other general developmental shifts.

Evaluation of these potentially cumulative impacts may be conducted through two alternative methods as presented by the CA State CEQA Guidelines, the list method and regional growth projections/plan method. As this project is independent and unique to the County, the latter is most appropriately employed to evaluate an individual project's contribution to potential cumulative significant impacts in conjunction with past, current, or reasonably foreseeable future projects. Thresholds of significance may be established independently for the project evaluated depending on potentially cumulative impacts particular to the project under review, but shall reference those established in the 2016 General Plan EIR and be supplemented by other relevant documents as necessary. According to CEQA Guidelines §15064.7, thresholds of significance may include environmental standards, defined as "(1) a quantitative, qualitative, or performance requirement found in an ordinance, resolution, rule, regulation, order, plan, or other environmental requirement; (2) adopted for the purpose of environmental protection; (3) addresses the environmental effect caused by the project; and, (4) applies to the project under review" (CEQA Guidelines §15064(d)). CEQA states that an EIR may determine a project's individual contribution to a cumulative impact, and may establish whether the impact would be rendered less than cumulatively considerable with the implementation of mitigation or reduction strategies. Any impacts would only be evaluated with direct associations to the proposed project. If cumulative impacts when combined with the impact product of the specific project are found to be less than significant, minimal explanation is required. For

elements of the environmental review for which the project is found to have no impact through the Initial Study, no additional evaluation of cumulative impacts is necessary.

No past, current, or probable future projects were identified in the project vicinity that, when added to project-related impacts, would result in cumulatively considerable impacts. The intent of the project is provide a cemetery for the Muslim community. This would be the first Muslim cemetery in Amador County. Though the project does increase the scope of allowed activities, uses are consistent with the zoning code subject to obtaining a Use permit. Due to the unique characteristics of the site in the context of the application, does not propose uses inherently inconsistent with the surrounding area. The proposed project is not inconsistent with the Amador County General Plan and no cumulatively considerable impacts would occur with development of the proposed project. **Impacts would be less than significant with mitigation incorporated**.

C There have been no impacts discovered through the review of this application demonstrating that there would be substantial adverse effects on human beings directly or indirectly relating the project. There is no proposed development and the current uses of the project shall remain unaffected by the proposed uses. All potentially significant impacts have been mitigated to a less-than-significant level through mitigation measures and Conditions of Approval proposed with the project, therefore, there is a less **than significant impact with mitigations incorporated**.

Sources: Chapters 1 through 21 of this Initial Study./

References: Amador County General Plan; Amador County General Plan EIR; Amador Air District; Amador County Municipal Codes; Fish & Wildlife's IPAC and BIOS databases; Migratory Bird Treaty Act; California Native Plant Society; California Air Resources Board; California Department of Conservation; Migratory Bird Treaty Act; California Department of Forestry and Fire Protection; California Geologic Survey: Alquist-Priolo Earthquake Fault Zones; State Department of Mines & Geology; Superfund Enterprise Management System Database (SEMS); Department of Toxic Substances Control Envirostor Database; Geotracker; Amador County GIS; Amador County Zoning Map; Amador County Municipal Codes; Amador County Soil Survey; California Native American Heritage Commission; Amador Fire Protection District; California Air Resources Board (ARB); California State Water Resources Control Board (CSWRCB); California Stormwater Quality Association (CASQA); California Environmental Quality Act 2019 Guidelines (CEQA); California Public Resources Board; Caltrans District 10 Office of Rural Planning; Amador County Important Farmland Map, 2016; Commenting Department and Agencies; Amador County Community Development Agency and Departments. All sources cited herein are available in the public domain, and are hereby incorporated by reference.

NOTE: Authority cited: Sections 21083, 21083.05, Public Resources Code. Reference: Section 65088.4, Gov. Code; Sections 21080, 21083.05, 21095, Pub. Resources Code; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal. Appl. 4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal. App. 4th at 1109; *San Franciscans Upholding the Downtown Plan v. city and County of San Francisco* (2002) 102 Cal. App. 4th 656.

AMADOR COUNTY COMMUNITY DEVELOPMENT AGENCY
PLANNING DEPARTMENT

PHONE: (209) 223-6380
FAX: (209) 223-6254
WEBSITE: www.amadorcounty.gov
E-MAIL: planning@amadorcounty.gov

COUNTY ADMINISTRATION CENTER • 810 COURT STREET • JACKSON, CA 95642-2132

NOTICE OF PUBLIC HEARING

Notice is hereby given the Planning Commission of the County of Amador, State of California, has received an application for the project described in this notice.

PROJECT NAME AND DESCRIPTION: Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery, which proposes 1832 graves sites divided among 7 blocks on the north end of the property. The 46-acre parcel is zoned R1A, Single-family Residential and Agriculture and has an MRZ, Mineral Resource Zone General Plan Designation. Proposed improvements include driveway parking for up to 100 cars, and a parking lot with 64 permanent spaces, and permanent restrooms. Proposed number of funerals is 60 funerals a month with a limit of 50 attendees per event. APN: 001-220-013

OWNER/APPLICANT: Mounir Kaddoura
SUPERVISORIAL DISTRICT: 5
LOCATION: 16630 Lambert Rd., Ione, CA 95640 and 857 Carbondale Rd., Ione, CA 95640

NOTE: SEE MAP ON REVERSE. ***The Staff Report will be available online (typically the Tuesday prior to the meeting) for viewing at http://www.amadorgov.org in the "Agendas and Minutes" section.***

ENVIRONMENTAL REVIEW PROCESS: In accordance with the California Environmental Quality Act (CEQA), the lead agency, the Amador County Planning Commission, intends to consider the adoption of a Mitigated Negative Declaration, as the project is consistent with the Amador County General Plan and zoning codes. The environmental assessment and application materials appear to be complete and indicate there are no extraordinary or unique environmental issues not normally mitigated for with the County's standard conditions which would be applied to this type of project and which are not otherwise addressed in the proposed mitigations for the project. If, during the processing of this application, it is determined that there are state or local issues which cannot be found to be insignificant or adequately mitigated through standard conditions, it may be found by the Planning Commission or Board of Supervisors that an Environmental Impact Report (EIR) shall be prepared. The Technical Advisory Committee (TAC) has reviewed this project and has found no technical objection to the approval of this project with the adoption of a Mitigated Negative Declaration. The required environmental review and comment period for this project will commence on August 19, 2026 and ends on September 8, 2026.

PUBLIC HEARING: Notice is hereby given said Planning Commission will hold a public hearing on this project at the County Administration Center, Board of Supervisors Chambers, 810 Court Street, Jackson, California, on ***September 8, 2026*** at ***6:00 p.m.*** or as soon thereafter as can be heard. Anyone having comments on the project may attend and be heard.

The meeting may be attended in person or via teleconference by dialing **669-900-6833** and using **meeting ID 537-512-8983**, or by using the following link: https://us02web.zoom.us/j/5375128983

The Chairperson will invite the public to comment via phone/online. Public comment will also be accepted by email at planning@amadorcounty.gov. All emails must be received prior to 5:00 p.m. on the meeting date and will be included in the record of the meeting. Emails received after those already included in the meeting materials will be printed and distributed to the Commissioners and available to the public, and shall be subject to the same rules as would otherwise govern speaker comments at the Commission meeting.

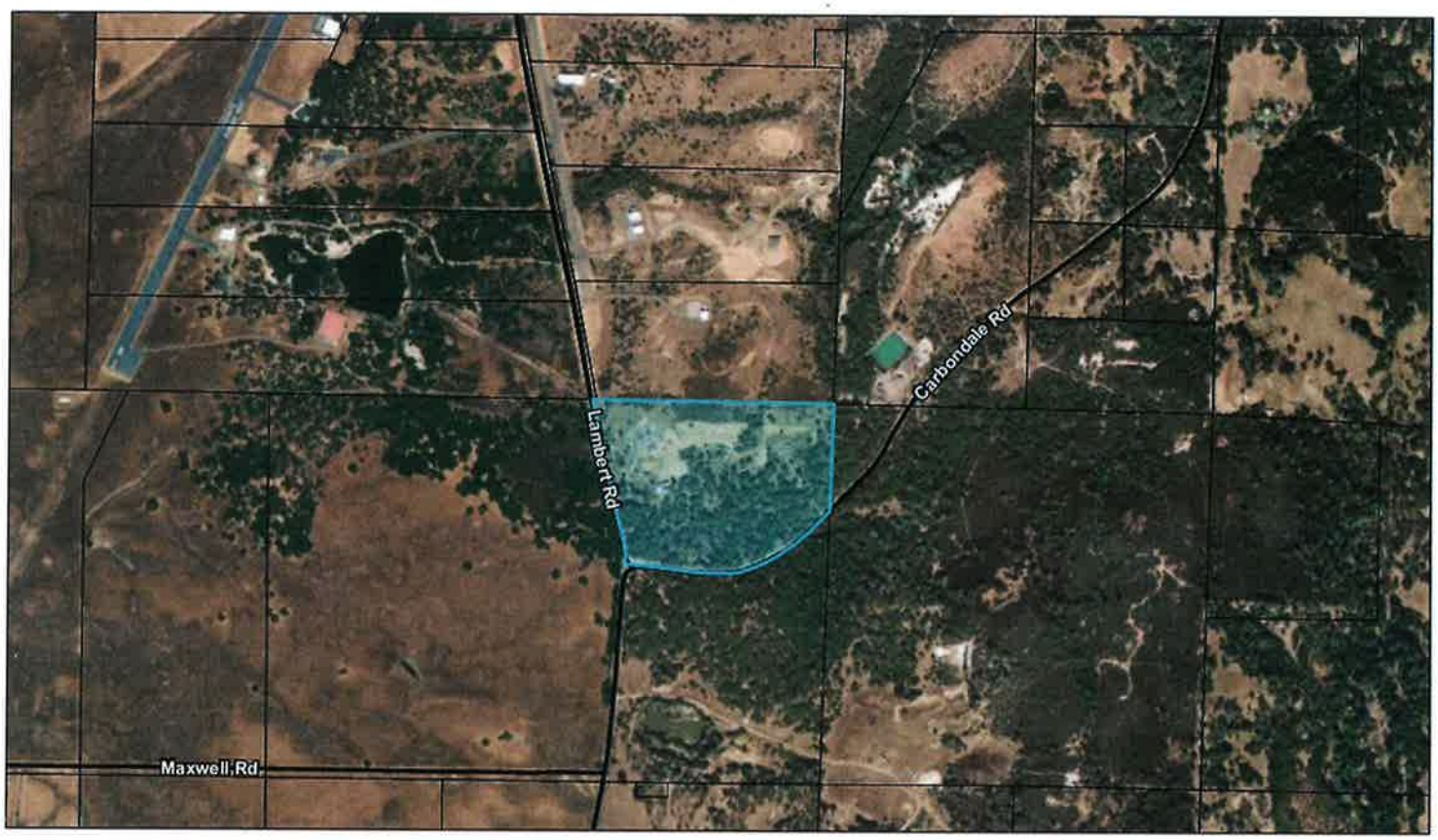
Letters of comment regarding this matter received by the County prior to the publication of the Staff Report will be sent to each Planning Commissioner as part of the agenda packet (generally the Tuesday prior to the meeting). Letters received after the Staff Report has been published will be copied and circulated to each Commissioner just prior to the public hearing. Be advised that due to time constraints, the Commissioners may not be able to give letters submitted after the Staff Report is published, as detailed a review as those received earlier. Therefore, it may be to your benefit to attend the hearing and summarize your concerns orally. Letters will not be read aloud at the public hearing. If you have any questions or desire more information, please contact this office.

In compliance with the Americans with Disabilities Act, if you require special accommodation(s) to participate in this meeting, please contact the Amador County Planning Department, at (209) 223- 6380, by email to planning@amadorcounty.gov. Requests must be made as early as possible, and at least two business days before the start of the meeting.

NOTE: If you do not comment at the public hearing or send in written comments and later decide to challenge the nature of this proposed action in court, you may be limited to raising only those issues you raised at the public hearing or have given in written correspondence delivered to the public entity conducting the hearing at, or prior to, the Public Hearing.

AMADOR COUNTY PLANNING COMMISSION
Date of this notice: August 19, 2026

PROJECT AREA OUTLINED IN BLUE



8/18/2026, 3:11:37 PM

Roads and Streets
State Highway
County Road
City Road
Private Road
U.S. Forest Service Road
Public Utility Road
Tribal Road
Unmaintained Private Road
California State Park Road
Other (See Comment)
Current Tax Parcels
Amador County Border

1:14,119
0 0.07 0.15 0.3 mi
0 0.15 0.3 0.6 km
Vantor

	Initial
1. Notice of Intent (NOI).	KR
2. GIS List. 1 mile ft. (Distance) Plus _____ (Special Instructions: e.g. to end of access road)	KR.
3. Checked ***all*** APN pages of those parcels from the GIS list for "NOTES" or a. "SPECIAL INSTRUCTIONS."	KR
4. Project Applicant and Representative(s), if applicable.	KR
5. Checked Project file cover for agency distribution. email	KR
6. Checked inside file for special requests for notification.	KR
7. Checked old notification list for additional notification. email + post	KR.
8. Other – Specify:	

AFFIDAVIT OF SERVICE BY MAIL

I am a citizen of the United States, over eighteen years of age, employed in Amador County, and not a party to the within action; my business address is 810 Court Street, City of Jackson, State of California. I hereby declare I served a copy of the attached public hearing notice regarding VP-22;2-3 Gardens of Noor Cemetery by placing copies in 43 envelopes addressed to: (see attached list).

Said envelopes were then sealed and postage fully paid thereon and were deposited in the United States Mail on 8/19/26 at Jackson, California.

I declare under penalty of perjury the foregoing is true and correct.

Executed at Jackson, California on 8/19/26

Signed _____

Witness _____

Project Application

PLANNING DEPARTMENT
Community Development Agency

County Administration Center
810 Court Street ▪ Jackson, CA 95642132
Telephone: (209) 223-6380
Website: www.amadorgov.org
E-mail: planning@amadorgov.org

APPLICATION PROCEDURE FOR USE PERMIT

A Public Hearing before the Planning Commission will be scheduled after the following information has been completed and submitted to the Planning Department Office:

_____ 1. Complete the following:

Name of Applicant MOUNIR KADDOURA

Mailing Address 3550 WATT AVE # 140

SACRAMENTO CA 95821

Phone Number (209) 429-1543

Assessor Parcel Number 01220013000

Use Permit Applied For:

_____ Private Academic School
_____ Private Nonprofit Recreational Facility
_____ Public Building and Use(s)
_____ Airport, Heliport
__X__ Cemetery
_____ Radio, Television Transmission Tower
_____ Club, Lodge, Fraternal Organization
_____ Dump, Garbage Disposal Site
_____ Church
_____ OTHER _____

__X__ 2. Attach a letter explaining the purpose and need for the Use Permit.

__X__ 3. Attach a copy of the deed of the property (can be obtained from the County Recorder's Office).

__X__ 4. If Applicant is not the property owner, a consent letter must be attached.

_____ 5. Assessor Plat Map (can be obtained from the County Surveyor's Office).

__X__ 6. Plot Plan (no larger than 11" X 17") of parcel showing location of request in relation to property lines, road easements, other structures, etc. (see Plot Plan Guidelines). Larger map(s) or plans may be submitted if a photo reduction is provided for notices, Staff Reports, etc. The need is for easy, mass reproduction.

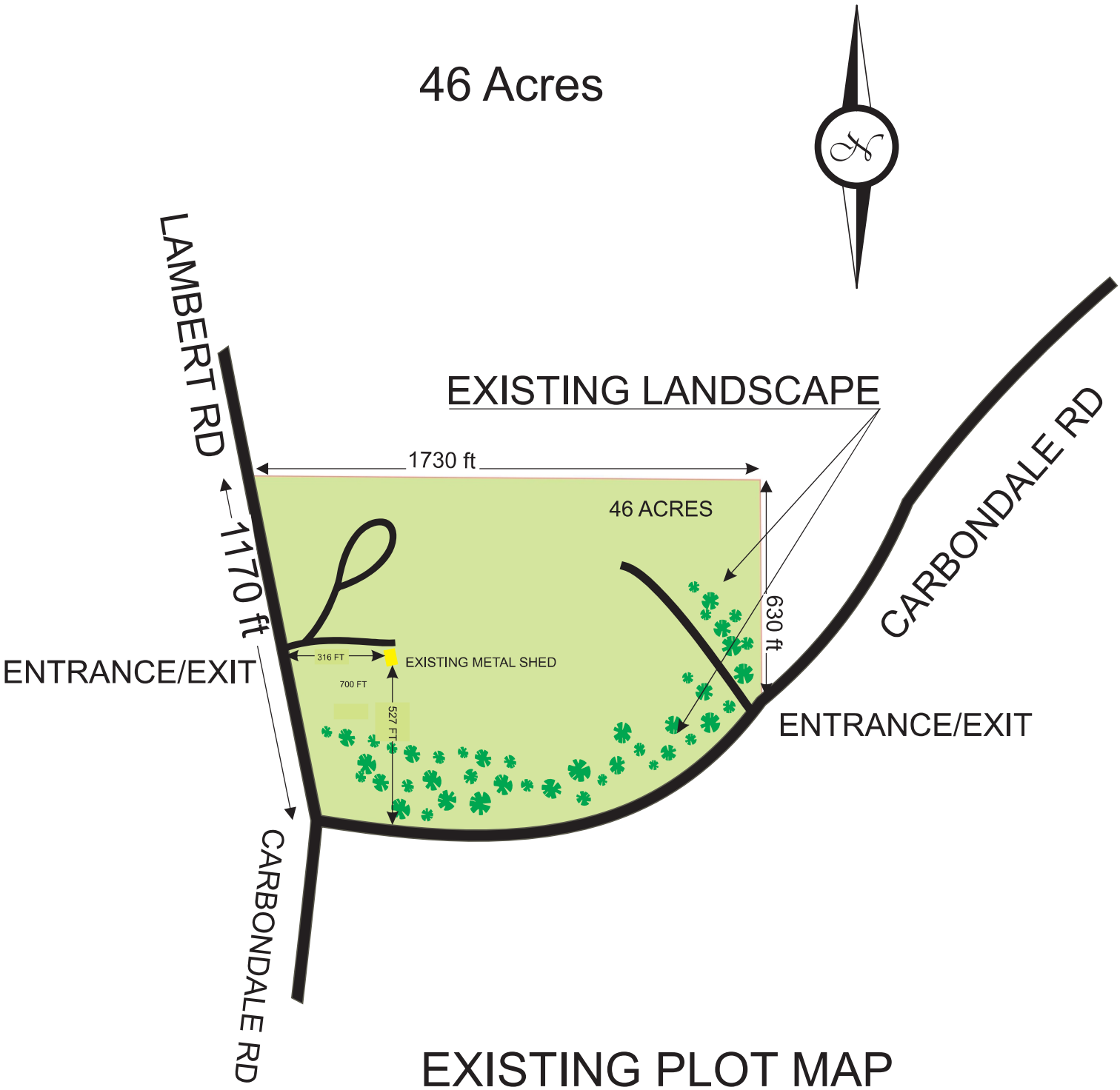
_____ 7. Planning Department Filing Fee: $_____
_____ Environmental Health Review Fee: $_____
_____ Public Works Agency Review Fee: $_____
_____ Amador Fire Protection District Fee: $_____

_____ 8. Complete an Environmental Information Form.

_____ 9. Sign Indemnification Form.

PROJECT PLOT MAP

46 Acres



EXISTING PLOT MAP

1111111111111111111111111111111111111111111111111111111111111111
* $ R 0 0 0 0 0 0 1 9 1 9 6 $ *

RECORDING REQUESTED BY:

Pasion Title
Placer Title Company
Branch Number: 90

WHEN RECORDED MAIL TO:

Mounir Kaddoura
3550 Watt Ave. #140
Sacramento, CA 95821

Amador Recorder
Kimberly L. Grady
DOC - 2022-0003961
Account: PlacerTIUeCo
Frlday, April 29, 202214:43
Total Paid: $594.50

counter1 /1 • 3

Order No: P-517865

Grant Deed

(Please fill in document title(s) on this line)

[X] Exempt from fee per GC27388.1(a)(2) due to being recorded in connection with concurrent transfer that is subject to the imposition of documentary transfer tax, or,

[ ] Exempt from fee per GC27388.1(a)(1) due to the maximum fees being paid on documents in this transaction, or,

[ ] Partially exempt from fee per GC27388.1 (a)(1). Only $75.00 to be charged as $150.00 in fees has been paid on documents recorded immediately prior hereto or,

[ ] Exempt from fee per GC27388.1 (a)(2) due to being recorded in connection with concurrent transfer that Is a residential dwelling to an owner-occupier, or,

[ ] Exempt from the fee per GC27388.1 (a) (1); Not related to real property, or,

[ ] Exempt from fee under GC27388.1 (a)(1) for the following reasons:

NOTE: The following exemptlcms may not be acceptable for use in all counties:

[ ] Exempt from fee per GC27388.1 due to being recorded in connection with a transfer that was subject to documentary transfer tax which was paid on document recorded previously on (date) as document number of Official Records, or,

[ ] Exempt from fee per GC27388.a due t0 the maximum fees having been paid on documents in the transaction(s) recorded previously on (date) as document number(s) of Official Records, or,

[ ] Partially exempt from fee per GC27388.1. Only $75.00 to be charged as $150.00 in fees having been paid on documents in this transaction(s) recorded previously on (date) as document number(s} of Official Records, or,

[ ] Exempt from fee per GC27388.1 due to it being recorded in connection with a transfer of real property that is a residential dwelling to an owner-occupier. The recorded document transferring the dwelling to the owner-occupier was recorded on (dale) as document number(s) .

THIS PAGE ADDED TO PROVIDE SENATE BILL 2 EXEMPTION INFORMATION
(Additional recording fee applies)

Mounir Kad
(Signature)

Print Name: MOUNIR KADDOURA

Date; 08/27/2025

RECORDING REQUESTED BY

Placer Title Company
Escrow Number: P-517865
Branch: 90

AND WHEN RECORDED MAIL TO
AND MAIL TAX STATEMENTS TO

Mounir Kaddoura
3550 Watt Ave. #140
Sacramento, CA 95821

A.P.N.: 001-220-013-000

SPACE ABOVE THIS LINE FOR RECORDER'S USE

GRANT DEED

The undersigned grantor(s) declare(s):
Documentary transfer tax is $566.50 City Transfer Tax: $0.00

Monument Fee $10.00

(**X**) Unincorporated Area ( ) City of _____
(X) computed on full value of property conveyed, or
( ) computed on full value less value of liens and encumbrances remaining at time of sale.

FOR A VALUABLE CONSIDERATION, receipt of which is hereby acknowledged, **Brett L. Carlsen, an unmarried man**

Hereby GRANT(S) to **Mounir Kaddoura, an unmarried man**

The land described herein is situated in the State of California, County of Amador, unincorporated area, described as follows:

All that portion of the Northeast 1/4 of Section 32, T. 7N., R. 9E.,M.D.M., Amador County California lying north of the centerline of Carbondale Road and East of the Centerline of Lambert Road.

APN: 001-220-013-000

Dated: April 21, 2022

Brett L. Carlsen

Brett L. Carlsen

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

State of California)
) ss.
County of Amador)

On April 22, 2022 before me,
Edy Sadowski,
Notary Public personally appeared Brett L. Carlsen
who proved to me on the basis of satisfactory evidence to be the person(s) whose name(s) is/are subscribed to the within instrument and acknowledged to me that he/she/they executed the same in his/her/their authorized capacity(ies), and that by his/her/their signature(s) on the instrument the person(s), or the entity upon behalf of which the person(s) acted, executed the instrument.

I certify under PENALTY OF PERJURY under the laws of the State of California that the foregoing paragraph is true and correct. WITNESS my hand and official seal.

SIGNATURE Edy Sadowski

EDY SADOWSKI
Notary Public - California
Calaveras County
Commission # 2355470
My Comm. Expires Apr 24, 2025

Exhibit "A"
Legal Description

The land described her-eln is situated in.the State of Californi , County of Amador, unincorporated area, described as follows:

All that portion of the Northeast 1/4 of Section 32, T. 7N., R. 9E., M.D.M., Amador County California lying north of ,the centerline of Carbondale Road and East of the Centerline of Lambert Road.

APN: 001-220-013-000

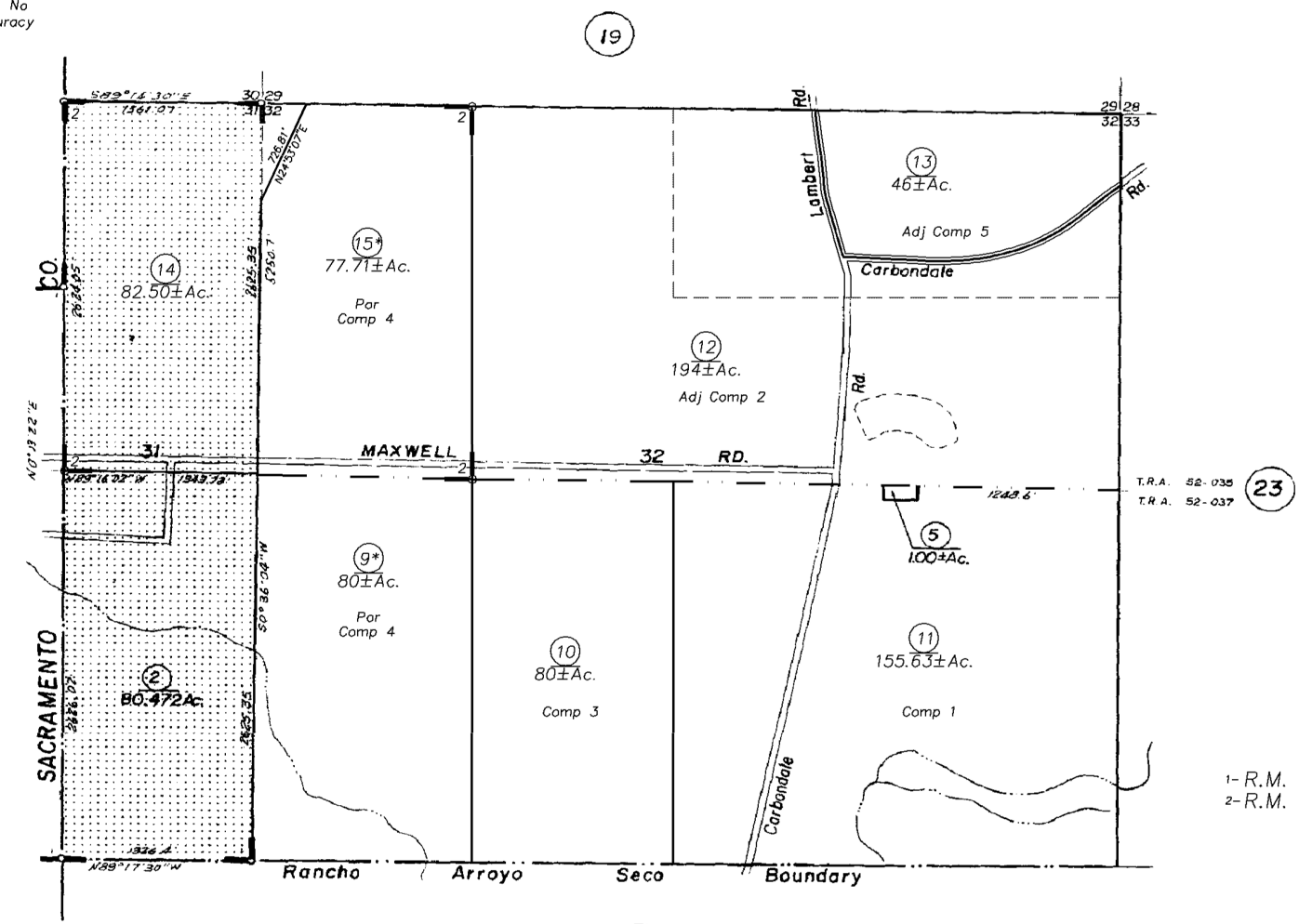
END OF DOCUMENT

POR. SEC. 31; ALL SEC. 32, T. 7N., R. 9E., M.D.B. & M.

1-22

IMPORTANT NOTE: This map was prepared for property tax assessment purposes only. It is assumed that the property, as described in it's deed, is the property being assessed. No liability is assumed for the accuracy of the data delineated hereon.

Map changes become effective with the 2008–2009 roll year. Parcel numbers are subject to change prior to adoption of roll on each July 1.



*Parcel split by TRA line

1- R.M. Bk.22, Pg.53
2- R.M. Bk.60, Pg. 9 (9/28/2007)

NOTE—Assessor's Block Numbers Shown in Ellipses.
Assessor's Parcel Numbers Shown in Circles.

(15)

Assessor's Map Bk. 1 , Pg. 22
County of Amador, Calif.

106

CEMETERY PLAN

Gardens of Noor Cemetery
16630 Lambert Road, Ione, California 95640
APN: 001220013000
March 30, 2026

Prepared for: Amador County

TABLE OF CONTENTS

1. EXECUTIVE SUMMARY *2*

2. INTRODUCTION *2*

2.1 Background..... 2

2.2 Physical Settings and Constraints 2

2.3 Design Layout 4

3. LANDSCAPE ARCHITECTURE *4*

3.1 Site Design 4

3.2 Planting and Irrigation 5

4. SITE CHARACTERISTICS *5*

5. ENVIRONMENTAL CONSTRAINTS.……..…….*6*

6. REGIONAL GEOLOGY-MINERAL RESOURCES ……*6*



1. EXECUTIVE SUMMARY

The proposed cemetery site is at 16630 Lambert Rd, Ione Ca 95640. The land will be developed as "Gardens of Noor Cemetery". This Plan is for the development of 46 acres for the proposed cemetery. This Plan is required for the application for a use permit. The purpose of this Plan is to illustrate development of the Gardens of Noor Cemetery over a 100-year timeframe.

2. INTRODUCTION

2.1 Background

Gardens of Noor Cemetery is interested in developing a cemetery on the 16630 Lambert Rd, Ione Ca 95640. The plan includes different areas for burials, parking lot with special need individuals parking, and restrooms.

2.2 Physical Settings and Constraints

Located on 16630 Lambert Rd and 857 Carbondale Rd, Ione Ca 95640, and APN: 001220013000 , the Gardens of Noor Cemetery is a 46 acre site. The site has a 1500 sqft steel building . The gravel parking lot can accommodate 64 car parking spots. Figures 1 through 3 show Property Location, Perimeter and Vicinity Map.
The anticipated group size attending funerals is 50 people per funeral event. The anticipated funeral events will be about 60 per month. The site is connected to Amador Water Agency water and electricity which will be sufficient for funeral services. A permit is applied for a well on the property by Rumsey Lang Well Drilling and Pump Inc.-Their address is 4241 Business Drive, Suite A, Cameron Park, CA 95682 and Phone number is 530-677-5361.

Sewage Disposal System:

Delta Engineering Inc. has been contracted and designed the sewage disposal system and has submitted the permit and plans to the ACEH for approval. Their address is:

Delta Engineering, Inc. 41 Main Street Jackson, CA 95642 Engineering Land Development Planning Environmental Permitting 209-223-1441 info@deltaengineeringinc.com.



Figure 1: View of Proposed Cemetery Site



Figure 2-Perimeter

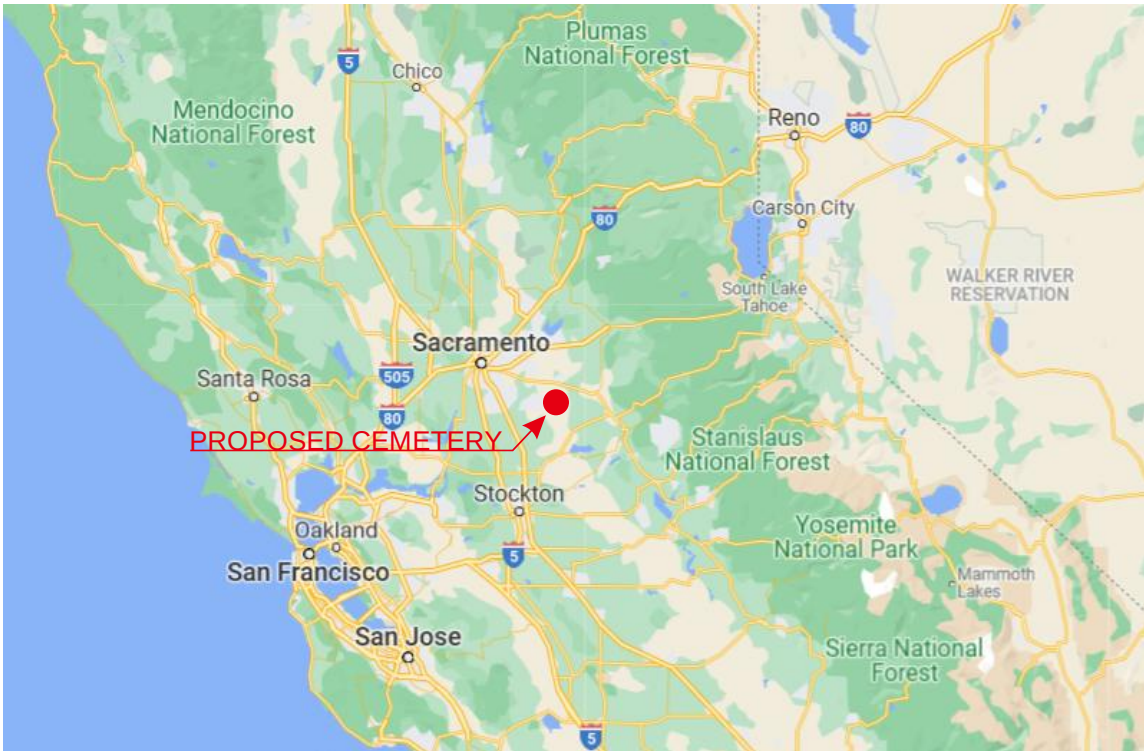


Figure 3-Vicinity Map

2.3 Design Layout

The primary objective for the Gardens of Noor Cemetery is to provide a burial place for the growing Muslim community in Amador County, Sacramento County, Placer County and surrounding areas.

3. LANDSCAPE ARCHITECTURE

3.1 Site Design

The Gardens of Noor cemetery encompasses approximately 46 acres property.

Entrance Area

The main entrance to the cemetery is from 16630 Lambert Rd. Another entrance is on Carbondale Rd. There are oak trees on the land.

Burial Options

The cemetery has a combination of burial facilities to meet the preferences of all clients. At full build-out, the cemetery will have gravesites enough to serve the anticipated needs of Muslim community for the next 100 years. The graves will have various sizes to accommodate customers' preference. Refer to the attached Plans for a more detailed improvements.

The graves will have upright and ledger type of markers. The single Adult Grave may contain:

- 2 caskets containing human remains; or
- Two (2) still-born remains in addition to a casket containing adult human remains; or
- 24" x 12" infant container may be buried at the head end of a single grave in which a casket containing human remains has been buried, provided space is available.
- Excavated soil will either go to low spots on the land or stay on the lot. When a lot is developed, the lot will be excavated to two feet below the surface. Concrete liners are laid then. The excavated soil will be covering the concrete liners. Thus the new ground profile will be two feet higher.
- The manner of burial will be according to grave burial details as attached with the Design Plans.
- An open equipment storage shed will be constructed. The size will be 25'x50'.

3.2 Planting and Irrigation

Ground Cover

The cemetery will have a natural cover. The burial sections with an area approximately 1.7 acres will be developed.

Climate based strategy

According to US Climate Data, Amador County's climate accounts for 35.4 inches of precipitation annually. The planting design of the Gardens of Noor Cemetery utilizes native low water use plants as well some adapted non-invasive trees, shrubs, groundcovers, and perennials. These plants reflect the character of Amador County and meet the necessary demand of low water usage.

4. SITE CHARACTERISTICS

Landscape Lighting

Due to the operational hours of the cemetery, exterior landscape Lighting is limited. Lighting for other features throughout the site including the main building, cemetery entrance and decorative accent lighting are optional.

Security

The perimeter of developed area of the cemetery will bordered by a 5 foot fence along Carbondale Rd and Lambert Rd or inside the land. The cemetery visitor entrances will be controlled by a manual swing gate and lock. The maintenance entrance of the sections in the cemetery will be controlled by a manual rolling gate and lock. Options for automatic gates or Automatic Number Plate Recognition Camera opening electric gates are available.

5. ENVIRONENTAL CONSTRAINTS

The tables below identify the summary of environmental constraints:

Summary of Potential environmental Constraints	***Impact Analysis/Mitigation Strategy***
Land Use and Planning	
Consistency with the existing zoning	Land Use Consistency Assessment
Aesthetics	
Consistency with visual character and/or quality of the project site and surrounding area	Visual Simulations
	Frontage improvements such as plantation and landscape setbacks.
Traffic	
Increase in traffic	An increase of an average of 20 Vehicles per day

6. REGIONAL GEOLOGY-MINERAL RESOURCES

A Geotechnical Engineering Investigation and Recommendations Report was conducted and prepared Hallenbeck/Allwest Geotechnical Engineering Consultants (East Bay Office-P. O. Box 1473, El Cerrito, CA 94530-Phone 650-219-4290) for the proposed cemetery site (The report is attached).

The report included geotechnical and geologic conditions, field exploration and testing.

Please refer to Section 2 and Figure 4 for more detailed information about mineral deposits.

APPENDIX I

Good Afternoon,

Thank you for taking the time to speak with me this afternoon. This email to summarize what we discussed during that phone call per your request. The water line that supplies the Eagles Nest area is undersized and susceptible to low pressure dips when demand is high, and as such, AWA has limited the size of meters which can be installed per parcel. This will limit APN 001-220-013 to a 5/8" meter, with one (1) Equivalent Dwelling Unit (EDU) of capacity. 1 EDU is approximately 400 gallons per average day. Each parcel in the Eagles Nest area is also required to have a backflow assembly installed consistent with AWA standards at owner expense to prevent backflow into the water main during times of low pressure. A list of approved backflow devices can be found in our Standard Design And Construction Specifications For Water Systems. You stated you also have plans to install a well on site to supplement water needs which would supply ~2gpm. Additionally, any fire protection needs required by the fire protection authority having jurisdiction will be required to be installed – this may be either City of Ione Fire Department or Amador Fire Protection District.

In order to move forward with water service to this parcel, the following items will be required prior to initiation of service:

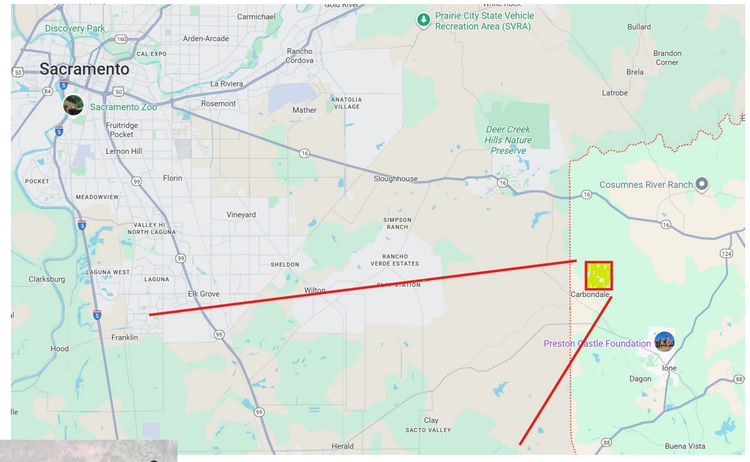
1. Completed application to start water service.
2. Installation and certification of backflow preventer – certification to be provided to AWA.
3. Remitted Time and Materials deposit for installation of fire service line or for a hydrant(s) installation at this parcel and subsequent installation of said fire protection service line or hydrant(s), if required by fire authority having jurisdiction (City of Ione or Amador Fire Protection District).

Our Customer Service Department can quote prices for any items, fees, or deposits listed above. If you have further questions, please feel free to contact the Agency at your convenience.

Kind Regards,

Lucas Carthew
Assistant Engineer
Amador Water Agency

Parcel Location for the proposed GARDENS OF NOOR CEMETERY





In Amador County at the corner of Lambert Road and Cabondale Road

Scale: 0 1 2 3

Company Disclaimer:

GARDENS OF NOOR CEMETERY
16630 Lambert Rd.
857 Carbondale Rd.
Ione, CA 95640

Designer:
Proj. Mngr:
Drawn By:
Signature:
Issue Date:
Rev.1 Date:
Rev.2 Date:
Rev.3 Date:

Registered Engineer
Name: Ali Kaddoura
Sig. Ali Kaddoura
Date:
Engineering Seal:

REGISTERED PROFESSIONAL ENGINEER
No. CE 55710
Exp. 12/31/2026
CIVIL
STATE OF CALIFORNIA

Sheet No.
LO 1

IMAGES OF THE EXISTING PARCEL



Location of the new proposed access road to the parcel



Aerial image of the entire parcel (Google Earth Image)



Existing gravel roads within the parcel



Street level view of the Current access road to the parcel, at Lambert Rd.



Current access road to the parcel, at Lambert Rd.

Scale: 0 1 2 3

N

Company Disclaimer:

GARDENS OF NOOR CEMETERY
16630 Lambert Rd.
857 Carbondale Rd.
Ione, CA 95640

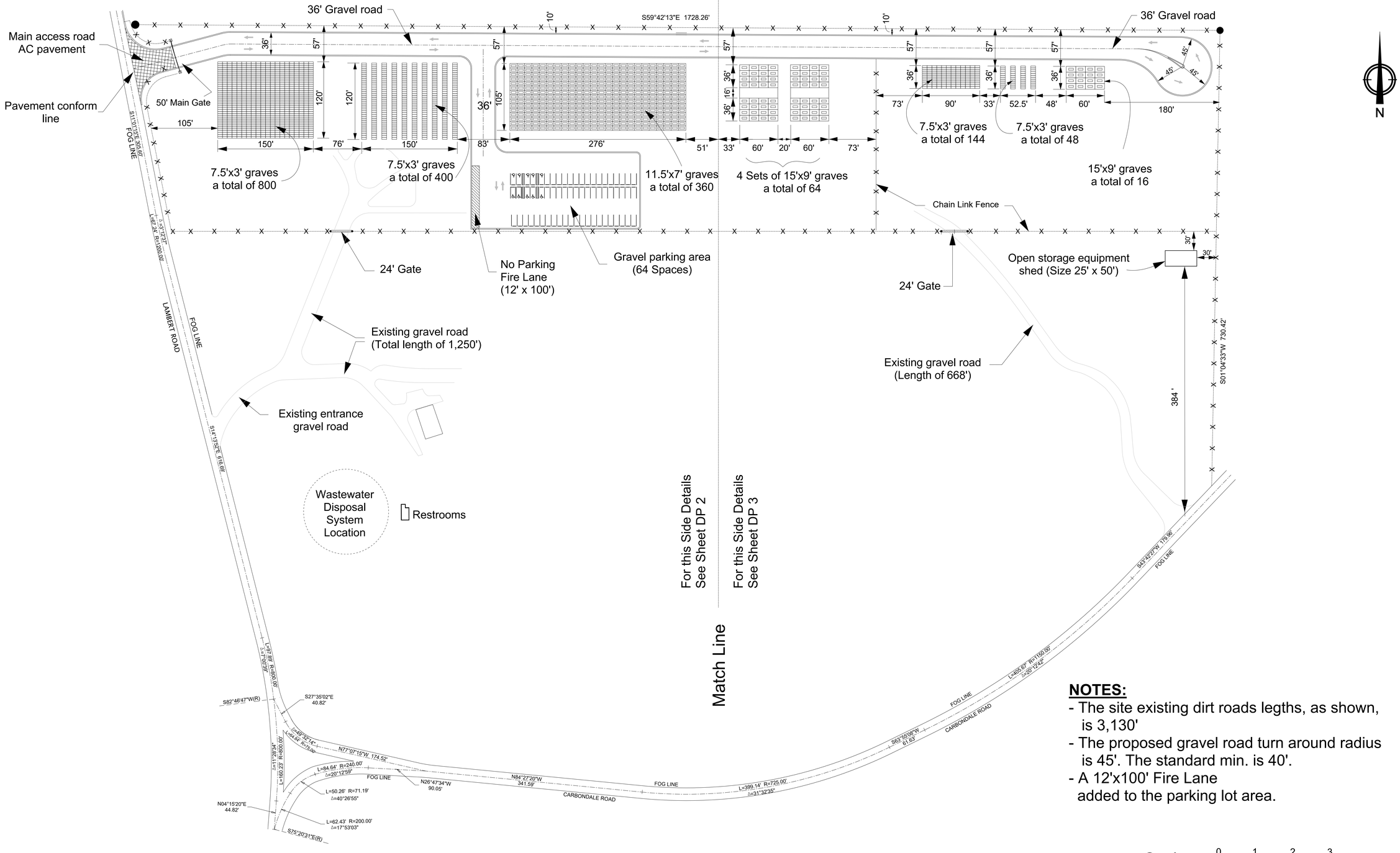
Designer:
Proj. Mngr:
Drawn By:
Signature:
Issue Date:
Rev.1 Date:
Rev.2 Date:
Rev.3 Date:

Registered Engineer
Name: **Ali Kaddoura**
Sig. Ali Kaddoura
Date:
Engineering Seal:

REGISTERED PROFESSIONAL ENGINEER
No. CE 55710
Exp 12/31/2026
CIVIL
STATE OF CALIFORNIA

Sheet No.
LO 2

Design Plan 1
General View of the Proposed Improvements



NOTES:

- The site existing dirt roads legths, as shown, is 3,130'
- The proposed gravel road turn around radius is 45'. The standard min. is 40'.
- A 12'x100' Fire Lane added to the parking lot area.

Scale: 0 1 2 3

Address:

Phone No.

Company Disclaimer:

GARDENS OF NOOR CEMETERY

16630 Lambert Rd.
857 Carbondale Rd.
Ione, CA 95640

Designer:
Proj. Mngr:
Drawn By:
Signature:
Issue Date:
Rev.1 Date:
Rev.2 Date:
Rev.3 Date:

Registered Engineer

Name: Ali Kaddoura

Sig. Ali Kaddoura

Date:

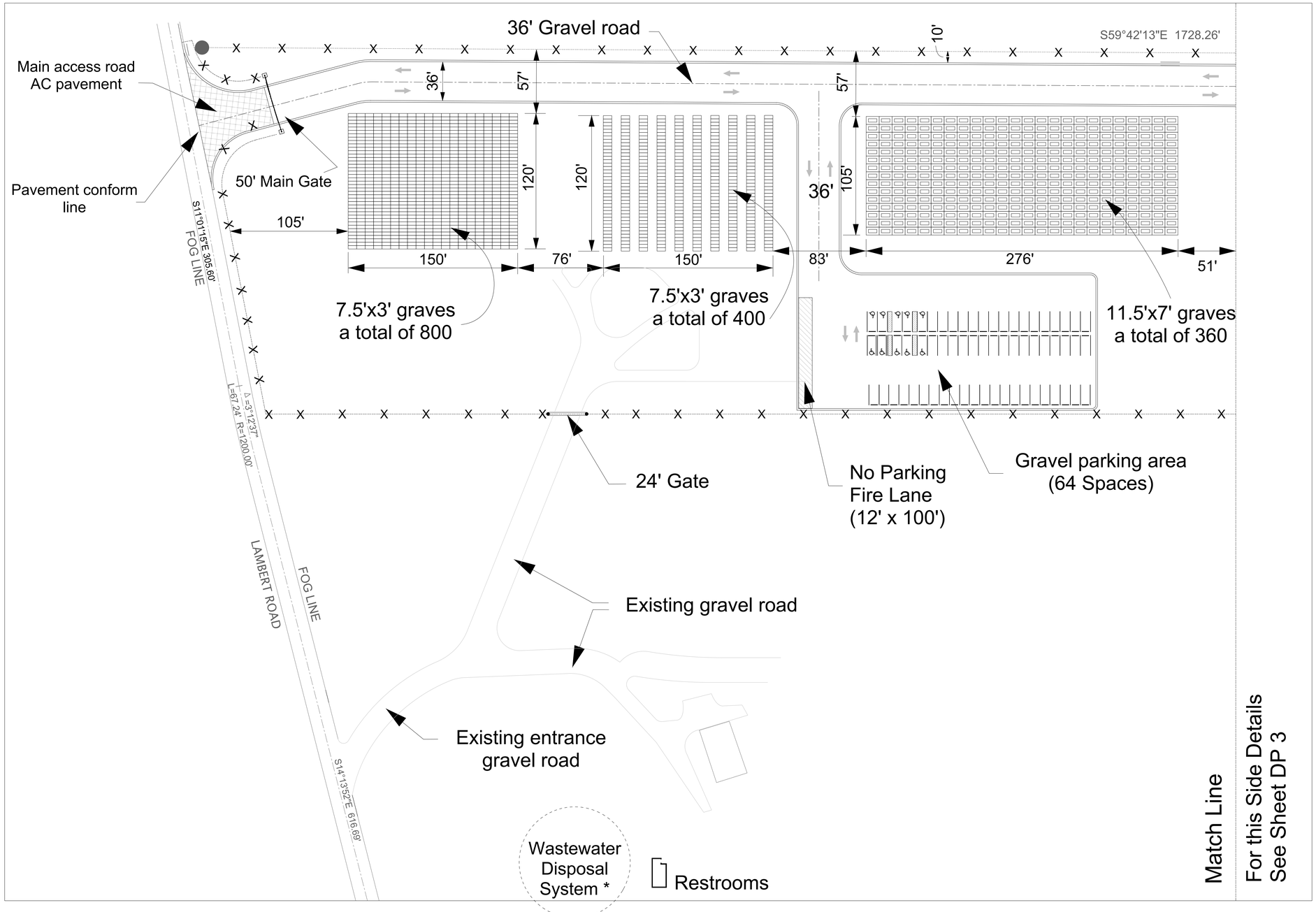
Engineering Seal:

REGISTERED PROFESSIONAL ENGINEER
No. CE 55710
Exp. 12/31/2026
CIVIL
STATE OF CALIFORNIA

Sheet No.

DP 1

Design Plan 2
Detailed Improvements



* Plans attached

Company Disclaimer:

GARDENS OF NOOR CEMETERY
16630 Lambert Rd.
857 Carbondale Rd.
Ione, CA 95640

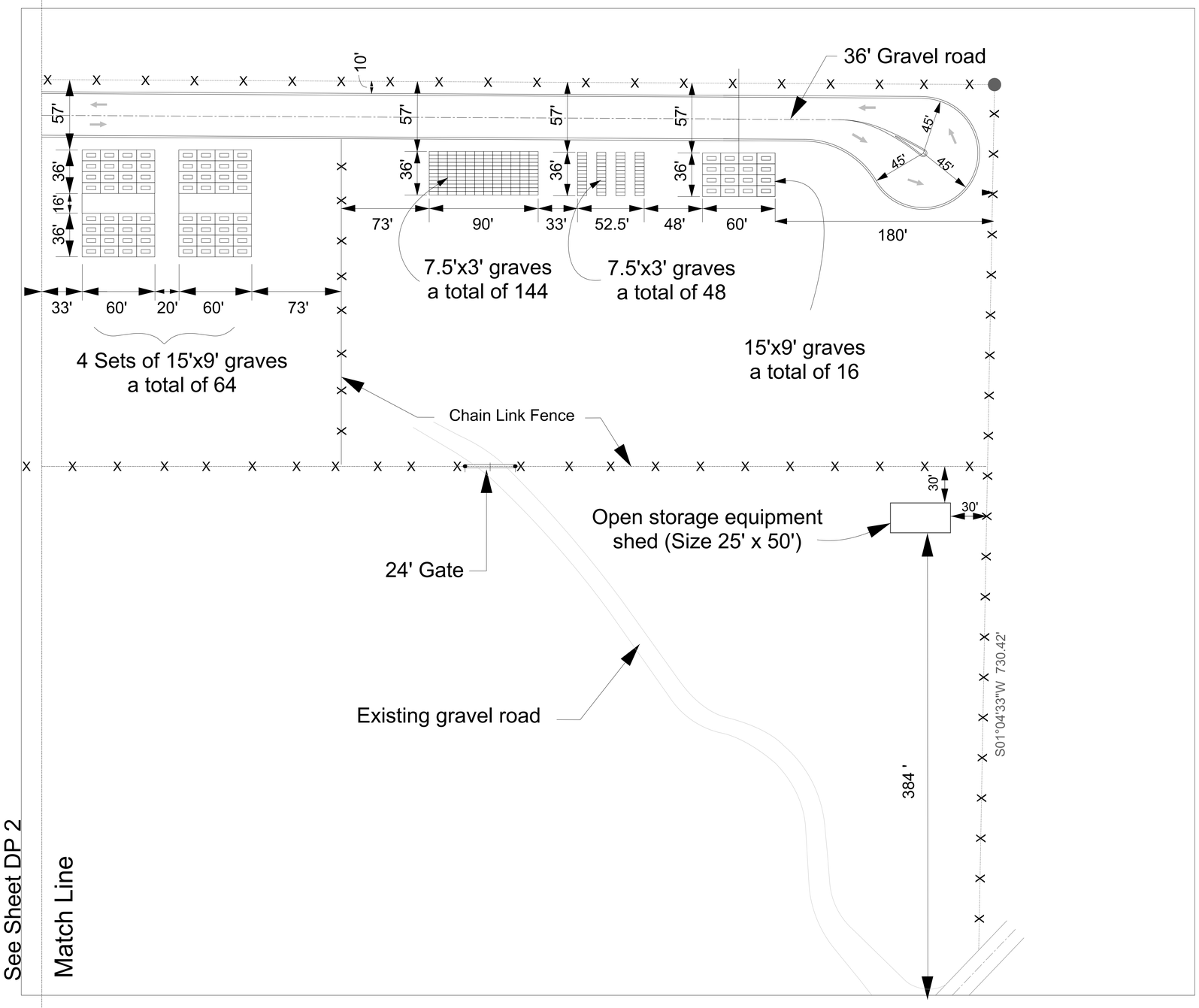
Designer:
Proj. Mngr:
Drawn By:
Signature:
Issue Date:
Rev.1 Date:
Rev.2 Date:
Rev.3 Date:

Registered Engineer
Name: Ali Kaddoura
Sig.
Date:
Engineering Seal:

REGISTERED PROFESSIONAL ENGINEER
No. CE 55710
Exp. 12/31/2026
CIVIL
STATE OF CALIFORNIA

Sheet No.
DP 2

Design Plan 3
Detailed Improvements



N

Company Disclaimer:

GARDENS OF NOOR CEMETERY
16630 Lambert Rd.
857 Carbondale Rd.
Ione, CA 95640

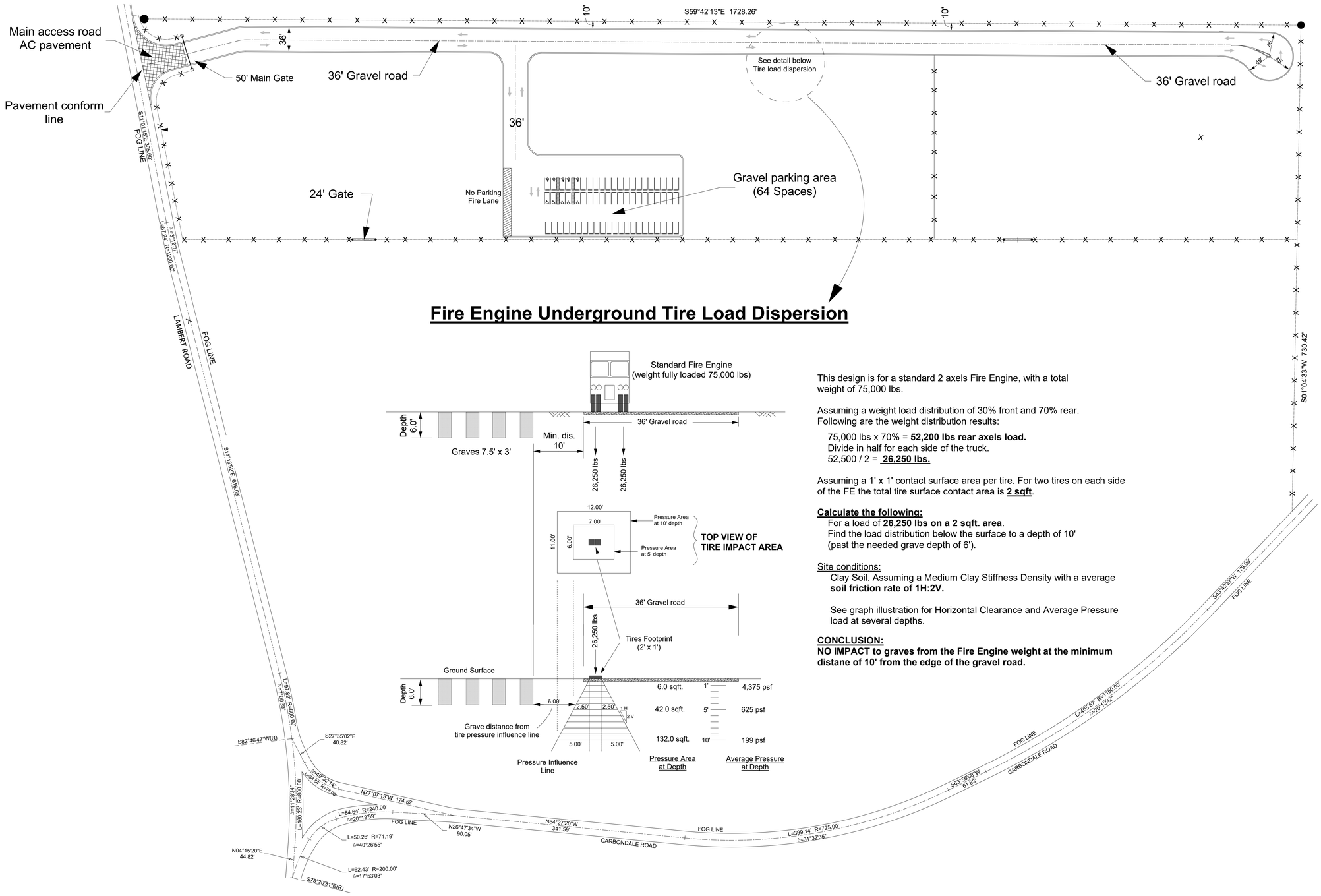
Designer:
Proj. Mngr:
Drawn By:
Signature:
Issue Date:
Rev.1 Date:
Rev.2 Date:
Rev.3 Date:

Registered Engineer
Name: Ali Kaddoura
Sig.
Date:
Engineering Seal:

REGISTERED PROFESSIONAL ENGINEER
No. CE 55710
Exp. 12/31/2026
CIVIL
STATE OF CALIFORNIA

Sheet No.
DP 3

Design Plan 4
Gravel Roads Tire Load Dispersion Detail



Fire Engine Underground Tire Load Dispersion

This design is for a standard 2 axels Fire Engine, with a total weight of 75,000 lbs.

Assuming a weight load distribution of 30% front and 70% rear. Following are the weight distribution results:

75,000 lbs x 70% = **52,200 lbs rear axels load.**
Divide in half for each side of the truck.
52,500 / 2 = **26,250 lbs.**

Assuming a 1' x 1' contact surface area per tire. For two tires on each side of the FE the total tire surface contact area is **2 sqft**.

Calculate the following:

For a load of **26,250 lbs on a 2 sqft. area**.
Find the load distribution below the surface to a depth of 10' (past the needed grave depth of 6').

Site conditions:

Clay Soil. Assuming a Medium Clay Stiffness Density with a average **soil friction rate of 1H:2V.**

See graph illustration for Horizontal Clearance and Average Pressure load at several depths.

CONCLUSION:
NO IMPACT to graves from the Fire Engine weight at the minimum distane of 10' from the edge of the gravel road.

Scale: 0 1 2 3

N

Address:

Phone No.

Company Disclaimer:

GARDENS OF NOOR CEMETERY
16630 Lambert Rd.
857 Carbondale Rd.
Ione, CA 95640

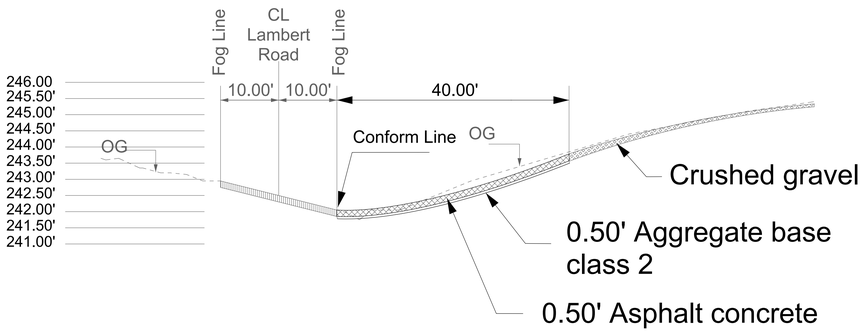
Designer:
Proj. Mngr:
Drawn By:
Signature:
Issue Date:
Rev.1 Date:
Rev.2 Date:
Rev.3 Date:

Registered Engineer
Name: **Ali Kaddoura**
Sig. Ali Kaddoura
Date:
Engineering Seal:

REGISTERED PROFESSIONAL ENGINEER
No. CE 55710
Exp. 12/31/2026
CIVIL
STATE OF CALIFORNIA

Sheet No.
DP 4

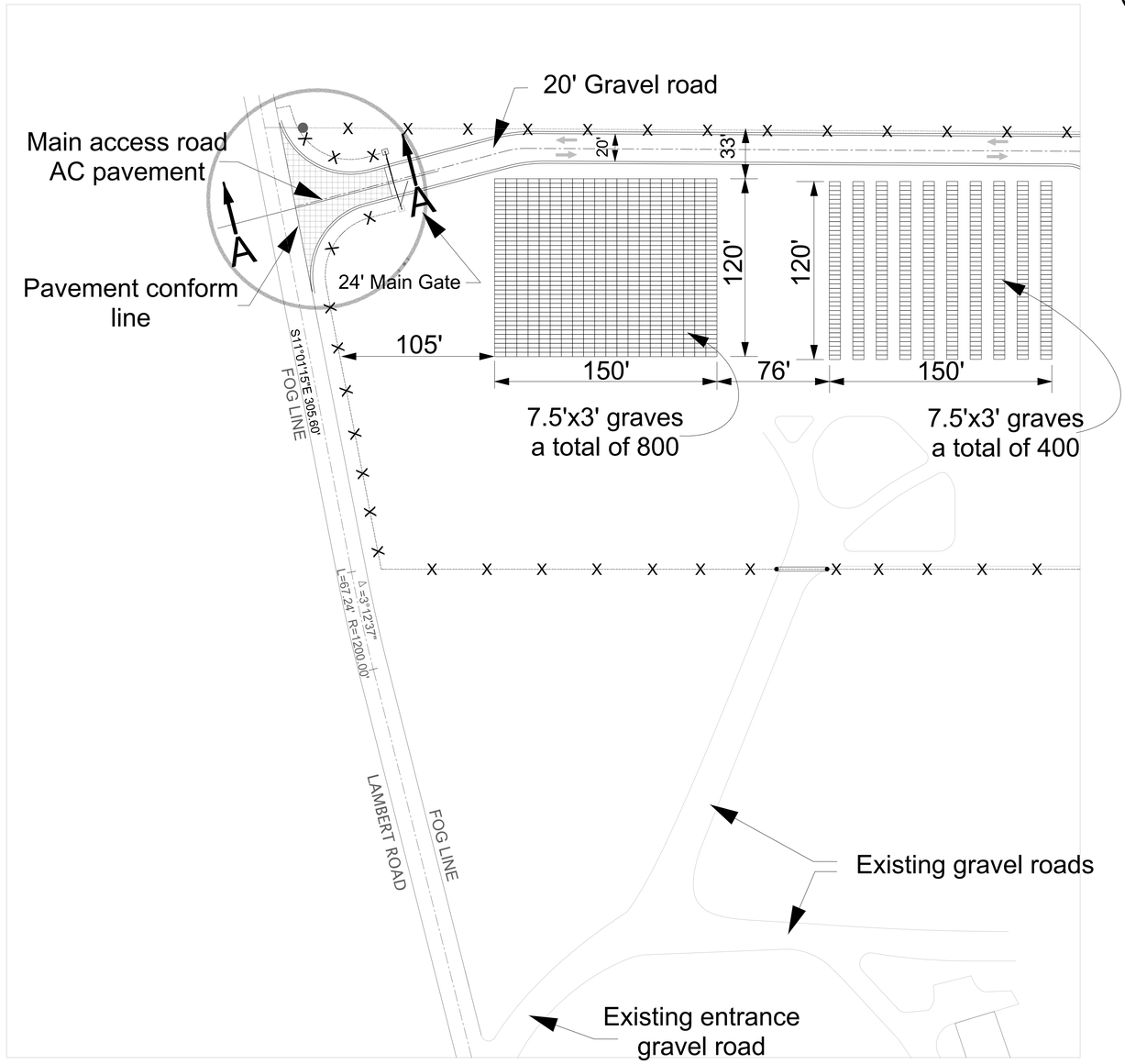
Design Details Plan 1



X-Section A - A



Main Gate
at main access road
3D Rendering



Scale: 0 1 2 3

N

Company Disclaimer:

GARDENS OF NOOR CEMETERY
16630 Lambert Rd.
857 Carbondale Rd.
Ione, CA 95640

Designer:
Proj. Mngr:
Drawn By:
Signature:
Issue Date:
Rev.1 Date:
Rev.2 Date:
Rev.3 Date:

Registered Engineer
Name: Ali Kaddoura
Sig.
Date:
Engineering Seal:

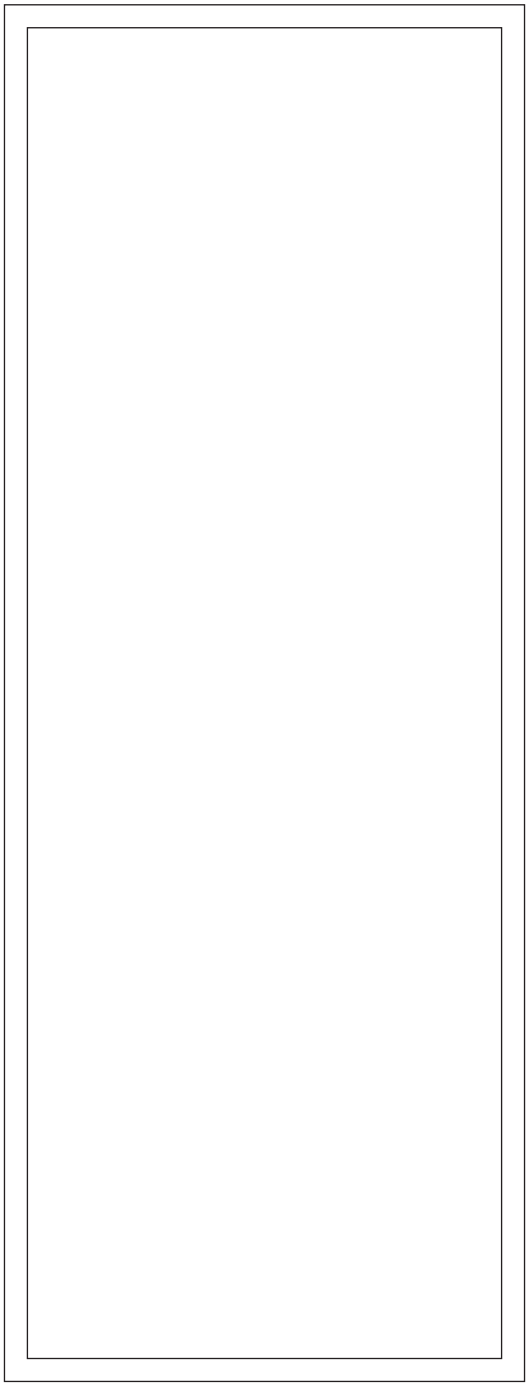
REGISTERED PROFESSIONAL ENGINEER
No. CE 55710
Exp. 12/31/2026
CIVIL
STATE OF CALIFORNIA

Sheet No.
DD 1

Grave Burial Details -5 pages

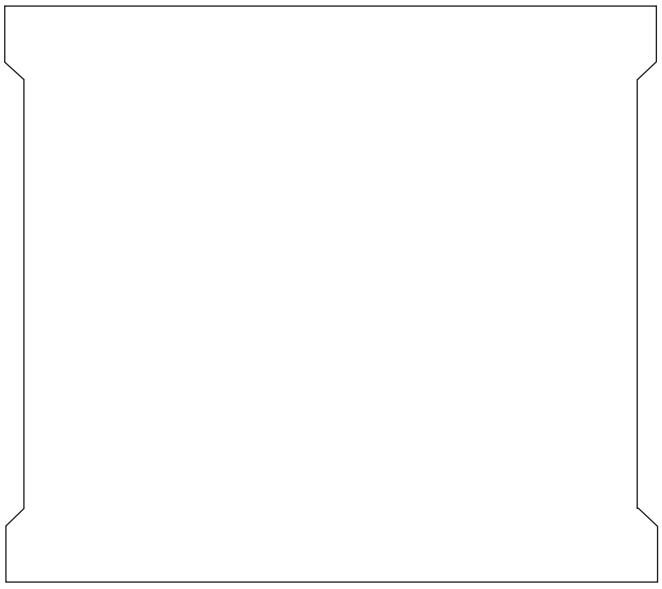
34 INCHES

90 INCHES

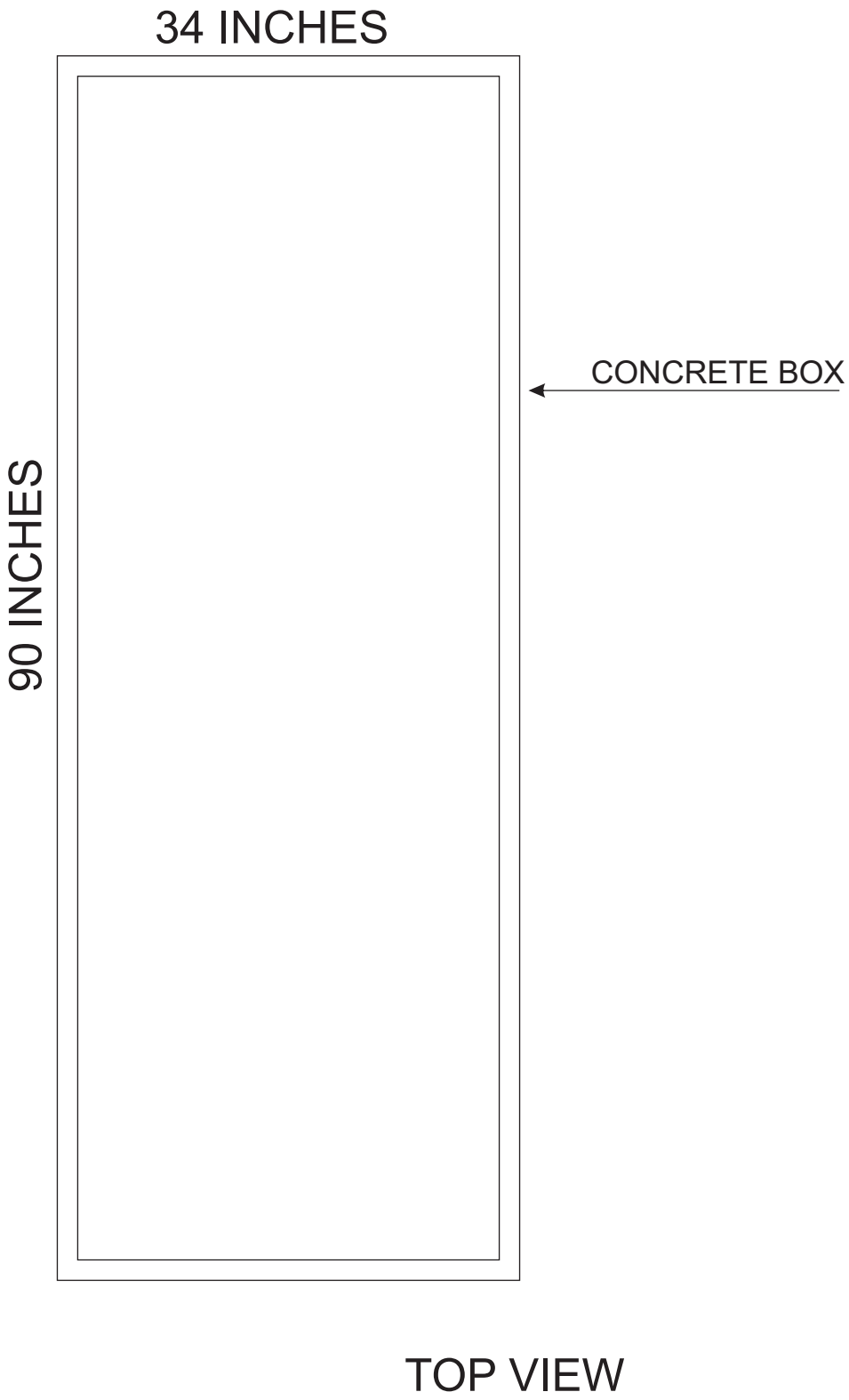


TOP VIEW

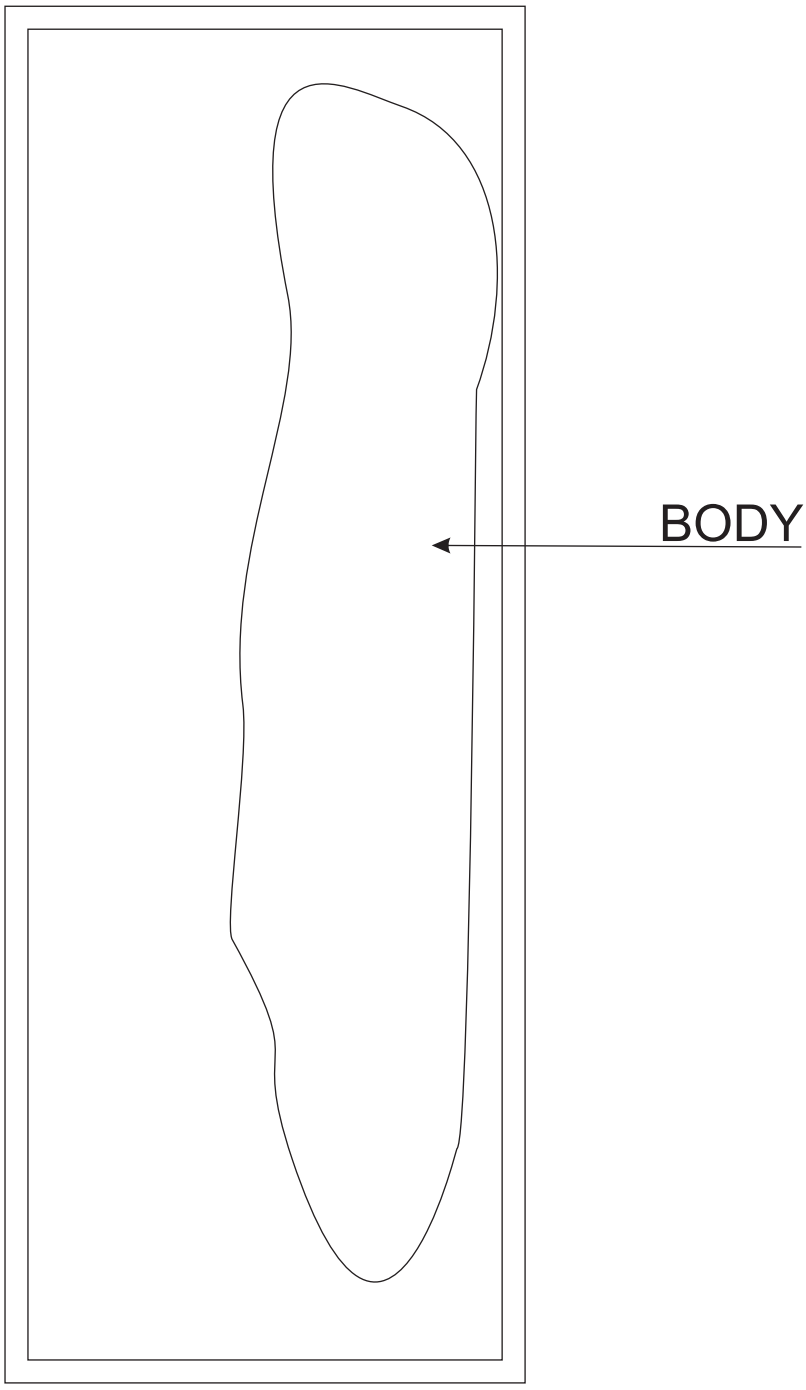
CONCRETE BOX



PROFILE



TOP VIEW

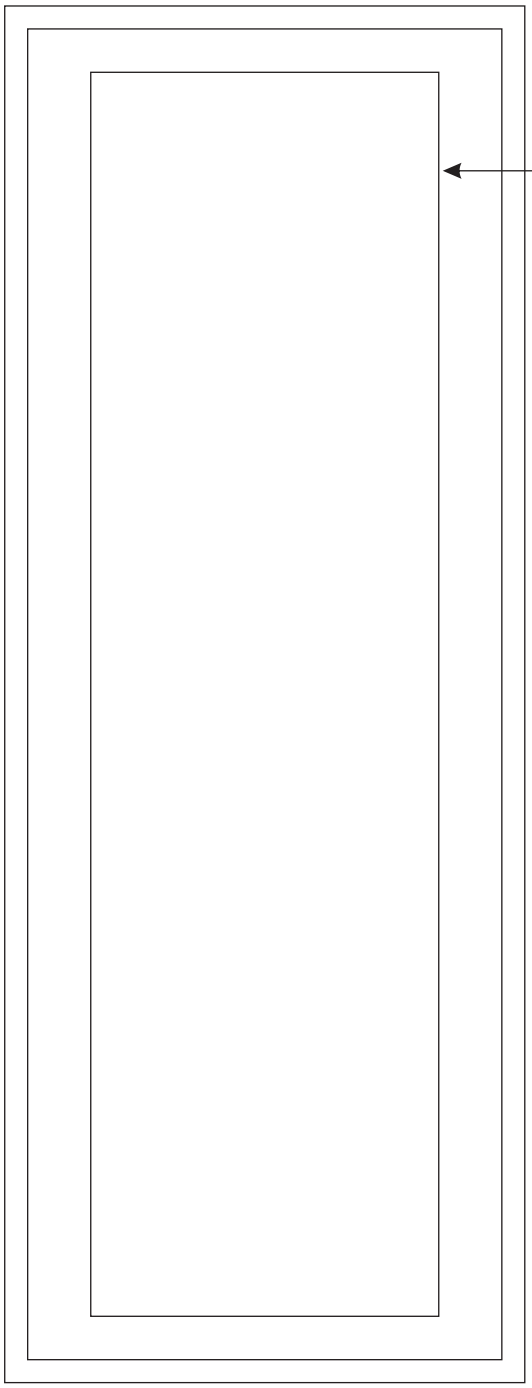


Wash at the Mosque: use pure water mixed with soap or Camphor.

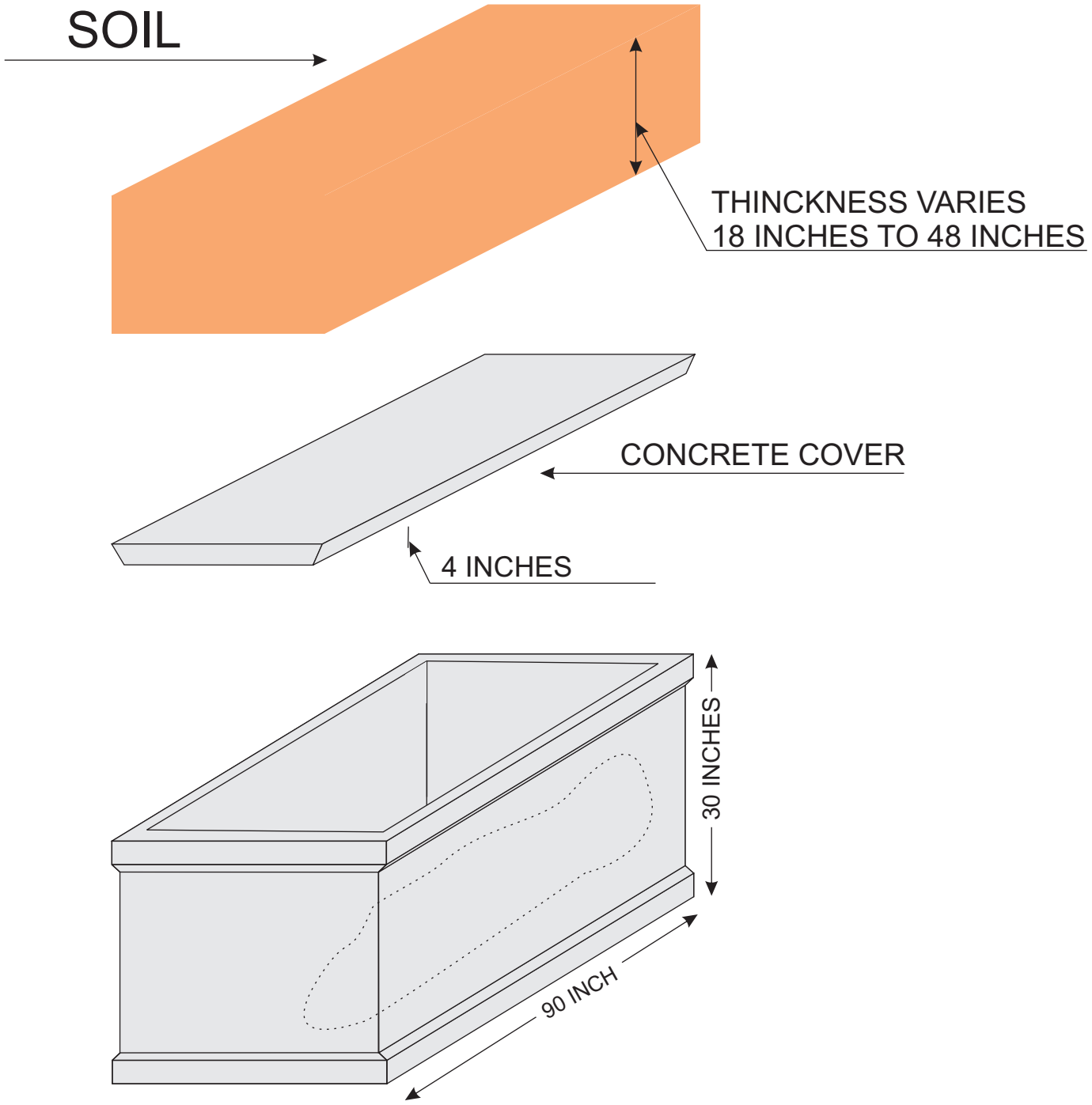
Dry the body: After washing, dry the body with clean towels.

Shrouding: Wrap the body with three layers of cotton cloth.
Each piece about 6 ft X 10 ft.Then body is placed in a casket.

At the cemetery: The shrouded body is either taken out of the casket or in some cases kept in the casket and lowered into the grave.


CASKET





GRAVE DEPTH VARIES BETWEEN 4.5 FT AND 6.0 FT

ENVIRONMENTAL INFORMATION FORM

To be completed by applicant; use additional sheets as necessary.
Attach plans, diagrams, etc. as appropriate.

GENERAL INFORMATION

Project Name: Gardens of Noor Cemetery

Date Filed: _____ File No. _____

Applicant/
Developer Mounir Kaddoura

Address 3550 Watt Ave #140, Sacramento, CA 95821

Phone No. (209) 429-1543

Landowner Mounir Kaddoura

Address 3550 Watt Ave #140, Sacramento, CA 95821

Phone No. (209) 429-1543

Assessor Parcel Number(s) 001220013000

Existing Zoning District RIA, Single Family Residential and Agriculture

Existing General Plan MRZ Mineral Resource Zone

List and describe any other related permits and other public approvals required for this project, including those required by city, regional, state, and federal agencies

well Permit and Sanitart Tank Permits have been acquired.

WRITTEN PROJECT DESCRIPTION (Include the following information where applicable, as well as any other pertinent information to describe the proposed project):

1. Site Size
2. Square Footage of Existing/Proposed Structures
3. Number of Floors of Construction
4. Amount of Off-street Parking Provided (provide accurate detailed parking plan)
5. Source of Water
6. Method of Sewage Disposal
7. Attach Plans
8. Proposed Scheduling of Project Construction
9. If project to be developed in phases, describe anticipated incremental development.
10. Associated Projects
11. Subdivision/Land Division Projects: Tentative map will be sufficient unless you feel additional information is needed or the County requests further details.
12. Residential Projects: Include the number of units, schedule of unit sizes, range of sale prices or rents and type of household size expected.
13. Commercial Projects: Indicate the type of business, number of employees, whether neighborhood, city or regionally oriented, square footage of sales area, and loading facilities.
14. Industrial Projects: Indicate type, estimated employment per shift, and loading facilities.
15. Institutional Projects: Indicate the major function, estimated employment per shift, estimated occupancy, loading facilities, and community benefits to be derived from the project.
16. If the project involves a variance, conditional use permit, or rezoning application, state this and indicate clearly why the application is required.

ADDITIONAL INFORMATION Are the following items applicable to the project or its effects? Discuss below all items checked "yes" (attach additional sheets as necessary).

YES	NO	
☐	☑	17. Change in existing features or any lakes or hills, or substantial alteration of ground contours.
☐	☑	18. Change in scenic views or vistas from existing residential areas, public lands, or roads.
☐	☑	19. Change in pattern, scale, or character of general area of project.
☐	☑	20. Significant amounts of solid waste or litter.
☐	☑	21. Change in dust, ash, smoke, fumes, or odors in the vicinity.
☐	☑	22. Change in lake, stream, or ground water quality or quantity, or alteration of existing drainage patterns.
☐	☑	23. Substantial change in existing noise or vibration levels in the vicinity.
☐	☑	24. Site on filled land or has slopes of 10 percent or more.
☐	☑	25. Use or disposal of potentially hazardous materials, such as toxic substances, flammables, or explosives.
☐	☑	26. Substantial change in demand for municipal services (police, fire, water, sewage, etc.).
☐	☑	27. Substantially increase fossil fuel consumption (electricity, oil, natural gas, etc.).
☐	☑	28. Does this project have a relationship to a larger project or series of projects?

ENVIRONMENTAL SETTING

29. Describe the project site as it exists before the project, including information on topography, soil stability, plants and animals, and any cultural, historical or scenic aspects. Describe any existing structures on the site, and the use of the structures. Attach photographs of the site (cannot be returned).
30. Describe the surrounding properties, including information on plants and animals and any cultural, historical, or scenic aspects. Indicate the type of land use (residential, commercial, etc.), intensity of land use (one family, apartment houses, shops, department stores, etc.), and scale of development (height, frontage, setback, rear yard, etc.). Attach photographs of the vicinity (cannot be returned).
31. Describe any known mine shafts, tunnels, air shafts, open hazardous excavations, etc. Attach photographs of any of these known features (cannot be returned).

Certification: I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this initial evaluation to the best of my ability, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.

Date 08/27/2025

Mohammad
(Signature)

For _____

INDEMNIFICATION

Project: Gardens of Noor Cemetery

In consideration of the County's processing and consideration of the application for the discretionary land use approval identified above (the "Project") the Owner and Applicant, jointly and severally, agree to defend, indemnify, and hold harmless the County of Amador from any claim, action, or proceeding against the County to attack, set aside, void or annul the Project approval, or any action relating related to the Project approvals as follows:

1. Owner and Applicant shall defend, indemnify, and hold harmless the County and its agents, officers or employees from any claim, action, or proceeding against the County or its agents, officers or employees (the "County") to attack, set aside, void or annul the Project approval, or any prior or subsequent determination regarding the Project, including but not limited to determinations related to the California Environmental Quality Act, or Project condition imposed by the County. The Indemnification includes, but is not limited to, damages, fees, and or costs, including attorneys' fees, awarded against County. The County in its sole discretion may hire outside counsel to handle its defense or may handle the matter internally. Indemnification also includes paying for the County's defense if it elects to hire outside counsel. Indemnification also includes compensating the County for staff time associated with the litigation. The obligations under this Indemnification shall apply regardless of whether any permits or entitlements are issued.

2. The County may, within its unlimited discretion, participate in the defense of any such claim, action, or proceeding if the County defends the claim, action, or proceeding in good faith.

3. The Owner and Applicant shall not be required to pay or perform any settlement by the County of such claim, action, or proceeding unless the settlement is approved in writing by Owner and Applicant, which approval shall not be unreasonably withheld.

IN WITNESS WHEREOF, by their signature below, Owner and Applicant hereby acknowledge that they have read, understand, and agree to perform the obligations under this Indemnification.

Applicant:	Owner (if different than Applicant):
Mohammad 08/27/2025	
Signature	Signature

Consent Letter

To: Ms. Krista Ruesel
Amador County Planning Department
810 Court Street
Jackson, CA 95642-2132

Re: 857 Carbondale Rd, Ione Ca 95640
APN: 001220013000

I, Mounir Kaddoura, give consent to Ali Kaddoura to act on my behalf to acquire the necessary permits to establish a cemetery at 857 Carbondale Rd, Ione Ca 95640.

08/27/2025

Mounir Kaddoura

GEOTECHNICAL ENGINEERING INVESTIGATION & RECOMMENDATIONS REPORT
PROPOSED GARDENS OF NOOR CEMETERY
#16630 LAMBERT ROAD- #657 CARBONDALE ROAD , AMADOR COUNTY , CA
APN 001-220-013
Amador County Planning Department UP-22,2-3

Date: June 20, 2024

REPORT PREPARED FOR :

MOUNIR KADDOURA
209.429.1543
3550 WATT AVE # 140,
SACRAMENTO , CA 95821
mounirkad@yahoo.com

HALLENBECK / ALLWEST



East Bay
P.O. Box 1473
El Cerrito, CA 94530

Peninsula
P.O. Box 1666
San Bruno, CA 94066

Hallenbeck/Allwest
Geotechnical Engineering Consultants
Tel (650) 219-4290 Fax (650) 636-4664
Email: adelkasim@gmail.com

Mounir Kaddoura **Project 7745 GP** **June 20, 2024**
#3550 Watt Ave # 140
Sacramento , CA 95821
mounirkad@yahoo.com

RE: Geotechnical Engineering Investigation & Recommendations Report
PROPOSED GARDENS OF NOOR CEMETERY
#16630 LAMBERT ROAD- #657 CARBONDALE ROAD , AMADOR COUNTY , CA
APN 001-220-013; Amador County UP-22,2-3

Our firm has completed this geotechnical engineering investigation report, GER, of the portion of subject parcel acreage property , proposed for planned Cemetery usage.

This investigation identified geotechnical and geologic conditions to guide the Project permitting and to develop design-level recommendations for the proposed project. The recommendations include Sections for :
Structural Footing Foundations ; Floor Slab on Ground ; Retaining walls ; Grading ; Geo-Earthquake Considerations and Drainage .
This report presents geotechnical engineering findings and assessments of impacts of identified geologic and geotechnical conditions along with recommended geo engineering measures to address mitigation to these conditions and their impacts.
The geology section covers aspects of mineral resources as well.
Our investigation methodology , scope and assessment are in compliance with the geotechnical practice standards. The site maps outside the State EQ ZAPP regulatory earthquake Special Studies hazards Zones .
This geotechnical report references the CBC 22 provisions.
This report includes the results of the field exploration , as well as testing , that was undertaken to substantiate the conclusions and feasibility assessments. Site –Specific exploratory pits-combo geo borings, were excavated & drilled and logged for this GER .
We point out that this report provides geotechnical assessments and recommendations for the project, based on our observations , the results of our field and laboratory work as well as ,our engineering analyses; and considering the description of the project relayed to us by the project owner & based on correspondence from Amador County Planning Department .
Please direct any questions with regards to this document to the undersigned geotechnical engineer.

Very Truly Yours, Hallenbeck / Allwest

REGISTERED PROFESSIONAL ENGINEER ADEL G. KASIM No. GE000453 Exp: DEC 2024 GEOTECHNICAL STATE OF CALIFORNIA

Adel Kasim , Ph.D , GE # 453 , Geotechnical Engineer

TABLE OF CONTENTS

Page

Letter of Transmittal

1. PROJECT SCOPE AND SITE DESCRIPTION 4

2. REGIONAL GEOLOGY . MINERAL RESOURCES..... 4

3. GEOTECHNICAL EXPLORATION AND CONDITIONS..... 7

4. CONCLUSIONS 8

5. GEOTECHNICAL RECOMMENDATIONS

5.1 STRUCTURAL GRIDDED FOOTING-SLAB FOUNDATION 9

5.2 STRUCTURAL CONCRETE FLOOR SLABS ON GROUND 11

5.3 STRUCTURAL RETAINING WALLS SUPPORTED ON GRIDDED FOOTINGS 11

5.4 GRADING AND UTILITY TRENCHES 14

5.4 GEO EARTHQUAKE CONSIDERATIONS 17

5.6 DRAINAGE (Surface & Subsurface)..... 18

5.7 PLANS AND CONSTRUCTION SPECIAL INSPECTIONS & TESTING..... 18

NOTICE & REFERENCES

Figures:
Fig. 1A Site Plan
Fig. 1B Site Aerial
Fig. 2 State CGS EQ Zapp
Fig. 3 Regional Geology Map
Fig. 4 Mineral Deposits-USGS Map
Fig. 5 Foundations & Retaining Walls Design Requirements
Fig. 6 Subdrain Behind Retaining Walls
Fig. 7 Dampproofing Slabs on Ground

APPENDIX A GEO-EXPLORATION PITS-BORINGS
APPENDIX GROUND MOTION - GM CBC 22 SPECTRAL PARAMETERS

GUIDE SPECIFICATIONS FOR DRAINAGE
GUIDE SPECIFICATIONS FOR ENGINEERED GRADING

DISCLAIMER

Work was performed to normal engineering practice standards. Undiscovered conditions are possible and would require updated engineering recommendations. No warranty is presented or shall be presumed . Report is for explicit use by the client and his consultants and is only for the stated project as described in this report. The geotechnical entity to review the plans and inspect construction shall be the geotechnical consultant of record responsible to verify / update the recommendations of this report as appropriate.

1.0 PROJECT SCOPE AND SITE DESCRIPTION

It is planned to develop this ~ 40 acre acreage parcel for cemetery usage. The parcel has been recently surveyed by Muir Consulting ; topo map dated December , 2023.The parcel lies in the general area of highway 16 & Ione Road. The parcel is at the fork of Lambert Road & Carbondale Road. Currently, the parcel is accessed by two gates one off of Lambert road , other is off of Carbondale Road. Most of the topography is gradual at ~ elevations 238 to 250 from the Carbondale-Lambert Roads fork to the central parcel area. There is a general gradual up topography to elevations on the order of 260 to 270 going northerly and northeast.

The cemetery usage would require and involve the construction of an office building , a caretaker's building, a yard and equipment building and perhaps accessory building(s). Current planning locates the burial sites to the west fronting Lambert Road portion of the site . There are primitive access roadways but a fully developed and paved access roadways would be needed. A production water well , setback per regulatory requirements from the grave burial sites, is to be installed. Also, some appurtenant improvements would be needed.

The buildings are anticipated to be supported on spread footings with concrete floor slabs. Grading for land-use would be required. Short site retaining walls may be needed in some areas. Currently, there is some fresh areal side-cast grading in the northern part of the parcel.

2.0 REGIONAL GEOLOGY . MINERAL RESOURCES

The site is situated east of Sacramento area , which is bordered by mountain ranges of The Coast Range Geomorphic Province. The State CGS EQ Zapp module shows the parcel to be outside of special geologic seismic hazard zones , refer to Figure 2.
The site and vicinity are located in the Carbondale USGS Geologic Quadrangle and have been mapped by Olaf P. Jenkins Edition-Rudolph G. Strand and James Koeing in 1965 , to be underlain by the Ione Formation bedrocks Eocene-Mesozoic geologic time scale ,Qa alluvium covers the landscape; refer to Figure 3 Regional Geology.

The Coast Range Geomorphic Province is considered a geologically young and earthquake- active area. Movements of the San Andreas SA Fault system, which, in California,

includes active earthquake fault systems which have caused the uplift of the Coast Ranges and associated earthquake activity. These active faults are the San Andreas, Hayward, Calaveras Faults, Green Valley & Bear Creek . These faults are over 30 miles from the site.

The middle Eocene Ione Formation extends over 200 miles along the western edge of the Sierra Nevada. Locally, the Dorado Soil Series is part of the Ione Formation. The Dorado soils are shallow soils developed from slate or schist rocs with an oak-grass vegetation. The soil is brown or near reddish brown , gravelly or stony , loam or silt loam. soil reaction is often slightly acid throughout, PH ~ 6 . Soil depth is shallow.

Ground Motion

Ground motion and response to earthquakes can be described in terms of peak acceleration PGA, risk-targeted magnitude MCE_R, and acceleration spectrum $Sa\text{-}S_1$ (period related parameter), which are most pertinent parameters for engineering design. Areas located in a far-field seismic setting and which that are underlain by bedrock or very stiff geo materials at shallow depths tend to experience less amplification of ground shaking than those underlain by unconsolidated soft sediments such as alluvial materials or artificial fills. Ground shaking may affect areas for many miles around an earthquake epicenter.

We expect the site to experience strong ground shaking caused by a major seismic event in the Bay Area during the lifetime of the planned structure that will be constructed at the site. The geotechnical work assessed the ground motion per CBC 22 Section 1613.3 and ASCE 7-22.

The predicted PGA-gs and the S_1 spectral parameter are calculated per for the site class applicable to this site (see Ground Motion Appendix-GM).

Surface Fault Rupture

Seismically induced ground rupture is defined as the physical displacement of surface deposits in response to fault rupture, whether surface or subsurface. The project site is not within an active fault surface rupture hazard zone as defined by the Alquist- Priolo A-P Earthquake Fault Zoning Act (discussed below). Since no mapped active or potentially active faults are known to pass through the project site, the potential risk from fault surface rupture is considered low.

Landslides

A landslide is a mass of rock, soil, and debris displaced downslope by block sliding, flowing, or falling. The susceptibility of land (slope) failure is dependent on slope and geologic characteristics, as well as the amount of rainfall , the nature and duration of an excavation and, the earthquake ground motion. Areas with steep slopes and downslope creep of surface materials are most susceptible to landsliding. Landslides concerns are least likely or irrelevant in areas of low topographic relief, such as topographically low lying alluvial fans, such as this site.

It is our opinion, that considering the mostly gradual topography of the site and vicinity, and that the visual walkthrough by the geotechnical engineer indicated lack of geomorphic features indicative of landsliding , that the potential hazards from landsliding, lateral spreading and/or mudflows that can affect the project when developed are very low and therefore, such issues shall not be a planning considerations or concerns for this project.

Ground Performance & Liquefaction

The subject parcel is located outside the Regulatory State CGS EQ Zapp Earthquake Special Studies Hazard Zones; refer to Figure 2. Site Specific exploratory pits-borings disclose weathered fine-grained siltstone bedrock and is not prone to liquefaction hazards.

Liquefaction is a phenomenon where water saturated granular soil (Sands SM ,Gravelly Sands SM-GM and Silts ML) loses shear strength and stiffness during strong ground shaking produced by earthquakes. The loss

of soil strength / stiffness occurs as a consequence of structural degradations from cyclic shear stresses and strains; resulting in cyclic pore water pressure increases in the portion of the deposit below the groundwater surface. Additionally, and in a general concept, primary liquefaction occurrence pore pressure increases could migrate upwards and result in a secondary liquefaction situation in zones above the groundwater table. Potential hazards due to liquefaction in flatland situations include loss of bearing strength beneath structures, possibly causing foundation failure and/or significant settlements associated with damaging differential settlements. Additionally and in general, such an occurrence may modify the ground motion (both accelerations and frequency content of the ground response spectrum) as well and therefore the site class.

Site Stability and Bearing Support

The geo borings data, site-specific for this project, indicate the site to be underlain by weathered fine-grained siltstone bedrock at shallow depth; no loose clean sands or silts that could be vulnerable to the perils of earthquake-induced liquefaction were logged.

Earthquake - Induced Settlements

Saturated and non-saturated geo-granular soils are subject to densification under strong cyclic shaking, which degrades geo-granular materials and results in settlement of the ground surface. The higher the intensity and duration of ground motion caused by a regional earthquake event, the greater the degree of the densification settlement potential where loosely placed soils are present. As pointed out in the preceding section no liquefaction-prone materials were found, and therefore, no particular earthquake-settlement sources are present.

Mineral Resources : Considering the rather uniform appearance of Ione deposits in outcrop , Ione sands differ remarkably besides grain-size differences , Ione sands range from Quartzose to Arkosic ; predominant is angular quartz so as detrial mica flakes; sulpher is also prevalent . Ione sediments (Eocene) were spread over Upper Mesozoic metamorphic and plutonic bedrock. The Ione is noted for its abundant kaolinitic clay minerals; non marine facies are voluminous and include conglomerates, sandstone & shale.

Mineral deposits of the type area of the Ione formation in relation to geology, from the work of Piper and others (1939) is captured on Figure 4. Pits in the general area indicated the abundant presence of coal. However, site - specific pits did not disclose coal even at depths on the order of some 15 ft to 20 ft (refer to Appendix A).

3.0 GEOTECHNICAL EXPLORATION AND CONDITIONS

- The geotechnical engineer walked through the site and vicinity to view geo outcrops and pertinent site conditions. Also, the geotechnical engineer reviewed regional geologic map (Figure 3) and the State CGS Hazard map (Figure 2) .The geo maps review was undertaken to correlate to the site-specific data.

- The geotechnical engineer commissioned the drilling of five site–specific geo exploratory combination pits-borings spread out across the parcel . These pit-borings are also to explore geo-conditions in specific planned improvements & building areas. The pit-boring locations extended from the Lambert Road frontage all the way to the central part of the parcel and to the Carbondale Road side. The collective pit-borings data would cross profile the site. core-samples were taken at various intervals to cross profile the various principal geo layers.

- Geo pit-borings were sampled / logged per CBC 22 Section 1803.5.1. Sampler blow counts were converted to the SPT sampler**.** The hammer delivery system was recorded by the supervising geotechnical engineer and the blow counts were converted to the ASTM standard in accordance with the work of Kovacs et al , 1983 , of the US Bureau of Standards (references)**.** The SPT conversion was per ASTM 1586 specs based on well-established energy correlations to the U.S. standard N-55 for liquefaction assessment, again, refer to Kovacs, et al (references).

- The geo pits-borings disclosed the following geo profile pertinent to the project :

  The upper ~ one ft to 2 ft ft is a non expansive reddish brown Silt ML , part of the Dorado Soils. Underlain by highly weathered fine grained Siltstone bedrock part of the regional Ione Formation. Which graded less weathered and turned indurated at depth.
  The current geo-exploration did not encounter any colluviums Qc .

- Generally, there was consistency between the layout of the geo strata disclosed by the pit-borings across the building footprint. This geo profile is generally consistent with regional geology.

- The complete set of boring logs as well as the Plasticity Chart are presented in the Geo-Exploration Appendix A. Per Item 1 CBC 22 Sec 1803.5.3. The site is practically classified as non expansive .

- Groundwater was consistently encountered , actively seeping at the time of drilling ATD. Groundwater appears to seep through fractures in the siltstone bedrock.

4.0 CONCLUSIONS

Based on review of the aforementioned geotechnical and geologic exploration material as well as assessment of the data in consideration of the proposed project, the following conclusions are drawn pertinent to geotechnical issues:

- The project is feasible from the geotechnical engineering perspective. No active regional earthquake faults that would preclude or, severely constrain the project are present @ or in the immediate vicinity of the site. Furthermore , the parcel is outside the State regulatory seismic-earthquake geologic hazard zones. The property is not in a landslide zone.map.
  Again, the parcel maps outside of the State CGS regulatory zones in which special earthquake hazard studies would be required. No liquefaction -prone materials were found in the site-specific geo-borings .

- The recommendations of this report and conclusions shall be embedded in proposed project planning, budgeting, and for the plans and construction .

- Foundation installation and excavations are to be undertaken in clear weather. Work may proceed in regulatory wet weather season with additional geotechnical engineering guidance. Also, working in regulatory wet weather , storm perched runoff should be anticipated & appropriate erosion & runoff control measures are to be undertaken with geo-engineering guidance.

- Considering the preliminary planning , footing excavations are anticipated to expose firm excellent bearing bedrock , a silty fine-grained Siltstone Bedrock.

- An appropriate and suitable approach to planning structural concrete gridded beam footing foundation to account for site conditions and earthquake ground motion, is to provide sufficient structural strength and stiffness and as well cross tie-grade beam footings to bolster the planar structural rigidity of the foundation.

- Moderately strong earthquake-generated ground motion is to be accounted for by the CBC 22 Section 1613.3 provisions & stipulations to the designated Site Class and Seismic Design Category.

- Groundwater was persistent & encountered in the geo-exploratory pit-borings; groundwater was pooling and ponded shortly following excavation of the pits . However, perched storm runoff, both surface and subsurface , from onsite and from the upper grades , should be accounted for both in construction & design documents /Specs.

- Appropriate drainage control measures should be developed all around the building sides. Considering the grades and topo, it would be readily appropriate to release runoff to nearby lower grades.

- Mapped mineral resources of mainly coal deposits, were not found in the exploratory pits spread out across the parcel.

5.0 GEOTECHNICAL RECOMMENDATIONS

5.1 STRUCTURAL GRIDDED FOOTINGS - SLAB FOUNDATION (Figure 5)

General

It would be most appropriate to support the (N) building on a structural reinforced concrete gridded footing-retaining wall (Section 5.3 Figures 5 & 6) foundation designed and installed to perform with gridded stiff layout. In this design approach, the foundation relies primarily on its stiffener beam footings for rigidity and bearing. Full structural flexure moments connections shall be provided by the structural engineer between a reinforced concrete floor slab (see Section 5.2 Figures 5 &7 drainage) and the stiffener beam footings and all the beam footings to beam footing connections; this conventionally referred to as " turned-down design".
The gridded beam footings should bypass the loose surface ML silt & be bearing onto the siltstone bedrock to the minimum geotechnical requirements of secure embedment depths & widths as stipulated below and per table

Upgrade of the gridded beam footings and its stiffening beams to the stipulated criteria , is required to address earthquake-generated ground motion and also to account for the geo-loads. This would involve doubly reinforced stiffened concrete beam footings designed to perform as structural beams with the provision of minimum sufficient rebar , #5 rebars T &B (eq) from the geo perspective. Geotechnical Foundation design requirements are presented on Figure 5.

As noted under the conclusions section , this investigation confirms that the onsite subgrade & bedrock are non expansive; reference CBC 22 Section 1803.5.3 Item # 1.

Minimum Embedment and Width

Continuous wall strip footing foundations should have a minimum width of 15inches for One & two-story buildings. Column pad footing foundations shall have a minimum width of 24 to 36 inches for two stories building or less, although structural considerations may require greater widths or depths for the foundations. All footing foundations , continuous & pad, shall be gridded and fully integrated structurally and be bearing onto the siltstone bedrock.

The depth-ft of footing foundations, measured from below the lowest adjacent finished ground grade (FG) should not be less than the values presented in the following table :

Number of Stories and Height	Depth of Footing (inches)	Width Of Footing(inches)
One-story, height not exceeding 20 feet	18 inches All Locations Except- 24 inches at Yard building Pit location # 3	15
One or Two-story, height not exceeding 30 feet	24 inches	18
Three-story, height not exceeding 40 feet	N/A	N/A
Four or Five-story, height not exceeding 50 feet	N/A	N/A

Note :
Final footings embedment is to be per special field geotechnical inspection CBC 22 Section 1705.6

Stepped Footings
Where the elevations of bottoms of foundations vary, the bottoms should not be sloped, but stepped as required. The minimum horizontal run of a step should be no less than 36 inches and the maximum rise of a step no greater than 24 inches; reference CBC 22 Section 1809.3.

Building Code CBC 22 Section 1809.3 stipulates that the top of footing stems must be level and shall not be sloped . The bottoms of footings may be sloped to conform to grades , however , the Code stipulates the cutoff of 10H: 1V on the bottoms sloping ; otherwise, the bottoms shall be stepped to conform. The minimum horizontal run of a step should be no less than 36 inches and the maximum rise of a step no greater than 24 inches.
This site is essentially flat therefore, the need for stepping is not indicated. final assessment shall be made by the project structural engineer.

Adjacent foundations load transfer
Foundations should be located so as not to surcharge other foundations. An upper foundation may be taken as not surcharging nearby lower foundations where those lower foundations are located beyond a 1.5:1 (~ 34 degrees) setback line projected downward from the outer edge of the bearing zone of the upper foundation. A lower foundation may be taken as not being surcharged by adjacent upper foundations where the foundation is located beyond all 1.5:1 setback lines projected downward from the edges of all adjacent foundations. The intent of CBC 22 Section 1809.6 on adjoining load impacts broadly pertains to both lateral as well as vertical loads. Where the referenced plane projections are based on the bearing zone of surcharging upper foundations onto the stem on of an adjoining foundation would imply lateral load transfer.

Additionally, support and bearing of adjoining foundations shall not be compromised or undermined; references to CBC 22 Sections 1803.5.7 and 1804.1 &.2. The project architect and structural engineer should account for such potential issues. The geotechnical engineer should be consulted as needed and as appropriate.

FOUNDATION DESIGN CONSIDERATIONS
Lateral Resistance
Settlements
Refer to Section 5.3

Footings In Proximity to Utility Trenches
This applies mostly to individual footing that may exist in proximity to the gridded system. Utility trenches in proximity of line footing foundations should be located to address both designs bearing as well as the possibility of future excavation of such utilities, that could result in lateral load and bearing capacity loss of adjoining shallow foundations. The conventional 1.5:1 setback basis shall be appropriate to indicate potential impacts. Where a utility run shadows/parallels more than 5 feet of a foundation, the 1.5:1 stress distribution plane would apply. In such cases shallow foundations may need to be deepened, a screen pier load buffer should be installed, or the utility should be relocated. Such measures may not be necessary should the structural engineer determines that the foundation has sufficient structural capacity to span across the utility frontage area. There may be special cases/situations that would be best addressed during the plan review consultations. Such situations should also be considered by the structural and civil engineers.

5.2 STRUCTURAL CONCRETE FLOOR SLAB ON GROUND (Figures 5 & 7)

Overall, it would be desirable to design any planned reinforced concrete habitable floor slab to be structurally monolithic , " turned-down ", with the perimeter footings (stiffening beams) (Section 5.1); full moments M and forces Q & V transfer **;** rebars shall be run through provided for this purpose. This is in consideration of seismic performance rigidity and monolithic performance.
Allowable bearing is per the values of Figure 5. In this approach the slab would be fixed to the foundation, no gaps. The structural engineer needs not to account for uplift from the subgrade onto the foundation system.

The structural engineer and in the case of a monolithic structural concrete slab to the beam footings, is justified to spread the floor loads onto the entire floor slab footprint effecting a design based on the allowable contact pressures of Figure 5. Alternatively, in case a Winkler subgrade design methodology is utilized to design the slab, the following parameters are recommended : Modulus of vertical subgrade reaction 40 pci or 12,000 KN/M3; already has factored in the slab mat size and groundwater. The resulting flexure force moments are dependent on the relative mat slab structural stiffness to the stiffness of the ground , $\beta = \lambda \times L$ and a commensurate PSI parameter multiplier for moment reduction .

The structural floor slab shall be surrounded by a perimeter foundation subdrain , Figure 6 & dampproofed per specifications of Figure 7. This would require the conventional Gravel/Sand/Membrane underlayment. It is important to tape seal the membrane seams and laps and to seal all utility penetrations**.**

It would be crucial that all Construction joints (within the slab and as it connects to the integrated foundation system) shall be properly sealed with approved waterstops WS.

It is important to construct the structural floor slab onto firm engineered subgrade. The geotechnical exploration disclosed a loose (E) surface -ML silt soil. Therefore, the loose subgrade is required to be proof compacted per Section 5.4, to produce the firm pad onto which the slab can be properly constructed.

5.3 STRUCTURAL RETAINING WALLS SUPPORTED ON GRIDDED FOOTINGS (Figures 5 & 6)

As pointed out under Section 5.1 , the building footing foundations , the floor mat slab along with the foundation retaining walls shall all be fully structurally integrated to perform monolithically.

From the geotechnical perspective, the following load conditions onto the foundation retaining walls shall be accounted for:

- Geo-lateral loads under normal static service conditions , commensurate the K_0 condition stipulated by CBC 22 Table 1610.1 and Figure 5, whichever is greater.
- Building earthquake inertia from the equivalent lateral force procedure.
- Any eccentric loadings.

- Lateral geo-earthquake force as stipulated by CBC 22 Section 1803.5.12 for retaining walls supporting retained height greater than 6 ft; refer to plans.
- Direct gravity Q structural loads.
- Geo-load transfers from any adjoining footings in the zone of influence, Section 5.1.

RETAINING WALLS FOUNDATION DESIGN CONSIDERATIONS

Stability

Foundation retaining walls shall be demonstrated to perform & and to remain stable per CBC 22 Sections 1807.2.1 & 1807.2.3 against lateral sliding , overturning - tilting and bearing shear punch .

The project design engineer may design the foundation retaining walls as a box structure incorporating any floor concrete mat slab as a structural diaphragm action for walls support in addition to the base friction and passive geo-support.

Minimum Embedment & Width- Footings

Footing foundations supporting foundation retaining walls should have the minimum widths and secure penetration into the bedrock as stipulated by the following table , and may have to be equipped with a shear key as per structural design.

All (N) footing foundations shall bypass the loose surface ML silt 7 any undocumented Qaf existing side-cast fill , and be embedded into the bedrock .

Structural considerations may require greater widths or depths for the foundations.

The following table shall be used for a guide:

Retaining Wall (RW) Retained Height H-ft	Footing Penetration Into Firm bedrock (inches) -Minimum	Minimum Width Of Footing(inches)
RW - H 3 ft max.	12	18
RW - H 3-5 ft	18	20
RW - H over 5 ft	30	30
Geotechnical Consultations for different & Special Conditions		

Note :

Final footings embedment is to be per special field geotechnical inspection CBC 22 Section 1705.6

Retaining Wall Footings with Shear Key (Figure 5)

It would be appropriate to support the foundation retaining wall on a structural reinforced concrete RC continuous strip footing equipped with an RC shear key (as per design engineer stability calculations) , all embedded per structural design requirements.

Adjacent Foundations Load Transfer : Refer to Section 5.1

Vertical Bearing Capacity-Footings
Vertical forces & gravity loads may be designed to be supported by footing foundations bearing against firm undisturbed firm geo-materials ; utilizing the design parameters of Figure 5.

The base allowable soil bearing pressure of 1500 psf due DL load basis ,shall be used for bearing onto the stable firm bearing bedrock material; bypassing any surface soils materials above are to be neglected. The above-recommended minimum embedment and width are to be met regardless of the resulting bearing pressures. The maximum edge pressure should not exceed the appropriate allowable pressure for foundations subjected to eccentric loads and/or overturning moments; no tension is permitted. An efficient design would base the resultant of the pressure under a stiff footing within the middle one-third of the width or length of footing ; in a linear geo-pressure distribution.

Lateral Resistance
Lateral forces ,in particular geo-earthquake inertia forces generated from ground motions, may be resisted by friction μ on the base of foundations and lateral passive earth pressure on the sides of the fully-integrated foundations-retaining wall system, laterally bearing, including the shear keyway, against competent firm indurated bedrock to the parameters of Figure 5.

- Allowable Lateral Soil Pressures (Equivalent Fluid Pressure)
  Passive Case: 400 pcf basis , triangular pressure ; starting atop of Bedrock support (Appendix A)
- Allowable Coefficient of Friction between concrete and soil: 0.30 (accounts for seismic degradation)

Passive pressure and base friction may be combined without reduction.
The structural engineer is to assess the overall stability the foundations in the event of a an MCE_R regional earthquake; the geo-parameters of Figure 5 may be utilized for this purpose.

Settlements
Settlement estimates are for foundations designed per the recommendations in this report. The potential static and earthquake load settlements are negligible for bearing onto firm less weathered bedrock. As settlements are negligible underneath the retaining walls footings, the geo-lateral loads of Figure 5 shall be appropriate no traction force reversal shall occur.

Backfill Behind Foundation Retaining Walls (refer to Section 5.4)
The space on the backside of structural foundation retaining walls shall be properly backfilled , no loose soil backfill. In case the space is tight , then the backfill may best consist of CalTrans Class 2 perm as expansion of the subdrain behind the retaining wall. Also, in a limited tight backfill areas away from the subdrain the aggregate filter , a CBC 22 **Sections 1803.5.9-1804.7 CLSM** may be placed so long it does not contaminate the subdrain material.

Soil backfill shall be placed to the requirements and procedures described in Section 5.4 .

Subdrainage
The backside of structural retaining walls shall be provided with engineered subdrain per Figure 6 in order to relief and avert the buildup of any hydrostatic water pressures and permit the geo-lateral loads of Figure 6 without a hydrostatic lateral pressure component.
In essence , this be a structural design load stipulation not just a matter of interception of water seeps.
Waterproofing of building foundation Retaining Walls Stems (Figure 6)

It is vital to waterproof foundation retaining walls as these walls support garage space . Both construction waterstops , to be Spec'd by the project design engineer , and waterproofing sheets are to be installed .
The waterproofing shall be Spec'd by the project architect. Typically a Bituthene grade 3000 asphalt-based blanket installed per manufacturer's Spec'd is adequate. It is critical that the Bituthene blanket seams are lapped and terminations and penetrations are effectively sealed.

It is vital that the project design engineer Specs the appropriate waterstops for the pour schedules where the floor slab , foundations and retaining walls are not poured concurrently.

5.4 GRADING AND UTILITY TRENCHES

5.4.1 GENERAL

In addition to demolition work, grading would involve preparation of building pad and subgrade. Grading work should be undertaken under the observation and with the approval of the geotechnical engineer. Placement and compaction of all structure backfills should be observed and tested by the geotechnical engineer and/or his representative. All grading work is to be performed in accordance with the attached Guide Specs for Engineered Grading , and in compliance with applicable CBC 22 Section 1804, city/county grading ordinances and Cal/OSHA.

The recommendations of this section anticipate that grading would be undertaken and completed in good weather conditions, and that work conditions would be manageable. Construction, at least in part, in wet inclement weather conditions may also be feasible .
Concerns of wet weather grading relate to the specter of direct precipitation & perched storm water in the vicinity intruding and seeping into open footing excavations. Also, from perched storm water or direct runoff onto any open exterior utility trenches. Issues would also be to control any grading compaction density & in-place moisture. Stability of open excavations in wet weather should also be assured with the guidance of the geotechnical engineer.

5.4.2 CLEARING AND GRUBBING

All soft unsuitable soils, and debris in the proposed foundation and slab areas should be removed from the site. Debris should be exported from the site. Any manmade obstructions encountered should be demolished and exported from the site.

5.4.3 SUB-EXCAVATION

Removals in all areas to receive the foundation and slab replacement should consist of sub-excavation of the upper portion of the loose ML silt and any existing Qaf-undocumented fill , unsuitable soils, and any localized demolition-loosened areas. Once the sub-excavation is accomplished , the bottom shall be proofed by the grading equipment to delineate and weed out any remaining soft areas that would require further sub-excavation and stabilization, prior to backfill and grading the building pad to design grade.

Overly-Wet or Soft Sub-Excavation Base

Where excavation bottom exposes overly wet or soft materials that “pump” or “move” under excavation or compaction equipment, the geotechnical engineer may stipulate the following procedure to stabilize such areas . The excavation bottom should be deepened an additional one to two feet. A bridging lift of 1 to 2 foot thick layer of gravel/cobbles (sized 3 to 4-inches) should be placed and compacted to obtain a working base for fill placement. Compaction equipment should pass over the gravel to see if there is still visible “pumping”, and additional gravel placed until there is no further visible pumping or undulations or, as

directed by the geotechnical engineer. A geotextile filter fabric may need to be placed over the gravel before soil fill placement, as directed by the geotechnical engineer in the field.

5.4.4 BUILDING PAD (CBC 22 Sections 1803.5.8 & 1804.6)

Where foundations and slabs-on-ground are constructed , at or above the existing grade and along with any areas needing demolition / removal work, should be sub-excavated a minimum of 12 inches (Section 5.3.3) scarified some 6" to 8" then re-compacted to 90% relative compaction (RC) specification for clayey soils and 93% (onsite) to 95% for sand -silt mixtures. Soft conditions over wet excavation bottoms to be treated in Section 5.4.3.

Where import fill is to be placed and compacted, the excavation is to proceed per plans to accommodate the required fill placement.

5.4.5 SLOPED EXCAVATION

This applies in case there are un-shored open excavations .
The onsite soils and following the sub-excavation and re compaction per Section 5.4.3, would stand , in good weather on vertical cut down to 3-5 ft then, a slope pitch of 0.5:1 (H:V) . These requirements may be updated by the geotechnical engineering inspections of the grading work.
These guidelines assume grading will be undertaken in good weather. Grading in wet weather shall employ provisions to avert silt tracking onto public streets, erosion and silt control as well as runoff collection, control and disposal. Grading in wet weather will certainly entail further geotechnical guidance as well as regulatory permitting.

5.4.6 SHRINKAGE FACTOR OF COMPACTED FILL

For estimating earthwork quantities, a mechanical compaction volumetric shrinkage factor of 10% may be assumed for the existing on-site suitable weathered bedrock to be re used as fill compacted to Relative Compaction. Relative compaction is based on the in-situ soil dry density ratio to the maximum dry density determined in accordance with ASTM D1557 standard.
For excavated to be hauled away soils, the volumetric expansion (swell) factor shall be taken as 20 % to 25%.

5.4.7 FILL MATERIALS

Any soils to be placed as fill, whether native or imported should be reviewed & pre-approved by the geotechnical engineer or his representative, in writing, before their placement. Any earth material for engineered fill should be free from vegetation, organic material, and debris or rocks greater than three inches in longest dimension. Import soil should have a non to only slightly expansive and a corrosivity potential no greater than the existing near surface soils on the site. Any select import placement would need to be reviewed/pre-approved by the geotechnical engineer for suitability & in order to avoid transition of uplift across the building pads.

5.4.8 FILL PLACEMENT AND COMPACTION

(CBC 22 Sections 1803.5.8 & 1804.6-Guide Specs)

Fillslopes should be engineered and keyed in secure into indurated bedrock.
Proper compaction of all fill materials placed is the responsibility of the contractor. Suitable fill soil should be placed in horizontal lifts and uniformly watered or aerated to obtain at least optimum moisture content. Each layer should be spread evenly and should be thoroughly mixed during the spreading to provide uniformity of soil and moisture in each layer. The thickness of lift before compaction should not exceed that required for proper compaction of the entire lift, but should not exceed eight (8) inches for tractor drawn or self- propelled compaction equipment, or four (4) inches for hand operated jumping jack wackers. After

each lift has been placed, it should be compacted thoroughly and uniformly to a minimum Relative Compaction (RC%) of 90 % for clays,93% for silts ML and 95% for sands and baserock, based on ASTM Standards D1557.

Backfill and Fill

If onsite soil is to be used for backfill, mechanical compacting methods will be necessary to obtain a Relative Compaction of at least RC 93%. In this case the bulk mechanical shrinkage factor shall be ~ 10% to 12%, from the in-place before excavation to the compacted state.

Materials imported, or generated from foundation trench excavations and other activity and where intended to be stockpiled for later use for backfill, shall not be stockpiled in a way to adversely impact the site , obstruct runoff or drainage pattern or wash out. The contractor shall place adequate signage, silt fencing, fiber rolls, silt transport prevention measures and tarping w/ sand bags as needed.

5.4.9 OBSERVATION AND TESTING OF FILL PLACEMENT

The geotechnical engineer or his representative should observe the excavation of the designated portions of the old fill and re compaction and should take sufficient tests to verify the moisture content and the uniformity and degree of compaction obtained. This is to be in accordance of the special inspection requirements of CBC 22 Section 1705.6 Table , Items # 3 & # 4. In-place dry density testing should be by, the nuclear gauge method per ASTM D2922 and ASTM D3017, In-place density core samples per ASTM D2937, or other equivalent testing method(s) acceptable to the local building authority. The optimum moisture content and maximum dry density for compacted soils should be determined in accordance with ASTM D1557 procedures.

5.4.10 UTILITY TRENCHES BACKFILL

Trench excavations for utility lines that extend under building (would require specific planning and engineering approval) and paved areas ,or are within the zone of influence of adjacent foundations should be properly backfilled and compacted in accordance with the following recommendations. In addition, reference is made to the “Adjacent Foundations” Section 5.1 of these recommendations.

Excavations for such utility trenches shall be properly shored to remain stable and also rigid not to yield & deflect and result in ground movements and impacts to adjoining structures , streets and improvements ; refer to the attached guide Specs.

The pipe should be bedded and backfilled with clean sand or approved granular soil to a depth of at least one foot over the pipe. This backfill should be uniformly watered and compacted to a firm condition.

The remainder of the backfill should be on-site soil or very low to low expansive import soil, which should be placed in loose lifts not exceeding eight inches in thickness, watered or aerated to optimum moisture content, and uniformly compacted to a minimum relative compaction RC of 90% for clayey fills and 95% for sandy/granular fills; based on ASTM Standards D2922-D2937/D1557. Water jetting of the backfill is not allowed. Utility backfills in the public right-of-way ROW should meet compaction specifications of the City/County Public Works Department.

5.4.11 Wet Weather

Wet weather construction shall be feasible as the bulk of the work is interior underneath the building footprint. Some perched storm runoff may occur in the vicinity of the building footprint.
The contractor is to undertake appropriate measures to avert storm water seeping ponding in open footing excavations areas and open utility trenches, protection of freshly graded tested & approved pad and graded areas .

Erosion-control measures of hay bales, durable silt fences, fiber-rolls along with tap placement & sand bags are typical undertakings. Also, dirt tracking onto public streets is not allowed .
Again, wet weather construction would involve regulatory permitting as well as additional specific geotechnical engineering guidelines.

5.5 GEO EARTHQUAKE CONSIDERATIONS (Ground Motion Appendix)

Earthquake geotechnical aspects are generally:

- Ground-surface fault rupture,
- Ground performance
- Ground motion,

Besides the structural engineering aspects.
The geotechnical aspects are reviewed in the following:

Earthquake Fault Zones-Surface fault Rupture
The site is not traversed by any known active fault, is outside the Alquist-Priolo Earthquake Fault Zones, and is therefore, not subject to primary seismic geologic hazards of surface-fault rupture.
The site is ~30+ miles from nearest regional Earthquake Fault System.
For compliance with the California Building Code CBC 2022, refer to the attached Ground Motion Appendix GM.

The purpose of the earthquake provisions presented in the California Building Code is primarily to safeguard against major structural failures, collapse, and loss of life, not to limit damage or maintain function, except for essential facilities; Seismic Risk Category IV. Based on that purpose, the subject development may be designed in accordance with the seismic formulas and requirements presented in the current version of the California Building Code, Seismic Occupancy Risk Category II.

Ground Performance
The site is a predominantly a bedrock site.
The site maps outside the State CGS Regulatory Earthquake Hazard Special Studies Zones .
For due diligence, this geotechnical work involved review of the site - specific geo boring logs & established performance criteria. No liquefaction-prone materials were found, and therefore, earthquake-induced liquefaction type hazards shall not be a concern for this project.
Site and surroundings involve no mapped landsliding or blue-zone earthquake mapping and therefore, hillside setting stability is irrelevant.

Ground Motion
Considering regional geologic factors and earthquake faults, moderately strong ground shaking should be anticipated throughout the service lifetime of the project. This is mostly a regional and vicinity exposure condition. earthquake-induced ground motion should obviously be anticipated. Much of the motion exposure would likely be the result of the regional Fault Systems, which is anticipated to generate a PGA of on the order of ~0.35 g, in the event of an earthquake with a moment magnitude of $M_{CER\ of}$ 7 or so. Soft soils that could amplify far field events (Cypress Freeway East Bay , Loma Prieta 1989) are NOT present at this site.
Site class is B to B-C designated based on the geo parameters from the site-specific investigation per CBC 22 Sec 1613.3. Refer to the attached Ground Motion Appendix GM.

5.6 DRAINAGE
(Figure 6 & Guide Specs)

All roof spouts shall be hooked up and piped to approved outlet.

The finished site drainage in unpaved areas should include a minimum positive gradient of 5% away from the structure for a minimum distance of 5 to 10 feet, in a non-erosive manner. Drainage over paved surfaces should have a positive flow gradient @ min 2 % .
CBC 22 Sec 1804.4; Sec 1808.7.4.

Perimeter Subdrain (CBC 22 -1805.4.2; Optional):
It is recommended to install a subdrain laid out to surround the entire mat slab turned-down footing; placed at the base of the footing .
The subdrain would relief hydrostatic perched groundwater pressures onto the footing , and prevent soggy subgrade. The subdrain may discharge into a collector non perf solid outlet pipe to Sunnyslope Ave below.

All roofs and canopies should be provided with eave gutters and down spouts that lead into non-perforated (solid) pipes that should be collected in drainage devices. All drainage devices should conduct drainage in an engineered non-erosive manner (the surface sands/silts are erodible) to an approved point of discharge off the site, e.g. to the storm drain or street curb-line, as permitted. All drainage off the property should be accomplished in an approved manner to prevent erosion or instability.
Storm water management , as stipulated by the agencies having jurisdiction and project permitting requirements should also be guided by any stipulated SWPPP.

5.7 PLANS AND CONSTRUCTION SPECIAL INSPECTIONS & TESTING

Plans and construction shall be prepared by a qualified licensed design professionals , licensed engineers and contractors . The assessment of this report should be a planning consideration and be embedded in the construction of this project. Plans and construction should be undertaken with geotechnical engineering consultations as needed . If required by plancheck, foundations and subgrade re compaction plans shall be reviewed by the geotechnical consultant for pertinent aspects of the project construction .

Construction of geotechnical pertinent aspects of the project shall also be as permitted and required by CBC 22 Section 1705.6 ; if so required by permit, then foundation trenches should be inspected by the geotechnical engineer. Footing foundation trenches shall be inspected to confirm bearing & depth of embedment. The subgrade grading is to confirm that the pad proof compaction is properly undertaken.

NOTICE

The conclusions and opinions in this report are based on the test borings that were made on the site, spaced as shown on the Site Plan, Figure 1A. While in our opinion these borings adequately disclose the soil conditions across the site, the possibility exists that anomalies or changes in the soil conditions that were not discovered by this investigation could occur between borings. Should such items be discovered during construction, our office should be notified immediately that any necessary supplemental recommendations can be made.

This study was not intended to disclose the locations of any existing utilities, septic tanks, leaching field or other buried structures. The contractor or other people working on the project should locate these items, if any.

Unless otherwise stated, the contract for this report excluded evaluation of corrosion potential of the soil, the presence of sulfates or chlorides in the soil, and other chemical substances that could impact utilities or structural concrete.

This report was prepared to provide engineering opinions and recommendations only. It should not be construed to be any type of guarantee or insurance.

REFERENCES

University of California ,U.S Department of agriculture , Amador County ,"Agricultural Extension Service , Soils of Amador County"

Bowles, Joseph E.: Foundation Analysis and Design" McGraw-Hill Book Company

Bowles, Joseph E.: "Physical and Geotechnical Properties of Soils" McGraw-Hill Book Company.

Duncan J.M. and A.L. Buchignani June 1976, An Engineering Manual for Settlements Studies, Department of Civil Engineering, Institute of Transportation and Traffic Engineering, University of California, Berkeley.

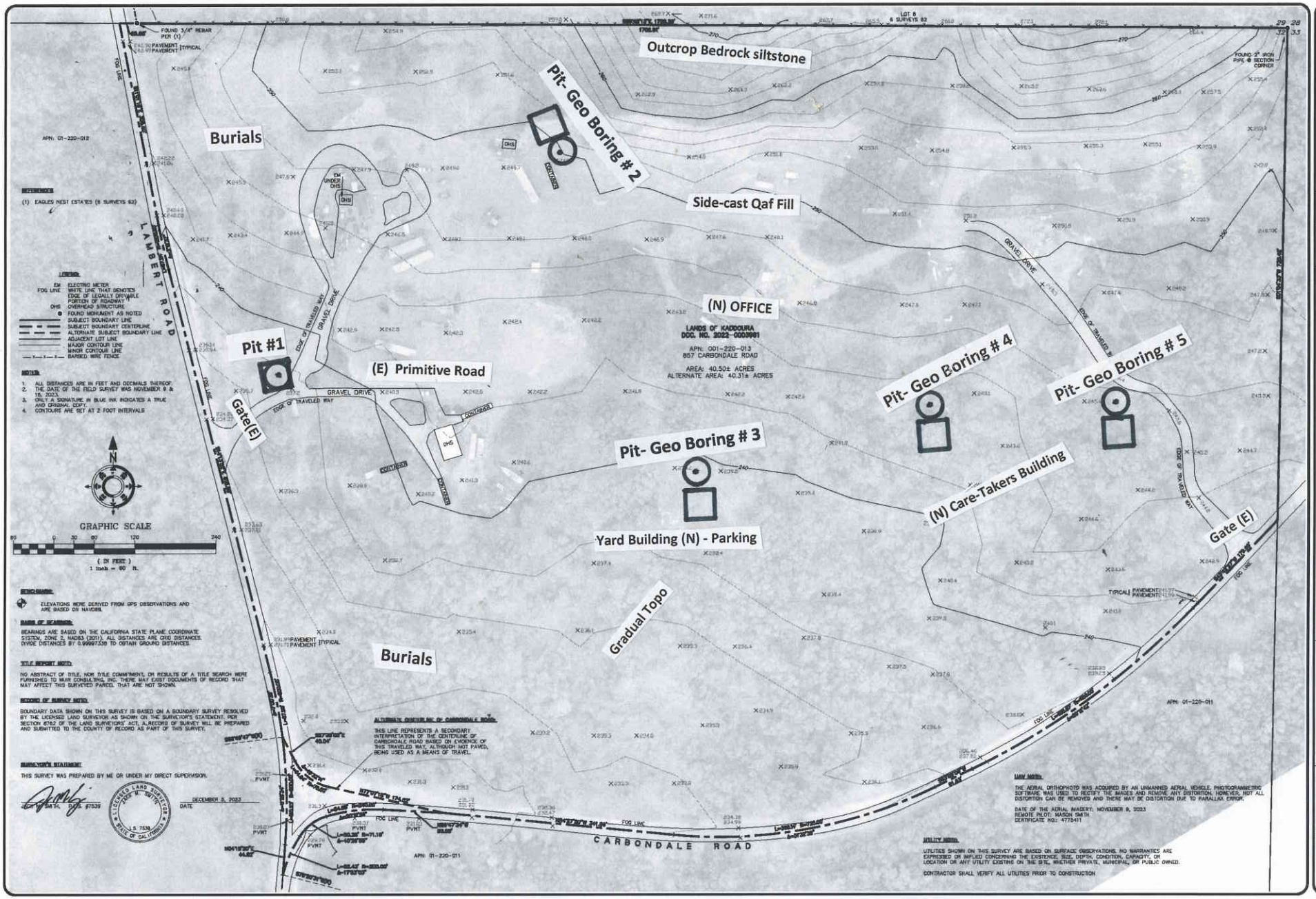
Kovacs W. D, Salomone, L.A. and Yokel F. Y. (November 1983), "Comparison of Energy Measurements in the Standard Penetration Test Using the Cathead and Rope Method." National Bureau of Standard Report to the U.S. Nuclear Regulatory Commission.

Marcuson, W.F. III, and Bieganousky W.A., Laboratory Standards Penetration Tests on fine Sands," Journal of Geotechnical Engineering Division, ASCS, Vol. 100, No. GT6, June, 1976, pp. 656-588

Special Publication 117A (2008) ," Guidelines for Evaluating and Mitigating Seismic Hazards in California" , Division of Mines and Geology, CGS.

"USGS Type Region of The Ione Formation, (Eocene) Central California, Stratigraphy , Paleogeography and relation to Auriferous Gravels" By Scott Creely and Eric R. Force , Open File Report 2006- 1378,2007.

To Hwy 16



MUIR CONSULTING
170 CHURCH AVENUE
OAKDALE, CA 95361
(209) 845-9630
SURVEY • GIS • GPS • UAV
www.muirconsulting.com

TOPOGRAPHIC SURVEY
OF
THE LANDS OF KADDOURA
AMADOR CALIFORNIA

REVISIONS	JOB NUMBER 7552-01	
	DRAWN BY	DRAWING NAME
	PLD	7552-01TOPO.dwg
	CHECKED BY	SHEET NO.
	JMS	1 OF 1
	12/05/2023	

IONE

SITE PLAN **Gardens of Noor Cemetery # 16630 Lambert Road, Amador County , CA**

APN 001-220-013

HALLENBECK/ALLWEST

FIGURE 1A

150

Project 7745 GP

To Hwy 16

7552-01_transparent_mosaic_group1.tif - Windows Photo Viewer

File Print E-mail Burn Open



1B

Aerial Plot ....

Type here to search

Wat...

1:55 AM
12/10/2023

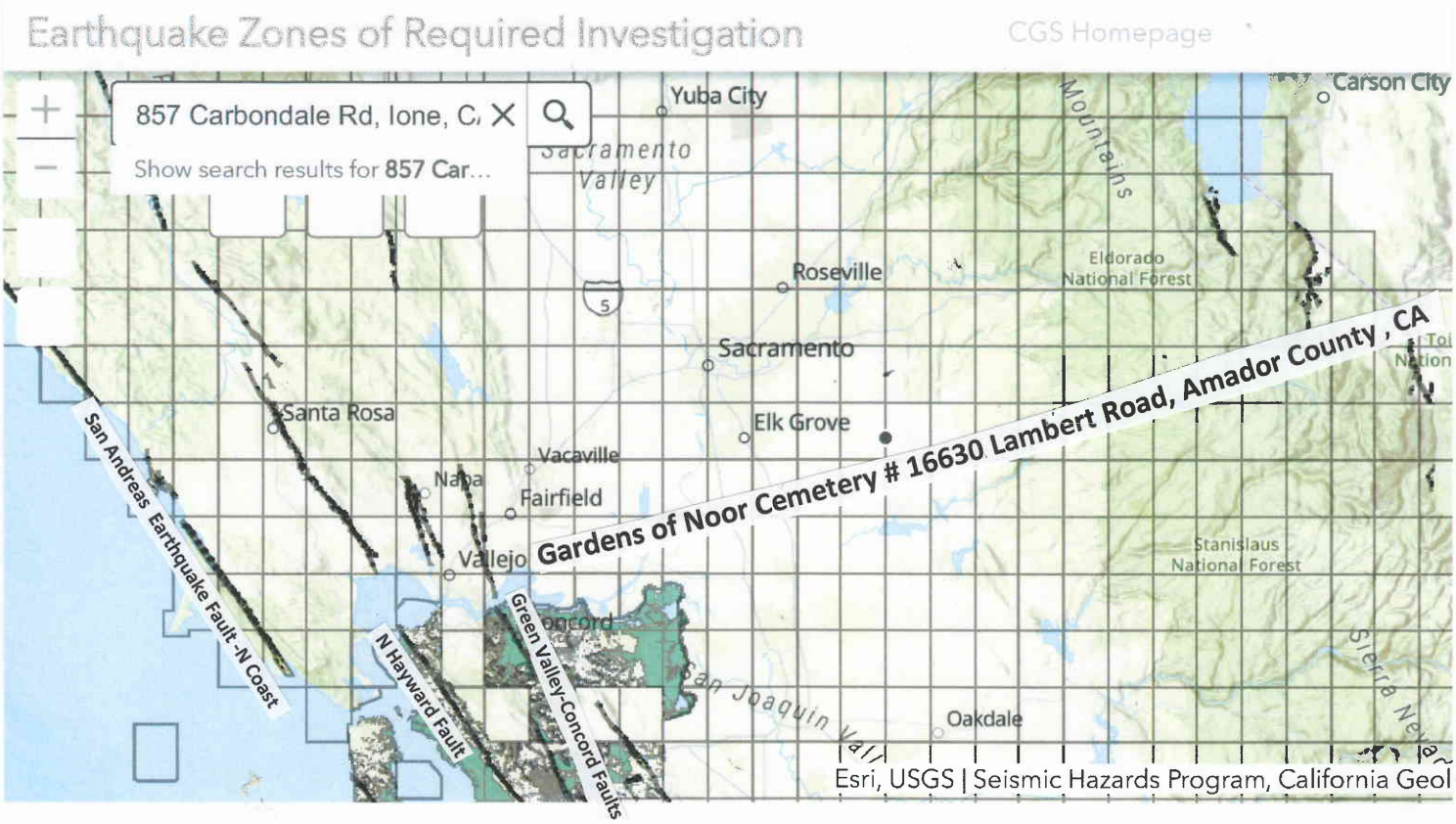
Gardens of Noor Cemetery # 16630 Lambert Road, Amador County , CA

APN 001-220-013

FIGURE 1B

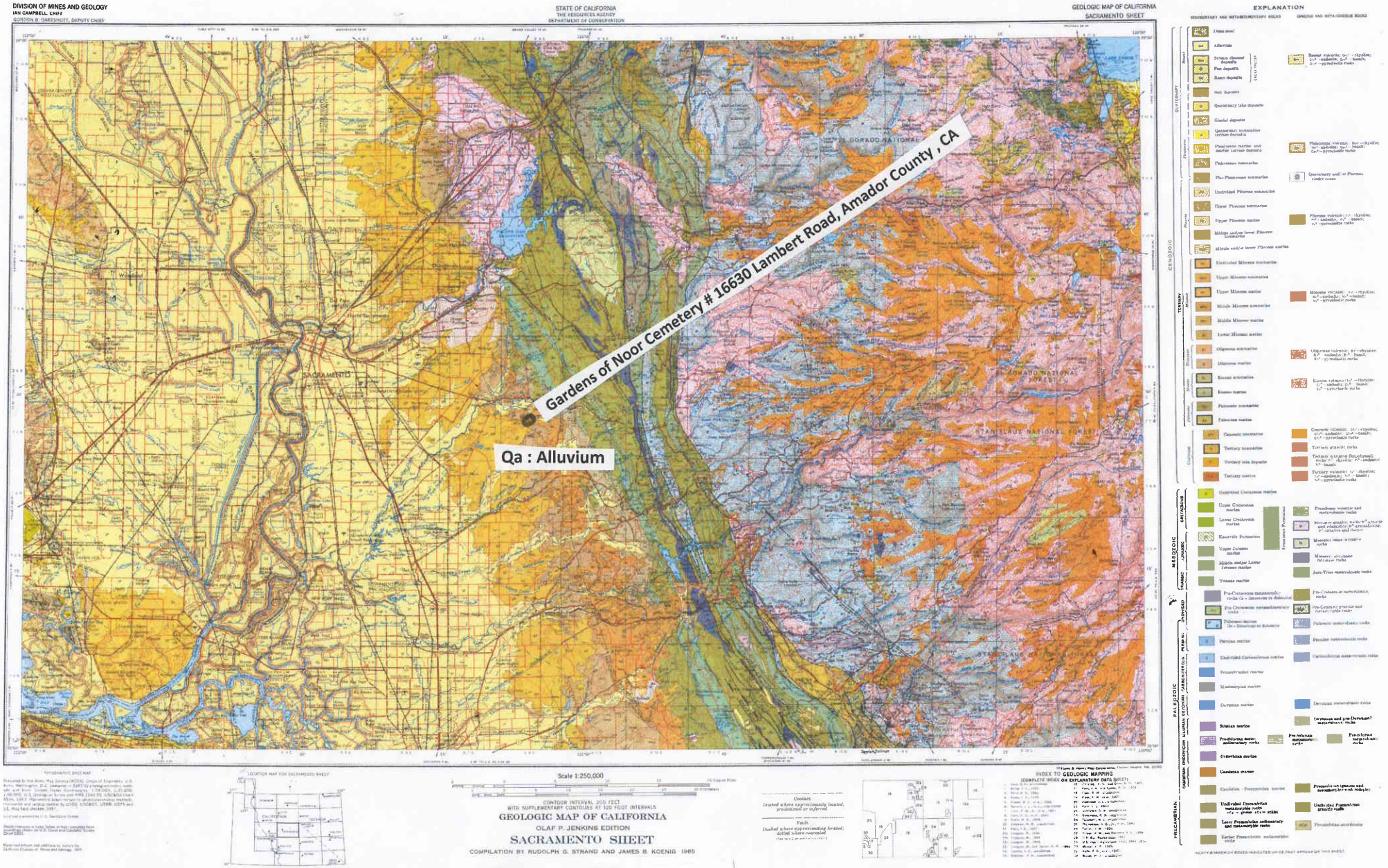
Project 7745 GP

HALLENBECK/ALLWEST



STATE CGS EQ ZAPP

FIGURE 2



REGIONAL GEOLOGY MAP

APN 001-220-013

FIGURE 3

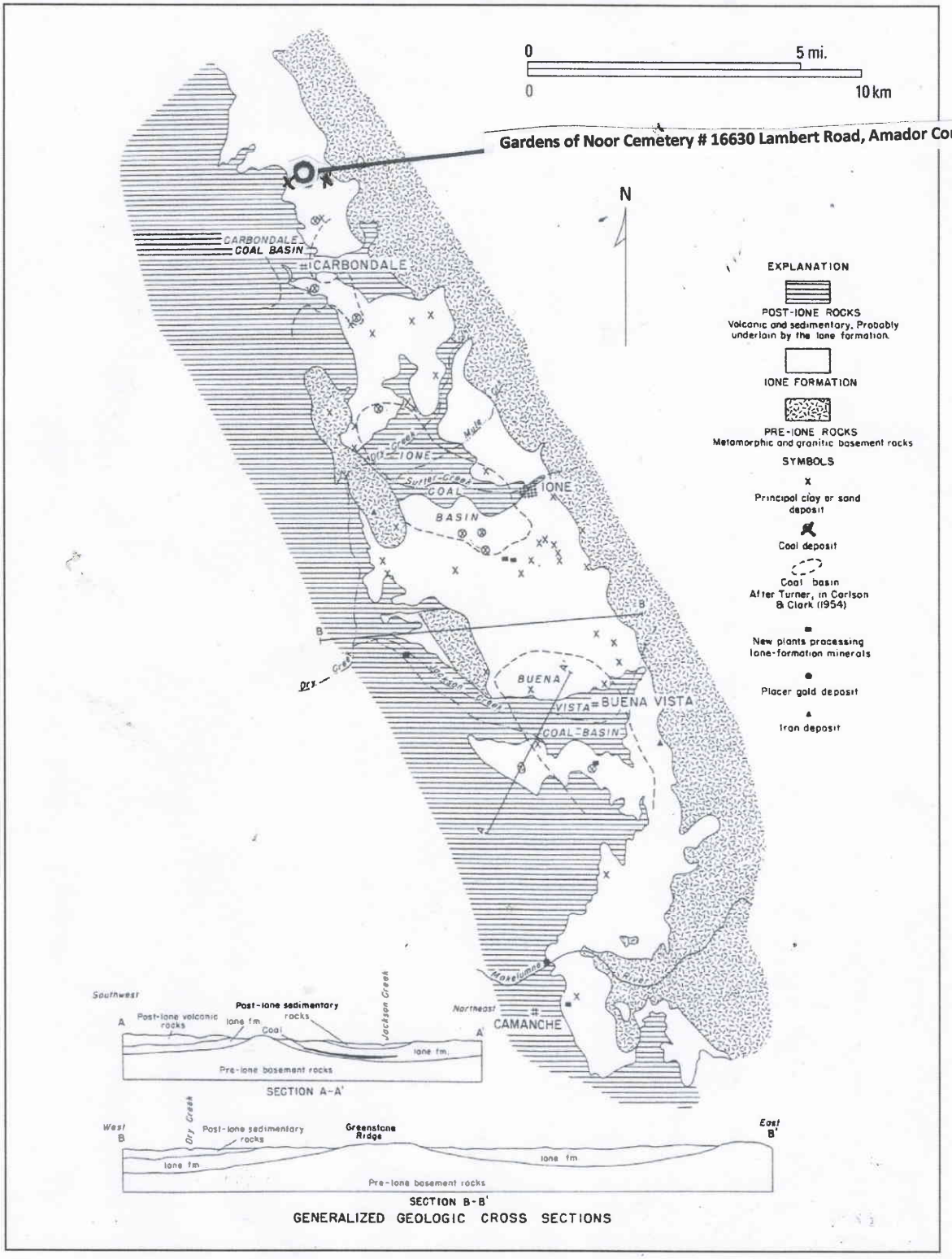


Figure 3. Mineral deposits of the type area of the Ione Formation in relation to geology, from Piper and others (1939).

MINERAL DEPOSITS-IONE...AMADOR COUNTY , CA

APN 001-220-013

Project 7745 GP

4

FIGURE 154

Recommendations Schematically Depicted

Gardens of Noor Cemetery # 16630 Lambert Road, Amador County , CA

Install a V-Ditch-Gutter to intercept upslope runoff.....

Earthquake Inertia 10 pcf Inverted Triangle

N/A to walls 6 ft & less -Retained height

N/A to walls 6 ft & under 6 ft CBC 22 -1803.5.12-#1

RW H= 5ft bgs

Q lep

45 pcf Site Retaining Wall

55 pcf Building Foundation Retaining wall

400 pcf bedrock passive support-allowable

400 psf bedrock shaft-surface friction allowable

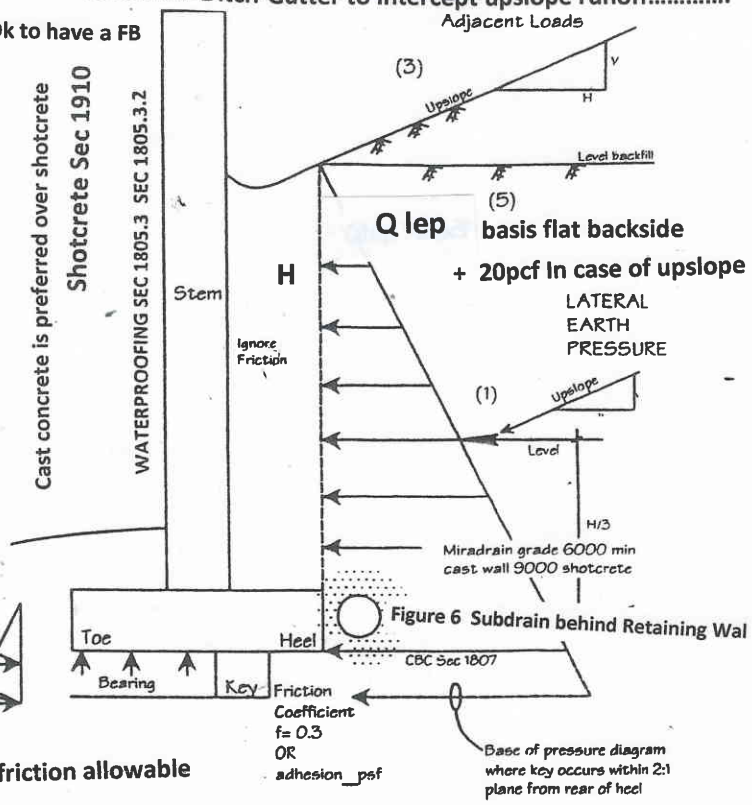


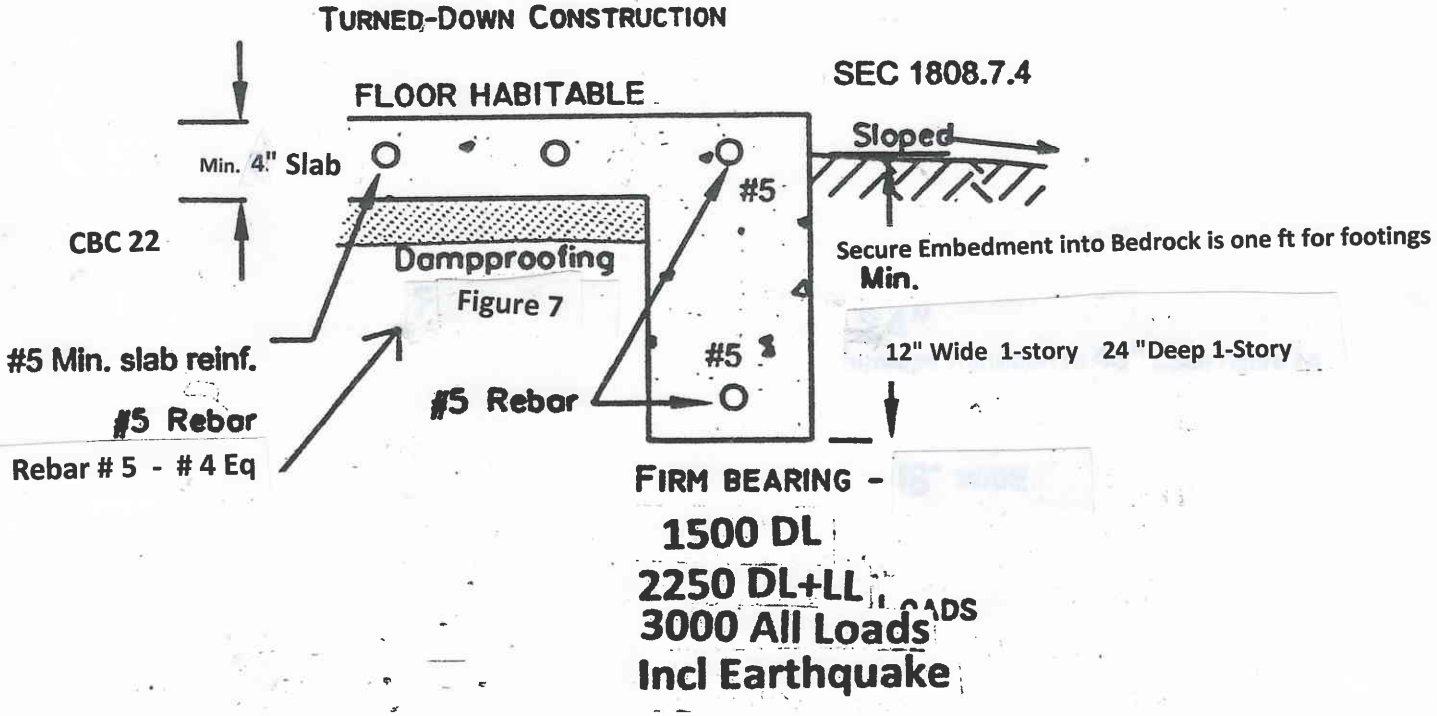
Figure 6 Subdrain behind Retaining Wal

friction coeff. μ ~ 0.3 bedrock-neglect Qaf

(N) Retaining Wall Footing Embedment depends on H-ft See Table Section 5.1

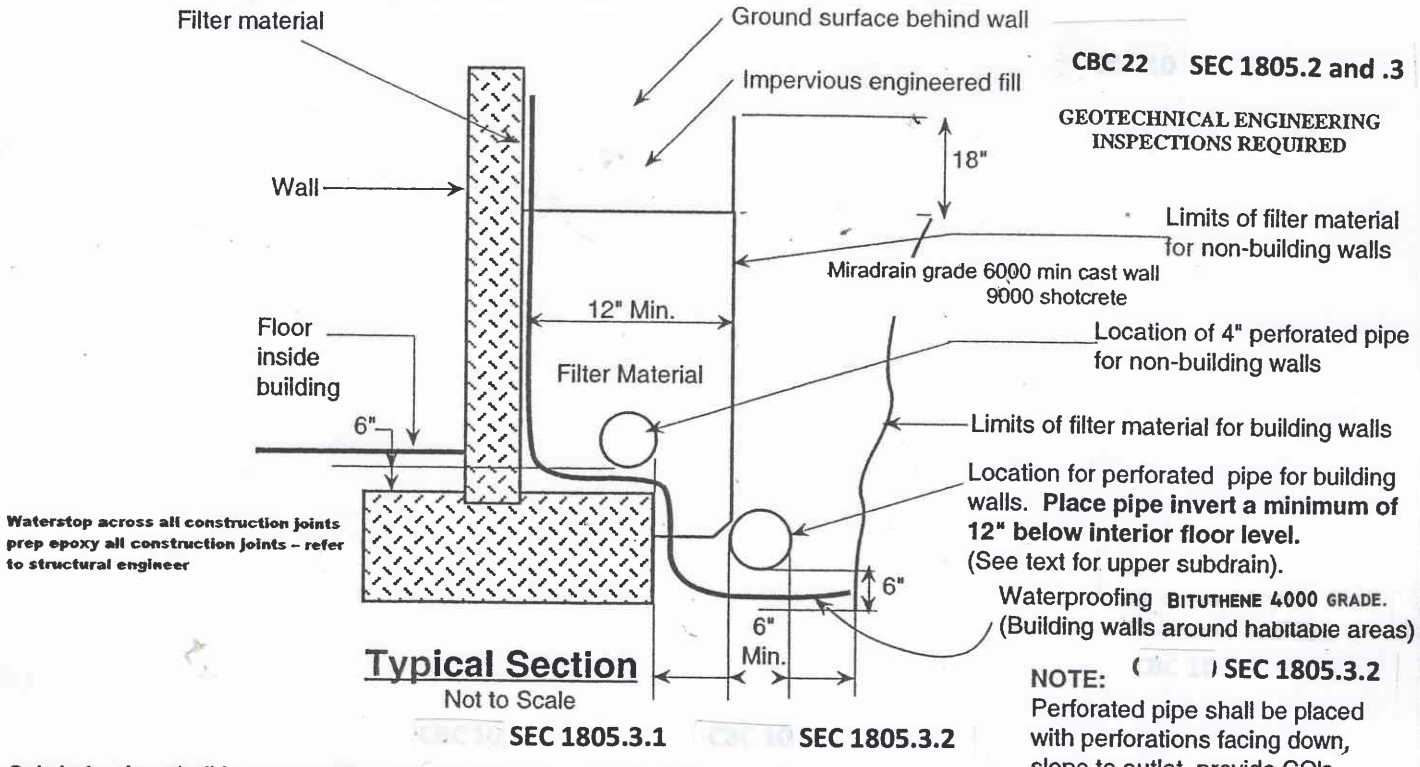
FRAMED WOOD FLOOR OR OPTION SLAB ON GROUND

Final per structural design and Geotechnical Special Inspections CBC 22 -1705.6



GUIDE SPECIFICATIONS FOR SUBDRAINS BEHIND RETAINING WALLS

Gardens of Noor Cemetery # 16630 Lambert Road, Amador County, CA



CBC 22 SEC 1805.2 and .3

GEOTECHNICAL ENGINEERING INSPECTIONS REQUIRED

SEC 1805.3.1 SEC 1805.3.2

NOTE: ( ) SEC 1805.3.2
Perforated pipe shall be placed with perforations facing down, slope to outlet, provide CO's

Subdrain pipe shall be manufactured in accordance with the following requirements:

a. Acrylonitrile-butadiene-styrene (ABS) plastic pipe shall conform to the specifications for ABS plastic pipe given in ASTM Designation D2282 and ASTM Designation D2751. ABS pipe shall have a minimum pipe stiffness of 45 psi at 5% deflection when measured in accordance with ASTM Method D2412.

b. Perforated clay pipe shall conform to the specifications for extra-strength perforated clay pipe of AASHTO Designation M-65.

c. Polyvinylchloride (PVC) pipe shall conform to AASHTO Designation M278. PVC pipe shall have a minimum pipe stiffness of 50 PSI at 5% deflection and impact strength of at least 50-feet (bf when measured in accordance with ASTM Method D2412. Pipes conforming to ASTM Designations D3034, F758, F810 (backfill less than 10-feet); Schedule 40 PVC, or equivalent shall be suitable. Also, corrugated HDPE pipes (smooth interior) that meet the stiffness and impact criteria.

Filter Material

Filter material for use in backfilling trenches around and over subdrains and behind retaining walls shall consist of clean coarse sand and gravel or crushed stone conforming to the following requirements:

Sieve Size	% Passing Sieve
2"	100
3/4"	70 to 100
3/8"	40 to 100
#4	25 to 50
#8	15 to 45
#30	5 to 25
#50	0 to 20
#200	0 to 3

CRITICAL : PLACE SUBDRAIN PIPE ONTO DISH LAYOUT

....THE HORIZONTAL PIECE OF THE DRAIN BLANKET SHOULD BE DIPPED TO THE PIPE TO FORCE COLLECTED RUNOFF INTO THE SUBDRAIN PIPE..PIPE MUST SLOPE PROPERLY /UNIFORMLY TO OUTLET

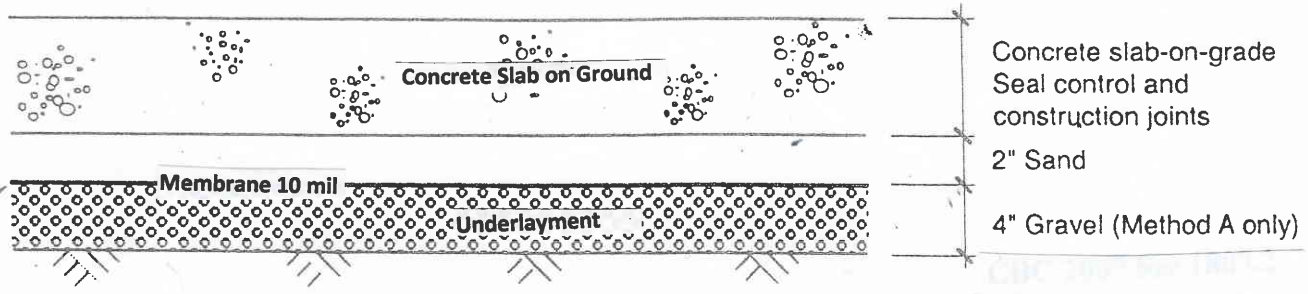
* Class 2 "Permeable Material" conforming to the State of California Department of Transportation Standard Specifications, latest edition, Section 68-1.025 shall be suitable.
* Clean, coarse gravel ("drainrock") shall be suitable, provided the subsurface drain is wrapped in an acceptable geotextile ("filter fabric").
* Miradrain 6200 drain blanket or approved equivalent is suitable in lieu of aggregate filter.
* Moistureproofing for building walls in habitable areas should be considered by the architect.

Gardens of Noor Cemetery # 16630 Lambert Road, Amador County , CA

DAMPPROOFING-WATERPROOFING-SLAB-ON-GRADE FLOORS

(Methods A and B)

DAMPROOFING CBC 22 Sec 1805.2 WATERPROOFING SEC 1805.3 SEC 1805.3.2



Methods A/B - membrane (durable upgraded for waterproofing - see spec below). Seal off edge of membrane; also, seal off around utility openings. Overlap and tape splices

I. MATERIAL:

The mineral aggregate for use under floor slabs shall consist of clean, **ROUNDED**, gravel – and sand. The aggregate shall be free from clay, vegetable matter, loam, volcanic tuff, and other deleterious substances.

II. GRADATION:

The mineral aggregate shall be of such size that the percentage composition by dry weight, as determined by laboratory sieve analysis (U.S. Series), will conform to the following gradation.

	PERCENT PASSING	
SIEVE SIZE	GRAVEL	SAND
1"	100	---
3/4"	90-100	---
No. 4	0-5	100
No. 50	0	0-30

Method A

1. The moistureproof membrane should be adequately thick so that it will not be easily damaged during construction. A minimum of 10-mil durable membrane shall be considered. It should be adequately detailed so that there are little or no openings around plumbing and conduit points and near foundations. The membrane sheets should be adequately lapped/taped.
2. The sand covering is not a part of the moistureproofing treatment. It is a normally used optional component that lends some protection to the membrane and also aids in curing the concrete.
3. Provisions of UBC Appendix Chapter 18 shall be considered.

Method B

The gravel may be eliminated where an upgraded, durable HDPE membrane is utilized. Suitable membrane grades are: Permalon X210; Griffolyn T-55 through T-105, as approved for under-slab applications; or equivalent. The membrane must be installed by manufacturers recommendations. Installation of membrane should be inspected/repaired, prior to concrete pour.

The sand may also be eliminated, provided that a second membrane is provided and concrete is properly cured. The second membrane should be Griffolyn T55 or equivalent.

WATERPROOFING: Membranes Paraseal, Miradri, Miraclay, Voltex, or equivalent.

APPENDIX A GEO-EXPLORATION PITS - BORINGS

Excavated Geo-Exploratory Pits...Logged by GE Engineer

Geo-Borings made at & from base of Pits

Core Samples and Classifications were taken CBC 22 Section 1803.5.1

Penetration SPTs were recorded ASTM D 1586

Plasticity Classification Chart per ASTM D 4318 is attached

Typical Pictures attached

PROJECT: Gardens of Noor Cemetery # 16630 Lambert Road, Amador County , CA

Geo-Exploratory Pit # 1

BORING SUPERVISOR: Brett

TYPE OF BORING: CAT Backhoe- Auger

DATE OF BORING: May 2024

HAMMER WEIGHT/DROP: TYPE:

SURFACE ELEVATION: Topo

GROUNDWATER DEPTH: GW

DESCRIPTION OF MATERIALS	DEPTH IN FT.	SAMPLE	SAMPLE NUMBER-SAMPLE DIAMETER	DRIVING RESISTANCE BLOWS PER FT. (SPT)	DRY DENSITY P.C.F.	MOISTURE CONTENT %	UNCONFINED-COMPRESSION STRENGTH P.S.F.	OTHER TESTS (Field, Lab)
Reddish Brown SILT ML Loose to M. Stiff to Stiff	1							
SILSTONE BEDROCK top weathered Tan Olive with streaks of very sandy white siltstone	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							

Exploratory Pit

SEE PICTURE # 1

Termination

CBC 16 Section 1803.5.1 ASTM D 2487

Project 7745 GP

HALLENBECK & ASSOCIATES

FIGURE 1A

Geo- Boring # 2 & Geo-Exploratory Pit Combo

PROJECT: Gardens of Noor Cemetery # 16630 Lambert Road, Amador County , CA

BORING NO.

BORING SUPERVISOR: Brett-Julio

TYPE OF BORING: CAT Backhoe- Auger

DATE OF BORING: May 2024

HAMMER WEIGHT/DROP: 70#/30" FF

TYPE:

SURFACE ELEVATION: Topo 250

GROUNDWATER DEPTH: GW

DEPTH IN FT.	SAMPLE	SAMPLE NUMBER-SAMPLE DIAMETER	DRIVING RESISTANCE BLOWS PER FT. (SPT)	DRY DENSITY P.C.F.	MOISTURE CONTENT %	UNCONFINED-COMPRESSION STRENGTH P.S.F.	OTHER TESTS (Field, Lab)	DESCRIPTION OF MATERIALS
1								Reddish Brown SILT ML
								M. Stiff to Stiff turns yellow
2		1--2"	88 (60) spt	106 pf	15%	Su> 4500 psf		Sandy SILTSTONE
3								top one ft weathered
4								sandy Tan/yellow /Grey
5								Seep through bedrock fractures
6								Indurated
7								
8								
9								
10								
11								
12								

Exploratory Pit

SEE PICTURE # 2

Seeps Groundwater

Termination

SPT Conversion:

Multiply field blow counts

by 0.65 to get

Nspt ASTM D1586

US Bureau of Stds, Kovacs et al 1983

CBC 22 Section 1803.5.1 ASTM D 2487

Project 7745 GP

HALLENBECK & ASSOCIATES

FIGURE 2A 12

Geo- Boring # 3 & Geo-Exploratory Pit Combo

PROJECT: Gardens of Noor Cemetery # 16630 Lambert Road, Amador County , CA

BORING NO.

BORING SUPERVISOR: Brett-Julio

TYPE OF BORING: CAT Backhoe- Auger

DATE OF BORING: May 2024

HAMMER WEIGHT/DROP: 70#/30" FF

TYPE:

SURFACE ELEVATION: Topo 238

GROUNDWATER DEPTH: GW

DESCRIPTION OF MATERIALS	DEPTH IN FT.	SAMPLE	SAMPLE NUMBER-SAMPLE DIAMETER	DRIVING RESISTANCE BLOWS PER FT. (SPT)	DRY DENSITY P.C.F.	MOISTURE CONTENT %	UNCONFINED-COMPRESSION STRENGTH P.S.F.	OTHER TESTS (Field, Lab)
Loose to M. Stiff Reddish Brown SILT ML non PI	1 2		1--2"	21(14)spt	101 pf	17%		
weathered Sandy Tan Sandy SILTSTONE Seeps through fractures Seep Pond Very Hard Indurated Seeps Groundwater	3 4 5 6 7							
Termination SPT Conversion: Multiply field blow counts by 0.65 to get Nspt ASTM D1586 US Bureau of Stds, Kovacs et al 1983	8 9 10 11 12 13 14 15							

SEE PICTURE #3 Exploratory Pit

CBC 22 Section 1803.5.1 ASTM D 2487

Project 7745 GP

HALLENBECK & ASSOCIATES

FIGURE 3A

Geo- Boring # 4 & Geo-Exploratory Pit Combo

PROJECT: Gardens of Noor Cemetery # 16630 Lambert Road, Amador County , CA

BORING NO.

BORING SUPERVISOR: Brett-Julio

TYPE OF BORING: CAT Backhoe- Auger

DATE OF BORING: May 2024

HAMMER WEIGHT/DROP: 70#/30" FF
TYPE:

SURFACE ELEVATION: Topo 242

GROUNDWATER DEPTH: GW

CBC 22 Section 1803.5.1 ASTM D 2487

DESCRIPTION OF MATERIALS	DEPTH IN FT.	SAMPLE	SAMPLE NUMBER-SAMPLE DIAMETER	DRIVING RESISTANCE BLOWS PER FT. (SPT)	DRY DENSITY P.C.F.	MOISTURE CONTENT %	UNCONFINED-COMPRESSION STRENGTH P.S.F.	OTHER TESTS (Field, Lab)
M. Stiff to Stiff Reddish Brown SILT ML non PI-Not Expansive	1 2		1--2"	60 (40) spt	103 pf	17%	Su> 4500 psf	
Sandy SILTSTONE Reddish Brown & Grey white fine grained coherent friable	3 4 5 6 7 8							
Groundwater GW Seeps hard Tan Yellow persistent GW Seeps Seep through bedrock fractures Very Hard Indurated	9 10 11 12							
20 ft Termination								

SEE PICTURE # 4 Exploratory Pit

Termination

SPT Conversion:

Multiply field blow counts

by 0.65 to get

Nspt ASTM D1586

US Bureau of Stds, Kovacs et al 1983

Project 7945 GP

HALLENBECK & ASSOCIATES

FIGURE 4A

PROJECT: Geo- Boring # 5 & Geo-Exploratory Pit Combo

Gardens of Noor Cemetery # 16630 Lambert Road, Amador County , CA

BORING NO.

BORING SUPERVISOR: Brett-Julio

TYPE OF BORING: CAT Backhoe- Auger

DATE OF BORING: May 2024

HAMMER WEIGHT/DROP: 70#/30" FF
TYPE:

SURFACE ELEVATION: Topo 238

GROUNDWATER DEPTH: GW

DEPTH IN FT.	SAMPLE	SAMPLE NUMBER-SAMPLE DIAMETER	DRIVING RESISTANCE BLOWS PER FT. (SPT)	DRY DENSITY P.C.F.	MOISTURE CONTENT %	UNCONFINED-COMPRESSION STRENGTH P.S.F.	OTHER TESTS (Field, Lab)	DESCRIPTION OF MATERIALS
1								M. Stiff Reddish Brown SILT ML
2		1--2"	40(27)spt	114pf	18%			Siltstone BEDROCK weathered
3								Highly weathered Siltstone
4								Sandy Tan
5								Reddish Sandy SILTSTONE
6								Grey White Streaks
7								Yellowish
8								Wet
9								Seeps through fractures Seep Pond
10								Very Hard Indurated
11								
12								
13								Hard
14								Indurated
17								17 ft Termination

Seeps GW preched through fractures

SEE PICTURE # 5 Exploratory Pit

Termination

SPT Conversion:

Multiply field blow counts by 0.65 to get Nspt ASTM D1586

US Bureau of Stds, Kovacs et al 1983

CBC 22 Section 1803.5.1 ASTM D 2487

Project 7745 GP

HALLENBECK & ASSOCIATES

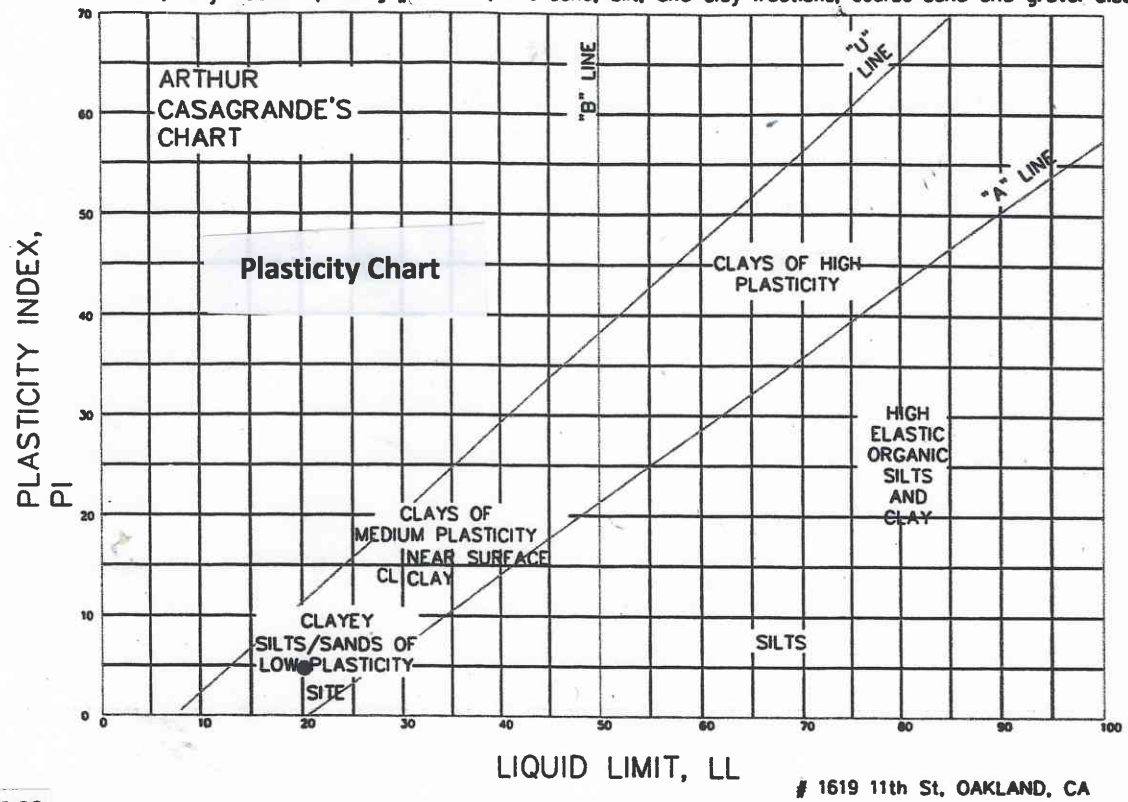
FIGURE 5A

Gardens of Noor Cemetery # 16630 Lambert Road, Amador County , CA

PLASTICITY CLASSIFICATION

per Arthur Casagrande

Remolded; only fraction passing #40 sieve, fine sand, silt, and clay fractions, coarse sand and gravel discarded



1619 11th St, OAKLAND, CA

CBC 22 1803.5.3

Reference 1803.5.3 Item #1 and ASTM D4318

CLASSIFACTION TEST RESULTS

SAMPLE IDENTIFICATION			ATTERBERG LIMITS			GRAIN SIZES % DRY WT.				
SAMPLE NO. (Boring/Pit/Bulk)	LETTER DESIGNATION	DESCRIPTION	LIQUID LIMIT	PLASTICITY INDEX	SHRINKAGE LIMIT	ESTIMATED % PASSING #40 SIEVE	SAND	SILT	CLAY	COLLOIDAL
		ML Sandy SILT At/Near Surface		—	---	---	---	---	---	---
					---	---	---	---	---	---
		Onto Siltstone Bedrock			—	—	—	—	—	—
					---	---	---	---	---	---
					---	---	---	---	---	---
					---	---	---	---	---	---

Soil Classification Section 1803.5.1 ASTM D 2487

PROJECT 7525 GP 53 . Hallenbeck / ALLWEST INC.

FIGURE 6A



PICTURE # 1


SLSC
5902612
4510
9½ HIGH
Pit- Geo Boring # 2
ML Reddish Brown SILT
PICTURE # 166

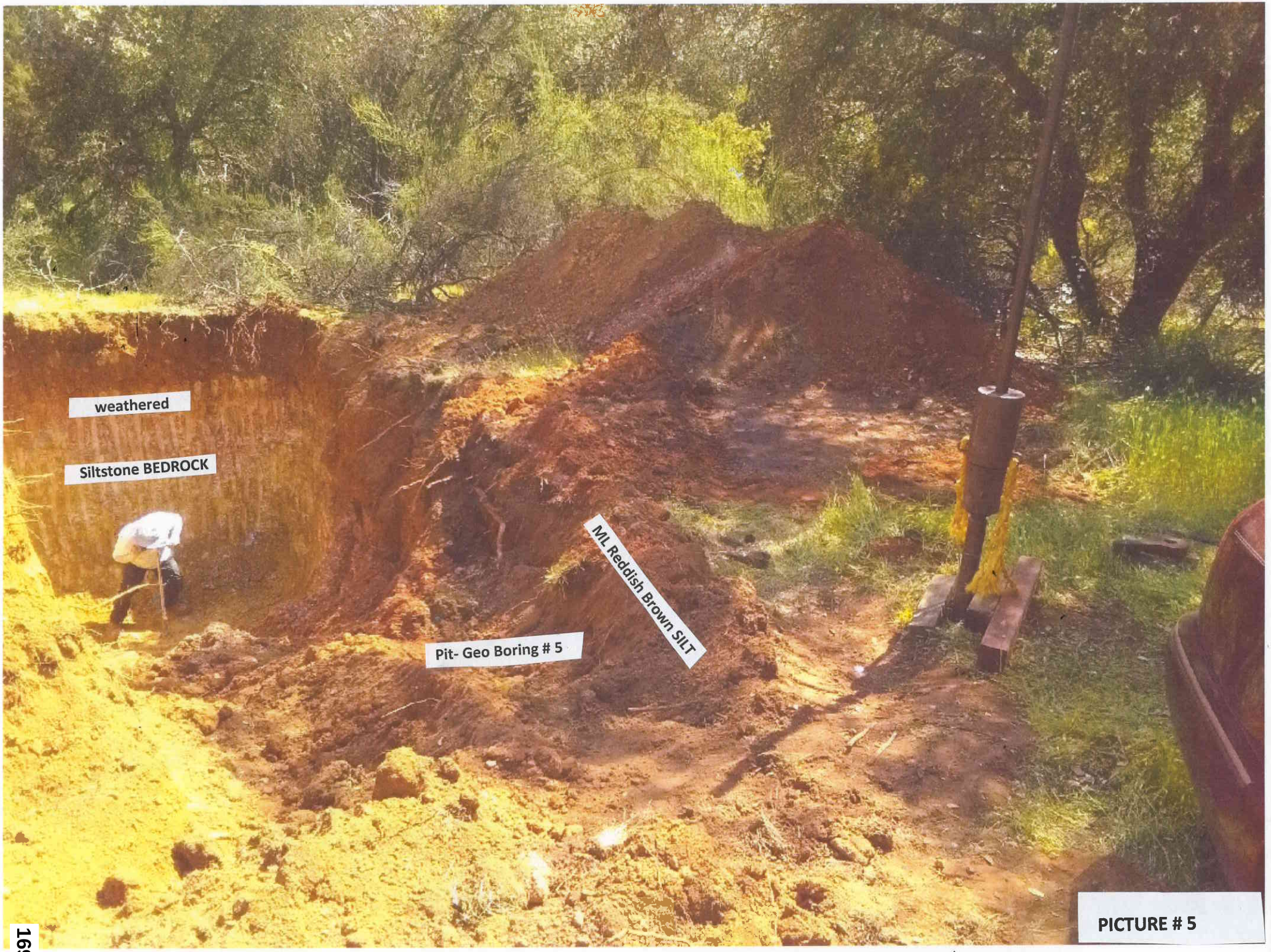

Siltstone BEDROCK
Pit- Geo Boring # 3
Groundwater Seep Ponded

PICTURE #3

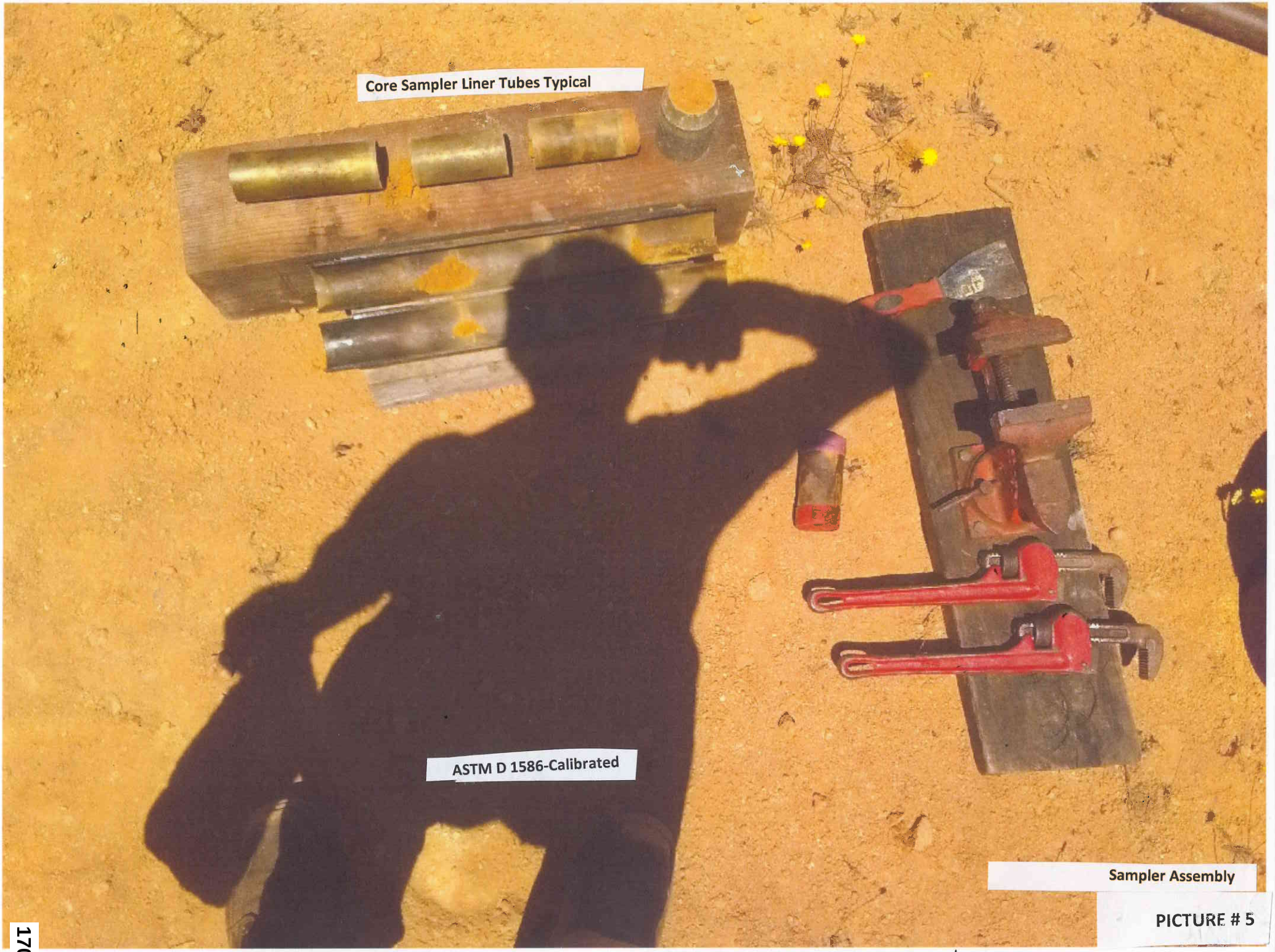


PICTURE # 4

4


weathered
Siltstone BEDROCK
ML Reddish Brown SILT
Pit- Geo Boring # 5

PICTURE # 5


Core Sampler Liner Tubes Typical
ASTM D 1586-Calibrated
Sampler Assembly

PICTURE # 5

GROUND MOTION APPENDIX…

SITE : #857 Carbondale Road , Amador County , CA

Lat : 37.425448 Long : -122.005845 West

CBC 22 SECTION 1613 SPECTRAL PARAMETERS ARE FOR

5 % LAMBDA DAMPING

2% 50 YEARS CONDITIONAL PROBABILITY

2500 years Return Period……

SITE CLASS B-C SELECTION :

The profile involves very shallow bedrock fine grained sand.Siltstone

Per CBC 22 Section 1613 :

This site qualifies as Site Class B to BC …….

Site is ~ many miles from Active Regional Earthquake Fault Systems

..Figure 2 State EQ Zapp module

PGA ~ 0.21 g …Geotechnical

S_1 ~ 0.19g …. Structural

ATTACHED IS CBC 22 SPECTRAL PLOT FROM REGIONAL SPECTRAL CHARTS , ASCE 7-22 ….

REPORT SUMMARY

Site Information

Address:	*857 Carbondale Rd, Ione, California, 95640*
Elevation:	239 ft (NAVD 88)
Lat:	38.425448
Long:	-121.005845
Standard:	ASCE/SEI 7-22
Risk Category:	II
Soil Class:	C - Very Dense Soil and Soft Rock

Seismic Data

S_S	0.46
S_1	0.19
S_{MS}	0.52
S_{M1}	0.28
S_{DS}	0.35
S_{D1}	0.18
T_L	12
PGA_M	0.21
V_{S30}	530
Seismic Design Category	C
Note	Where values of the multi-period 5%-damped MCER response spectrum are not available from the USGS Seismic Design Geodatabase, the design response spectrum shall be permitted to be determined in accordance with Section 11.4.5.2

ASCE HAZARD TOOL

Location

857 Carbondale Rd, Ione, California, 95640

Elevation	239 ft with respect to North American Vertical Datum of 1988 (NAVD 88)
Lat:	38.425448
Long:	-121.005845
Standard:	ASCE/SEI 7-22
Risk Category:	II
Soil Class:	C - Very Dense Soil and Soft Rock

Seismic Overlay

Risk Category II DETAILS

FULL REPORT SUMMARY

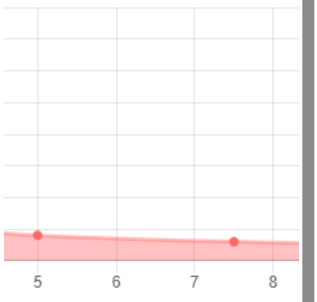
All data are per the requirements of published ASCE standards; local requirements may vary

© 2024 American Society of Civil Engineers. All rights reserved, including rights for text and data mining and training of artificial technologies or similar technologies.

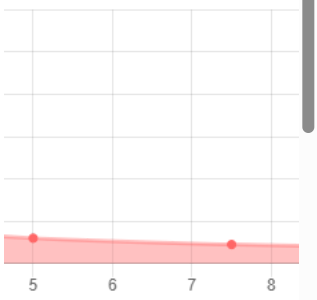


S_{MS} 0.52 S_{M1} 0.28
T_L 12 PGA_M 0.21

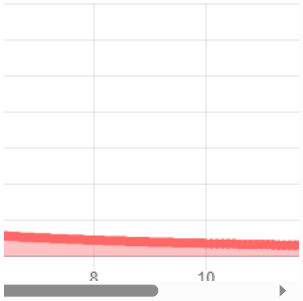
um CSV

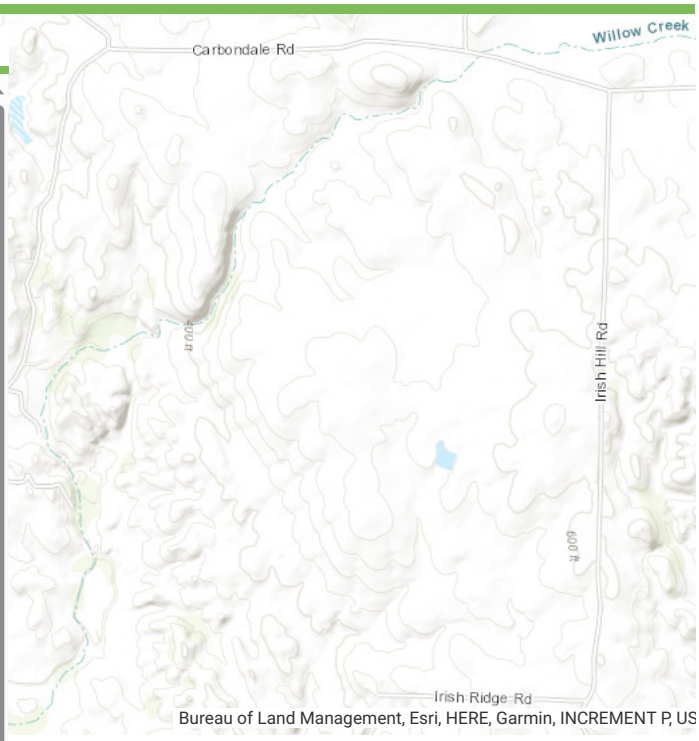


um CSV



um CSV





Legend

Select data to display

GUIDE SPECIFICATIONS FOR SUB- SURFACE DRAINAGE
GENERAL SITE DRAINAGE

REFERENCES : CBC 22 Sections 1804.4 ; 1805.2 , 1805.3 1805.3.2 & 1805.4.2 , 1805.4.3, 1808.7.4

A. DESCRIPTION

Subsurface drains consist of pipes and permeable filter materials installed beneath the ground surface and which collect and convey subsurface drainage water as called for by the plans , or the geotechnical engineer in the field. These specifications apply to construction dewatering as well as any permanent dewatering as called for by the plans. These specifications apply to both blanket and trench sub- drains.
Unless otherwise directed by the geotechnical engineer in the field , or shown on plans , the conduit shall be placed in a trench, and the trench shall be backfilled with pervious filter material. The conduit and pervious material shall meet the requirements for the materials given in these specifications. The materials for the sub-surface drains and the sizes of trenches shall be as shown on the plans ,or as determined by the geotechnical engineer in the field

B. MATERIALS

1. **Sub-Drain Pipe :** Sub-drain pipes shall be manufactured in accordance with the following requirements:
   a. Acrylonitrile-Butadiene-Styrene (ABS) plastic pipe shall conform to the specifications for ABS plastic pipes given in ASTM Designation D 2282 and ASTM Designation D 2751. ABS pipes shall have a minimum pipe stiffness of 45 psi at 5% deflection, when measured in accordance with ASTM Method D 2412.

   b. Polyvinyl Chloride (PVC) pipe shall conform to AASHTO Designation M 278. PVC pipes shall have a minimum pipe stiffness of 50 psi at 5% deflection and impact strength of at least 50 psi (or kpa) when measured in accordance with ASTM Method D 2412. Pipes conforming to ASTM Designations D 3034 , F 758 , F 810 (for backfill less than 10 ft) such as Schedule 40 , or equivalent shall be suitable.

2. **Pervious –Permeable Backfill Material :** Pervious materials for use in backfilling trenches and subdrainage galleries shall conform to the requirements of paragraph “C1” (aggregate filter) of these specifications . Alternatively, pervious material conforming to the requirements of paragraph “C2” (drainrock) may be used , provided that the backfill is fully wrapped in a suitable geotextile “filter fabric” meeting the requirements given on section “D”. The choice of this option should be subject to the prior approval of the geotechnical engineer.

C. BACKFILL MATERIAL

1. Aggregate Filter Material: Filter material for use in backfilling trenches around and over sub-drain pipes and behind retaining walls shall consist of clean coarse sand and gravel or crushed stone conforming to the following requirements :

SIEVE SIZE	% PASSING SIEVE
2”	100
3/4 “	70-100
3/8 “	40-100
#4	25-50
#8	15-45
#30	5-25
#50	0-20
#200	0-3

Class 2 “ Permeable Material” conforming to Caltrans Standard Specifications , latest edition , Section 68-1.025 Shall be suitable. Caltrans Perm Class 1A may be acceptable when approved by the geotechnical engineer. Class 2 AB and ASB are NOT acceptable.

2. **Gravel (Drainrock) :** Gravel for use in pervious blankets and in backfilling trenches or wrapped in filter fabric , meeting the requirements of Section D of these specifications , shall consist of clean fresh stone conforming to the following grading requirements :

SIEVE SIZE	% PASSING SIEVE
1”	100
½”	50-100
#4	40-100

#8	0-40
#30	0-20
#50	0-5
#200	0-3

Caltrans Class "Permeable Material" Standard Specifications Section 68-1.025 shall be suitable. Caltrans perm Class 1B may be suitable when approved by the geotechnical engineer.

D. GEOTEXTILE-FILTER MATERIAL

Geotextile for use in sub-drains or as directed by the geotechnical engineer shall be of non- woven , needle punch construction and consist of long chain polymeric fibers composed of polypropylene , polyethylene ,or polyamide. The filters shall be oriented to a multi-directional , stable network . The geotextile shall conform to the physical property requirements listed below:

PHYSICAL PROPERTY	TEST METHOD	ACCEPTABLE TYPICAL TEST RESULTS
Tensile Strength, wet, lbs	ASTM D 1682	90 (minimum)
Elongation , wet , %	ASTM D 1682	40 (minimum)
Coefficient of Water Permeability cm/sec	ASTM D 4491	0.1 (minimum)
Pore size –EOS US Standard Sieve	ASTM D 4751	40 (maximum)

A Mirafi 140 N or equivalent shall be suitable.
The geotextile shall be furnished in a protective wrapping which shall protect the fabric from ultraviolet radiation and from abrasion due to shipping and handling.

E. LAYING AND PLACING

The drainpipe and filter material shall be placed as shown on the plans and as determined by the geotechnical engineer in the field. Unless otherwise directed by the geotechnical engineer , perforated pipe shall be laid with the perforations side facing down.

ONSITE Storm Drain-Subdrain Pipe Systems

Pipe hook ups shall be such that no backflow can occur from collector pipes into perforated Sub-drains, foundation drains or other drainage improvements ; no backflow or diversion from downspout collector pipes into site area drains. Contractor is to set collector pipes at proper elevations and provide appropriate safeguards to avert backflows . Safeguards such as : sanitary sweeps , offset pipes , non-return check valves, etc.

All backfills of collector non-perforated pipes is to be moderately compacted using onsite non-pervious materials . NO crushed or drainrock backfill may be used , unless a PLUG is placed as per geotechnical engineer guidance. In this case a PLUG of non-pervious material shall be placed tight at the transition from perforated sub-drain pipes to solid non-perforated collector outlet pipes.

Trench Backfill

After excavating the sub-surface drain trench, but before placing the perforated sub-drain pipe , a minimum of 6" of aggregate filter material shall be placed on the trench bottom. The filter material shall be rounded to conform to the curvature of the pipe so that the pipe is carefully bedded. The trench shall then be backfilled , with the same filter material above the pipe , and the backfill is tamped or hand wedged into place to provide firm supports at the sides of the pipe. As a minimum , pipes of subdrain blankets or trench subdrains , shall be surrounded by permeable aggregate material at the rate of 10 cubic feet per foot of pipes , unless specifically called for on the plans and approved by the geotechnical engineer. In general, the installation shall follow the guidelines of ASTM Designation D 2774 , except that compaction of the filter material in the trench shall not be required. The perforated sub-drain pipe shall be wrapped in a fabric sleeve "sock" as an additional protection , in addition to the aggregate material surround.

Sub-surface drains shall be placed to the depths, lines and grades shown on the plans and as directed by the geotechnical engineer in the field. Sub-surface drains should be connected by an outlet "tightline" collector and led to discharge in a suitable outlet as defined in the field by the geotechnical engineer , or as shown on the permit plans. An impervious "Plug" should be placed at the connection between the perforated pipe and the outlet "tightline" collector .

Backfill around the non perforated outlet "tightline" collector pipe shall be a compacted onsite , non-pervious clay material ; No crushed rock may be used to backfill outlet non-perforated collector pipes.

The sub-drain "solid" collector system shall be separate from and shall not convey water from surface drainage improvements and any roof downspouts, unless otherwise specifically approved by the engineer. Both the sub-drain and the outlet "solid" collector shall have adequate hydraulic fall to the outlet release location; a minimum fall of 2% shall be provided (one foot drop in 50 lineal feet of pipe) ,unless otherwise approved by the engineer.

For deep fills and landslide repairs , multiple depth sub-drains and/or chimney extensions would be required. The contractor is to review such situations with the geotechnical engineer..Additional sub-drains shall be provided in areas where significant groundwater seepage and/or springs are encountered or exposed during grading and excavations required to secure the grade into competent materials. Separate non-perforated outlet pipes would be required in areas of intense seepages.
The contractor shall , at his own expense , replace all drainage pipes that are damaged during the installation process or, Sub-Surface Drains not placed at the lines and grades called for on the permit plans , or as determined by the geotechnical engineer in the field.
The geotextile shall be placed in the manner and at the locations shown on the plans . The surface to receive the fabric and/or the trench into which the fabric is to be placed shall be prepared to a smooth condition free of wrinkles, obstructions and debris.

The geotextile shall be covered with a permeable material within two weeks from its placement. Should the fabric be damaged during construction , the torn or punctured section shall be repaired by placing a piece of fabric that is large enough to cover the damaged area and to meet the overlap requirement. Adjacent borders of the geotextile shall be overlapped a minimum of 12" or sewn. The preceding roll shall the following roll in the direction the material is being placed. The geotextile blanket seams should be secured and attached, per manufacturer's specifications/ procedure.

IMPORTANT : Pipe hookups shall be such that no backflow can occur from the collector pipes into perforated sub-drain pipes / sub-drains or other improvements. No backflow from downspout collectors shall occur into site area drains. The contractor is to set collector pipes at proper elevations , provide sanitary sweep elbows and/or non-return valves , as appropriate to prevent such backflows. All backfill of collector non-perforated pipes is to be moderately compacted using onsite non-pervious clay material ; NO crushed rock may be used. A "plug" of non-pervious backfill around perforated subdrain pipes must be placed at the location of the start of non-perforated collector pipe sections.

F. CLEANOUTS

At the direction of the geotechnical engineer , cleanouts shall be provided and the ends of pipes and at junctions and connections of pipes. Junction angles should be no steeper than 45 degrees where cleanout pipes connect to the subdrain pipes. Cleanout should be provided with caps. In many cases horizontal cleanouts may pose less construction problems than vertical cleanouts.

G. GENERAL SITE DRAINAGE CBC 22 Section 1804.4 & 1808.7.4

The following should be observed on plans and approved by Geotechnical / Civil Engineers for the project :
Site area drains are to be set at low- finish graded areas; conformed to grades. No outlet collector pipes are to discharge openly on slopes; pipes are to release/outlet in approved disposal locations. Measures shall be undertaken to prevent erosion at approved disposal areas, as required. Such measures may include riprap, cobbles , gravel , and engineered energy dissipaters ; placement of fabric and / or aggregate filters ; fiber rolls and or hay bales. The outlet collector non-perforated pipes are to be secured in the ground. Roof downspouts are to be directly hooked up to collector non-perforated pipes. All pipes are to have proper slope (fall) to outlets. Riser clean outs are to be provided with caps.

H. OUTLETS . DISPOSAL CBC 22 Section 1805.4.3

Disposal of runoff shall be to pre approved disposal locations, not to adversely impact slopes, nearby foundations , improvements or cause erosion. The disposal location shall be pre approved by the engineer and the building official/PW as per CBC 22 Section 1805.4.3 and in compliance with City/County Ordinances.
Outlet disposals into creeks – water courses-Ditch require fitting the outlet pipes with non-return check valves to prevent backflow into the drainage systems.

GUIDE SPECIFICATIONS FOR ENGINEERED GRADING

REFERENCE: CBC 22 Sections 1803.5.8 , 1804 (CBC 22 Section Changes) , 1705.6

A. GENERAL

1. Definition of Terms

FILL: Is all soil and/or soil rock mixtures mechanically placed to raise the grade of the site , or to backfill excavations and sub-excavations.

ONSITE MATERIAL: Is that which is obtained from the required excavations and any sub-excavations onsite activity.

IMPORT MATERIAL: Is that hauled in from off-site areas.

SELECT MATERIAL :Is a soil and aggregate material meeting the requirements set forth in C(2) below.

ENGINEERED FILL : Is a fill placed properly compacted and tested , under the observation and with the approval of the geotechnical engineer of record ; certified to meet the plans , job specifications and requirements for special inspections per CBC 22 Section 1705.6 Items #2-#5.

SPECIAL INSPECTION AND TESTING : Such inspections and testing services undertaken in accordance and compliance with the stipulations of special inspections of CBC 19 Chapter 1705. Requirements for the qualifications of the special inspector , inspection reports and approvals shall be met. The special inspection reports shall be furnished to the building official.

CALTRANS. SSS : Is the latest edition of the State of California Department of Transportation (State Standard Specifications SSS).

AASHTO SPECIFICATIONS : are the Standard Specifications of the American Association of State Highway and Transportation Officials , latest revision.

ASTM SPECIFICATION : Are the Annual Book of ASTM Standards (Section 4)
American Society for Testing and Materials, latest revision.

MAXIMUM LABORATORY DENSITY: Is the maximum dry density, a given fill material , that can be produced in the laboratory by the Standard procedure ASTM D1557," Moisture –density Relations of Soils Using a 10-pound (4.5 kg) Hammer and an 18-inch (457mm) drop "(AASHTO Test T-180, "Moisture-Density Relations of Soils Using 10-Pound Hammer and an 18-Inch Drop").

OPTIMUM MOISTURE CONTENT: Is the moisture content at which the maximum laboratory density is achieved using the standard compaction procedure ASTM Test Designation D1557 (ASHTO Test -180).

FIELD ,or IN-PLACE DENSITY: Is the in-place , as-placed-and-compacted , dry density of fill or mechanically-graded material ; as determined by nuclear method ASTM Standard D2922 , or sand-cone method ASTM Standard D1556 , In-Place core density samples per ASTM D 2937 ,or other method as approved by the geotechnical engineer of record.

RELATIVE COMPACTION (RC)% : Is the ratio , expressed as a percentage , of the dry density of the fill material as compacted in the field , to the Maximum Laboratory Density (dry) , for the same material.

2. Responsibility of The Geotechnical Engineer and Engineering Geologist

The State- Registered Geotechnical Engineer shall be the owner's representative to observe the grading operations , both during preparation of the site and grading work. The Geotechnical Engineer and /or the representative shall make enough visits to the site to familiarize himself with the progress and quality of the work. He and/or his representative shall make a sufficient number of field observations and appropriate tests to enable him to form an opinion regarding the adequacy of the site preparation, the acceptability of the grading work, and the extent to which the relative compaction RC % meets the job specification requirements. Any, where the site preparation , type of material , or compaction is not approved by the Geotechnical Engineer shall be removed , reworked and /or re compacted until the requirements are satisfied. The contractor should allow a reasonable amount of time for engineering decisions on changes to the plans in the field as required by the exposed geologic/geotechnical conditions. In some cases, this may require updated engineering evaluations or soil testing. Reference to a State-Registered Geotechnical Engineer who may also call upon the expertise of a State-Registered Certified Engineering Geologist to examine excavations and bedrock and required by the project's engineer and the governing jurisdiction .

Pre-Contract and Pre-Construction Site Walk-Through: It is strongly recommended that , on projects involving significant site work , a joint site walk be made prior to contractual agreements and /or jobsite mobilization and work.

3.Geotechnical Site Conditions

A geotechnical investigation has been performed for the site by Hallenbeck/Allwest and a report has been issued by them dated July 2024, covering that investigation. The contractor shall familiarize himself with the geotechnical conditions on the site , whether covered in that report or not , and shall thoroughly understand all recommendations associated with

the grading. The contractor shall also anticipate potential impact of groundwater conditions , as disclosed by the geotechnical investigation , on the proposed grading work. These specifications generally apply to construction in clear weather and would require amended specifications and additional engineering guidance and recommendations ; regulatory compliance is also required for wet weather construction.

The contractor and/or civil engineer (when present) are responsible to locate and account for all existing underground utilities / improvements , grade set and control , and survey in grading areas.

B. SITE PREPARATIONS

1. Demolition and Building Cribbing-Underpinning

Prior to any construction, the (E) hardscape and any landscape I in work area are to be completely demoed removed. Disturbed loose soils are to be re compacted as directed by the geotechnical engineer.

The geotechnical engineer may also require removal of soft clayey soils, old fill containing refuse and boulders / rubble where encountered ,to such greater depth as the geotechnical engineer in the field may deem necessary to remove materials that , in his opinion, are un suitable. The removed materials shall be stockpiled in an approved part of the site and later on hauled away. None of this material may be re used for engineered fill. Onsite clean sans and silty sand materials may be stockpiled for reuse to backfill behind the retaining wall(s) as needed to make grade.

Contractor is look at logistics and availability of stockpile area onsite

2. Preparations For Filling

After demolition and removals of unsuitable soils,, the disturbed soils in areas to receive improvements , shall be sub excavated to the minimum depth called for on the plans / Specs , or that is required by the geotechnical engineer in the field. The entire subgrade of the building area(s) and any principal site improvements should be proofed with portable grading equipment . Sub excavation would be required in areas that move or "pump" under the grading equipment and any loosened soil from demolition of previous improvements and abandoned utility trenches , etc, as designated by the geotechnical engineer. The sub excavated materials that are slightly to non expansive , clean and free from organic materials may be used later for general engineered fill.

After demolition and sub excavating the weak soils to the required depths , the exposed surface shall be scarified to a minimum depth of 6" , moisture conditioned as necessary to bring the soil to a moisture content that would permit compaction , and re compacted to the requirements of engineered fills as specified in "E " below.

Exception: Excavation into intact bedrock resulting in rough surface shall not require scarifying an intact rough bedrock. Prior to placing fill , the contractor shall obtain the geotechnical engineer's approval of the site preparation in the area to be filled. The requirements of this section may be omitted only when approved in writing , by the geotechnical engineer.

Prior to placing fill , subdrains, as required , shall be installed as shown on the plans and as directed by the geotechnical engineer in the field .

C. MATERIALS USED FOR FILLS

1. Engineering Requirements for General Engineered Fill

All fill material must be pre approved by the geotechnical engineer . The material shall be a soil or , soil/ aggregate mixtures that is free of organic matter or other deleterious substances. The fill material shall not contain rocks or lumps over 6" in size, and not more than 15% by dry weight, shall be larger than 2.5" in size. The soils from the site , except the surface strippings shall be suitable for re use in engineered fill, subject to the environmental stipulations of Section C.4.a of these specifications.

Clean onsite sand and silty-sand mix shall be suitable for re-use to backfill behind the lower CMU replacement retaining wall.

2. Engineering Requirements For Select Fill Material Beneath Floor Slabs

In addition to the requirements of C.1. above , select material , when called for on the plans and/or the geotechnical report for use under floor slabs or flatwork , must conform to the following minimum requirements:

Maximum Plasticity Index PI ASTM D 424	Maximum % Fines Passing # 200 Sieve	Description
10	~ 40	Loam: Clayey Silty Sands-Clayey Silts SC-ML
12	~30	Very Silty Clayey Sands, Clayey Sandy Silts SC
15	~20	Very granular Calyey Sands SC-SM

Generally , a material with an R-Value of 30 or greater would be suitable.
CLSM CBC 22 Sections 1804.3 and 1803.5.9.
Soilcrete , Sandcrete , and lean concrete are suitable high –grade backfill materials.

3. Requirements for Select Material For Use in Buttress Fills
In addition to the requirements of C.1. above , select materials for use in buttress fills and slope shear keys shall be non plastic (non expansive) and shall have an R-Value of at least 30 (or PI less than 12) . Select materials for buttress fills / shear keyways shall be pre approved by the geotechnical engineer.

4. Import Fill Material. Architect's & Owner's Requirements

a. Environmental Certification For Imported Fill
All imported fill materials , to be used as select material or otherwise , shall be free from hazardous contaminants and other refuse (scrap metal , debris ,etc) . the contractor shall provide to the owner proper certification and other documentation as required by the owner to verify that the imported material is not contaminated with hazardous substances . The acceptable levels of any contaminants discovered in the soil shall be determined by the owner in consideration of State and Federal Regulatory limits; and any stipulations by the RWQCB ; and any stipulations by the governing jurisdiction.

b. Other Requirements
The contractor shall comply with earthwork and specifications , and review with the architect / owner any other requirements to be met by the imported materials, such as suitability of materials for landscaping and land-use purposes ,etc .

c. Import Approval Procedure
All fill materials would need to be pre approved by the geotechnical engineer and architect / owner , prior to the actual import to the jobsite. Approval by either side does not necessarily imply approval by the other.

D. EXCAVATIONS

1. General
All excavations shall be carefully made true to the grades and elevations shown on the plans. The excavated surfaces shall be properly graded to provide good drainage during construction and to prevent ponding of water. Excavated materials may not be stockpiled near the top of excavations and should be properly setback from such open excavations and trenches.

The main issues with excavations are :
Location , depth, stability and pitch of excavated slope , , site safety and OSHA requirements , proximity and impacts to existing nearby properties /buildings , foundations ,underground utilities and improvements. Excavations may have to be staged in segments.

2. Excavated Cutslopes
Where temporary excavated cutslopes , such as behind retaining walls , buttress , keyway or , sub excavations or, as required by the plans , are to be constructed , it is pointed out that the plans and the geotechnical report indicate estimated inclinations (see below) for temporarily stable cutslopes. The actual inclinations of excavated cutslopes and their configuration may be adjusted by the geotechnical engineer/ engineering geologist in the field , as required by the geologic conditions , and that the contractor should be prepared to haul away excavated materials to designated stockpile areas away from the tops of cutslopes , as much as required by the geotechnical engineer / engineering geologist , to assure temporarily stable cutslopes. Such adjustments to the configurations of the cutslopes and where they occur within the bounds of the graded area as delineated on the plans , shall be anticipated by the contractor , and shall not be considered as such, changes to the grading plans or the geotechnical report.

Inclinations of Cutslopes for Planning Purposes (Final in the Field)
Cutslope Height 10 ft Max Inclination 1 H : 1 V or flatter
Cutslope Height 5 ft Max Inclination 1 H : 2 V or flatter
Important : Taller cutslopes and any cutslopes in the proximity of street improvements , building foundations , underground utilities require secure shoring to provide for stability and control ground movements as well.

It is pointed out that the purpose of the excavated cutslopes is to provide temporarily stable construction , and the contractor is to proceed immediately to backfill once the geotechnical engineer/ engineering geologist approves the excavation. Access ramps , benches and routs around the construction and grading area should be reviewed with the Civil and geotechnical engineers and shall not be destabilizing to the excavations.

The contractor shall submit a workplan and schedule acceptable to the engineer relative to geotechnical conditions , with the understanding that such a plan may be adjusted during construction to ensure adequate stability of the excavations in the grading area. The extent of the excavation indicated by the report / specs and by the grading volume is for construction planning purposes . The contractor and the owner /client are to anticipate that the depth and layout of the grading work , as well as, subdrainage requirements may have to be substantially updated to address differing / anomalous site geo conditions. Proper provisions in the grading work contract and project documentation shall be made to accommodate such changes. It is pointed out that the geotechnical engineer and / or engineering geologist may request pilot exploratory pits or trenches to lead / update the subsequent stages of work. Such requirements for exploratory work to help better guide the grading operations should be anticipated by the contractor as part of the engineering inspection mandate, and therefore, should not be considered as extra work , or requirements imposed by the engineer.

3. Shoring... CBC 22 Sections 1803.5.7 ,1804.1, 1804.2, 1804.2.1
Excavations in the proximity to impact street improvements , underground utilities, nearby buildings and foundations must not reduce lateral support to (E) improvements and foundations nearby in service be securely and must be properly shored up. Not only to provide for stable excavation sites , but the shoring demand shall include control of ground movements and monitoring of such improvements . The shoring shall account for the ground lateral loads , surcharges from construction and other traffic , water seepage traction forces . The shoring installation shall not conflict or damage existing utilities and shall be undertaken with proper permits including any encroachment permits. The shoring system shall account for weather and groundwater conditions which may require a cutoff section to extend 8 ft to 10 ft below the base of the excavation. The cutoff is to control groundwater seepage influx and stall bottom heaves in the onsite silty soils.

4. Dewatering
Excavations shall anticipate the need for dewatering in wet weather. Groundwater is approximately 15 ft to 20 ft below existing grade. Dewatering shall observe disposals per CBC 16-19 Section 1805.4.3

E. PLACING , COMPACTING & SPECIAL TESTING OF FILL MATERIALS

CBC 22 Sections 1803.5.8 and 1804.3 (CBC 22 Section 1804.3 & .4),
Special Testing Required CBC 22 Section 1705.6

All fill materials shall be compacted as specified below or, by other methods , if approved by the geotechnical engineer , so as to produce a minimum relative compaction RC % of :

95% Relative compaction for ONSITE SM-ML sands and mix of silty sands-sandy silts
93% for ML Silts….
90% for Siltstone bedrock cuttings….

All tests are based on ASTM Designations D2922 –D2937 / D1557 dry density basis .
ASTM D3017 and D 4643 for moisture contents.
Tests are to be made on the compacted materials in-place as rolled and compacted .

The fill material shall be spread in uniform lifts not exceeding 8” in un compacted thickness. Before compaction begins, the fill shall be brought to water content that would permit proper compaction by either aerating if it is too wet or spraying the material with water if it is too dry. Each lift shall be thoroughly mixed before compaction to ensure a uniform distribution of water content and homogeneous product. Where natural clayey soils are used within 3 ft of the finished ground surface , they shall be placed and compacted at a moisture content that is ~ 1% to 3% above optimum.

Exception; CBC 22 Section 1803.5.9 and 1804.3 CLSM , Soilcrete , Sandcrete or , Lean Concrete would be exempt from compaction special testing.
Fill-Slopes : In general and unless stable stabilization methods are implemented, finish –graded slopes should be built to a pitch no steeper than 2:1. Flatter slopes would invariably be required by the geotechnical engineer and/ or geologist for slopes greater than 15 ft in height and or where the slope-forming material is predominantly expansive material and/or where other particular geologic conditions exist which preclude a 2: 1 graded fill-slope. A mid-slope bench would be required at the height interval of 30ft. Fill-slope shall be fully engineered , surveyed to confirm location and pitch etc and subjected to special inspections and testing. Fill-slopes shall have shear keyways secured into competent materials as approved by the geotechnical engineer and / or the engineering geologist ; subdrains are typically required. Slope stability analyses may be required to ascertain long-term stable slopes.
Refer to attached Grading Section I to schematically depict geotechnical engineering recommendations for grading engineered fill-slopes.

F. SPECIAL STABILIZATION METHODS

Special slope stabilization methods may be required as designated by the geotechnical engineer to provide for a stable finish-graded slopes. Primarily , such methods may involve cement / lime stabilization and or geogrids as outlined below. Other methods may also be specified as approved by the geotechnical engineer and the governing Jurisdiction.

1. Cement(cement treated soils , soil cement - CLSM) & Lime Stabilization. Soilcrete
Portland cement or lime (quick lime preferred over hydrated lime) as stabilizing agents and as specified by the project plans, geotechnical documents , and further designated by the geotechnical engineer. The cement lime stabilizers would have to be thoroughly mixed with the fill or backfill materials , properly placed and mechanically rolled and compacted. In general, use of lime would require , as a guideline ration, of 5% lime to bulk compacted Cu. yard of treated soil. The lime treated soil must be rich in silica (fat clay) . Cement stabilization may be utilized to blot excess water in the earth material and stabilize construction conditions ; and additionally, to provide long-term design strength to allow stable slopes . As a guideline , cement should be mixed at the rate of two standard sacks per bulk cu. Yard of placed material for each excess 5% of water content to be blotted. Lime stabilization would require proper curing following initial mixing and a hold time prior to final rolling, placement and compaction. The hold time is needed for the lime to dissolve the silica in the clays to be stabilized. Reference State CalTrans SSS. Project specifications should require in place strength tests on cement and lime stabilized materials , as a primary indicator for accepting the completed product. In addition to the in-place dry density , which in this case should be a secondary indicator.
CLSM: CBC 22 -1803.5.9 & 1804.3:Mix is to be Spec'd by the engineer ; placed vibrated-no compaction but testing is required as per engineer.

2. Geo-Grids. Geo Textiles/Fabrics
Geo-grids may be utilized in various layouts and arrays thru ought a graded slope to provide for properly designed stable slope. The grids or geo textiles may also be utilized to stabilized sub-grades on flat sites to support structural pavements onto expansive soils. The areal extent and elevation interval of Geo-grids should be specified by the plans and further stacked out in the field by the contractor during construction. Placement of the grids should not conflict with the installation of subdrains or any permanent future structures . Placement of the Geo-grids should follow standard manufacturers' specifications. Standard grids are : Stratagrid , Tensar , Miragrid and Fortrac; refer to respective manuals. Proper compaction should be achieved around the grids. The direction of the grids relative to the face of the slope should be oriented as required by the technical specifications and the geotechnical engineer in the field. The grids may be deployed in one portion of the slope or, the entire slope, as called for by the engineering requirements. Slope trim to finish grades shall not result in soil cover of more than 6" to 12" at the most, at the face of the slope end of Geogrids. A secondary layer of grid near the face of the slope may be required by the engineer to avoid surface sloughing. UON , the contractor should assume that the grids would have 100% coverage on any particular layer. Generally, grid layout and plan view should be oriented with the slope for maximum effectiveness . grids should be properly lapped .
Geogrids should be secured to the required design embedment length into stable material per slope stability assessments.

G. FINISH GRADING

CBC 22 Sections 1804.4 and 1808.7.4
Finish grading FG , whether following foundations construction , pad grading , or site improvements , shall result in firm ground slopes to direct surface water runoff away from ponding at or onto the site improvements or building foundations. Surface water shall be directed to appropriate collection facilities as designated by plans , the civil engineer or the project architect.

H. TREATMENT AFTER COMPLETION OF GRADING

After grading is completed and the geotechnical engineer has finished his observations and special testing of the grading work , no further excavation or filling shall be done except with the approval of and under the observation of the geotechnical engineer.

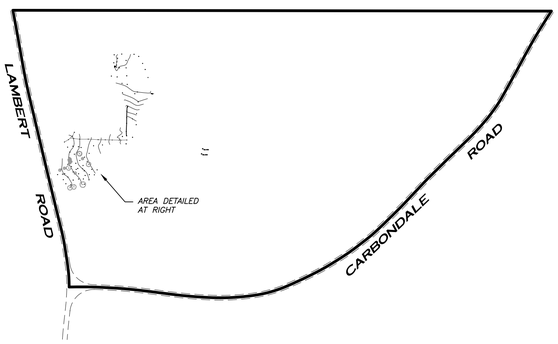
It shall be the responsibility of the grading contractor to prevent damage and erosion of the freshly graded areas during construction and until such time as permanent drainage and erosion control measures have been in-place. Graded pads in warm weather may develop desiccation shrinkage cracks where left exposed for extended periods , due to lapse in the construction scheduling of buildings and structures. Exposure of building pads to wet weather may result in pad ruts from construction traffic and or erosion gullies from surface water runoff. In such situations , the project should consider protection of fresh pads ; typical methods include covering the pads with tarp and control of surface water runoff erosion with appropriate erosion-control methods.

Finish –graded areas and slopes should invariably require a proper ECRM , as approved by the geotechnical engineer and accepted by the project owner. ECRM should be placed to cover erosion-prone areas of the freshly-graded slopes , well secured and lapped as called for by the manufacturer's specifications. Installation of ECRM may still require vegetation for long-term erosion protection of the graded areas. Typical suitable ECRM brands are : Landlok ; Bonterra ; Greenfix; Terra-Guard. Prior to starting work , the contractor should inquire from the geotechnical engineer about the most suitable and appropriate ECRM for the project.

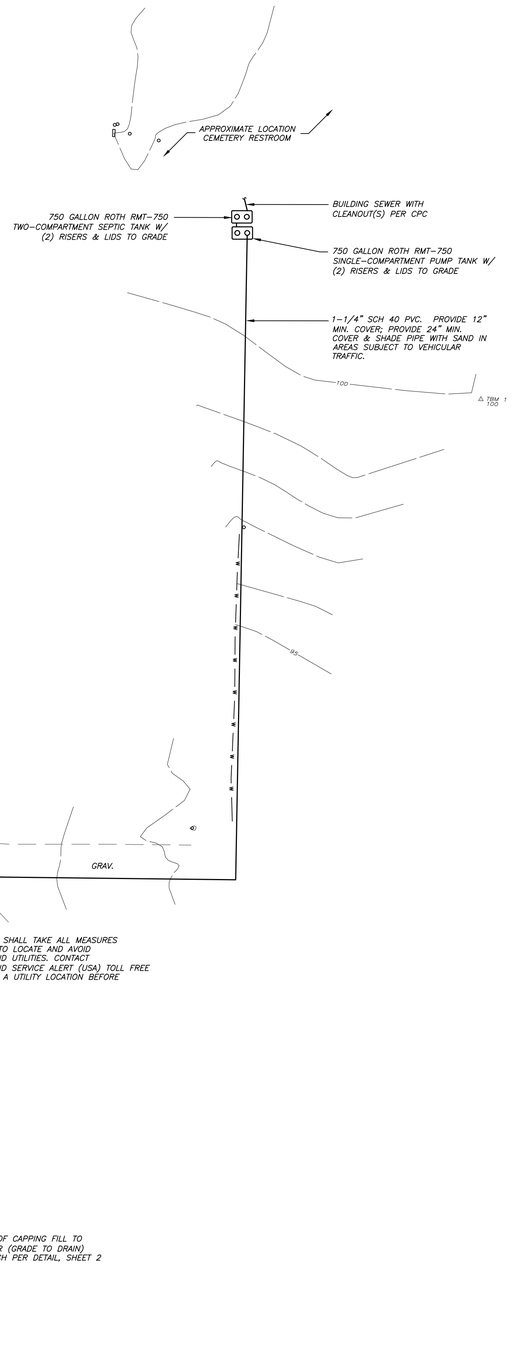
C:\Users\peter\Delta Engineering\CAD Files - Documents\2026 PROJECTS\260000\260009 KADDOURA SEPTIC\260009 KADDOURA CEMETERY SEPTIC.dwg 3/20/2026 2:35:19 PM

ATG-P

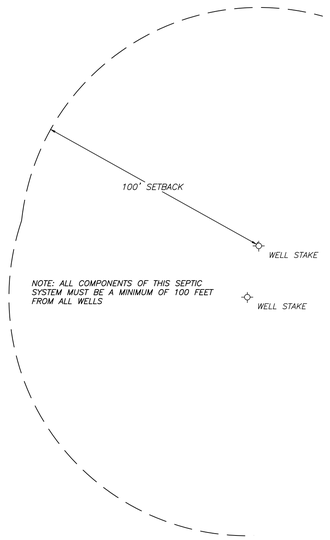
1" = 300'



1" = 30'
C.I. = 1'



NOTE: SEPTIC & PUMP TANKS AND OTHER SYSTEM COMPONENTS MAY NOT BE RELOCATED UNLESS APPROVED IN ADVANCE BY THE PERMITTING AUTHORITY



CONSTRUCTION-RELATED SITE VISITS BY THE DESIGNER:

Construction-related site visits by the designer are required by the permitting authority. Site visits by the designer are not a substitute for site visits by the permitting authority; additional site visits by the permitting authority are also required. It is the responsibility of the owner and/or installer to contact both the designer and the permitting authority for site visit requests. Delta Engineering, Inc. will not contact the permitting authority to coordinate site visit requests.

Site visits by the designer are required at the following stages of construction:

1. *Layout* — *The location and layout of the distribution beds must be approved by the engineer prior to construction. Contractor is responsible for laying out distribution beds in advance of the inspection.*
2. *Ripped ground* — *After distribution bed area has been ripped (and curtain drain excavated if required) and prior to placement of drain rock. Drain rock must be on-site and the tank placed but not backfilled.*
3. *Pump Test* — *After perforated distribution lateral(s) have been placed with orifices oriented upward but prior to backfilling. Power must be available and the pumping system operational so that residual pressure may be observed. Prior to backfilling, the distribution lateral must be rotated so the orifices face downward.*
4. *Final* — *When the system is complete in accordance with the approved plans. All system components must be in place and operational.*

These limited observations made during construction-related site visits do not allow for detailed observation of all system components and workmanship and thereby provide only a general indication of the installer's work. The installer is responsible for all workmanship and materials utilized on the project and for the means and methods of construction. Additional site visits required due to installer or owner error will be billed to the owner as extra work. Completion of construction-related site visits in accordance with this schedule does not constitute approval of the work by the designer. Initials, notes or signatures on "inspection" cards issued by the permitting authority do not constitute or imply approval of the work or materials observed, but rather acknowledge that the site visit was conducted. The designer reserves the right to combine visits as may be deemed appropriate.

NOTE: TOPOGRAPHIC SURVEY UTILIZES AN ARTIFICIAL DATUM BOUNDARY DATA ARE RECORD

DELTA ENGINEERING, INC.
ENGINEERING LAND DEVELOPMENT
PLANNING ENVIRONMENTAL PERMITTING
41 MAIN STREET JACKSON, CA 95642
209-223-1441 INFO@DELTAENGINEERINGINC.COM

REGISTERED PROFESSIONAL ENGINEER — ROBERT DAVID PEDRO — No. 58004 — CIVIL — STATE OF CALIFORNIA

© 2026 DELTA ENGINEERING, INC. ALL RIGHTS RESERVED.

COPYRIGHT NOTICE
THE TEXT, GRAPHICS, DESIGN AND PRESENTATIONS ON THIS PLAN ARE PROTECTED BY COPYRIGHT AND ARE THE SOLE PROPERTY OF DELTA ENGINEERING, INC. NO PORTION OF THE INFORMATION ON THIS PLAN MAY BE REPRODUCED IN ANY FORM OR BY ANY MEANS WITHOUT PRIOR WRITTEN PERMISSION FROM DELTA ENGINEERING, INC.

LICENSE
THIS DRAWING IS NOT FINAL AND MAY NOT BE USED FOR CONSTRUCTION UNLESS WET-SIGNED BY THE ENGINEER. THIS DRAWING REPRESENTS A ONE-TIME LICENSE FOR USE ON THE SUBJECT PROPERTY ONLY.

03-20-26

ON-SITE WASTEWATER DISPOSAL SYSTEM

AMADOR COUNTY APN 001-220-013
857 CARBONDALE ROAD, IONE

PREPARED FOR: MOUNIR KADDOURA
3550 WATT AVENUE #317
SACRAMENTO, CA 95821

SITE PLAN

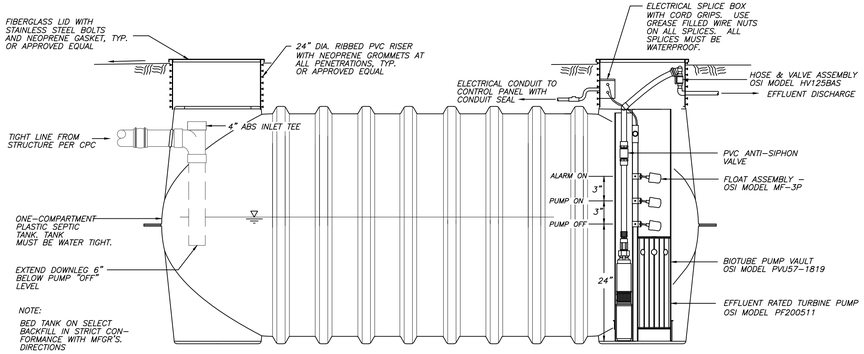
NO.	REVISION	BY	DATE	APP.

JOB NO.: 260009	DATE 03-20-26
DRAWN: SD	SCALE AS NOTED
DESIGNED: RDP	SHEET 1 of 2
CHECKED: RDP	

KADDOURA 857 CARBONDALE ROAD #260009

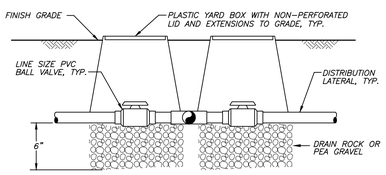
C:\Users\peters\Delta Engineering\CAD Files - Documents\2026 PROJECTS\260000\260009 KADDOURA SEPTIC\260009 KADDOURA CEMETERY SEPTIC.dwg 3/20/2026 2:52:21 PM

ATG-P



18 750 GALLON ROTH RMT-750 PUMP TANK

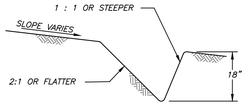
NOT TO SCALE



BALL-TRIMMER-VALVE

9 BALL TRIMMER VALVES

NOT TO SCALE



V-DITCH

10 V-DITCH

NOT TO SCALE

DESIGN DATA

GENERAL DESIGN DATA:

Application:	Private cemetery - 50 guests maximum
Water supply:	On-site domestic well
Septic tank:	Roth RMT-750 750 gallon two-compartment septic tank
Pump tank:	Roth RMT-750 750 gallon single-compartment pump tank
Maximum daily design flow:	(50 guests)(2.0 gals./guest) + (1 employee)(15 gals./m-s) = 115 gpd
Wastewater application rate:	0.45 gpd/s.f. based on observed soil characteristics
Unit application area:	4.0 s.f./l.f.
Soil absorption area required:	256 s.f.
Distribution bed length required:	64 l.f.
Distribution bed dimensions:	64' long x 5.5' wide

DISPOSAL BED DISTRIBUTION SYSTEM:

Total disposal bed lateral length:	64 l.f.
Lateral orifice diameter:	1/8 in.
Lateral orifice spacing:	18 in c-c
Residual lateral pressure:	6 ft.
Orifice discharge rate:	0.47 gpm
Total number of orifices:	42
Total discharge rate:	20 gpm

SEPTIC TANK PUMPING SYSTEM:

Net lift (max.):	0 ft.
Residual lateral pressure:	6 ft.
Feed line friction:	38 ft.
Misc. losses:	6 ft.
Total system head:	50 ft.
Septic tank pump required:	PF200511

MAJOR COMPONENT SCHEDULE

Septic tank:	750 gallon Roth RMT-750 two-compartment tank
Pump tank:	750 gallon Roth RMT-750 single-compartment tank
Pump tank pump:	PF200511
Pump tank float assembly:	MF-3P
Pump tank hose & valve ass'y:	HV125BAS
Pump control & alarm panel:	S1-CT

Proprietary components are manufactured by Orenco Systems, Inc. (OSI), 814 Airway Avenue, Sutherlin Oregon. OSI components are distributed by Sender's Hardware in Mountain Ranch, Calaveras County; Tel: (209) 754-1074.

6 DESIGN DATA

OWNER'S RESPONSIBILITIES AND GENERAL NOTES

1. All septic systems, regardless of type, have finite life spans and as such will not operate indefinitely. In accepting this plan, the owner understands and accepts that repair and/or replacement of all or portions of this system will likely be required at some time in the future.
2. Proper and diligent monitoring and maintenance will maximize the life of this system and is required. Monitoring & maintenance guidelines were prepared for this system and were submitted with these plans to the original owner; these guidelines must be understood and implemented for the system to function reliably. All subsequent owners must secure a copy of, understand, and implement the monitoring and maintenance guidelines or this design will be considered invalid.
3. This system is designed to accommodate a finite quantity of domestic wastewater generated by a single family residence. Non-domestic wastewater will not be treated properly by this system and will damage its components. Wastewater generation exceeding the daily design flow rate listed elsewhere on these plans is likely to damage the system or cause failure and is strictly prohibited.
4. All toilets and shower heads connected to this system must meet the following specifications: toilets shall have a maximum flush rate of 1.28 gallons per flush; shower heads shall have a maximum flow rate of 1.8 gallons per minute.
5. Garbage disposal units will increase the need for septic tank pumping, will increase the treatment load on the system, and will likely reduce the system's functional life. These units, therefore, are strongly discouraged.
6. Recreational vehicle holding tank chemicals can damage this system's microbiology and must not be discharged into the system.
7. The creation of cut banks below the disposal or replacement areas increases the possibility of interception and surfacing of migrating effluent and should always be avoided. Cut banks below the disposal or replacement areas are created solely at the risk of the owner.
8. The disturbance of native soils within or below the disposal or replacement areas increases the possibility of soil structure damage and may lead to disposal field failure. Disturbance of native soils within or below the disposal or replacement areas by any means including vehicular traffic, grading, livestock, etc. is prohibited and will invalidate this design.
9. Unless noted otherwise, the relationship between the property boundary and topographic data and site features shown on these plans has not been established by a professional licensed to practice land surveying. Only a professional licensed to practice land surveying is authorized to establish such a relationship. Boundary data shown on these plans, if any, are record data unless noted otherwise. It is the owner's responsibility to contract with a professional licensed to practice land surveying to delineate the property boundary for the purposes of construction.

INSTALLER'S RESPONSIBILITIES

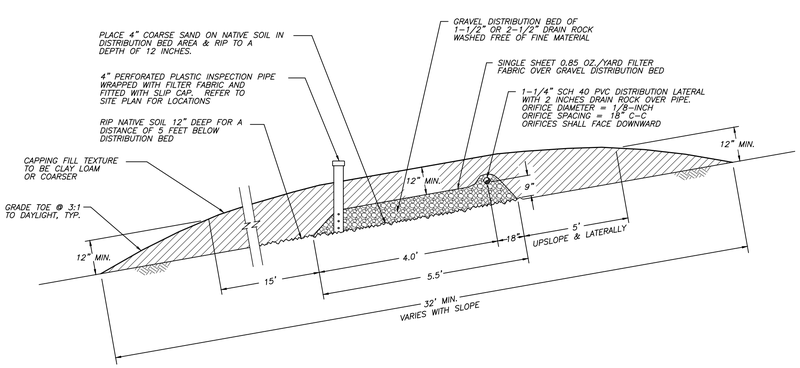
1. Construction of this septic system may be undertaken only after obtaining a permit from the permitting authority(ies). Do not begin construction prior to approval of this design and issuance of a permit by the permitting authority(ies). The owner and/or installer of this system is/are solely responsible for identifying and obtaining any other permits which may be required for construction of this system.
2. Construction-related site visits or observations, are required during construction by the designer and, in most cases, the permitting authority. The installer and/or owner are solely responsible for contacting the designer and the permitting authority at least 24 hours in advance of each required observation. Every effort will be made to respond within 24 hours, however additional notice may sometimes be required. Delta Engineering, Inc. will not contact the permitting authority for construction related site visits.
3. The permit and an approved set of design documents must be on the job site at all times.
4. The installer and/or owner are solely responsible for ensuring that all property boundaries are accurately marked, that all appropriate setbacks are marked and observed, and that underground and/or overhead utilities and/or utility easements are identified prior to construction. These design documents may not show all present utilities.
5. Information on these plans pertaining to existing underground facilities is based on the best information available at the time of plan preparation and is for information purposes only. Installer shall locate all facilities and utilities prior to excavation in any area. Telephone Underground Service Alert (USA) toll free at 811 a minimum of forty eight (48) hours prior to start of construction. Pothole all crossings by hand to verify marked locations prior to excavation.
6. Under no circumstances shall the disposal or replacement areas, or the relative positions of the other system components, be modified without the prior consent of the permitting authority(ies).
7. If the soil in the disposal area can be formed into a ribbon it is too wet to excavate. Do not remove vegetation, operate equipment, or otherwise manipulate soils in the disposal area until receiving approval from the designer.
8. Disturbance of native soils in the disposal and/or replacement areas and for a distance of 50 feet below the disposal or replacement areas may damage the permeability of the soil column and cause premature system failure. Do not at any time allow vehicular traffic, construction equipment, or livestock in the area within or below the disposal or replacement areas.
9. Do not direct concentrated surface water runoff onto adjacent properties.
10. Some OSI control panels utilize magnetic motor contractors that can cause noise and/or vibration in the dwelling if mounted on the dwelling's exterior wall. Coordinate panel location with the owner prior to mounting to avoid conflicts.
11. All disturbed areas shall be seeded at a rate of 5 lbs./1000 s.f. with blando brome, annual rye, or other approved grasses. Apply fertilizer at a rate of 250 lbs./acre and straw mulch at a rate of two tons/acre.

2 NOTES

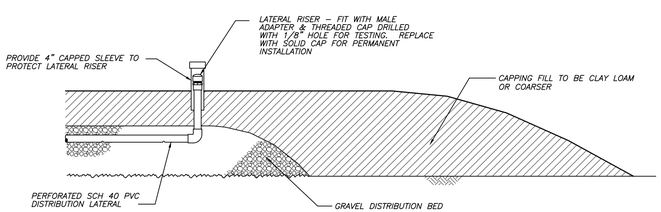
AT-GRADE BED CONSTRUCTION GUIDELINES

The following guidelines are presented as a general guide to the installer based on the designer's past experience with at-grade bed construction. These guidelines are not intended to modify or be a substitute for the installer's construction responsibilities or expertise. Delta Engineering, Inc. does not accept liability for the means or methods of construction.

1. Before beginning construction, check soil for proper moisture. Soil moisture must be observed by the designer prior to ripping. Lay out disposal bed and call for layout observation.
2. Cut grass, brush and trees within disposal area and rake area to remove organic debris. Do not scrape disposal bed area with motorized equipment and do not operate equipment for a distance of 50 feet below the disposal bed area.
3. Stake the lower edge of the distribution bed so that it is level. At the steepest end of the bed, measure upslope to the bed's upper edge and use this elevation to stake the bed's upper edge so that it is level. Note that the bed's width may vary from end to end as ground slope varies.
4. Place 4 inches of coarse washed sand over entire distribution bed. Discuss rigging method with designer prior to ripping.
5. Rip distribution bed area through the sand to a depth of approximately 12 inches. Do not over-rip soil and do not operate equipment on previously ripped areas. Call for ripped ground observation.
6. Place distribution bed gravel to the depth and extent shown on these plans. Do not place gravel from downslope side of bed.
7. Place the perforated distribution lateral on the gravel bed so that it is level from one end to the other, with orifices temporarily oriented upward. Call for squirt test observation.
8. After squirt test observation, rotate laterals so that orifices are facing downward and solvent weld into place. Cover lateral with 2 inches of additional drain rock and cover the entire distribution bed with filter fabric.
9. Rip an area 5 feet wide immediately below the completed distribution bed. Place capping fill material to the depth and extent shown on these plans. Complete all other system details and call for final observation.



DISTRIBUTION BED CROSS SECTION



DISTRIBUTION BED END SECTION

SINGLE AT-GRADE

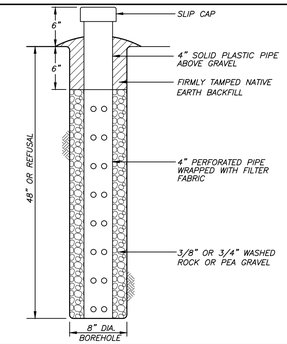
20 AT-GRADE DISPOSAL BED SECTIONS

NOT TO SCALE

11 NOT USED

7 NOT USED

3 GUIDELINES

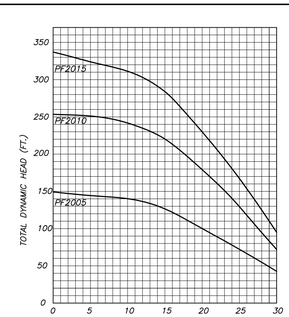


MONITORING WELL

12 MONITORING WELL

NOT TO SCALE

8 NOT USED



4 PUMP PERFORMANCE CURVE

DELTA ENGINEERING, INC.
ENGINEERING LAND DEVELOPMENT
PLANNING ENVIRONMENTAL PERMITTING
41 MAIN STREET JACKSON, CA 95642
209-223-1441 INFO@DELTAENGINEERINGINC.COM

REGISTERED PROFESSIONAL ENGINEER — ROBIN DAVID PETERS — No. 38604 — CIVIL — STATE OF CALIFORNIA

© 2026 DELTA ENGINEERING, INC. ALL RIGHTS RESERVED

COPYRIGHT NOTICE
THE TEXT, GRAPHICS, DESIGN AND PRESENTATIONS ON THIS PLAN ARE PROTECTED BY COPYRIGHT AND ARE THE SOLE PROPERTY OF DELTA ENGINEERING, INC. NO PORTION OF THE INFORMATION ON THIS PLAN MAY BE REPRODUCED IN ANY FORM OR BY ANY MEANS WITHOUT PRIOR WRITTEN PERMISSION FROM DELTA ENGINEERING, INC.

LICENSE
THIS DRAWING IS NOT FINAL AND MAY NOT BE USED FOR CONSTRUCTION UNLESS WET-SIGNED BY THE ENGINEER. THIS DRAWING REPRESENTS A ONE-TIME LICENSE FOR USE ON THE SUBJECT PROPERTY ONLY.

ON-SITE WASTEWATER DISPOSAL SYSTEM

AMADOR COUNTY APN 001-220-013
857 CARBONDALE ROAD, IONE

PREPARED FOR: MOUNIR KADDOURA
3550 WATT AVENUE #317
SACRAMENTO, CA 95821

DESIGN DATA & CONSTRUCTION DETAILS

NO.	REVISION	BY	DATE	APP.

JOB NO.: 260009
DATE: 03-20-26
DRAWN: SD
SCALE: AS NOTED
DESIGNED: RDP
CHECKED: RDP
SHEET: 2 of 2

03-20-26

KADDOURA 857 CARBONDALE ROAD #260009

Outlook

Gardens of Noor Cemetery

From m.helmle@comcast.net <m.helmle@comcast.net>
Date Tue 11/3/2026 5:44 PM
To BOS-Board of Supervisors <boardofsupervisors@amadorcounty.gov>

1 attachment (1 MB)
Statement of Opposition for Gardens of Noor Cemetery.pdf;

Some people who received this message don't often get email from m.helmle@comcast.net. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good Evening:

I would like to submit the attached Statement of Opposition for the Gardens of Noor Cemetery proposed in Ione, CA. I understand this matter will be discussed at the upcoming Board of Supervisors meeting to be held on November 10, 2026. My neighbors and I would like you to include the attached statement since we are unable to attend the meeting. Thank you!

Sincerely,
Madelyn Helmle
(916) 806-2972

Statement of Opposition

TO: The Amador County Board of Supervisors

ATTN: Amador County Board of Supervisors, 810 Court Street, Jackson, CA 95642 (boardofsupervisors@amadorcounty.gov)

RE: Formal Citizen Petition Opposing Request for Use Permit Application UP-22; 2-3 Gardens of Noor Cemetery

PROPERTY LOCATION: 857 Carbondale Rd. and 16630 Lambert Rd., Ione, CA 95640 (APN: 001-220-013)

CURRENT ZONING: R1A Single-Family Residential & Agricultural and has an MRZ, Mineral Resource Zone General Plan Designation

PROPOSED USE: 1832 graves sites divided among 7 blocks on the north end of the property. Proposed improvements include driveway parking for up to 100 cars, and a parking lot with 64 permanent spaces, and permanent restrooms. Proposed number of funerals is 60 funerals a month with a limit of 50 attendees per event.

We, the undersigned residents, property owners, and stakeholders of Amador County, hereby formally oppose the land use proposal referenced above. We respectfully urge the Board of Supervisors to deny this application because it is inconsistent with the Amador County General Plan, would place an undue burden on local infrastructure—including roads and water resources—would significantly alter the rural character of our community, and raises environmental concerns requiring careful consideration under the California Environmental Quality Act (CEQA).

Printed Name: Madelyn Helmle Signature: Madelyn Helmle

Address: 1505 Willow Dr., Ione CA 95640 Date: 10/13/2026

Printed Name: Heather Lueck Signature:

Address: 1514 Baywood Greens Dr. Ione, CA. Date: 10-13-2026

Printed Name: Tammy Feryance Signature:

Address: 1503 Willow Drive, Ione CA 95640 Date: 10/14/26

Printed Name: Denise Perry Signature: Denise Perry

Address: 1506 Willow Dr Date: 10/18/26

Printed Name: Hannah Rodriguez Signature: Hannah Rodriguez

Address: 1508 Willow Dr Ione, CA 95640 Date: 10/18/26

Printed Name: Stacy Harvey Signature: Stacy Harvey

Address: 1508 Willow Dr. Ione, CA 95640 Date: 10/18/26

Printed Name: Dennis Harvey Signature: Dennis Harvey

Address: 1508 Willow Dr. Ione, CA 95640 Date: 10/18/26

Printed Name: Jack Mills Signature: Jack Mills

Address: 1015 Willow Dr Ione CA 95640 Date: 10-18-26

Printed Name: Jennie Reynolds Signature: Jennie Reynolds

Address: 1015 Willow Dr Date: 10-18-26

Printed Name: _____ Signature: _____

Address: _____ Date: _____

Printed Name: _____ Signature: _____

Address: _____ Date: _____

Printed Name: _____ Signature: _____

Address: _____ Date: _____

10-22-24

My name is Hope L Heat
10800 Dutschke Rd
Ione, Ca 95640

I strongly object to have a mussiim cemetary put in the Carbonedale area. The thought of them coming to our area is beyond comprehesion.

There are alot of areas in larger cities available to them. We need to keep our county in control of who has the right to be here. I am not a prejudice person but those people are very rude & have no respect for we americans.

Let them find another place to be lets keep Amador Co. a place for ranchers where our children can grow up in a normal enviorment.

Thank you

Hope L. Heath
209-304-1410

I hope that all who oppose are heard and respected. Money isn't everything!

Outlook

400 yr old oak

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Tue 9/8/2026 12:13 PM
To Plan-Planning <planning@amadorcounty.gov>

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



Outlook

Re: Gardens of Noor Cemetery

From Plan-Planning <planning@amadorcounty.gov>
Date Tue 10/6/2026 11:36 AM
To Heather Peek <hpeek@amadorcounty.gov>

Received, thank you.

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorcounty.gov

From: Heather Peek <hpeek@amadorcounty.gov>
Sent: Tuesday, October 6, 2026 10:07 AM
To: Plan-Planning <planning@amadorcounty.gov>
Cc: Greg Gillott <GGillott@amadorcounty.gov>
Subject: Fw: Gardens of Noor Cemetery

Please see email below.

Sent via the Samsung Galaxy S20 FE 5G, an AT&T 5G smartphone
Get Outlook for Android

From: Jessica Sloat <aintknowsaint@gmail.com>
Sent: Tuesday, 06 October 2026 10:02:37
To: BOS-Board of Supervisors <boardofsupervisors@amadorcounty.gov>
Subject: Gardens of Noor Cemetery

Some people who received this message don't often get email from aintknowsaint@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

My name is Jessica Sloat. I live on Carbondale road. I would be directly impacted if this cemetery proposal is approved. The roads here are distressed, have many potholes, are cracked, and in over all poor condition. I understand 2 funeral processions could be allowed

each day. Carbondale Road and Maxwell road will be heavily impacted by this additional traffic. Additionally this is too close to the airport. I also have concerns regarding the water and environmental impact of placing a cemetery in this location. During the TAC meeting, the applicant suggested he may want to bury embalmed bodies. My question is, who will regulate this? If such a mishap should arise that embalmed bodies are buried and the toxins reach the water table, how will this be dealt with? Will soil checks be performed? I have these and many other questions regarding regulation enforcement. How much money will this cost tax payers?

Please, I urge you to reject this project. It will cause traffic and potential environmental risk to our community, disruption to livestock ect. We live and ranch here. It is my belief that such a cemetery should be built off of a main road as to minimally impact small country roads that are narrow and distressed. If this proposal is approved, I will be selling my 90 acre property and leaving Amador country as I do not intend to live near a cemetery on a narrow road with 2 funeral processions a day.

Thank You
Jessica Sloat

Outlook

Re: use permit UP-22;2-2

From Plan-Planning <planning@amadorcounty.gov>
Date Mon 10/19/2026 9:08 AM
To John Pulice <ecilupjj@gmail.com>

Received, thank you. The request for appeal will be included in the project packet, and a newspaper notice will be released 10 days prior to the date of the scheduled hearing. If you have questions regarding the tax status of the property, the Tax Collector's office may be reached at (209)223-6364.

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorcounty.gov

From: John Pulice <ecilupjj@gmail.com>
Sent: Sunday, October 18, 2026 1:55 PM
To: Plan-Planning <planning@amadorcounty.gov>
Subject: use permit UP-22;2-2

You don't often get email from ecilupjj@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Now isn't that convenient. The hearing will be held at 10:30 AM so that those most impacted by the proposed land use will be able to attend, not that they have to work, or manage their business or had previous plans, Nov 10, at 10:AM seems to be a very convenient time. Has a list of reasons for the rejection been compiled and published to facilitate the "hearing"? Can, and will the LEDGER DISPATCH publish a PUBLIC NOTICE?
This incident gets dirtier and dirtier. Which time has the applicant been perfectly truthful regarding the proposed use of the land? What is the current status/ownership of the land and the tax status?

Outlook

Gardens of Noor Cemetery

From Trevor Banner <trevorbanner@gmail.com>
Date Tue 10/20/2026 11:15 AM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from trevorbanner@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

As one of a multi-generational resident and taxpayer in Amador County, I'm requesting the denial of a use permit for the Gardens of Noor Cemetery off of Carbondale and Lambert roads, northwest of Ione. Having first-hand knowledge of the soil conditions in that area and the issues I'd encountered in the past with water lines for residents near the Eagle's Nest Airport, I can't imagine that area being fit for a cemetery.

In addition, the roads in that area are in no way sufficient or in the condition needed for that type of increase in traffic.

And I can't imagine the damage to the environment that would/could be caused by that many cars on those roads during the annual tarantula mating season when hundreds/thousands of them gather on or cross the roads. It's already impossible to drive a few cars along those roads without crushing dozens, even when being careful. The addition of hundreds of cars could only serve to annihilate their population in the area.

Trevor Banner
Jackson, California

October 21, 2026

Amador County Board Of Supervisors
RE: UP-22: 2-3 Gardens of Noor Cemetery.

Dear Chairman and Board Members

My name is Curtis Holmes, I'm an Eagles Nest Airport lot owner and resident.

I'm in opposition to this project for the numerous reasons that have been presented by others and for reasons that would be unique to my families lot. We are located barely west and downhill from the proposed cemetery site and would receive surface and likely subsurface water runoff from the proposed site onto our lot.

There is a culvert under Lambert Rd that routes some of the surface water runoff from the proposed cemetery site down a ditch and into our pond that's about 500 yards from the proposed cemetery site. Unlike many other ponds in our area, ours has a healthy PH balance and supports a dense eco system. This pond covers a land area of about 9 acres and is used for recreation by my family and several others in the area that routinely fish, swim, kayak and paddle board here.

Due to the high level of clay in this area, I believe that much of the fluid from these corpses and waste water system would not percolate downward as would be desired and that these fluids would likely flow horizontally and downhill into our pond. This fluid could potentially carry bacteria like E. Coli, Salmonella and Strep. I understand that some of these pathogens can live outside of the host body for years after the death of the host. Approval of this project could potentially cause our families health issues. In addition, it would change the pristine feel of our recreation area just knowing that the water could contain fluids from the corpses and leach field wast water.

In addition to the above concern, the location of this proposed cemetery site is right at the entrance to Eagles Nest Airport. Any guest or potential lot buyers would see the cemetery first when entering the airport. I don't believe that I know anyone that would want to live next to a cemetery or have it as the entry feature of their community. I believe that a large percentage of potential Eagles Nest buyers would not even make an offer or would dramatically reduce their offer due to this. Considering that there are 23 very valuable lots within Eagles Nest Airport, the combined property value loss due to the approval of this project could easily be in the millions.

The approval of this cemetery project would be a huge disservice to our community and environment and I strongly urge the Board to rule against this project at the November 10th meeting and not drag this on.

Thank You for your consideration
Curtis Holmes
17029 Lambert Rd.
Ione, Ca. 95640

Outlook

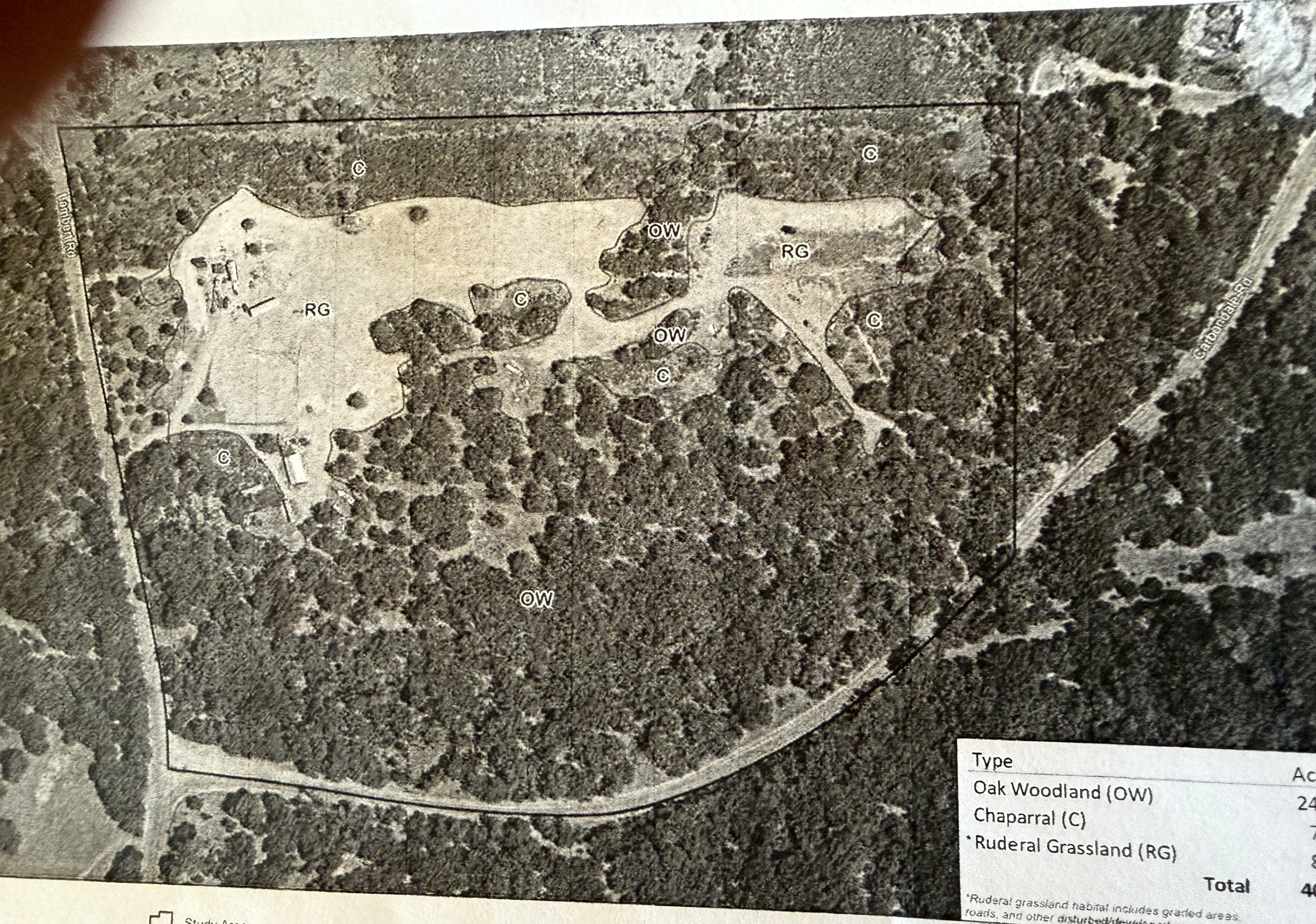
Fwd: Blue aols map

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Sat 9/5/2026 3:08 PM
To Plan-Planning <planning@amadorcounty.gov>

2 attachments (6 MB)
IMG_0487.jpeg; IMG_0490.jpeg;

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---------- Forwarded message ---------
From: **Ron Woodhouse** <ronwoodhouse33@gmail.com>
Date: Sat, Sep 5, 2026 at 12:51 PM
Subject: Blue aols map
To: Ron Woodhouse <ronwoodhouse33@gmail.com>



Type	Ac
Oak Woodland (OW)	24
Chaparral (C)	
*Ruderal Grassland (RG)	
Total	4

*Ruderal grassland habitat includes graded areas, roads, and other disturbed/developed areas.

Study Area

Vegetation Types

0 200 400
Feet

Vegetation Types



Outlook

Fwd: Ione Manzanita my property

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Sat 9/5/2026 3:11 PM
To Plan-Planning <planning@amadorcounty.gov>

2 attachments (19 MB)
IMG_0436.jpeg; IMG_0442.jpeg;

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---------- Forwarded message ---------
From: **Ron Woodhouse** <ronwoodhouse33@gmail.com>
Date: Sat, Sep 5, 2026 at 12:56 PM
Subject: Ione Manzanita my property
To: Ron Woodhouse <ronwoodhouse33@gmail.com>





Outlook

Fwd: IMG_4799

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Sat 9/5/2026 3:13 PM
To Plan-Planning <planning@amadorcounty.gov>

1 attachment (19 MB)
IMG_4799.MOV;

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---------- Forwarded message ---------
From: **Ron Woodhouse** <ronwoodhouse33@gmail.com>
Date: Sat, Sep 5, 2026 at 1:08 PM
Subject: IMG_4799
To: Ron Woodhouse <ronwoodhouse33@gmail.com>

Buttercups

Outlook

Fwd: White tailed kite

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Sat 9/5/2026 3:15 PM
To Plan-Planning <planning@amadorcounty.gov>

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---------- Forwarded message ---------
From: **Ron Woodhouse** <ronwoodhouse33@gmail.com>
Date: Sat, Sep 5, 2026 at 1:58 PM
Subject: White tailed kite
To: Ron Woodhouse <ronwoodhouse33@gmail.com>



Outlook

Fwd: IMG_0406

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Sat 9/5/2026 3:18 PM
To Plan-Planning <planning@amadorcounty.gov>

1 attachment (16 MB)
IMG_0406.MOV;

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---------- Forwarded message ---------
From: **Ron Woodhouse** <ronwoodhouse33@gmail.com>
Date: Sat, Sep 5, 2026 at 1:16 PM
Subject: IMG_0406
To: Ron Woodhouse <ronwoodhouse33@gmail.

Outlook

Fwd: Cemetery Blue Oaks at the gate

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Sun 9/6/2026 7:49 AM
To Plan-Planning <planning@amadorcounty.gov>

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---------- Forwarded message ---------
From: **Ron Woodhouse** <ronwoodhouse33@gmail.com>
Date: Fri, Sep 4, 2026 at 4:23 PM
Subject: Cemetery Blue Oaks at the gate
To: Ron Woodhouse <ronwoodhouse33@gmail.com>



Outlook

Fwd: lone manzanita on property next to cemetery

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Sun 9/6/2026 7:52 AM
To Plan-Planning <planning@amadorcounty.gov>

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---------- Forwarded message ---------
From: **Ron Woodhouse** <ronwoodhouse33@gmail.com>
Date: Fri, Sep 4, 2026 at 4:31 PM
Subject: lone manzanita on property next to cemetery
To: Ron Woodhouse <ronwoodhouse33@gmail.com>



Outlook

Re: Ione Manzanita map Holman and Meyer

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Sun 9/6/2026 4:14 PM
To Plan-Planning <planning@amadorcounty.gov>

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please show these pics at the meeting Tuesday when requested One Manzanita map Holman and Meyer Ron Woodhouse

On Sun, 6 Sep 2026 at 4:08 PM, Ron Woodhouse <ronwoodhouse33@gmail.com> wrote:

> ---------- Forwarded message ---------
> From: **Ron Woodhouse** <ronwoodhouse33@gmail.com>
> Date: Sat, 5 Sep 2026 at 3:27 PM
> Subject: Fwd: Ione Manzanita map Holman and Meyer
> To: <planning@amadorcounty.gov>
>
> Please show Ione Manzanita map pictures when requested during my presentation at Planning Comm meeting Tuesday Ron Woodhouse
>
> ---------- Forwarded message ---------
> From: **Ron Woodhouse** <ronwoodhouse33@gmail.com>
> Date: Sat, 5 Sep 2026 at 1:00 PM
> Subject: Ione Manzanita map Holman and Meyer
> To: Ron Woodhouse <ronwoodhouse33@gmail.com>



Distribution of *Phytophthora cinnamomi* within the range of lone manzanita (*Arctostaphylos myrtifolia*)



Prepared by:

Tedmund J. Swiecki, Ph.D.
Elizabeth Bernhardt, Ph.D.
1027 Davis Street
Vacaville, CA 95687-5495

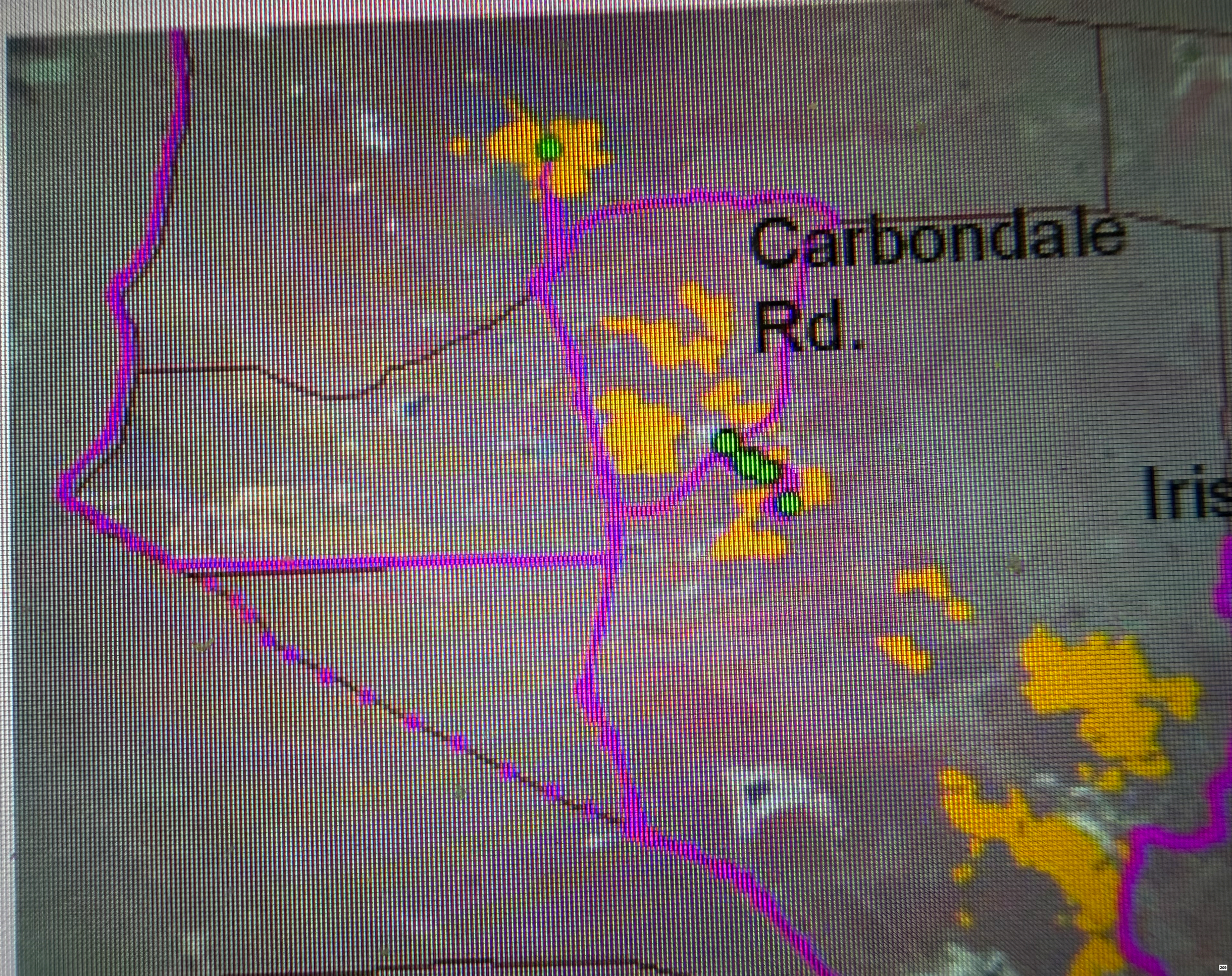
and
Matteo Garbelotto, Ph. D
Department of ESPM-ES,
University of California
Berkeley, CA 94720-3110

Agreement No. P022013 between the California Department of Fish and Game and the University of California

UC Subagreement SA4315
PR Project No. 2004-0601

September 20, 2005

PHYTOSPHERE RESEARCH


Carbondale
Rd.
Iris

Outlook

FW: Critical photos for your biological discission

From davidwardall@gmail.com <davidwardall@gmail.com>
Date Mon 9/7/2026 6:00 PM
To Plan-Planning <planning@amadorcounty.gov>
Cc Ron Woodhouse <ronwoodhouse33@gmail.com>; tmacmc@aol.com <tmacmc@aol.com>; Mike Preskar <mhpres@icloud.com>; Jim Wirfel <wirf@edcgsr.com>

3 attachments (6 MB)

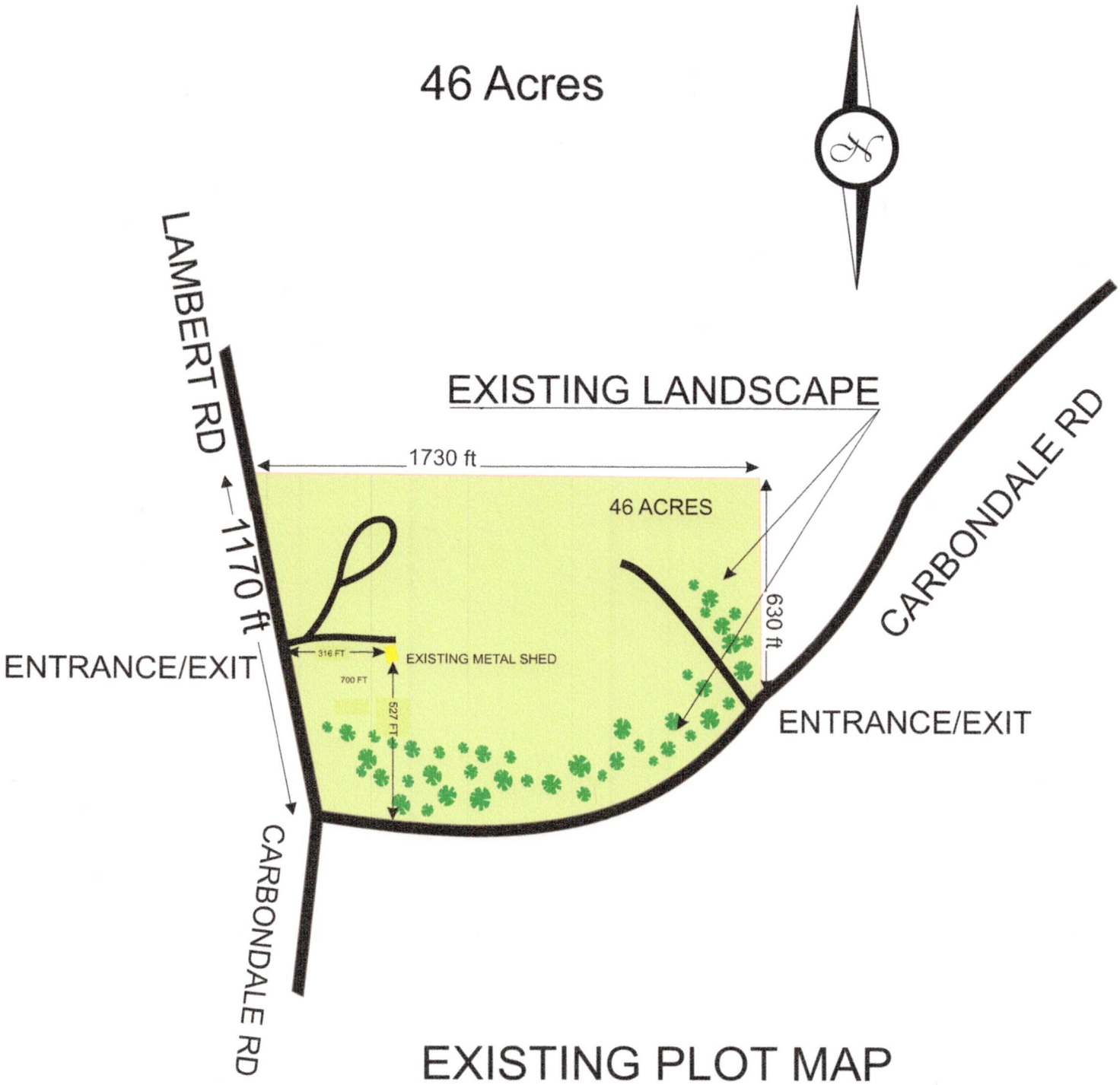
Appliccants incorrect illustration of too few oak trees.pdf; Ione removal of Oak Trees and endangered plants 2026.pdf; 1999 Bilogocal Report by Dr. Patrick Collins PhD.pdf;

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello planning Staff-
Please not these three photos for local resident speaker Ron Woodhouse.
He will be focusing on the Moore biological report

PROJECT PLOT MAP

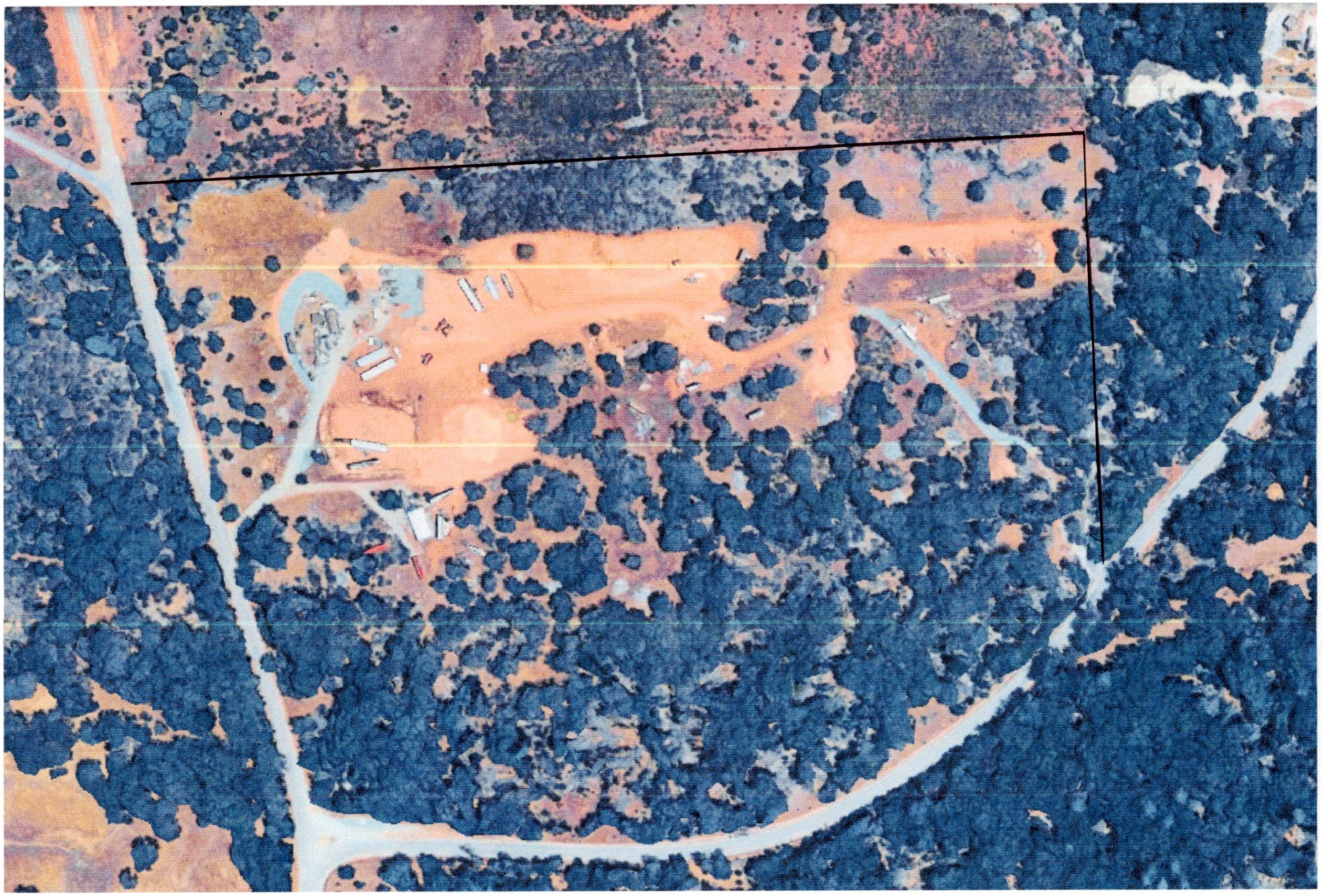
46 Acres



EXISTING PLOT MAP

File Edit View Add Tools Help

Search Google Earth



BIOLOGICAL SURVEY
FOR THE EAGLES NEST ESTATES
AMADOR COUNTY, CALIFORNIA

for

David Wardall
EAGLES NEST OWNERS ASSOCIATION
17069 Lambert Rd.
Ione, California 95640

by

Patrick D. Collins, Ph.D.
MT. NEBO SCIENTIFIC, INC.
330 East 400 South, Suite 6
Springville, Utah 84663
(801) 489-6937

May 1999

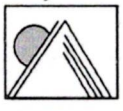


TABLE OF CONTENTS

Introduction 1

Methods 1

Results 2

Vegetation Map 2

Plant Communities 2
Oak Woodlands 2
California Annual Grasslands 2
Manzanita Chaparral 3
Ione Manzanita Chaparral 3
Vernal Pools 3

Plant Species of Special Concern 4
Bisbee Peak Rush-Rose 4
Ione Manzanita 5
Ione Buckwheat 6
Irish Hill Buckwheat 6
Parry's Horkelia 6

Wildlife Corridors 7

Conclusions 7

Recommendations 8

Literature 9

Vegetation Map . . . . . (folder)

BIOLOGICAL SURVEY
FOR THE EAGLES NEST ESTATES
AMADOR COUNTY, CALIFORNIA

INTRODUCTION

The Eagles Nest Estates is a planned subdivision of residential dwellings with aviation amenities including individual aircraft buildings supported by a common taxiway and runway. Individual lot sizes average approximately 40 acres.

The Technical Advisory Committee (TAC) for Amador County Planning Department has required the Eagles Nest Owner's Association to provide a biological survey of their property for "special status plant species, and whether or not wetland habitats and wildlife corridors exist on the property". This study was to be done in order for the county to draft conditions and mitigation measures to complete the 'initial study' for a proposed Mitigated Negative Declaration.

The Eagles Nest Estates property lies in the transitional areas between the Great Central Valley and Sierra Nevada geographic subdivisions of California. Vegetation types within this area were California Annual Grasslands, Foothill Woodlands and Chaparral. Elevation of the study area ranged between 220 ft and 250 ft above sea level.

METHODS

Fieldwork for the study at the Eagles Nest Estates property was conducted by systematically walking the entire area. On-site vegetation mapping, plant species of special concern surveys, and vernal pool mapping was accomplished during the field study. An aerial photograph was utilized first for the field mapping and later to make subsequent interpretations to create a final vegetation map of the area.

Habitats for species of special concern and vernal pools were surveyed during the field investigations. When a population of one of these species or a vernal pool was located, appropriate environmental and biological data were then recorded.

RESULTS

Vegetation Map

Results from the field mapping were transferred to an aerial photograph which are shown on the "Vegetation Map" included in this report. The plant communities delineated on the property shown on the vegetation map include Oak Woodland, California Annual Grasslands, Manzanita Chaparral, and Ione Manzanita Chaparral. Vernal pool communities are also shown on the Vegetation Map.

Plant Communities

Oak Woodlands

Located in the upland areas of the study area, Oak Woodlands or Foothill Woodlands was the most common vegetation type found in the Eagles Nest Estates. Found only in California, this particular woodland type covers several million hectares in the Central Valley of California (Barbour and Major 1995). Often called the Blue Oak series or phase, common woody species of this plant community included blue oak (*Quercus douglasii*), interior live oak (*Q. wislizenii*), foothill pine (*Pinus sabiniana*) and whiteleaf manzanita (*Arctostaphylos viscida*).

California Annual Grasslands

Nearly as important from an acreage standpoint and located on the valley floors within the study area, were the California Annual Grasslands. Historically these grasslands were comprised

of perennial plant species but have long been known to be dominated by the present-day annual exotic grass species. Plant species in this area were soft chess (*Bromus hordeaceus*), ripgut (*B. diandrus*), and storksbill (*Erodium botrys*). Located within the California Annual Grasslands were vernal pools. This important remnant of the pristine annual grasslands of California has been discussed below.

Manzanita Chaparral

Located within the upland areas in the study area, the Manzanita Chaparral was dominated by whiteleaf manzanita, chamise (*Adenostoma fasciculatum*), common manzanita *(Arctostaphylos manzanita*), foothill pine (*Pinus sabiniana*), and wedgeleaf ceanothus (*Ceanothus cuneatus*).

Ione Manzanita Chaparral

Also located within the upland areas and within the Manzanita Chaparral and Foothill Woodlands was the Ione Manzanita Chaparral. Ione manzanita (*Arctostaphylos myrtifolia*) appeared to be nearly the sole species in this community. More about this species is discussed in the following section called "Plants of Special Concern".

Vernal Pools

Located within the California Annual Grassland community mentioned above vernal pools are an important feature in the project area. Vernal pools area primarily hard-pan depressions in the valley floor that fill with water during winter precipitation events. As the season progresses and the water evaporates, beautiful concentric rings of showy, native annual plant species appear. Because vernal pools are unique habitats and are a historic relic of pristine native valley grasslands, they are a much cherished resource for botanists and layperson alike. They often support interesting or rare native species. Ecologists disagree, however, whether vernal pools should be treated from an ecosystem or from a vegetation viewpoint (Sawyer and Keeler-Wolf

1995). Vernal pools of the Eagles Nest Estates were mapped and shown on the Vegetation Map included in this report.

Plant Species of Special Concern

A survey was done for specific plant species that have been noted as "Plant Species of Special Concern" by appropriate governmental agencies. These plants could have been listed as threatened, endangered, rare, sensitive or have some other special concern identified by regulatory authorities and/or biologists from other interested groups. The following plant species were surveyed within the Eagles Nest Estates boundaries:

Bisbee Peak Rush-Rose (*Helianthemum suffrutescens*)
Ione Manzanita (*Arctostaphylos myrtifolia*)
Ione Buckwheat (*Eriogonum apricum* var. *apricum*)
Irish Hill Buckwheat (*Eriogonum apricum* var. *prostratum*)
Parry's Horkelia (*Horkelia parryi*)

Bisbee Peak Rush-Rose

Bisbee Peak Rush-Rose is not a state or federally listed species. It is, however, a California Native Plant Society (CNPS) 1B plant which means it may be rare throughout its range, judged to be vulnerable under present circumstances (or have a high potential of becoming so due to habitat vulnerability), have low numbers of individuals (even though they may be wide ranging), or have a limited number of populations. Most 1B plants are endemic to California.

Bisbee Peak Rush-Rose was recognized by Munz (1973) as *Helianthemum suffrutescens* Schreib., but was not recognized as a separate species by Hickman (1993). Instead, the Jepson Manual synonymized the taxon with Peak Rush-Rose, or *Helianthemum scoparium* Nutt.

Bisbee Peak Rush-Rose was found on the properties of the Eagles Nest Estates. Site locations are shown on the Vegetation Map (see S-1, S-2, S-3, S-5, S-6, & S-8).

Site Number S-1, S-2 - The plant was found on a disturbed area here in an area 12 ft by 30 ft. The disturbance was created in the Manzanita Chaparral along the roadside by using scrapers or similar equipment. There were twenty-four (24) individuals of the plant in this area.

Site Number S-3 - This site was located 450 ft south of S1 in the same disturbance type as described above. There were five (5) individuals found an area of 5 ft by 5 ft.

Site Number S-5 - South along the same disturbance type about 225 ft. eight (8) more Bisbee Peak Rush-Rose plants were found in a 6 ft by 20 ft area.

Site Number S-6 - This area, located in undisturbed Manzanita Chaparral, supported a number less than fifty (50) individuals.

Site Number S-8 - This was another site located in the disturbed areas near the road corridor. There were eight (8) individual plants in an area of approximately 15 ft. by 20 ft.

As suggested by the site locations where the individuals were found, certain types of disturbance may actually increase or encourage germination and establishment of this plant species.

Ione Manzanita

Ione manzanita has recently (Federal Register, May 26, 1999) been listed as "Threatened" by federal law. It has no state legal status i.e. rare, threatened or endangered, but it has long been a species of concern by botanists. CNPS also lists this plant as "1B" (see above for description of 1B listing).

Large populations of Ione Manzanita were located in the upland areas and within the Manzanita Chaparral and Oak Woodlands (see Vegetation Map). Ione manzanita appeared to be nearly the sole species in the community where it was found on the Eagles Nest Estates. As one may guess by observing the Vegetation Map, number of individuals were too numerous to count in this area.

Ione Buckwheat

Ione buckwheat has a legal status of "Endangered" by the State of California. It has also recently been listed as "Endangered" by federal law (Federal Register, May 26, 1999). This species was not found within the boundaries of the Eagles Nest Estates.

Irish Hill Buckwheat

Irish Hill buckwheat also has a legal status of "Endangered" by the State of California. The plant has also recently been listed as "Endangered" by federal law (Federal Register, May 26, 1999). This species was not found within the boundaries of the Eagles Nest Estates.

Parry's Horkelia

A member of the rose family, this plant species has no federal or state legal status i.e. rare, threatened or endangered, but it is a 'Species of Concern' by CNPS that lists this plant as 1B (see above for description of 1B listing). Parry's Horkelia was found within the study area (see Site Locations S-4 and S-7 on the Vegetation Map).

Site Number S-4 - This site was located on the same disturbance corridor as described above for the Bisbee Peak Rush-Rose. The plant was located in a 3 ft by 3 ft area and appeared to be spreading.

Site Number S-7 - Also found in a disturbed area, Parry's Horkelia was located in a powerline corridor. There were three (3) large populations of this plant each in a 20 ft by 20 ft area. The populations appeared very healthy and spreading.

Because the plant's habit is open mat-forming, individual plants were difficult to discern. Of particular interest, this plant was seen only in disturbed areas of the property.

Wildlife Corridors

There were no important wildlife areas, parks, wilderness areas or preserves designated on or near the study area, so no distinct migration routes were expected. However, with the diverse plant communities and ratio of open vs. wooded areas, wildlife undoubtably use the area extensively. Elevation of the study area was below the most important deer wintering areas. Migrating birds also move through the area, but because there is no distinct corridor, impacts of the planned project would be one of cumulative effect rather than the Eagles Nest Estates project being of one major impact.

There are some clay pits that have been left un-reclaimed for many decades e.g. Harbinson-Walker's Yosemite Pit. Some of these pits hold water and are used by some wildlife species. The Eagles Nest Estates have very few fences or other barriers that would preclude the movement of wildlife species through the area.

CONCLUSIONS

Biological resources were surveyed for the Eagles Nest Estates in Amador County, California. Four major plant communities were surveyed and mapped including vernal pools in the study area. The Ione Manzanita Chaparral plant community and vernal pool systems were noteworthy features on the property.

There were five (5) "Plant Species of Special Concern" surveyed within the boundaries of the study area. Three (3) of these species were located on the project area including Bisbee Peak Rujsh-Rose, Ione Manzanita, and Parry's Horkelia.

RECOMMENDATIONS

Based on the biological survey of the Eagles Nest Estates, the following recommendations are made if future disturbances to the biological resources are proposed.

- Avoid stands of Ione Manzanita because it is a federal listed plant species.

- Avoid vernal pool habitats and drainage to them if possible. If disturbance is necessary, the property owners should recreate vernal pools in adjacent areas so that no net loss is insured.

- For areas that are proposed for any future disturbance, property owners should have a qualified botanist clear those <u>specific areas</u> for the presence of the following species:

  Bisbee Peak Rush-Rose (*Helianthemum suffrutescens*)
  Ione Manzanita (*Arctostaphylos myrtifolia*)
  Ione Buckwheat (*Eriogonum apricum* var. *apricum*)
  Irish Hill Buckwheat (*Eriogonum apricum* var. *protratum*)
  Parry's Horkelia (*Horkelia parryi*)

- If Ione Manzanita, Ione Buckwheat or Irish Hill Buckwheat are located in the future, avoidance of disturbance to them and their habitats is recommended.

- If known populations (or those found in the future) of Bisbee Peak Rush-Rose or Parry's Horkelia are located in sites of proposed disturbances, plants should be transplanted or established by other methods in areas near the disturbance site in an attempt to mitigate their loss.

- If other native plant communities are disturbed, attempts should be made to reclaim as much of the surrounding areas as possible with native plant species .

LITERATURE CITED

Barbour, M.G. and J. Major (eds.). 1995. Terrestrial vegetation of California. Wiley Interscience, reprinted by the California Native Plant Society, 1722 J Street, Suite 17, Sacramento, CA. 1020 p.

Hickman, J.C. (ed.). 1993. The Jepson Manual: Higher Plants of California. University of California Press, Los Angeles California. 1400 p.

Munz, P.A. and D.D. Keck. 1973. A California Flora and Supplement. University of California Press, Berkeley California. 1681 p.

Federal Register. May 26, 1999. U.S. Department of Interior, Fish & Wildlife Service, Rules and Regulations. Volume 64, No. 101.

Sawyer, J.O. and T. Keeler-Wolf. 1995. A manual of California vegetation. California Native Plant Society.

Outlook

Poor County Roads

From davidwardall@gmail.com <davidwardall@gmail.com>
Date Mon 9/7/2026 3:26 PM
To Plan-Planning <planning@amadorcounty.gov>
Cc Mike Preskar <mhpres@icloud.com>; 'Tom McCleary' <tmacmc@aol.com>; Jim Wirfel <wirf@edcgsr.com>; Ron Woodhouse <ronwoodhouse33@gmail.com>; Ron Hess <hess3x@sbcglobal.net>; 'PJ Patrick Flynn' <pjpatrickflynnbooks@gmail.com>

8 attachments (783 KB)

Untitled attachment 00239.txt; Untitled attachment 00242.txt; Untitled attachment 00245.txt; Untitled attachment 00248.txt; IMG_3281.jpeg; IMG_3283.jpeg; IMG_3295.jpeg; IMG_3296.jpeg;

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello staff-

I will be talking about traffic loading on way too narrow very poor condition roads.
During my presentation can you please display these photos about 20 seconds per photo please.

Thanks!
David Wardall







Outlook

Fwd: The cemetery proposed near the intersection of Carbondale and Lambert Roads

From Jerry Poore <jerry.friendsrealestate@gmail.com>
Date Mon 9/7/2026 9:18 PM
To Plan-Planning <planning@amadorcounty.gov>

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---------- Forwarded message ---------
From: **DAVID WEST** <invenit@aol.com>
Date: Mon, Sep 7, 2026 at 9:18 PM
Subject: The cemetery proposed near the intersection of Carbondale and Lambert Roads
To: <jerry.friendsrealestate@gmail.com>

My wife and I live near the intersection of Carbondale and Barney Roads. We object to the construction of a cemetery near Carbondale and Lambert Roads.
The traffic volume, related noise, impacts created by water use and sewerage requirements are not compatible with our rural community. Please oppose project approval. Thank you .

David and Mary West

Sent from my iPhone

Outlook

To Amador County Planning Commission

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Mon 9/7/2026 11:54 AM
To Plan-Planning <planning@amadorcounty.gov>

1 attachment (7 MB)
To Amador County Planning Commission.pdf;

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To: Amador County Planning Commission September 7, 2026
Attn: Chuck Beatty, Planning Director
Address: 810 Court Street, Jackson, Ca. 95642
Email: planning@amadorcounty.gov
RE: Public Comment on Use Permit Application UP-22;2-3 (Gardens of Noor Cemetery) - Inadequacy of Endangered Species and Biological Mitigations in the Proposed MND
Dear Planning Director Beatty and Members of the Planning Commission,
The CEQA document for the proposed Gardens of Noor (use permit UP-22,2-3) fails to note the likely presence of federal and state rare and endangered species.
The plants: Ione Manzanita, Irish Hill Buckwheat, Ione Buckwheat, Brisbee Peak rush-rose, Perrys Horkelia
The animals: Red legged Frog, California Tiger Salamander, Western Red Bat
These plants are documented to exist adjacent to the property. The amphibians exist in ponds nearby. These are all in Western Amador County in the Carbondale area. All are omitted from the environmental study of Moore Biological Consultants submitted by the applicant
The California Oak Preservation Act addresses Blue Oak Woodlands. Moore Consultants states "Interior Live Oak was the only oak species observed in the oak woodlands, no valley oaks were observed." P.6 &7. There are dozens of Blue Oaks on the 25 acre oak woodland, many observable from Carbondale Road. It is impossible to believe an environmental consultant doesn't know what a Blue Oak looks like. CDFW is compelled by law to protect these rare species and ecologically valuable habitats.
There are vernal pools across Lambert from the cemetery. These might be on the property and are not mentioned.
There is a fair argument that the project may cause a significant impact on biological resource and endangered species.
I urge the Planning Commission to require the following before granting any approvals:
1. Comprehensive Protocol Surveys: Relying on accidental discovery during construction (as written in BIO-1) is reactive. Complete, seasonally appropriate protocol surveys for California Endangered Species Act (CESA) listed plants and local wildlife (such as special-status bat or amphibian species) must be finalized before any site work begins
2. Incidental Take Permitting (CESA/ESA): The environmental documents fail to adequately address whether an incident Take Permit (ITP) from the California Department of Fish and Wildlife (CDFW) or the U.S. Fish and Wildlife Service is required. Under CEQA Guidelines 15380, any unmitigated "take" of a protected or rare plant (such as CRPR 1B species) constitutes a significant impact.
3. Long-Term Habitat Fragmentation: The layout of 1,832 gravesites and extensive parking facilities will alter the local watershed and eliminate native oak woodland foraging zones. They must require definitive, binding off-site or on-site preservation and enhancement plans rather than leaving mitigation open-ended.
Because the current MND defers critical biological analysis and fails to provide enforceable performance standards for endangered species protection, I respectfully request that the Planning Commission deny the Use Permit or delay approval until a comprehensive Environmental Impact Report (EIR) is prepared.
Sincerely, Ron Woodhouse 19500 Lambert Rd. Ione, Ca 95640

Outlook

Fwd: Cemetery CDFW and endangered species

From Jerry Poore <jerry.friendsrealestate@gmail.com>
Date Mon 9/7/2026 12:17 PM
To Plan-Planning <planning@amadorcounty.gov>

1 attachment (7 MB)
To Amador County Planning Commission.pdf;

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---------- Forwarded message ---------
From: **Ron Woodhouse** <ronwoodhouse33@gmail.com>
Date: Mon, Sep 7, 2026 at 12:15 PM
Subject: Cemetery CDFW and endangered species
To: <jerry.friendsrealestate@gmail.com>

Jerry there are 5 endangered plants and 3 rare or endangered animals almost certainly on the cemetery property Ione Manzanita documented by numerous studies CDFW has protocols that must be followed The applicant and Planner mentioned none of these in the CEQA report Please read the attached document Thank you Ron Woodhouse

AVDIS & CUCCHI, LLP
LAND USE + REAL ESTATE + ADVOCACY

September 8, 2026

VIA EMAIL TO: planning@amadorcounty.gov

Chuck Beatty, Planning Director
Chair and Members of the Planning Commission
Amador County Planning Department
810 Court Street
Jackson, California 95642

Re: Use Permit UP-22;2-3 (Gardens of Noor Cemetery), APN 001-220-013; Objections of Lucich Enterprises, LLC and Comments on Proposed Mitigated Negative Declaration; Request for Continuance and for Preparation of an Environmental Impact Report

Dear Director Beatty and Members of the Commission:

We submit these comments on behalf of Lucich Enterprises, LLC regarding the proposed Mitigated Negative Declaration and Use Permit UP-22;2-3 for the Gardens of Noor Cemetery. These comments are timely, having been submitted before the close of the public review period at 5:00 p.m. on September 8, 2026. Lucich Enterprises, LLC is the holder of a permitted surface mining operation on approximately 1,000 acres immediately adjoining the project site. We write in that capacity, as an adjoining permitted operator whose mapped mineral resource interest and shared roadway access are directly affected, and not as a general objector.

Our client does not ask the Commission to reach any conclusion about the merits of a cemetery use at this location. Our objections are directed to the sufficiency of the environmental review. For the reasons set forth below, the record before the Commission contains substantial evidence supporting a fair argument that the project may have significant effects on the environment, and the proposed Mitigated Negative Declaration does not supply the information necessary for informed decisionmaking. We object to its adoption. Specifically, the Initial Study contains conflicting project descriptions and an unresolved physical baseline; it relies in five separate chapters on assertions that the project involves no change in use or no physical change, assertions the document itself refutes; its Transportation and Hazards chapters do not analyze the project under the Eagle's Nest Airport overlay as actually enacted and instead materially misstate that ordinance; it is silent as to our client's permitted surface mining operation on the adjoining property notwithstanding the County's own Mineral Resource Zone designation of the project parcel, and its cumulative impacts analysis states that no past, current, or probable future projects were identified in the project vicinity; and it defers to post-approval study a series of questions that determine whether significant impacts exist at all.

I. Interest of Lucich Enterprises, LLC as an Adjoining Permitted Operator

Lucich Enterprises, LLC owns approximately 1,000 acres immediately adjoining the project site. The adjoining property is zoned for mining, carries the same Mineral Resource Zone General Plan designation context at issue in this application, and is the subject of a permitted surface-mining operation. Our client's interest is therefore not a generalized interest in neighborhood character. It is the interest of the holder of a County-approved extraction entitlement on a mapped mineral resource, whose ability to exercise that entitlement is affected by the permanent, functionally irreversible land use the County proposes to authorize alongside it.

The adjoining property and the project site share access, and project traffic would use Carbondale Road and the Lambert Road corridor, which also serve our client's operations. Lucich Enterprises is therefore a directly affected adjoining landowner with a permitted and mapped mineral-resource interest requiring consideration in the environmental review. That interest receives no consideration anywhere in the document before the Commission.

II. The Public Review Period Does Not Satisfy Section 21091

The Notice of Intent establishes a public review period running from August 19, 2026, to 5:00 p.m. on September 8, 2026. That is twenty days. Twenty days is the floor that applies only where no state agency is a lead, responsible, or trustee agency for the project, and where the project is not of statewide, regional, or areawide significance.[1] Where a state agency is a responsible or trustee agency, or otherwise has jurisdiction by law with respect to the project, the Guidelines require the lead agency to submit the document to the State Clearinghouse, and a document submitted to the State Clearinghouse carries a public review period of not less than thirty days.[2]

The County's own Initial Study establishes state-agency jurisdiction here. It identifies potentially affected special-status wildlife, plants, and riverine habitat within the Department of Fish and Wildlife's trustee jurisdiction, and BIO-1 through BIO-5 repeatedly require CDFW consultation, approval, or other involvement. HYD-2 also contemplates any applicable permit from the Regional Water Quality Control Board. CDFW is a trustee agency by operation of the Guidelines, and if a Regional Board permit is required, that Board would be a responsible agency as well. Because at least one state trustee agency has jurisdiction by law over natural resources the Initial Study identifies as potentially affected, the County was required to submit the proposed Mitigated Negative Declaration to the State Clearinghouse, and submission would have

[1] Pub. Resources Code, § 21091, subd. (b); Cal. Code Regs., tit. 14, § 15073, subd. (a).

[2] Pub. Resources Code, § 21091, subd. (b); Cal. Code Regs., tit. 14, §§ 15073, subd. (d), 15205, subd. (b). Submission to the State Clearinghouse is mandatory where a state agency is a responsible or trustee agency, and a lead agency cannot avoid the longer review period by declining to submit a document the Guidelines require it to submit.

carried a review period of not less than thirty days. The County's failure to submit is the defect, and it cannot supply its own cure.[3] We therefore object that the twenty-day period afforded here does not satisfy section 21091, subdivision (b).

The Initial Study leaves the entry for "Other public agencies whose approval is required" blank, and the record supplied with the project materials discloses no State Clearinghouse number or transmittal.[4] We request that the County identify every agency whose approval, permit, consultation, or jurisdiction is required or potentially implicated, and state whether State Clearinghouse circulation occurred, on what date, and under what State Clearinghouse number.

If the document was not circulated through the State Clearinghouse for the period the statute requires, it must be recirculated before the Commission may act.

III. Consideration of Comments Before Adoption

The public review period closes at 5:00 p.m. on September 8, 2026, and the Commission is noticed to consider adoption at 6:00 p.m. the same evening. Before approving a project for which a negative declaration is proposed, the lead agency must consider the document together with comments received during public review.[5,6] That schedule affords no practical opportunity for staff to compile and transmit comments received near the deadline or for the Commission to review them before acting. Unless the County can demonstrate that all timely comments were made available to and considered by the Commission, the Commission should continue the hearing for sufficient time to compile, provide, analyze, and respond to comments received during the public-review period before deciding whether to adopt the MND. We further note that the MND included in the agenda packet is written in the past tense and states that the Commission already conducted a public hearing and found no substantial evidence of significant environmental impact, although the identified comment period had not yet closed. The pre-completed finding does not establish a violation by itself, but it underscores why the Commission should not adopt the document until the comment period has closed and the timely comments have actually been considered.

[3] Cal. Code Regs., tit. 14, § 15381 (responsible agency); id., § 15386 (trustee agency, including the Department of Fish and Wildlife with respect to fish and wildlife and other resources specified in the regulation); Gentry v. City of Murrieta (1995) 36 Cal.App.4th 1359, 1386-1389.

[4] Cal. Code Regs., tit. 14, § 15205, subd. (b).

[5] Pub. Resources Code, § 21091, subds. (d)(1), (f).

[6] Cal. Code Regs., tit. 14, § 15074, subd. (b).

IV. The Initial Study Repeatedly Relies on a Premise Its Own Text Contradicts

Five separate chapters of the Initial Study reach a conclusion of no impact or less than significant impact on the express ground that the project involves no change in use or no physical change to the property. The Air Quality chapter states that "there is no proposed change in use through this Use Permit" (Initial Study, p. 22). The Mineral Resources chapter states that "[t]here are no proposed structures or changes in use" (p. 43). The Utilities chapter states that the project involves a "lack of changes in use," and, one paragraph later, that "there is no proposed physical changes of the property proposed with this project" (pp. 54, 55). The Public Services chapter states that "[t]here is no physical change or additional inconsistent uses proposed" (p. 47). The Mandatory Findings of Significance chapter, in which the County summarizes the adequacy of the document as a whole, states that "[t]here is no proposed development and the current uses of the project shall remain unaffected by the proposed uses" (p. 60).

Each of these statements is incorrect, and the document refutes them itself. The project description proposes 1,832 grave sites, a paved encroachment, on-site circulation, sixty-four permanent parking spaces, driveway parking for up to one hundred additional vehicles, permanent restrooms, a storage and utility building, perimeter security fencing, security lighting, and signage, on a parcel the Initial Study describes as vacant. The Hydrology chapter states that "[t]he proposed project would increase the impermeable surfaces on-site." The Utilities chapter states in the same paragraph as its no-physical-change conclusion that "[s]tormwater drainage on site will need to be redirected." (Initial Study, pp. 40, 55)

We object that five impact conclusions rest on a factual predicate the document elsewhere contradicts. Where the stated basis for a finding is contradicted by the record, the finding is unsupported, and an environmental impact report is required where substantial evidence in the record supports a fair argument that the project may have a significant effect on the environment.[7]

V. The Project Description Is Unstable

The Initial Study describes inconsistent existing conditions on a single page and again across successive chapters. It states that there is "an existing 1500 sq. ft. barn and an existing gravel roadway," and then, two sentences later, that "[t]here are no existing structures or improvements on the property" (Initial Study, p. 5). The following page states that the property "is currently graded and vacant in the majority of the northern 50% of the site" and that "[t]here is one storage building on-site" (p. 6). The Land Use chapter states that "[t]he subject property is currently vacant" (p. 42). The applicant's own Cemetery Plan describes an existing 1,500 square foot steel

[7] Pub. Resources Code, § 21151; Cal. Code Regs., tit. 14, § 15064, subd. (f)(1); No Oil, Inc. v. City of Los Angeles (1974) 13 Cal.3d 68, 75.

building and states that "[t]he gravel parking lot can accommodate 64 car parking spots," (Cemetery Plan, p. 2) which, if accurate, means that parking the Initial Study treats as a proposed improvement already exists. The physical baseline is the foundation of every impact conclusion in the document, and the document does not settle on one. The MND should identify one supported physical baseline and explain the source and date of the baseline information used for each impact conclusion.

The staff report, Notice of Intent, proposed Mitigated Negative Declaration, Initial Study, and Conditions of Approval generally describe 1,832 grave sites divided among seven blocks on the northern 1.2 acres of the property, with 64 permanent parking spaces and driveway parking for up to 100 additional cars. (Staff Report, p. 1; Initial Study, p. 5; Conditions of Approval/MMRP, p. 1) But the applicant's Cemetery Plan states that "burial sections with an area approximately 1.7 acres will be developed," describes the Plan as development of the 46-acre property over a 100-year timeframe, and contemplates an open equipment storage shed. (Cemetery Plan, pp. 2, 5) The Hallenbeck/Allwest report likewise states that it is planned to develop the approximately 40-acre parcel for cemetery usage and identifies an office building, caretaker's building, yard and equipment building, fully developed and paved access roadways, a production well, and grading. (Hallenbeck/Allwest Report, p. 4) These are not merely different historical capacity figures; they describe materially different physical scopes of development.

The County should identify which of those components and acreages are authorized by this Use Permit, which have been superseded, and which would require future discretionary approval, and it should identify the site plan that governs. Until the County defines the approval's physical scope, the Commission and the public cannot reliably evaluate traffic, water, wastewater, biological, mineral-resource, or other consequences of the project.

An accurate, stable, and finite project description is necessary for meaningful environmental analysis and public participation. County of Inyo held that a shifting project description frustrated CEQA's informational and public-participation purposes.[8] The Commission and the public cannot reliably evaluate traffic, water, wastewater, biological, or mineral-resource consequences until the governing project description and physical baseline are reconciled.

VI. The Mineral Resources Analysis Omits the Adjoining Permitted Mining Operation

The project parcel has an MRZ, Mineral Resource Zone, General Plan designation. The Initial Study relies on a geotechnical report prepared by Hallenbeck/Allwest Associates and concludes that the project would not restrict access to unique mineral resources, while also stating that there are no proposed structures or changes in use (Initial Study, p. 43). That statement should be

[8] County of Inyo v. City of Los Angeles (1977) 71 Cal.App.3d 185, 193, 199-200.

corrected or explained because the project materials describe gravesites, parking, circulation, restrooms, a storage or utility building, fencing, and other improvements.[9]

Our principal objection under this heading is one of omission. The Land Use chapter identifies the conflict and then resolves it without looking beyond the parcel, stating that "[t]he General Plan designation of MRZ, Mineral Resource Zone would potentially be a source of conflict however the applicant has supplied a comprehensive geotechnical and geological study for the project, which has indicated that there is no presence of uniquely significant minerals on site with which this project would restrict future access to" (Initial Study, p. 42). Neither that chapter nor the Mineral Resources chapter makes any reference to our client's permitted surface mining operation on the adjoining 1,000 acres. The operation appears nowhere in the document. The Mineral Resources chapter asks whether the project would result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, marks the answer less than significant, and confines its reasoning to whether minerals are present beneath the project site and whether the project would "encroach onto any of the other properties." Encroachment onto the mining parcel is not the only relevant question. The analysis never asks whether the cemetery's traffic, access pattern, outdoor gatherings, or other project-generated effects would interact with the immediately adjoining permitted mining operation, whether the combined operations could produce cumulatively considerable effects on shared roadways, air quality, noise, or safety, or how the proposed use relates to the mineral-resource policies reflected in the MRZ designation.

We object that the MND cannot be adopted without analyzing those questions, and we request that the analysis address the operational characteristics of the permitted operation, including approved hours, haul routes, blasting or processing activity if any, and the reclamation plan. The omission carries through to the cumulative analysis. The Mandatory Findings of Significance chapter states that "[n]o past, current, or probable future projects were identified in the project vicinity that, when added to project-related impacts, would result in cumulatively considerable impacts" (Initial Study, p. 60). At minimum, an ongoing permitted surface mining operation on 1,000 adjoining acres sharing the same access roads is an existing condition and, to the extent future permitted extraction or reclamation activity remains to occur, a present or reasonably foreseeable activity relevant to cumulative analysis. The Initial Study's statement that no relevant projects were identified provides no indication that the mine was considered. That omission leaves the cumulative-impact conclusion unsupported.

The Hallenbeck/Allwest report does appear in the planning application materials, but it does not support the breadth of the conclusion drawn from it. It is principally a geotechnical engineering

[9] Cal. Code Regs., tit. 14, app. G, § XII.

report whose conclusions address seismic hazard, foundation design, bearing capacity, groundwater, and drainage control. It discusses the Ione Formation and notes materials including quartzose to arkosic sands and kaolinitic clays, but its site-specific mineral conclusion is limited to the statement that "[m]apped mineral resources of mainly coal deposits, were not found in the exploratory pits spread out across the parcel." (Hallenbeck/Allwest Report, p. 8) The Initial Study characterizes that report as having "determined that this project would not restrict access to any unique mineral resources on site." The report does not make that determination. It reports that coal was not encountered in site-specific exploratory pits, does not perform a mineral land classification or evaluate economic recoverability, and says nothing about mineral access beyond the parcel boundary. The Commission should not treat the report as evidence of a fact it does not state. If the parcel or affected resource area is classified MRZ-2, the County should state whether the Public Resources Code section 2762 procedure is triggered and, if so, whether it has been completed.[10] That procedure requires the County, before permitting a use that would threaten the potential to extract minerals, to prepare a statement specifying its reasons and to forward it to the State Geologist and the State Mining and Geology Board. Because this project is subject to CEQA, subdivision (d)(2) directs the County to comply with CEQA's public-review requirements; the separate sixty-day notice-and-hearing procedure applies when the proposed use is not subject to CEQA.[11] The Initial Study discloses only that the project lies within the Irish Hill 15-minute quadrangle, for which a SMARA study area was reported in 1983 (Initial Study, p. 43). It does not disclose the applicable mineral-land-classification sector, and the record contains no section 2762 statement or transmittal to the State Geologist and the Board.

VII. Airport Compatibility Analysis Misstates and Does Not Apply the Governing Eagle's Nest Overlay

The Transportation chapter addresses airport compatibility by stating that the project "would not be located within any Westover Airport safety zones (Westover Field Airport Land Use Compatibility Plan Draft 2017)" (Initial Study, p. 50). Westover Field is a public-use airport that the Initial Study elsewhere places approximately five miles from the site (p. 38). The project, however, is approximately .58 miles from Eagle's Nest Airport and is subject to the County's Eagle's Nest overflight overlay. The Transportation chapter addresses Eagle's Nest in a single sentence, reasoning that the attendance cap "limits the density of individuals on site." The Hazards chapter discusses Eagle's Nest at greater length, but materially misstates the governing ordinance. Current Amador County Code section 19.77.300 (Ord. 1836, § 2, 2023) establishes a two-mile overflight-notification requirement for accessory dwelling units and divisions of land; within one mile it prohibits schools, churches, and other places of assembly inside buildings, and requires an overflight notification for use permits and new commercial or residential structures.

[10] Pub. Resources Code, § 2762, subd. (d)(1).

[11] Id., § 2762, subds. (d)(1)-(3).

The project, at approximately .58 miles from the runway, lies within the one-mile perimeter. Condition 12 instead states that places of assembly are prohibited within two miles and requires an avigation easement. Those are not the standards enacted in section 19.77.300.

Because the Initial Study and Condition 12 proceed from an incorrect description of the ordinance, the record does not establish project compatibility under the regulation actually in force. Conditioning funeral events to occur outdoors may avoid the overlay's prohibition on places of assembly inside buildings, but that does not answer the separate questions presented by the one-mile overflight-notification requirement, permanent structures and building heights, or any project-specific safety and noise effects. The County should identify the correct overlay ordinance and map, runway location, one- and two-mile boundaries, any applicable safety or noise contours, and the project-specific standards it actually applied.

The County should then analyze the project under those standards rather than treating an attendance cap as a substitute for compatibility analysis. In particular, the record should distinguish between compliance with the overlay's indoor place-of-assembly prohibition and the separate CEQA questions concerning project-generated traffic, site access, structures, and any safety or noise effects associated with locating the proposed use within approximately .58 miles of the runway.

Independent of how the overlay is ultimately construed, we object that the failure to analyze the project against the applicable land use regulation is a defect in its own right. A conflict with land-use policies or regulations adopted to avoid or mitigate an environmental effect may constitute substantial evidence supporting a fair argument.[12] The County should place the applicable overlay ordinance and map in the record and analyze the project under the correct standards.

VIII. The Transportation Analysis Concedes Potential Effects and Relies on Undefined Measures

The Transportation chapter states that the project could potentially introduce a substantial increase in traffic at maximum operational capacity, but the record supplied does not include trip-generation estimates, roadway-safety or roadway-geometry analysis, intersection or roadway-segment conditions, or a VMT estimate supporting the conclusion that the impacts would be less than significant. A qualitative analysis may be permissible, but it must disclose a reasoned basis tied to the project and the affected transportation system.

TRA-1 requires payment of a traffic mitigation fee "as determined adequate by the Transportation and Public Works Department" to offset road-maintenance costs. The

[12] Pocket Protectors v. City of Sacramento (2004) 124 Cal.App.4th 903, 929-936.

Transportation chapter's discussion of that measure refers generally to the "improvement/introduction of an adequate commercial encroachment" and to potential congestion at the intersection of Lambert and Carbondale Roads (Initial Study, p. 49). If the County relies on the fee as CEQA mitigation, the record must identify a reasonable mitigation program or improvement to which the fee is tied and the project's share of that mitigation.[13] TRA-1 identifies no fee amount, no fee program, no identified improvement, no proportional share, and no schedule, and the operative condition describes the fee as an offset for road-maintenance costs rather than as funding for an identified environmental mitigation measure. The record should identify the environmental effect being mitigated, the nexus between that effect and the fee, the project's proportional share or objective formula, the improvements to be funded, the payment deadline, the implementation commitment, and the enforcement mechanism. If the County cannot establish those elements before approval, it should not rely on TRA-1 as substantial evidence that a potentially significant transportation effect has been reduced to insignificance.

The project materials authorize funeral events for up to 50 attendees, with up to two events per day, and public access from sunrise to sunset. They also describe 64 permanent parking spaces and driveway parking for up to 100 cars. The transportation analysis assumes up to 100 people per day visiting for funerary services, while the permit does not appear to impose a comparable limit on general cemetery visitation. The parking supply the applicant proposes is itself evidence that the analyzed ceiling is not the ceiling the permit would establish. The County should explain whether the 100-person assumption is an enforceable project limit or merely an analytical assumption. (Staff Report, p. 1; Conditions of Approval/MMRP, pp. 1-2; Initial Study, p. 50)

The VMT discussion concludes that cemetery use is not particularly significant because of the infrequency of individual visits and characterizes the project as having no impact under CEQA Guidelines section 15064.3(b). Vehicle miles traveled refers to the amount and distance of automobile travel attributable to a project; the infrequency with which any particular individual visits does not by itself establish low aggregate VMT. The Cemetery Plan expressly states that the project is intended to serve the Muslim community in Amador, Sacramento, Placer, and surrounding counties (Cemetery Plan, p. 4), yet the Initial Study does not analyze the amount and distance of automobile travel attributable to that expected service area. The County should provide a quantified VMT analysis or a reasoned qualitative analysis addressing aggregate vehicle travel, location, access, transit availability, and expected visitation, and should reconcile that conclusion with the separate statement that the project could substantially increase traffic.[14]

[13] Anderson First Coalition v. City of Anderson (2005) 130 Cal.App.4th 1173, 1188-1189.

[14] Cal. Code Regs., tit. 14, § 15064.3, subds. (a), (b)(4).

IX. Air Quality and Greenhouse Gas Conclusions Lack Supporting Analysis

The Air Quality chapter concludes that the project would not generate a significant increase in operational or long-term emissions and relies on a five-minute vehicle-idling restriction and future compliance with applicable requirements. Its conclusion under the applicable air quality plan rests on the same erroneous statement addressed in Part IV, that there is no proposed change in use. The MND should disclose the construction and operational emissions analysis actually performed, the methodology or qualitative basis used, the applicable thresholds or other significance criteria, comparison to existing conditions, and the basis for concluding that grading, paving, excavation, construction traffic, cemetery operations, and maintenance would not cause a significant impact.

The GHG analysis contains no numerical emissions inventory, calculation methodology, or quantitative threshold and concludes that the project would not generate substantial GHG emissions, relying in part on the idling restriction. It further states that there is no applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions. The absence of a numerical inventory is not by itself dispositive; CEQA Guidelines section 15064.4 allows a lead agency to use a model or methodology it considers appropriate and to rely on quantitative and/or qualitative analysis. But the agency must make a good faith effort to describe, calculate, or estimate the greenhouse gas emissions of a project and to consider the extent to which the project may increase or reduce emissions as compared with the existing setting.[15] The Initial Study does not disclose such an analysis. The County should provide the analysis supporting its conclusion and explain the project's emissions relative to the existing setting.

X. The Mitigation Program Impermissibly Defers Analysis and Formulation

The biological materials identify potential habitat for multiple special-status species and state that biological and/or rare-plant surveys will be conducted before construction or future discretionary development. BIO-1 and BIO-3 state that, if avoidance is infeasible, impacts "will need to be quantified and mitigation developed," and BIO-4 requires a rare-plant survey prior to construction. Those measures defer the determination of affected resources and, if impacts are found, the formulation of mitigation. BIO-2's nesting-bird timing survey is a conventional preconstruction implementation measure; our objection is not that every preconstruction survey must occur before approval, but that the County cannot postpone the studies necessary to determine whether significant impacts exist and what mitigation will be required before relying on a less-than-significant finding. (Initial Study, pp. 27-28)

The same defect appears in the water supply, wastewater, and water quality measures, where the packet contains conflicting and unresolved evidence. Mitigation Measure UTL-2 provides that

[15] Cal. Code Regs., tit. 14, § 15064.4, subds. (a), (b).

the well that is to serve the project "shall be evaluated" after approval and that the evaluation "shall describe estimated water demand and whether or not the water well may be expected to serve the proposed use." (Initial Study, p. 55) The Utilities chapter states that "[t]he project is not located within the service area of an existing public water system" (Initial Study, p. 55), while the applicant's Cemetery Plan states that the site "is connected to Amador Water Agency water and electricity which will be sufficient for funeral services" and separately describes a pending well permit application. (Cemetery Plan, p. 2) The application materials include Amador Water Agency correspondence stating that the line serving the Eagle's Nest area is undersized and susceptible to low-pressure dips, limiting this parcel to a 5/8-inch meter with one EDU of capacity, approximately 400 gallons per average day; the same correspondence references a proposed supplemental well of approximately 2 gallons per minute. (Cemetery Plan, Appendix I, p. 8) The record contains no project water-demand calculation reconciling those facts. Mitigation Measures UTL-1 and GEO-1 likewise direct a consultant retained by the applicant to "either" certify the existing on-site wastewater system "or" specify the modification, expansion, replacement, or treatment that would be needed for certification to be possible. Mitigation Measure HYD-2 addresses groundwater quality associated with interment by requiring the applicant to "adhere to any required regulations" and to obtain "any applicable permits" from the Regional Water Quality Control Board. (Initial Study, pp. 33, 41, 55)

The packet also contains site-specific groundwater evidence the Initial Study does not confront. Hallenbeck/Allwest reports that groundwater was "consistently encountered, actively seeping" during the site borings and later states that groundwater was persistent and pooled or ponded shortly after excavation (Hallenbeck/Allwest Report, pp. 7-8). The applicant's Cemetery Plan states that burial lots will be excavated below the existing surface and concrete liners placed before excavated soil is replaced. (Cemetery Plan, p. 5) HYD-2 contains no site-specific analysis of groundwater separation, burial depth, pollutant pathways, or the performance standards necessary to protect groundwater under those conditions; it instead directs future compliance with whatever regulations or permits may apply. Before finding the impact less than significant, the County should analyze the project's proposed interment method against the groundwater conditions documented in its own technical report and identify enforceable standards that will reduce any impact to insignificance.

Sundstrom held that environmental review must occur at the earliest feasible planning stage and disapproved conditions that deferred hydrological studies and mitigation formulation until after approval.[16] The parallel is close. Sundstrom set aside a use permit and negative declaration where the county conditioned approval on the applicant performing future hydrological and soils studies and on obtaining a sludge disposal plan approved by the Regional Water Quality Control Board, holding that directing the applicant to perform the studies improperly delegated the

[16] Sundstrom v. County of Mendocino (1988) 202 Cal.App.3d 296, 306-308.

agency's own responsibility and omitted the input of the public and interested agencies.[17] If mitigation details remain subject to future formulation, the County should identify enforceable performance standards, measurable success criteria, responsible parties, timing, monitoring, and enforcement. A general direction to quantify impacts or develop mitigation later does not by itself demonstrate that impacts will be reduced to insignificance.[18]

XI. The Mitigation Monitoring and Reporting Program Contains Conflicting and Missing Measures

The packet presents mitigation measures in three places—the text of individual Initial Study chapters, the summary list in the Mandatory Findings of Significance chapter, and the proposed Conditions of Approval and Mitigation Monitoring and Reporting Program—but the versions and summaries are not consistent. The summary version of GEO-1 requires compliance to be demonstrated "[p]rior to recordation of any final map," and the summary version of PUB-1 requires that "the subdivider" participate in annexation to a community facilities district prior to recordation of a final map (Initial Study, p. 59). This is a use permit. There is no map and there is no subdivider, so those formulations cannot operate as written. The summary version of TRA-1 omits the traffic mitigation fee entirely, which is the only substantive element of that measure beyond permitting. The version of NOI-1 in the Initial Study requires consistency with Mitigation Measure AES-1; the proposed MMRP condition omits that requirement. (Initial Study, p. 45; Conditions of Approval/MMRP, p. 5) Before adoption, the County should identify the operative text of each measure and adopt a single monitoring or reporting program adequate to ensure compliance during project implementation, with responsibility, timing, performance criteria, reporting or monitoring requirements, and enforcement specified where necessary to make each measure enforceable and monitorable.[19]

The Tribal Cultural Resources chapter rests its significance conclusion on a mitigation measure whose operative text does not exist. It states that potentially significant resources "would be preserved and avoided by future development consistent with the provisions of Mitigation Measure CULTR-3," and that impacts "are less than significant with the mitigation measures incorporated in CULTR-3" (Initial Study, p. 53). The Cultural Resources chapter adopts CULTR-1 and CULTR-2; the summary list in the Mandatory Findings of Significance chapter lists CULTR-1 and CULTR-2; and the proposed Conditions of Approval contain CULTR-1 and CULTR-2. Although the Tribal Cultural Resources chapter refers to CULTR-3, no operative

[17] Id. at p. 307.

[18] Gentry v. City of Murrieta (1995) 36 Cal.App.4th 1359, 1393-1396; Cal. Code Regs., tit. 14, § 15126.4, subd. (a)(1)(B).

[19] Pub. Resources Code, § 21081.6, subds. (a)(1), (b); Cal. Code Regs., tit. 14, §§ 15070, subd. (b)(1), 15097, subds. (a), (c); see Sundstrom v. County of Mendocino (1988) 202 Cal.App.3d 296, 306-307.

measure designated CULTR-3 appears in the Initial Study, the Conditions of Approval, or the application materials. The County cannot rely on CULTR-3 as the basis for a less-than-significant-with-mitigation conclusion unless the measure is actually defined, incorporated into the project or conditions of approval, and made enforceable. The County should either supply and properly incorporate CULTR-3 or acknowledge that the tribal cultural resources conclusion is unsupported.

The same problem appears in the Biological Resources chapter. That chapter expressly relies on "Mitigation measure BIO-6" to support its less-than-significant-with-mitigation conclusion for oak woodland impacts and quotes the recommended limits on burial excavation near mature oaks (Initial Study, p. 25). But BIO-6 does not appear in the Mandatory Findings summary or in the proposed Conditions of Approval and MMRP. If the County is relying on BIO-6 to reduce oak woodland impacts to insignificance, its operative requirements must be incorporated into the approval and monitoring program before adoption.

Two further inconsistencies warrant correction. In the Land Use chapter, the checklist entry addressing conflict with an applicable land use plan, policy, or regulation is marked less than significant with mitigation incorporated, but the accompanying discussion states only that the proposed uses are commercial and residential, and no land use mitigation measure appears anywhere in the program. In the Utilities chapter, the conclusion that the project will not increase demands on any wastewater treatment provider is supported by the statement that UTL-1 addresses provision of sufficient irrigation improvements; UTL-1 addresses on-site sewage disposal and says nothing about irrigation.

XII. The Noise Analysis Does Not Explain How Avigation or Notification Measures Reduce Noise

The Noise chapter concludes that noise impacts associated with the adjacent airport "shall be mitigated through the Eagle's Nest Airport Overlay Zone requirements, which include the requirement of an avigation easement," and that "[i]t would be the property owner's responsibility to inform guests of potential issues arising from the projects relative proximity to an active airport." As discussed above, current County Code section 19.77.300 requires an overflight notification for use permits within one mile, not an avigation easement. The Initial Study does not explain how an avigation easement would reduce airport noise, and it likewise does not explain how guest notification would reduce the noise exposure it identifies. The Noise chapter contains no measurement, modeling, applicable noise contour, performance standard, or other analysis showing that either requirement would reduce the identified effect to a less-than-significant level.

Mitigation Measure TRA-3 presents a related enforceability problem. It directs the operator to "provide assurances" that the Lambert Road entrance will be accessed only from Carbondale

Road and to notify guests that they are "required to navigate to the property along routes to avoid utilization of Maxwell Rd., Claypit Rd., and Mustang Alley." The operator can give directions, but the measure does not state how the routing restriction will be implemented or enforced against members of the public, whether signage or wayfinding is required, how compliance will be monitored, or what performance standard will determine success. A direction to notify guests, without an implementation or enforcement mechanism, does not demonstrate that the assumed traffic pattern will occur. (Initial Study, p. 51; Conditions of Approval/MMRP, p. 6)

XIII. Tribal Cultural Resources

The Tribal Cultural Resources chapter states that "all tribes requesting notification for discretionary project submissions were notified of this project proposal." The packet does not disclose the nonconfidential procedural facts necessary to determine what occurred: which tribes were notified, the dates of notice, whether any tribe timely requested consultation, and, if so, whether consultation concluded under Public ResourcesCode section 21080.3.2(b). If consultation was requested, the County should identify on the record the statutory basis on which it may proceed; to the extent section 21082.3(d) applies, one of the conditions stated there must be satisfied before adoption.[20] We do not request disclosure of confidential tribal cultural resource information. Public Resources Code section 21082.3(c) protects such information from public disclosure absent tribal consent. The County should instead place in the administrative record the nonconfidential notices, response dates, procedural correspondence, and written procedural determinations sufficient to demonstrate compliance while maintaining the confidentiality of protected tribal information. It should also identify the factual basis for the Tribal Cultural Resources significance conclusion.

XIV. The Required Findings Cannot Be Made on This Record

Proposed Finding 3 states that the use is consistent with Amador County Code section 19.28.020, subdivision (E), which provides that cemeteries may be permitted with a use permit "in any district unless otherwise prohibited elsewhere in this title."[21] The qualifying clause is the operative one. The Commission therefore must apply the Eagle's Nest overlay as actually enacted. The Initial Study instead analyzes the overlay under a materially incorrect two-mile places-of-assembly prohibition and avigation-easement requirement. Nor does the record explain how the proposed permanent cemetery relates to the Mineral Resource Zone designation the County has assigned the parcel or to the County's mineral-resource policies. Those omissions matter both to the Initial Study's land-use analysis and to the Commission's required

[20] Pub. Resources Code, §§ 21080.3.1, subds. (b), (d)-(e), 21080.3.2, subd. (b), 21082.3, subds. (c), (d).

[21] Amador County Code, § 19.28.020, subd. (E).

determination that the proposed use will not be detrimental or injurious to neighboring property, improvements, or the County's general welfare.[22]

Proposed Finding 4 requires the Commission to determine that operation of the project "will not under the circumstances of the particular case be detrimental to the health, safety, peace, morals, comfort and general welfare of persons residing or working in the neighborhood of such proposed use or be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the county with the implementation of the proposed Conditions of Approval and Mitigation Measures." We take no position on the "morals" element of that finding and rely on the property, improvements, and general-welfare elements. Our client's permitted surface mining operation, situated on 1,000 adjoining acres and dependent on the same roadways, is property and an existing land use in the neighborhood that the Commission must consider in making that finding. The record before the Commission contains no analysis of the interaction between this project and that operation. In the absence of such analysis, the finding is unsupported on the present record. We note that relevant personal observations of area residents regarding roadway conditions and the character of the surrounding area are themselves competent evidence on these questions.[23]

XV. Requests

For these reasons, Lucich Enterprises, LLC respectfully requests that the Commission: (1) continue the hearing long enough to compile, disclose, analyze, and respond to all comments received during the public-review period; (2) decline to adopt the proposed MND on the ground that the record supports a fair argument that the project may cause significant environmental effects and that the MND does not provide sufficient information for informed decisionmaking; (3) direct preparation of an EIR addressing, at a minimum, the compatibility of the proposed use with the permitted surface mining operation on the adjoining property and with the County's Mineral Resource Zone designation, compatibility with the applicable Eagle's Nest Airport overlay, project traffic and roadway safety on Carbondale Road, Lambert Road, and Maxwell Road, adequately supported air-quality and greenhouse-gas analysis, water supply and wastewater capacity, site-specific groundwater and interment conditions, biological resources, and cumulative impacts, including the incremental effects of this project considered together with the permitted surface mining operation on the adjoining property; and (4) alternatively, correct and recirculate the environmental document if material changes, conflicting project descriptions, or significant new information require further review.

---

[22] Cal. Code Regs., tit. 14, app. G, § XI(b); Amador County Code, § 19.56.040.

[23] Pocket Protectors v. City of Sacramento, supra, 124 Cal.App.4th at p. 928.

At minimum, before taking action, the County should disclose and reconcile the governing project description and physical baseline; traffic and VMT analysis; air-quality and GHG analysis; biological surveys; the operative text of each mitigation measure and a single operative monitoring or reporting program, including the missing CULTR-3 and BIO-6 measures; the TRA-1 fee methodology; the applicable mineral classification and evidentiary basis for the mineral-resource conclusion; the current Eagle's Nest overlay ordinance and map; State Clearinghouse information; water-demand, groundwater, and wastewater information; and nonconfidential AB 52 procedural documentation sufficient to establish compliance. We request that this letter and any attachments be entered into the administrative record for this project. We further object on, and preserve for review, every ground raised by any other person during the public review period or at the hearing, and every ground appearing on the face of the staff report, the Initial Study, the proposed Mitigated Negative Declaration, the Conditions of Approval, the proposed findings, and the application materials, whether or not separately identified above.

We appreciate the Commission's consideration of the comments provided in this letter.

Very truly yours,

AVDIS & CUCCHI, LLP

Nick S. Avdis, Esq.

cc: Clerk of the Planning Commission (clearkoftheboard@amadorcounty.gov)
Chuck Beatty, Planning Director (cbeatty@amadorgov.org)
Lucich Enterprises, LLC

Outlook

Signed Opposition Petition – Use Permit UP-22;2-3, Gardens of Noor Cemetery

From Melinda Avila <Melinda@ionebas.com>
Date Tue 9/8/2026 10:55 AM
To Plan-Planning <planning@amadorcounty.gov>

1 attachment (445 KB)
Opposition to Use Permit UP-22;2-3.pdf;

You don't often get email from melinda@ionebas.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Amador County Planning Department,

Attached is a signed neighborhood petition opposing Use Permit UP-22;2-3 for the proposed Gardens of Noor Cemetery, which is on the agenda for tonight's Planning Commission meeting.

Please distribute the petition and all attached signatures to the Planning Commissioners before this agenda item is heard and include them in the official public record.

Please confirm that the petition has been received and will be provided to the Commission for tonight's meeting.

Sincerely,
Melinda Avila
Accountant | Notary Public
IBAS – Ione Balance Accounting Services
15941 Irish Hill Road
Ione, CA 95640
209-781-6354
melinda@ionebas.com

"The integrity of the upright guides them." — Proverbs 11:3

IBAS | IONE BALANCE ACCOUNTING SERVICES

NEIGHBORHOOD OPPOSITION TO USE PERMIT UP-22; 2-3

Gardens of Noor Cemetery - Lambert Road / Carbondale Road, Ione

To the Amador County Planning Commission:

We, the undersigned residents and property owners in the surrounding area, respectfully oppose the approval of **Use Permit Application UP-22; 2-3 for the proposed Gardens of Noor Cemetery.**

The proposed project includes **1,832 grave sites on approximately 46 acres** and anticipates as many as **60 funerals per month, with up to 50 attendees per event.** We believe a project of this size and intensity raises significant concerns for the residents who live in this rural area.

- **Traffic and road conditions:** Our rural roads are already in poor condition and are **narrow and winding, with narrow or nonexistent shoulders and limited visibility in many areas.** They were not designed to accommodate the additional traffic and funeral processions that could result from as many as 60 services each month.
- **Traffic safety, cyclists and emergency access:** Our rural back roads are regularly used by cyclists who come to this area to ride the quieter country roads. The combination of winding roads, limited sight distance, narrow shoulders, and increased vehicle traffic associated with funeral services and processions could create additional hazards for cyclists as well as residents, pedestrians, agricultural vehicles, school buses and emergency responders.
- **Road deterioration:** We are concerned about the long-term impact of increased traffic on roads that already require maintenance and repair.
- **Groundwater, wells and drainage:** Many rural properties depend upon groundwater. We believe the County should thoroughly evaluate the proposed burial practices and their potential effects on groundwater, private wells, soil conditions, seasonal drainage and neighboring properties.
- **Rural character and compatibility:** A cemetery containing 1,832 burial sites and potentially serving people from throughout the region represents a substantial long-term change in land use and traffic for this rural residential and agricultural area.

We are particularly concerned that the increased traffic generated by this project could negatively affect the safety of the many cyclists who regularly use these narrow, winding rural roads.

We respectfully request that the Planning Commission **deny Use Permit UP-22; 2-3, or at minimum postpone approval until comprehensive studies adequately address traffic, road capacity and safety, groundwater and hydrology, drainage, burial practices, and the long-term cumulative impacts on surrounding residents and properties.**

We ask the Commission to give substantial consideration to the people who live in this area and will experience the impacts of this project every day.

Respectfully submitted by the undersigned residents and property owners.

SIGNATURES - OPPOSITION TO USE PERMIT UP-22; 2-3

Gardens of Noor Cemetery - Lambert Road / Carbondale Road, Ione

By signing below, we join in the neighborhood opposition statement on the preceding page and request that the Amador County Planning Commission deny the proposed use permit, or postpone approval until the identified impacts have been fully evaluated and addressed.

Printed Name	Address / Road	Signature	Date
Brooke Avila	[redacted] Irish Hill Rd Ione 95640		9/7/26
Judy Burakowski	Irish Hill Rd Ione 95640	J Burakowski	9-7-26
Susan Kohler-Anderson	16003 Irish Hill Rd. Ione CA	Susan Kohler Anderson	9-7-26
Glenda Glass	2414 Irish Ridge Rd Ione CA 95640	Glenda J. Glass	9-7-2026
ALEXIS KEEF	2414 IRISH RIDGE RD IONE CA 95640		9-7-2026
WILLIAM BOHALL	2727 IRISH RIDGE RD IONE, CA. 95640	William Bohall	9-7-2026
Debra Bohall	2727 Irish Ridge Rd Ione CA 95640	Debra Bohall	9-7-2026
Debra Peck	2900 Irish Ridge Ione CA 95640		9-7-2026
Mike Luiz	2900 IRISH Ridge IONE CA 95640		7/7/2026
DON Luiz Don Luiz	2900 IRISH RIDGE	Don Luiz	7/7/2026
Connie Murdock	16555 Irish Hill Ione, ca		9-7-26
CHARLES FOYIL	16555 Irish Hill IONE. CA.	Charles Foyil	9-7-26

SIGNATURES - OPPOSITION TO USE PERMIT UP-22; 2-3

Gardens of Noor Cemetery - Lambert Road / Carbondale Road, Ione

By signing below, we join in the neighborhood opposition statement on the preceding page and request that the Amador County Planning Commission deny the proposed use permit, or postpone approval until the identified impacts have been fully evaluated and addressed.

Printed Name	Address / Road	Signature	Date
John D Boise	11304 Irish Hill RD Ione CA 95640		9/7/26
Charles D. Reed	16250 Irish Hill Rd Ione, CA 95640 PO Box 164	Charles D. Reed	9/8/26
Melinda Avila	15941 Irish Hill Rd Ione, CA 95640	Melinda	9/8/26
Daniel Avila	15941 Irish Hill Rd Ione, CA 95640		9/8/26

page 3

Outlook

Opposition Letter Use Permit Application UP-22; 2-3 Gardens of Noor Cemetery

From Kevin Bohall <kwbohall@hotmail.com>
Date Tue 9/8/2026 10:42 AM
To Plan-Planning <planning@amadorcounty.gov>

1 attachment (112 KB)
Amador County Planning Commission.docx.pdf;

You don't often get email from kwbohall@hotmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Amador County Planning Commission,

Please consider the attached letter in opposition to the Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery. I and my family own multiple parcels in the area, and operate a small cattle business in Western Amador County. I am also a Career Firefighter with education and knowledge specific to emergency response, and beneficial fire/vegetation management in Chapparal/Oak woodland and Foothill Pine Ecosystems for resource benefit.

Feel free to contact me with any questions/concerns.

Kevin Bohall
2749 Irish Ridge Rd
Ione, CA 95640
(209)304-7829

September 8, 2026

Amador County Planning Commission,

This letter is provided in opposition to the Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery located at the intersection of Carbondale Road and Lambert Road near the Sacramento County Line. While the parcel specific to this application is zoned R1A, in addition to residential parcels, there are also many landholdings that are designated as agricultural preserves (Williamson Act) parcels that are utilized for cattle grazing. Adjacent is also a rural privately owned airport, and multiple parcels designated Mineral Resource Zone.

Regardless of any specific Religious Affiliation, a facility providing observance of memorial plots, as well as funeral and internment services would not be compatible and ultimately in conflict with the current land use for this area. Increased traffic and impact to narrow county-maintained roadways (Maxwell, Carbondale & Lambert) as well as increased volume of emergency calls to this rural area, including Law Enforcement and Fire/First Responders would be additional negative impacts to the area. The site is not actually located in the Jackson Valley Fire Protection District, and the City of Ione Fire Station is not 2 miles away as identified on Page 57 of the Staff Report. Amador Fire Protection District provides service for local response but does not have a staffed fire station in the area. The City of Ione is approximately 7 miles away and would be the closest staffed fire station, as well as the closest ambulance provider (American Legion Ambulance). As stated on Page 67 of the Staff Report, The project is located in the “Moderate” & “Very High” CAL FIRE Hazard Severity Zones for wildland fire potential. The closest CAL FIRE Station is approximately 16 miles away. The additional temporary population during memorial services and daily observation would increase exposure to wildland fire during dry summer months, as well as increase in vehicle accidents, medical response and need for law enforcement presence for traffic mitigation, as well as security for local landowners and homeowners. The grazing land adjacent to the project has significant economic value and is a portion of the livelihood of some of the residents here, outside of the obvious improved properties including homes and infrastructure in the area. There would also be anticipated negative impact to the adjacent airport operation, including the taxiway for takeoff and landing.

The Staff Report does identify a mitigated negative declaration (MND), but there are multiple native species that only occur in and around the project site. The two soil types present provide some of the only habitats some of the species can exist in whole. Ione

Manzanita and Ione/Irish Hill Buckwheat only occur in the specific clay soils this area is known for. Eastern Sacramento County and Extreme Western Amador County are also locations for Sacramento Valley Vernal Pool Ecosystems. This habitat is critical to various species that only occur in specific soil types, with thousands of acres already placed into conservation easements in the immediate area to protect this specific area as it exhibits each of these characteristics. Coincidentally, each of these very specific ecosystems exist is clay soils, which are known for lack of drainage and percolation, which would be another negative aspect to burial plots as a land use, as has already been identified in this area with the requirement for alternative septic systems when residential homes projects are submitted. Multiple Native Oak Species also exist and are identified on the project parcel (Blue, Valley, Black, Oracle and Live Oaks). Heritage Oaks (large diameter) have negative impacts from disturbance due to root compaction or severing their expansive root systems when digging/excavating in their general area.

Typically, a project of this scope would have anticipated positive impacts to the location/area identified for consideration. Oftentimes, the jurisdiction that activities would be located in would benefit from some sort of additional revenue, or community impact that would improve/enhance the local economy, essential services, or some type of benefit that would outweigh negative implications if the project were to gain approval. In this case I do not see anything identifying any positive impact, with only a possibility of slight economic to neighboring Sacramento County, as individuals and families attending any of the functions identified would most likely be from out of the area, and travelling via the main transportation corridor (Highways 99 & Interstate 5) located the West in the Sacramento Valley.

Feel free to contact me with any questions/concerns regarding my opposition to this project, or items identified in this letter.

DocuSigned by:
Kevin Bohall
5B111D89083B4C7...

Kevin Bohall

2749 Irish Ridge Rd

Ione, CA 95640

(209)304-7829

This message is from CITIZENS in OPPOSITION to the project. Read closely consider. Tonight's hearing on the Gardens of Noor cemetery proposal should be a test of careful, even-handed local land-use decision making—not a referendum on an applicant's faith, identity, or religious practices. Stay focused.

Federal law protects religious assemblies and institutions from discriminatory zoning treatment. It does not, however, eliminate the County's duty to apply neutral planning and environmental rules fairly and consistently. A religiously affiliated applicant is entitled to the same treatment as a secular applicant—not less favorable treatment, and not an exemption from the General Plan, zoning standards, use permit findings, or the California Environmental Quality Act.

RECEIVED
SEP 08 2026
AMADOR COUNTY
PLANNING DEPARTMENT

For that reason, public comments should stay focused on the proposal's documented land-use and environmental effects. Relevant questions include whether the project description accurately identifies the entire proposed action; whether a project described as "Phase 1" has reasonably foreseeable future phases that must be disclosed and analyzed; and whether the environmental record adequately addresses traffic, emergency access, parking, water and wastewater, drainage, wildfire conditions, biological and cultural resources, noise, lighting, mineral-resource policies, and cumulative effects.

The Planning Commission's role is not to decide whether it approves of an applicant's religion or to respond to generalized public fear or support. Its role is to apply the same objective standards it would apply to any comparable cemetery or institutional proposal: determine whether required land-use findings can be made, whether the proposal conforms to applicable General Plan and zoning requirements, and whether CEQA review adequately evaluates the project's physical environmental effects.

Residents who comment should bring evidence, identify the relevant plan policy, ordinance provision, technical study, or CEQA issue, and propose a legally available remedy. If the record supports an EIR, further analysis, or enforceable mitigation, the Commission should require it. If the applicable findings are supported, the Commission should act accordingly. Neutral rules, a complete record, and a decision based on evidence protect both the public and the applicant.

Please comment on documented physical impacts, applicable General Plan and zoning criteria, and CEQA evidence—not on religion, identity, religious practices, or generalized fears; the County must apply the same neutral standards to this proposal that it would apply to a comparable secular land use. Consider commenting on:

1) No fire protection water 2) 18,000 added vehicle trips per month (roads cannot handle traffic loads, air quality, funeral processions 3) Emergency vehicle area access with 300 cars per day clogging local narrow roads 4) Ground water contaminating with shallow graves only 18 inches deep 5) Removal of oak trees against State Oak Tree Preservation Act 6) Removal of federally protected endangered plants 7) Incompatible land use (big commercial operation in rural Ag and ranch locality 8) Does not "fit" (harm to community safety, well-being, tranquility, traffic, noise, and financial impacts 9) Wild pigs will sense shallow graves and dig up remains 10) Extreme flooding and wash out of graves on the subject parcel 11) Original Moore Biological study was thiughly inaccurate 12) Noise 13) Interior roads need to meet County standard PW-7 14) Interior roads need to support 75,000 pound fire trucks 15) Site slope and elevations (drainage and flooding of Carbondale road 16) Ground level sewage treatment to handle 450 visitors daily

Outlook

Comment for the PC mtg tonight re the Gardens of Noor

From katherine mokeriver.com <katherine@mokeriver.com>
Date Tue 9/8/2026 8:33 AM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from katherine@mokeriver.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Members of the Commission:

I have no position on the proposed cemetery on your agenda. I am providing this link as information about how Muslims are buried for your information. It's from an actual cemetery in Canada.

https://bakerviewmemorial.ca/what-does-a-muslim-cemetery-look-like/

Very Truly Yours,
Katherine K. Evatt
Volcano

Outlook

Public Comment - Additional Signatures for Appending Sept. 1 Letter

From PJ Patrick Flynn <pjpatrickflynnbooks@gmail.com>
Date Tue 9/8/2026 2:33 PM
To Plan-Planning <planning@amadorcounty.gov>

2 attachments (15 MB)
Gardens of Noor - Supplemental Public Comments Sept 1 2026.pdf; Additional signatures to be added to Sept. 1 Submittal.pdf;

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please see the attachment re: Additional Signatures to append to the also attached Sept 1, 2026 letter, previously submitted.

Thank you in advance.

Peggy Flynn

September 1, 2026

Re: Supplemental CEQA Comment and Signatory Roster
Use Permit UP-22;2-3, Gardens of Noor Cemetery, Applicant Mounir Kaddoura, 857 Carbondale Road / 16630 Lambert Road, Ione, CA, APN 001-220-013
Planning Commission Hearing: September 8, 2026

Dear Planning Commission and Planning Department:

This is a supplemental written CEQA comment submitted on behalf of Eagle's Nest Owners Association and the individuals identified in attached **Exhibit A, Signatory Roster and Adoption of CEQA Objections.**

Eagle's Nest Owners Association previously submitted its 442-page CEQA review, titled **PUBLIC COMMENT ON THE INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION — Use Permit UP-22;2-3, Gardens of Noor Cemetery, Applicant Mounir Kaddoura, 857 Carbondale Road / 16630 Lambert Road, Ione, CA, APN 001-220-013 — Confirmation of Prior Submittal as Timely Written Comments Within the Official 20-Day Environmental Review and Comment Period (August 19 – September 8, 2026),** on August 19, 2026 , regarding the Cemetery Applicant's Initial Study and proposed Mitigated Negative Declaration ("CEQA Review").

Each person identified in Exhibit A objects to approval of the proposed cemetery project and to adoption of the proposed Mitigated Negative Declaration, and joins in, adopts, and incorporates by reference the CEQA objections, evidence, and requested actions in the Eagle's Nest Owners Association CEQA Review submitted to Amador County on August 19, 2026.

The CEQA Review raises, among other matters, deficiencies regarding groundwater and flooding, burial-related environmental risks, fire protection and water supply, road and traffic capacity, funeral-procession effects, emergency access and response, cumulative impacts, piecemealing, and the adequacy and enforceability of proposed mitigation.

Please treat this letter and Exhibit A as timely written comments on the Initial Study and proposed Mitigated Negative Declaration; provide them to the Planning Commission; retain them in the official project file; and include them in the record of proceedings and any CEQA administrative record prepared for this matter.

Respectfully submitted,

Peggy Flynn, Land-Use and Environmental Consultant to the Eagle's Nest Owners Association

pjpatrickflynnbooks@gmail.com
September 1, 2026

1 Name: Print Jim Wirtz Signature:
Address: 941 Eagles Ranch Rd Date: 6-9-26

2 Name: Print CHET BERTELSEN Signature:
Address: 17140 CAMBERT RD Date: 7-10-26

3 Name: Print Michael McCleary Signature:
Address: 945 Eagles Ranch Rd Date: 7/22/26

4 Name: Print Margaret McCleary Signature:
Address: 945 Eagles Ranch Rd, Ione Date: 7/22/26

5 Name: Print Nadine McCleary Signature:
Address: 945 Eagles Ranch Rd, Ione CA Date: 6/22/26

---

6 Name: Print BRIAN K SMALL Signature: 916 201 9770
Address: ~~knuckleheads150@SBCGLOBAL.NET~~ 18861 CLAYPIT RD, IONE, CA. Date: 7/8/26 CLAYPIT Rd

7 Name: Print Ron Hess Signature:
Address: 18851 CLAYPIT RD, IONE CA Date: 7/8/26

8 Name: Print Tammy Hess Signature:
Address: 18851 Claypit Rd Ione CA 95640 Date: 07/08/2026

9 Name: Print Richy m Grimshaw Signature:
Address: 15908 Oak Park Court Plymouth, Ca Date: 7/8/2026

10 Name: Print Lena Stiward Signature: Lena Stiward
Address: 15933 Muller Rd. Plymouth CA 95669 Date: 7-8-26

11 Name: Print MARK WATT Signature:
Address: 18800 CLAYPIT ROAD, IONE, CA 95640 Date: 7/8/2026

12 Name: Print BRADLEY RONNER Signature: [signature]
Address: 17800 CLAYPIT RD Date: 7/8/26

13 Name: Print Mike Preskar Signature: [signature]
Address: 17901 Lombard Rd. Ione CA 95640 Date: 7-8-26

14 Name: Print Tom McClearey Signature: [signature]
Address: 945 Eagles Ranch Rd, Ione CA 95640 Date: 7/8/'26

Name: Print

15 Name: Print Michelle Stevens Signature: [signature]
Address: 451 Sutter Hill Rd #219 Sutter Creek, CA Date: 7-4-26

16 Name: Print GEORGIA FOX Signature: Georgia Fox
Address: 54 BADGER RD. - SUTTER CREEK CA Date: 7-4-26

17 Name: Print Margaret Bailey Signature: Margaret Bailey
Address: 64 Bryson Dr Sutter Creek Ca Date: 7-18-26

18 Name: Print Jennifer Fox Fritz Signature: [signature]
Address: 111 Wallace St. Jackson, CA 95642 Date: 7-21-26

19 Name: Print Scott A Fritz Signature: [signature]
Address: 111 Wallace St., Jackson, CA 95642 Date: 7-21-2026

20 Name: Print ANNA LAWRENCE Signature: [signature]
Address: 5580 Overlook Court Plymouth 95669 Date: July 22 2026

Name: Print Signature:

21 Name: Print ROBERT L. SLATER Signature: [signature]
Address: 17860 Claypit Rd, Ione CA 95640 Date: 07/21/26

22 Name: Print Peggy Armer Signature: [signature]
Address: 17500 Claypit Rd Ione, CA 95640 Date: 07/24/26

23 Name: Print Donna Pilkington Signature: D Pilkington
Address: 1400 W. Marlette St Date: 7-25-26

24 Name: Print LINDA PORRAZ Signature: Linda Porraz
Address: 304 Policeman Hill St Date: 7-25-26

25 Name: Print MARILYN EVANS Signature: Marilyn R Evans
Address: 292 VARDON CT Date: 7-25-26

26 Name: Print DOLORES SOUZA Signature: Dolores Souza
Address: 526 Fawnrey Dr. Reno, CA Date: 7-23-26

27 Name: Print ANN OLMSTEAD Signature: Ann Olmstead
Address: 1001 Shakeley Ln Reno Date: 7/23/26

28 Name: Print JENISE MARIE MURPHY Signature: Jenise Marie Murphy
Address: 1400 WEST MARLETTE ST SPACE 58 RENO CA 89503 Date: 7-29-26

29 Name: Print Nick Truitt Signature: Nick Truitt
Address: 1400 W. MARLETTE ST SP 59 Date: 7/29/26

30 Name: Print Joan Truitt Signature: Joan Truitt
Address: 1400 W Marlette St Sp. 59 Date: 7/29/26

31 Name: Print Dorothy Semenoff Signature: Dorothy Semenoff
Address: 1400 W Marlette #41 Date: 7/29/2026

32 Name: Print Paul Semenoff Signature: Paul Semenoff
Address: 1400 W. Marlette #41 Date: 7/29/2026

33 Name: Print MARTHA FINCH Signature: Martha C Finch
Address: 313 W. JACKSON ST. RENO Date: 7-14-26

34 Name: Print Rick Finch Signature: Rick Finch
Address: 313 W. Jackson St Reno. Date: 7-14-26

35 Name: Print Janet Wardell Signature: Janet Wardell
Address: 17069 Lambert Rd, Reno Date: 7-21-26

36 Name: Print Dawn Hollman Signature: D Holl

Address: 813 Shakeley Ln Date: 7-22-26

37 Name: Print Shirley Furr Signature: Shirley Furr

Address: 340 Cottonwood Ct Date: 7/22/26

38 Name: Print Funderburg, Veronica Signature: Veronica Funderburg

Address: 1208 Fairway Dr Ione Ca 95640 Date: 7/22-26

39 Name: Print Funderburk, Jerry Signature: Jerry Funderburk

Address: 1208 Fairway Dr Ione Date: 7-22-26

---

40 Name: Print Carson Yager Signature:

Address: 10250 Hwy 124 - POBox 553, Ione, CA 95640 Date: 7-24-2026

41 Name: Print Lewis Yager Signature: Lewis Yager

Address: 10250 Hwy 124 - POBox 553, Ione, CA 95640 Date: 7-24-2026

42 Name: Print Christina Hart Signature: Christina Hart

Address: 10250 Hwy 124 - POBox 553, Ione, CA 95640 Date: 7-24-2026

43 Name: Print Dan Hoyle Signature:

Address: 6080 Jackson Valley Rd Ione Date: 7-29-26

---

44 **Name: Print** Norma Jean Knaggs **Signature:** Norma Jean Knaggs

Address: 4240 Curran Rd - Ione **Date:** 7/23/26

45 **Name: Print** Susan Senser **Signature:** Susan Senser

Address: 133 OAKRIDGE DR Ione **Date:** 7/23/26

46 **Name: Print** DENNIS CUSTARD **Signature:** DENNIS CUSTARD

Address: 1001 SHAKELEY LN, IONE **Date:** 7/23/26

47 **Name: Print** Robin Karnitz **Signature:** Robin Karnitz

Address: 172 Ashworth Dr, Ione **Date:** 7-24-2026

48 **Name: Print** Phil Karnitz **Signature:** Phil Karnitz 7-24-26

Address: 172 Ashworth Dr. **Date:**

49 Name: Print LINDA MATULICH Signature: [signature]
Address: 143 Springcreek Dr Ione Date: 7-14-26

50 Name: Print ROBERT DURDEVICH Signature: Robert Durdevich
Address: 143 SPRINGCREEK DR IONE 95640 Date: 7-15-26

51 Name: Print Anna Moon Signature: Anna Moon
Address: 321 S. Sacramento st. Ione Date: 7-16-26

52 Name: Print Klina Koehler Signature: Klina Koehler
Address: 819 Shakeley Ln. Date: 7-15-26

53 Name: Print Cynthia Easterwood Signature: Cynthia Easterwood
Address: 626 Brookview Ct Ione CA 95640 Date: 7-15-26

---

54 Name: Print KEITH McCALLUM Signature: Keith McCallum
Address: 233 StonyBrook DR Date: 7-15-26

55 Name: Print JAN Mueller Signature: [signature]
Address: 113 Violet Lane Ione Date: 7-15-26

56 Name: Print JULIA MATHIS Signature: [signature]
Address: 85 KARSAN Rd Sutter Ca 95685 Date: 7/15/26

57 Name: Print Gerri Windsor Signature: [signature]
Address: 14074 Irishtown Rd Pine Grove Date: 7/15/26

58 Name: Print Louise A. Nunn Signature: Louise A. Nunn
Address: P.O. Box 4, Sutter Creek, Ca. 95685 Ridge Rd Date: 7-15-2026

---

59 Name: Print Carol Glatheler Signature: Carol Glatheler
Address: 1422 St. Andrews Lane Ione Date: 7/20/2026

60 Name: Print Emily Glatheler Signature: Emily Glatheler
Address: 1422 St. Andrews Lane Ione CA 95640 Date: 7/21/2026

61 Name: Print DAVID MURRAY Signature: [signature]
Address: 1422 ST ANDREWS DR IONE CA Date: 7/20/26

62 Name: Print MIKE KRISMER Signature: [signature]
Address: 5501 BUENA VISTA Ione Date: 7/21/26

63 Name: Print JUDY NURISID Signature: Judy Nurisid
Address: 1010 Shakeley Lane Ione Date: 7/23/26

64 Name: Print MARLENE Signature: Marlene
Address: 112 INVERNESS COURT IONE CA Date: 7/23/26

65 Name: Print CAROLYN Sanders Signature: Carolyn Sanders
Address: 5745 Red Oak DR. Ione, CA Date: 1/23/26

66 Name: Print Maria De La Torre Signature: Maria De La Torre
Address: 571 Foothill Blvd. Ione Date: 7/23/2026

67 Name: Print PAT PORTO Signature: Pat Porto
Address: 210 KERN ST. JACKSON, Ca. Date: 7-15-2026

68 Name: Print Sally Morris Signature: Sally Morris
Address: 149 Spring Creek dr Ione Date: 7-15-26

69 Name: Print Nancy Vieira Signature: Nancy Vieira
Address: 1640C Martin Ln. Ione CA 95640 Date: 7/15/26

70 Name: Print Debbie Cowan Signature: Rebecca Cowan
Address: 11190 Shenandoah Rd Plymouth Date: 7/15/26

71 Name: Print Donna Jackson Signature: Donna Lee Jackson
Address: 18908 Wheelerway Plymouth Date: 7/15/26

72 Name: Print William CONNOR Signature: William Connor
Address: 24120 GOLD CIRCLE DR. PIONEER CA Date: 7/21/26

73 Name: Print Darlene Collins Signature: Darlene Collins
Address: 10461 Mariposa Ave, Jackson CA Date: 7/21/26

74 Name: Print Robyn Ormsby Signature: Robyn Ormsby
Address: 2095 Camanche rd Ione 95640 Date: 7-16-26

75 Name: Print Shelly Rohrer Signature: Shelly Rohrer
Address: 17800 Clay Pit Rd Ione Calif 95640 Date: 7-16-26

76 Name: Print Denise Emery Signature: Denise Emery
Address: 729 Fairway Dr. Ione, CA 95640 Date: 7/16/26

77 Name: Print Janis Fonseca Signature: Janis Fonseca
Address: 154 N Arroyo Seco St #214 Ione, CA Date: 7-16-26

78 Name: Print Michael Schmidt Signature:
Address: 3740 Camanche Rd Ione CA Date: 7/17/2026

79 Name: Print Mary Ann Yost Signature: Mary Ann Yost
Address: 377 Eagle Dr. Ione, Ca 95640 Date: 7.18.26

80 Name: Print KIRK Goodman Signature:
Address: 400 Castle OAKS Ione Date: 7/18/26

81 Name: Print Tia Meyers Signature:
Address: 1400 W. Marlette St. #5 Ione Date: 7/19/26

82 Name: Print Phillip J. Jones Signature:
Address: 12345 Silver Creek Road Ione Date: 7.19.26

83 Name: Print Barbara Ellen Ormsby Signature: Barbara E. Ormsby
Address: 2445 Quiver Dr. Ione, Ca 95640 Date: 7-19-26

84 Name: Print Rosemary Hoyt Signature:
Address: 31 Pinehurst ct Ione Date: 8/8/26

85 Name: Print Alice Curran Signature: Alice G. Curran
Address: 4790 Spyglass Dr. Ione, Date: 8/8/26

86 Name: Print Babbi Rissling Signature: Babbi L Rissling
Address: 1434 St. Andrews Ln Ione, CA Date: 8/8/26

87 Name: Print Tanya Vela Signature: Tanya Vela
Address: 615 Pleasant Valley Dr Date: 8/8/26

88 Name: Print Shannon Swager Signature: Shannon Swager
Address: 200 Mustang Alley Ione CA 95640 Date: 7-17-2026

89 Name: Print Joel Swager Signature:
Address: 200 Mustang Alley Ione CA 95640 Date: 7-17-2026

90 Name: Print Dennis Sanders Signature:
Address: 17149 Lambert Rd, Ione CA 95640 Date: 7/17/2026

91 Name: Print Marcia Sanders Signature:
Address: 17149 Lambert Rd Ione CA 95640 Date: 7/17/2026

---

92 Name: Print Elizabeth Touhy Signature: Elizabeth Touhy
Address: 800 Edgebrook Dr Ione Date: 3/21/26

93 Name: Print KATHY SHAW Signature: Kathryn A. Shaw
Address: 608 Fairway Dr Ione, CA Date: 7-20-26

94 Name: Print Alice Yaray Signature: Alice Yaray
Address: PO Box 1x Dr, Ione CA 95640 Date: 7-20-26

95 Name: Print Patti Page Signature: Patti Page
Address: 101 Poppy Lane Ione Date: 7-21-26

96 Name: Print Helen Stanley Signature: Helen Stanley
Address: 4012 Lewis Ct, Ione 95640 Date: 7/21/26

97 Name: Print [redacted] Temple Signature: Dawn Temple
Address: 12551 Burnt Cedar Lane Pine Grove Date: 7-21-2026

98 Name: Print Dolores Larrigan Signature: Dolores Larrigan
Address: PO Box 727 Ione Date: 7-21-26

99 Name: Print Marie Muse Signature: Marie Muse
Address: 725 Shakeley Lane Ione Date: 7-21-26

100 Name: Print Janet Thompson Signature: Janet Thompson
Address: 608 Avalon Drive Date: 7-21-26

101 Name: Print Joan Rogers Signature: Joan Rogers
Address: 1609 Shakeley Lane Ione 95640 Date: 7-23-26

102 Name: Print Erin Looney Signature: [signature]
Address: 21795 Allan Rd Volcano 95689 Date: 7/18/26

103 Name: Print Chris Looney Signature: Chris Looney
Address: 21795 Allan Rd, Volcano, CA Date: 7/18/26

104 Name: Print Julianne van Leeuwen Signature: [signature]
Address: 705 Fairway Drive Ione CA Date: 7/18/2026

105 Name: Print Elizabeth Fisher Signature: Elizabeth J Fisher
Address: 402 CALLAWAY LANE Date: 07/16/26

106 Name: Print Kristine Caputo Signature: Kristine Caputo
Address: 707 Shakeley Ln. Ione Date: 7/16/26

---

107 Name: Print Stephanie Ward Signature: Stephanie Ward
Address: SAW ~~16500~~ Irish Hill Road, Ione, CA. Date: 7/16/2026

108 Name: Print Heather Mae Thomas Signature: Heather M Thomas
Address: 1400 Cook Rd. Ione, CA. 95640 Date: 7-16-2026

109 Name: Print Patricia A. Fisher-Misura Signature: Patricia A Fisher-Misura
Address: 13241 Mount Echo Drive Ione, CA 95640 Date: 7/16/2026

110 Name: Print LAWRENCE BEARDSLEY Signature: Lawrence R Beardsley
Address: 139 SPRINGCREEK DR. IONE, CA. 95640 Date: 7-18-2026

111 Name: Print Karen D'Imperio Signature: Karen D'Imperio
Address: 1021 N MAIN ST Jackson CA Date: 7-18-26

---

112 Name: Print Melissa Sanders Signature: Melissa Sanders
Address: 15575 Muller Rd, Plymouth CA 95669 Date: 8-9-26
Name: Print DAVID SANDERS Signature: David Sanders
Address: 15575 MULLER ROAD PLYMOUTH Date: 8/9/26

113 Name: Print GLORYANN POTTS Signature: GloryAnn Potts
Address: PO Box 868 IONE CA Date: 95640

114 Name: Print Theresa Wynn Signature: Theresa Lewynn
Address: 1011 W. Marlette St, Ione CA Date: 7-19-26

115 Name: Print Doug Hawkins Signature: Doug Hawkins
Address: 5355 CARBONDALE, Plymouth, CA. 95669 Date: 7/19/26

116 Name: Print Deanna Hawkins Signature:
Address: 5355 Carbondale, Plymouth 95669 Date: 7/19/26

117 Name: Print WILMA HAWKINS Signature: Wilma Hawkins
Address: 30 VILLA LANE IONE, CA 95640 Date: 7-19-2026

---

118 Name: Print Marla Maroon Signature: Marla Maroon
Address: 940 W. Marlette St Ione Date: 7-22-26

119 Name: Print Roy Robles Signature: Roy Robles
Address: 2520 QUIVER DR IONE CA Date: 7-22-26

120 Name: Print Maresa Davidson Signature: MDavidson
Address: PO BOX 24 Plymouth CA Date: 95669

121 Name: Print Ronald Matulich Signature: Ron Matulich
Address: PO Box 217 Drytown CA Date: 95699

122 Name: Print THOMAS E REED Signature: Thomas E Reed
Address: 2480 QUIVER DR IONE, CA. 95640 Date: 7-29-26

123 Name: Print Stacy Rhoades Signature:
Address: 138 N. ARROYO SECO IONE Date: 7-29-26

104 Name: Print Connie Inczewski Signature Connie Inczewski
Address: 13170 Mt. Echo Dr Ione, CA Date: 7/23/2026

105 Name: Print ROSEMARY JORDAN Signature: Rosemary Jordan
Address: 318 S. Mill St, IONE, CA 95640 Date: 7/29/26

106 Name: Print Norma Allen Signature: Norma Allen
Address: 12851 Old Spring Rd, Pine Grove, CA 95665 Date: 30 July 2026

107 Name: Print TONYA DUFFY Signature: Tonya Duffy
Address: 11140 Sutter Creek Ranchos Rd Date: 8-4-26

108 Name: Print SHERYL LEARY Signature: Sheryl Leary
Address: PO BOX 93 IONE, CA 95640 Date: 8-6-26

109 Name: Print Billy L. Sullivan Signature: Billy L Sullivan
Address: 4357 Comanche Rd Ione CA 95640 Date: 8-6-26

---

110 Name: Print IKE CLARK Signature:
Address: 12026 FAIRWAY DR. Date: 7-31-26

111 Name: Print Wayne Barcus Signature: Wayne Barcus
Address: 140 W. Marlette Spc 79 Ione Date: 7-31-26

112 Name: Print LAWRENCE [illegible] Signature:
Address: 707 SHANLEY LN IONE, CA 95 Date:

113 Name: Print Regina Schaengold Signature:
Address: 2095 Camanche Rd Ione Date: 8/7/26

114 Name: Print AUSTIN CURRAN Signature:
Address: 1500 Cook Rd Ione, CA 95640 Date: 8/8/26

115 Name: Print DAVID FOYIL Signature:
Address: 130 POPPY LN IONE CA 95640 Date: 8/11/26

116 Name: Print Dianne McCleery Signature: Dianne McCleery
Address: 13525 Mt. Echo Dr. Ione CA 95640 Date: 7/29/26

117 Name: Print Kristina Hoover Signature: Kristina Hoover
Address: 13551 Mount Echo Drive, Ione, CA 95640 Date: 7/29/26

118 Name: Print Renae Hoover Signature: Renae Hoover
Address: 13551 Mt echo drive, Ione CA, 95640 Date: 7/29/26

119 Name: Print Nicholas Nuricio Signature: Nicholas Nuricio
Address: 1010 SHARKEY LN. IONE CA. Date: 7-29-26

120 Name: Print RAMONA L. Wells Signature: Ramona Wells
Address: 20 Rollingwood DR SPC 153 Jackson CA Date: 8/3/2026

121 Name: Print Fedor Khramtsov Signature: Khramtsov
Address: 18400 Claypit RD Ione CA Date: 7/31/26

122 Name: Print DIANA KHRAMTSOV Signature: Diana Khramtsov
Address: 18400 Claypit Rd Ione CA Date: 7/31/26

123 Name: Print MAYA Khramtsov Signature: Maya Khramtsov
Address: 18400 Claypit RD Ione CA Date: 7/31/26

124 Name: Print Shelly Rohrer Signature: Shelly Rohrer
Address: 17800 Clay Pit Date: May 15 2026

125 Name: Print Brad Rohrer Signature: Brad Rohrer
Address: 17800 Clay Pit Date: May 17 2026

126 Name: Print Gary Cunningham Signature: Gary Cunningham
Address: 15160 Clinton Rd Jackson Date: 8-19-26

127 Name: Print Robert Chang Signature: Robert Chang
Address: 15100 Clinton Rd Jackson Date: 8/19/26

128 Name: Print C Beghtm Signature: Carolyn Begh
Address: 550 Castle Oaks Dr. Date: 7/16/26

129 Name: Print Andrea Karr Signature: Andrea Karr
Address: 607 Hwy 124 Ione Date: 7-16-26

130 Name: Print Marianne Pantle Signature: Marianne Pantle
Address: 402 Creekside Ct Ione Date: 7-16-26

131 Name: Print Sharon May Signature: Sharon May
Address: ~~#~~ 2141 Jackson Valley Rd, Ione Date: 7-16-26

132 Name: Print Jane Fowler Signature: Jane Fowler
Address: 402 Pleasant Valley Ione CA Date: 7-16-26

---

133 Name: Print Paula Bibby Signature: Paula A Bibby
Address: 18420 Shake Ridge Rd, Sutter Creek Date: 7/25/26

134 Name: Print DAVID Bibby Signature: David Bibby
Address: P.O. BOX 752, SUTTER CREEK CA 95685 Date: 7-25-26

135 Name: Print Lori Mote Signature: Lori Mote
Address: 9401 Brook Ranch Rd Ione, CA Date: 7/26/26

136 Name: Print David R. Moon Signature: David R. Moon
Address: P.O. Box 321 So. Sacramento St. Date: 7/26/26

137 Name: Print Barbara Gilroy Signature: B P Gilroy
Address: 604 Avalon Dr, Ione, Ca. Date: 7/27/26

---

138 Name: Print Louise Nunn Signature: Louise Nunn
Address: P.O Box 4 15561 Ridge Rd Sutter Creek Date: 8-19-2026

140 Name: Print Sandy Dwyer Signature: Sandy Dwyer
Address: 295 Meadowcrest Sutter Creek ca Date: 8-19-26

141 Name: Print CAROLE PUGH Signature: Carole Pugh
Address: 5574 N. PARK DR., IONE, CA Date: 8-16-26

142 Name: Print Ashley John Signature: Ashley John
Address: 624 Preston Ave. Ione CA Date: 8.16.26

143 Name: Print Marty Goeres Signature: Marty Goeres
Address: 624 Preston Ave Ione Date: 8 16 26

144 Name: Print JULIA MATHIS Signature: Julia Mathis
Address: 85 Hanson Rd Sutter Ck Date: 8/19/26

145 Name: Print Gerri Windsor Signature: Gerri Windsor
Address: 14074 Inshtown Rd #8 PINE GROVE Date: 8/19/26

146 Name: Print Marilyn Dalbeck Signature: Marilyn Dalbeck
Address: 18930 Golden Way Plymouth Date: 8/3/26

147 Name: Print Judy Upton Signature: Judy Upton
Address: 1400 West Marlette #66 Ione Date: 8-3-26

148 Name: Print Angela Lundgren Signature: Angela K. Lundgren
Address: 13600 Tony Court, Pine Grove, CA 95665 Date: 8-4-26

149 Name: Print Sharon Lundgren Signature: Sharon J. Lundgren
Address: 19665 Hooper Dr Pine Grove CA 95665 Date: 8/4/26

150 Name: Print LINDA CUTLER Signature: Linda Cutler
Address: 26268 SPANCE RIDGE RD - VOLCANO 95689 Date: 8/4/26

151 Name: Print Martha Smith Signature: Martha Smith
Address: 706 Heath Dr Ione Ca 95640 Date: 8-6-2026

152 Name: Print Rachel M Aguilera Signature: Rachel M Aguilera
Address: 279 Springcreek Dr. Date: 8/6/2026

153 Name: Print Margaret Gardner Signature: M Gardner
Address: 12885 Quartz Mt Rd Sutter Creek Date: 8/6/26

154 Name: Print Judy Weyhe Signature: Judy Weyhe
Address: 8203 Underwood Dr. Ione Date: 8-6-26

155 Name: Print Laura Swett Signature: L
Address: 361 Sutter Crest & Sutter Creek Date: 8/7/26

156 Name: Print Adrienne Jensen Signature: [signature]
Address: 16400 Irish Hill Rd Ione Date: 8-14-26

157 Name: Print JAMES JENSEN Signature: [signature]
Address: 16100 IRISH HILL RD IONE Date: 8/14/26

158 Name: Print GEORGE WARD Signature: George Ward
Address: 16500 IRISH HILL RD IONE Date: 8/16/26

159 Name: Print Terri DuFrene Signature: Terri DuFrene
Address: 616 W. Marlette St, Ione Date: 8/17/26

160 Name: Print Don DuFrene Signature: [signature]
Address: 616 W. Marlette St, Ione Date: 8/17/26

161 Name: Print LOVELL SMITH Signature: Lovell C. Smith
Address: 20 Rollingwood Dr. Date: 8-3-26

162 Name: Print Karen Grady Signature: Karen M Grady
Address: 185 Hillside Pl, Jackson, Ca. Date: 8-3-26

163 Name: Print LOIS SANBORN Signature: Lois Sanborn
Address: 10519 Ridgecrest DR., Jackson CA Date: 8-3-26

164 Name: Print Cindy Burke Signature: Cindy Burke
Address: 1505 Lahanton Way Ione Date: 8/9/26

165 Name: Print COLLEEN CLARKE Signature: Colleen Clarke
Address: 408 Laurel Dr. Ione 95640 Date: 8/14/26

166 Name: Print GARY V. HANKINS Signature: Gary V. Hankins
Address: 11261 TABEAUD RD. PINE GROVE Date: 8/9/26

167 Name: Print Christina Openshaw Signature: [signature]
Address: PO Box 1825 Jutter Creek Ca Date: 8/9/26

168 Name: Print Kerrie Kreischer Signature: Kerrie Kreischer
Address: 19865 Fallen Leaf Dr. Pioneer ca Date: 8/9/26

169 Name: Print Tim Boehm Signature: Tim Boehm
Address: 14915 Ponderosa Way Date: 8/9/26

170 Name: Print CHARLES TIVE Signature: [signature]
Address: 25949 LUPIN RD. VOLCANO Date: 8-9-26

171 Name: Print Sylvia Martine Signature: Sylvia Martine
Address: 10 Sybil Beach Ct. Date: 8-6-26

172 Name: Print Aileen Briley Signature: Aileen Briley
Address: 10796 Sutter Circle Sutter Creek Date: 8/6/26

173 Name: Print Keary Colwell Signature:
Address: 9120 Lauren Ln, Jackson, CA Date: 8/6/26

174 Name: Print Rita Dahl Signature: Rita Dahl
Address: 320 W. Marlette St. Ione, CA 95640 Date: 8-6-26

175 Name: Print Marie Nutting Signature: Marie Nutting
Address: 615 Oakshire Dr Ione, CA Date: 8/6/26

---

176 Name: Print Vicki Wagner Signature: Vicki Wagner
Address: 154 Albatross Dr. Ione Date: 8/6/2026

177 Name: Print JUDY HUDOCK Signature: Judy Hudock
Address: 142 ALBATROSS DR IONE Date: 8-6-2026

178 Name: Print Marianne Duncan Signature: Marianne Duncan
Address: 908 Avalon Dr, Ione Date: 8-6-26

179 Name: Print MERRY SMITH Signature: Merry Smith
Address: Po Box 52, Ione, CA 95640 Date: 8/6/26

180 Name: Print Sammie Belden Signature: Sammie B. Belden
Address: 1115 Oak View Dr, Ione, CA Date: 8/6/26

---

181 Name: Print Bradley Smith Signature: Bradley Smith
Address: 1400 W. Marlette St. Ione Date: 8/9/2026

182 Name: Print Irene Smith Signature: Irene Smith
Address: 11560 Gold Strike Rd, P.G. Date: 8/10/26

183 Name: Print Sandy Creach Signature: Sandra Creach
Address: 14365 E Quartz Mt Rd Sutter Creek Date: 8/11/26

184 Name: Print Julie Griffin Signature: Julie Griffin
Address: POBox 1595, Sutter Creek, CA 95685 Date: 8/11/26

185 Name: Print Sharon Cassella Signature: Sharon Cassella
Address: 210 Hillside Place Jackson 95642 Date: 8/13/26

186 Name: Print Veronica Bonilla Signature: Veronica Bonilla
Address: P.O. Box 1005 Date: 8/4/26

187 Name: Print Dixie Gold Signature: Dixie Gold
Address: 11006 Shakeley Lane Ione Date: 8-4-26

188 Name: Print Debbie Bryan Signature: Deborah Bryan
Address: 713 Albatross Dr. Ione Date: 8-4-26

189 Name: Print Polly Luy Signature: Polly Luy
Address: PO Box 845 Sutter Creek Date: 8/4/26

190 Name: Print Donna Miller Signature: Donna Miller
Address: 10207 Buena Vista dr. Date: 8-5-26

191 Name: Print Nick Gray Signature:
Address: 26508 South CT Pioneer Date: 8/9/26

192 Name: Print SHEA CORSALETTI Signature: Shea Corsaletti
Address: 727 W. MARIETTE ST IONE CA 95640 Date: 8/9/26

193 Name: Print LINDY LINCOLN Signature:
Address: 201 SPRINGCREEK DR. IONE, Date: 8-9-26

194 Name: Print Judy Clemens Signature: Judy Clemens
Address: Date: 8-9-26

195 Name: Print Rebecca R Dozet Signature: Rebecca R Dozet
Address: 19300 Gold Creek Tr Volcano, CA Date: 8/9/26

196 Name: Print JAN L FRITZ Signature:
Address: 15190 Barney Road, Plymouth Date: 8-9-26

197 Name: Print James Hollabaugh Signature: James Hollabaugh
Address: 11051 Clinton Bar Rd Date: 9 Aug 2026

198 Name: Print Angela Shidnoff Signature:
Address: 2970 Thomas DR. Date: 8/9/26

199 Name: Print Steve Moore Signature: Steven G. Moore
Address: 14210 Williams Rd. Pioneer, CA 95666 Date: 8/9/2026

200 Name: Print George Dozet Signature:
Address: 19300 Gold Creek Tr. Volcano, CA 95689 Date: 8/9/26

201 Name: Print Janet Wilson Signature: Janet Wilson
Address: 709 Pleasant Valley Dr. Ione Date: 7/27/26

202 Name: Print BARBARA DONATACCI Signature: Barbara Donatacci
Address: 1216 JACKSON GATE RD JACKSON Date: 7-28-26

203 Name: Print Regina Saling Signature: Regina Saling
Address: 19970 Dawn Ridge Jackson Date: 8-29-26

204 Name: Print Carol Lynn Nichols Signature: Carol Nichols
Address: 120 David Drive Sutter Creek Date: 8/29/26

205 Name: Print Aurora Hicks Signature: Aurora Hicks
Address: 511 Clinton Rd Jackson, CA Date: 7-29-26

206 Name: Print DONNA SILVA Signature: Donna Silva
Address: 14020 PRIMROSE LN PINE GROVE Date: 07-29-2026

207 Name: Print LINDA SMITH Signature: Linda Smith
Address: 20551 OSTROM RD FIDDLETOWN CA Date: 07-29-2026

208 Name: Print Debra Mathia Signature: Debra Mathia
Address: 717 Fairway dr, Ione Date: 209-268-8274

209 Name: Print Barbara King Signature: Barbara King
Address: 14420 Walnut Pine Grove Date:

210 Name: Print Gerald McCarthy Signature: Gerald McCarthy
Address: 114 W. Marlette St Ione Date: 7/29/26

211 Name: Print Herb Peoples Signature: H. Dym
Address: 407 Callaway Ln. Ione, CA. 95640 Date: 25 July 2026

212 Name: Print Haidee Peoples Signature: Haidee Peoples
Address: 407 Callaway Ln. Ione 95640 Date: July 27, 2026

213 Name: Print Elizabeth Smith Signature: Elabeth Smith
Address: 501 Avalon Dr Ione, Ca 95640 Date: 08-10-2026

214 Name: Print Donald R SMITH Signature: Donald R Smith
Address: 501 Avalon Drive Ione CA 95640 Date: 8/10/2026

215 Name: Print Robert Rankin Signature: Robert R
Address: 503 Avalon DR Ione CA 95640 Date: 8/23/2026

216 Name: Print JoAnn Ramsey Signature: JoAnn Ramsey
Address: 162 North Main Jackson CA 95642 Date: 7/26/26

217 Name: Print Christy Jo White Miser Signature: Christy Jo White Miser
Address: 111 Inverness Court, Ione, CA 95640 Date: 07/26/2026

218 Name: Print Brian Miser Signature: Brian Miser
Address: 111 Inverness Ct. Ione CA 95640 Date: 7/26/26

219 Name: Print Cheryl Beck Signature: Cheryl Beck
Address: 397 Fairway Dr, Ione, CA 95640 Date: 7/26/26

220 Name: Print Wayne A Beck Signature: Wayne A Beck
Address: 397 Fairway Dr, Ione, CA 95640 Date: 7/26/26

221 Janell B. Ramos
26240 Golf Links Dr.
Pioneer, CA 95666
09 Aug. 2026

222 Kathy Krshul
14050 Hooper Ct
Pine Grove CA 95665
8-9-2026

223 Laurie Doss
21151 Shakeridge Rd
Volcano, CA 95689
8-9-2026

224 Preston Sandus
15731 Happie Lou Lane
Pioneer CA 95666
8-9-26

225 Walt Openshaw
16028 Hwy 49
Drytown CA 95699

226 Adler Simmons
6027 Oakshire Dr
Ione, CA 95640
8-9-26

227 Leona Dauthey
12002 New York Ranch Road
Jackson
Leona Dauthey 8-9-26

228 Daniel Cantrell
27174 Carson St. Pioneer, CA 95666
8/9/26

229 Marcia Cabral
21411 Aqueduct Cir 8-9-2026
Pine Grove Cal 95665

230 Noel Tennet - 18700 Vista Ln 95666

231 Steve Nevarez
398 Avalon Drive Ione, CA 95640

232 Jim Mattimoe
P.O. Box 156
Amador City, CA 95601

233 Dorothy Trebes
P.O. Box 958
Sutter Creek, Ca 95685
Dorothy Trebes 8/9/2026

	Point name	Phone	email	
224	BRIAN SMALL	916 201 9770	✓ knuckleheads5150@sbcgloba	Ne
225	Linda Woodhouse	916 765-8485		
226	Cheryl Clark	209 217-4230	✓ clarkoneto77@yahoo.com	
227	Tom McCleary	916-705-4517	✓ tmacmc@aol.com	
228	Peggy Flynn	530 368 6434	pjpatrickflynnbooks@	

Contacts list yes/no

	Point name	Phone	email	
230	MARK WATT	209 332-0159	✓ MWWATT@YAHOO.COM	YES
231	MARK CAREY	(916) 223 3928	✓ markacarey@msn.com	
232	Georgiana Preskar	916-425-7446	✓ gleepres@gmail.com	
233	RON HESS	916 806-2450	✓ HESS3X@SBCGLOBAL.NET	
234	Tammy Hess	916 718-4896	✓ TLCHESS57X@sbcglobal.	
235	CRAIG LAMBERT	(209) 481-0901	✓ seateslambert@hotmail.com	
236	Ron Woodhouse	916 791 0333	✓ ronwoodhorse33@gmail.c	
237	Mike Preskar	916-425-6439	✓ mhpres2@gmail.com	
238	BRAD ROHAR	9165332371	BSROHAR@GMAIL.COM 17800 CASPIT	
			mhpres@icloud.com	

Name: Print CAROLE PUGH Signature: Carole Pugh

Address: 5574 N. PARK DR., IONE, CA Date: 8-16-26

Name: Print Ashley John Signature: Ashley John

Address: 624 Preston Ave. Ione CA Date: 8.16.26

Name: Print Marty Goeres Signature: Marty Goeres

Address: 624 Preston Ave Ione Date: 8.16.26

Name: Print JULIA MATHIS Signature: Julia Mathis

Address: 25 LARSAN Rd Sutter Date: 8/19/26

Name: Print Gerri Windsor Signature: Gerri Windsor

Address: 14074 Irishtown Rd #8 PINE GROVE Date: 8/19/26

Name: Print Gary Cunningham Signature: Gary Cunningham

Address: 15160 Clinton Rd Jackson Date: 8-19-26

Name: Print Robert Chang Signature: Robert Chang

Address: 15100 Clinton Rd Jackson Date: 8/19/26

Name: Print _____ Signature: _____

Address: _____ Date: _____

Name: Print _____ Signature: _____

Address: _____ Date: _____

Name: Print _____ Signature: _____

Address: _____ Date: _____

Name: Print Lou Nunn Signature: [signature]

Address: P.O Box 4 15561 Ridge Rd Sutter Creek Date: 8-19-2026

Name: Print Sandy Dwyer Signature: Sandy Dwyer

Address: 95 Meadowcrest Sutter Creek ca Date: 8-19-26

Name: Print Adrienne Jensen Signature: [illegible]

Address: [illegible]

Name: Print JAMES JENSEN

Address: 16100 IRISH HILL RD IONE Date: 8/14/26

[illegible]

[illegible] Irish Hill Rd Ione Date: 8-14-26

[illegible] Signature: [signature]

[illegible]

Name: Print GEORGE WARD Signature: George Ward

Address: 16500 IRISH HILL RD IONE Date: 8/16/26

Name: Print Terri DuFrene Signature: Terri DuFrene

Address: 616 W. Marlette St, Ione Date: 8/17/26

Name: Print Don DuFrene Signature: [signature]

Address: 616 W. Marlette St, Ione Date: 8/17/26

ON

Name: Print Dennis Poss Signature: Dennis Poss

Address: 5125 GRAIN FLAT RD Date: 7-23-26

Name: Print _____ Signature: _____

Address: _____ Date: _____

Name: Print Ruth Anne Poss Signature: Ruth Anne Poss

Address: 5125 grain Flat RD Plymouth Date: 7-23

Name: Print Curtis Poss Signature: _____

Address: 5125 grainflat RD Date: 7-23

Name: Print [illegible] Signature: [illegible]

Address: [illegible] Date: 9-3-26

Name: Print [illegible] Signature: [illegible]

Address: [illegible] Date: [illegible]

Name: Print Sean Mason Signature: [illegible]

Address: 18 W. MAIN ST. Jackson CA Date: 9/3/2026

Name: Print [illegible] Signature: [illegible]

Address: [illegible] Date: 9/3/26

Name: Print L. B. Reeves Signature [illegible]

Address: 968 Roadrunner CT Tone Date: 9/3/26

Name: Print James Perkins Signature: [illegible]

Address: 327 Fairway Dr, Ione, CA Date: 9/3/26

Name: Print Kathy Scoble Signature: [signature]

Address: 19070 ALLAN RD W. VOLCANO CA 95689 Date: 9-3-26

Name: Print Stephen Beach Signature: Stephen Beach

Address: PO Box 1437 Sutter Creek Date: 9-3-26

Name: Print Brad Hogarth Signature: [signature]

Address: 9457 Cosumnes Dr Plymouth CA 95669 Date: 9-3-26

Name: Print KEN HUNT Signature: [signature]

Address: PO Box 7 Pine Grove CA Date: 9/3/26

Name: Print Kate Hulse Signature: [signature]

Address: Jackson Date: 9-3/26

Name: Print Tom Aurand Signature: [signature]

Address: Jackson Date: 9-3-26

Name: Print BILL CARTER Signature: Bill Carter

Address: PO BOX 1483 Sutter Creek Date: 7-10-26

Name: Print MAREK ZAWADZKI Signature: Marek Zawadzki 7/10/26

Address: P.O. Box 626 Pine Grove, CA Date: 7.10.2026

Name: Print Lynn Hacmston Signature: Lynn Hamilton

Address: PoBox1552 Sutter 171 mill st Creek, CA Date: 7-31-2026

Name: Print LEO MOUSON Signature: Leo Mouson

Address: 220 JUDY D RIVE SUTTER CREEK CA Date: 7-31-2024

Name: Print JUDITH ALBRO Signature: Judith L. Albro

Address: 15784 MULLER RD, PLYMOUTH, CA Date: 8-31-2026

Name: Print JENNIFER PINELLI Signature: Jennifer Pinelli

Address: 211 Oto Madre Way Sutter Creek Date: 8-31-2026

Name: Print BOB MOTTS Signature: [signature]

Address: 14906 HY 88 #20 CA. JACKSON Date: 7/9/26

Name: Print ROY PORTER Signature: [signature]

Address: 221 KERN ST JACKSON Date: 7-9-26

Name: Print Donna Marklin Signature: [signature]

Address: 182 WESTVIEW DR JACKSON Date: 7-10-26

Name: Print Robert C. Allen Signature: [signature]

Address: 12151 Allen Ranch Rd, Sutter Creek Date: 7-9-26

Name: Print Robert Lockhart Signature: [signature]

Address: 17 E Plymouth Ave Date: July 10-26

Name: Print Adam Whitmore Signature: [signature]

Address: 719 Kristi Court, Jackson, Ca 95642 Date: 7/10/26

Name: Print LINDA MARSDEN Signature: Linda Marsden

Address: 602 Foothill Blvd Ione 95640 Date: 7/9/26

Name: Print Diane Fuentes Signature: Diane Fuentes

Address: Ca Date: 7-9-26

Name: Print JAMES MARKLI

11 French Bar Rd Jackson, Signature:

Address: 182 Westview Dr., Jackson, Ca 95642 Date: 7-9-26

Name: Print LEO MONSON JR Signature: Leo Monson Jr

Address: 220 Judy Drive Sutter Creek 95685 Date: 7-9-26

Name: Print Donna Simpkins Signature: Donna P Simpkins

Address: 210 Amador Trail Sutter Creek Date: 7-9-26

Name: Print JOHN KOLDJESKI Signature: John Koldjeski

Address: 11201 CR 34 95601-0075 Date: 7.9.26
Amador City

Name: Print EDITH CHUMES

Address: 16000 DR 3

Name: Print DA _____ Signature: _____

_____ Signature: Edith J Colmes

20 Rollin Place #26 Jackson, CA 95642 Date: 9/4/26

VIDEWAY

Address: 150 Clinton Rd Space 25, Jackson, 95642 Date: 9.4.26

Name: Print BOB MOTTS Signature: _____

Address: 14906 HY88 #20 Jackson Date: 9/4/26

Name: Print Carol Solmes Signature: Carol Solmes

Address: 10875 Sutter Creek Ca 95685 Date: 09082026

Name: Print DAVID G. WAY Signature: Dgway

Address: 150 Clinton Rd Space 25 Jackson CA Date: 8.7.16

Name: Print Dawn M. Hall Signature: Dawn Marie Hall

Address: 11105 Quail Dr Pine Grove Date: 9-2-26

Name: Print John ALBRO Signature: John Albro

Address: 15284 MUELLER ROAD Date: 10-4-26

Name: P int [illegible] Signature: [illegible]

Address: 94140 Sunkist Ln Date: 7/28/26

Name: Print Jason Dodson Signature: Jason D

Ad ress: [illegible] Date: 7/28/2

Name: rin. [illegible] Signature: [illegible]

Address: [illegible] Da e: 7-28-26

Name: Print Zeek Bell Signature: [illegible]

Address: 6626 Jamison Way Date: 7-28-26

Name: Print Marjorie Salo Signature: [illegible]

Address: 15100 Robles Grandis Dr. Date: 07/28/2026

Name: rint Suanne Chase Sig u e: Suanne Chase

Address: 34 EAGLE DR Lone, 95640 Date: 7/29/26

[redacted]

Name: Print Suanne Chase Signature: Suanne Chase

Address: 341 EAGLE DR Ione, CA. 95640 Date: 9/1/26

Name: Print Stacy Mitchell Signature: Stacy Mitchell

Address: 384 Eagle Drive Ione CA 95640 Date: 9/1/26

Name: Print Bethe C. Rhoades Signature: Bette C. Rhoades

Address: 125 N. ARROYO SECO ST. IONE, CA. Date: 9-1-26

Name: Print BRIAN SMALL Signature: B-K-L

Address: 18861 CLAYPIT RD IONE CA 95640 Date: 9-3-26

Name: Print Dan Pippa Signature:

Address: 1420 Jackson Gate Rd. Jackson Date: Sept 3, 26

Name: Print Signature:

Address: Date:

Outlook

State of Opposition - Garden of Noor Cemetery

From m.helmle@comcast.net <m.helmle@comcast.net>

Date Tue 9/8/2026 4:12 PM

To Plan-Planning <planning@amadorcounty.gov>; BOS-Board of Supervisors <boardofsupervisors@amadorcounty.gov>

1 attachment (608 KB)

Statement of Opposition - Gardens of Noor.pdf;

You don't often get email from m.helmle@comcast.net. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Amador Planning Commission and Board of Supervisors:

Attached please find my Statement of Opposition for the Gardens of Noor Cemetery being proposed in Ione, CA.

Sincerely,
Madelyn Helmle

Statement of Opposition

TO: The Amador County Planning Commission and the Board of Supervisors

ATTN: Amador County Planning Department, 810 Court Street, Jackson, CA 95642 (planning@amadorcounty.gov and boardofsupervisors@amadorcounty.gov)

RE: Formal Citizen Petition Opposing Request for Use Permit Application UP-22; 2-3 Gardens of Noor Cemetery

PROPERTY LOCATION: 857 Carbondale Rd. and 16630 Lambert Rd., Ione, CA 95640 (APN: 001-220-013)

CURRENT ZONING: R1A Single-Family Residential & Agricultural and has an MRZ, Mineral Resource Zone General Plan Designation

PROPOSED USE: 1832 graves sites divided among 7 blocks on the north end of the property. Proposed improvements include driveway parking for up to 100 cars, and a parking lot with 64 permanent spaces, and permanent restrooms. Proposed number of funerals is 60 funerals a month with a limit of 50 attendees per event.

We, the undersigned residents, property owners, and stakeholders of Amador County, hereby formally oppose the land use proposal referenced above. We respectfully urge the Planning Commission and the Board of Supervisors to deny this application because it is inconsistent with the Amador County General Plan, would place an undue burden on local infrastructure—including roads and water resources—would significantly alter the rural character of our community, and raises environmental concerns requiring careful consideration under the California Environmental Quality Act (CEQA).

Printed Name: Madelyn Helmle Signature: Madelyn Helmle

Address: 1505 Willow Dr., Ione CA 95640 Date: 8/12/2026

Printed Name: _____ Signature: _____

Address: _____ Date: _____

Printed Name: _____ Signature: _____

Address: _____ Date: _____

Outlook

Gardens of Noor comments

From katie rodgers <katierodgers1632@gmail.com>
Date Tue 9/8/2026 1:32 PM
To Plan-Planning <planning@amadorcounty.gov>

[You don't often get email from katierodgers1632@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

I'm going to try my best to attend the meeting this evening however I have 5 small children and a husband who works graveyard shift in the county so I'm unsure if I will be able to. I'm writing as a concerned citizen regarding the garden of noor project. My concerns range from cultural concerns regarding our small county's unique concern for it's own citizens as well as the impacts of large funerals in a rural area.

I would first like to address the cultural aspect of it. While the Muslim population has grown through out California, it is not growing in amador county. I am aware the planning district cannot deny an application based solely on these reasons but I would implore them to draw it out until the applicant withdraws. My understanding is the applicant has already failed at previous attempts in Northern California for this project. We are a community known for putting its citizens and neighbors first and I don't believe the planning commission approving something so unpopular at this time, and so detrimental to those in the neighborhood sets a good precedent. I am all for smart development but putting a large cemetery in the middle of a well established amador neighborhood where almost no members of the community will benefit or have a cultural connection is not in the best interests of those who live here.

My second concern is the traffic and environmental impacts. Even with only 60 funerals a month, and 50 cars that's 3,000 additional cars down Carbondale per month. With the vast majority of these I'm assuming on the weekends that could be 500-750 cars a weekend. I don't see how Carbondale as a neighborhood or the roads are built for sustained traffic like this. With the huge growing demand for Islamic burial sites it will surely be highly sought after by the neighboring Islamic community. I also don't understand who is going to ensure only 50 people are in attendance ? From my understanding funerals are usually a larger community event with prayers and obligatory attendance even if the deceased wasn't well known. I don't anticipate someone sitting at the turn off to Carbondale monitoring attendees. What is the protocol for if funerals are too large? This has an huge impact on the community of Carbondale. Are there plants in place for limiting them or is this just on the honor system? Once approved and funerals begin I'm not understanding what can be done to keep them from holding these caps.

Which leads me to my second point on the environmental side. Does the applicant have the financial

means to remediate any ground water contamination? Are they responsible for annual testing to ensure there is no leeching for the lifetime of the cemetery. It's easy for us to look at the applicant now but what about 20 years from now if issues arise? Are we potentially giving short term use to a long term project that can impact the generations after us who want to live in carbondale? What long term financial bond or insurance is the applicant providing to ensure they will be caretakers of the land for its entire use?

I hope I can attend tonight. However if unable, I urge the commission to use its power by whatever means necessary to put the citizens of amador county first. Please consider that projects like this; whether you agree with them or not, do not serve the community as it stands today. I would also hope the applicant would consider and choose a location outside of a neighborhood and in an area where they are already established. Thank you for taking the time to read this.

Katie Rodgers

Sent from my iPhone

Outlook

Use permit application UP-22; 2-3 Gardens of Noor Cemetery

From Jacob Rounds <jrrounds126@yahoo.com>
Date Tue 9/8/2026 4:24 PM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from jrrounds126@yahoo.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Amador County Planning Commission

c/o Amador County Planning Department

810 Court Street

Jackson, CA 95642

planning@amadorcounty.gov

Re: Use Permit Application UP-22; 2-3 — Gardens of Noor Cemetery

Hearing date: September 8, 2026

APN: 001-220-013

Applicant: Mounir Kaddoura

Location: 16630 Lambert Road and 857 Carbondale Road, Ione, CA 95640

Dear Chair and Commissioners:

Please accept this written comment for the record on Use Permit UP-22;2-3 and the proposed Mitigated Negative Declaration.

I am a resident of Amador County at 17950 Holly Rd, Fiddletown, CA 95629. I ask the Commission to **deny** the Use Permit, or at minimum **continue** the hearing and **reject the Mitigated Negative Declaration** until a full Environmental Impact Report and enforceable conditions are prepared.

1. Use the current application, not the old one

The application now before you is **1,832 grave sites in seven blocks on the north end** of a 46-acre parcel zoned R1A, with an MRZ General Plan designation. Proposed operations are **60 funerals per month**, a limit of **50 attendees per event**, driveway parking for up to 100 cars, a parking lot with 64 permanent spaces, and permanent restrooms.

That is a real reduction from earlier versions that included a large religious building and tens of thousands of plots. The reduction does not make this a low-intensity rural use, and it does not cure the remaining environmental, traffic, fire, water, and expansion problems.

2. A Mitigated Negative Declaration is not adequate

An MND is proper only if there is no substantial evidence that the project may have a significant effect after mitigation. There is substantial evidence of potentially significant impacts that have not been fully analyzed:

- This is a **destination cemetery**. Public statements and the project history describe service to surrounding counties, not only local families.
- **60 funerals per month equals 720 events per year.** That is a high-intensity assembly use on rural two-lane roads.
- Peak-event traffic, vehicle miles traveled, emergency access, fire risk, groundwater and wastewater, and the growth-inducing effect of leaving most of the 46 acres unused have not been studied at EIR level.
- The CEQA comment period runs from August 19, 2026 to **5:00 p.m. on the hearing date**. Same-day close of comments is not meaningful public review for a project of this type.

Please reject the MND and require an Environmental Impact Report, or continue the item until that analysis is complete and recirculated.

3. The attendance and funeral caps are not self-enforcing

A 50-attendee limit does not match how funerals actually operate. Many services draw well more than 50 people. Overflow parking will occur on Lambert Road and Carbondale Road.

Sixty funerals a month, if each were a new interment, would fill 1,832 plots in a little over two and a half years. That shows the requested operating intensity is high relative to the stated grave count.

Please do not treat paper caps as mitigation unless the Use Permit includes:

- a hard limit of 50 vehicles and 50 attendees on site at one time;
- a requirement that the operator count and log each event;
- a County inspection and complaint process;
- automatic return to the Planning Commission after documented overflow; and
- no stacking of events that would exceed those limits.

Without monitoring and penalties, the cap is not a condition. It is an assumption.

4. Traffic, safety, and emissions

Many of the roads in our county are in a state of disrepair, Lambert Road and Carbondale Road are no exception. They are rural two lane roads like the majority of the roads in Amador county. Repeated funeral peaks, unfamiliar drivers, and roadside parking create safety conflicts with local residents, farm equipment, and emergency vehicles. Not to mention the accelerated wear caused by the large increase in vehicular traffic.

Many trips will be long-distance passenger-vehicle trips. There is no transit alternative. That means added VMT and added carbon emissions from a land use that is not locally serving.

Please require an independent traffic study based on **peak funeral conditions**, not average-day traffic, including turning movements, sight distance, shoulder parking, and encroachment design at both road frontages.

5. Fire hazard and emergency access

The site is rural foothill land. California and local fire standards for this kind of development typically require adequate access width, turning radii, water supply, and defensible space. Large gatherings on a dry-season site raise evacuation and response risk.

Amador Fire Protection District comments are already in the project file. Those comments should be adopted as mandatory conditions. A public Fire Protection Plan should be approved **before** any Use Permit, not deferred to a later building permit.

6. Zoning, mineral resources, and leftover acreage

The parcel is R1A, Single-family Residential and Agriculture, with an MRZ Mineral Resource Zone designation. A high-intensity cemetery serving a multi-county population is not the same as a quiet residential or agricultural use. MRZ land is supposed to be protected from incompatible development.

1,832 graves can physically fit on the north end of 46 acres. That is not the issue. The issue is the remainder of the property. Earlier applications included a large religious building and far more graves. The applicant has already discussed future amendments.

If any approval is considered, the conditions must freeze the project:

- maximum 1,832 graves;
- graves limited to the seven north-end blocks shown on the current plan;
- no mosque, sanctuary, or other religious assembly building;
- no increase in funerals, attendance, or parking without a new Use Permit and new CEQA review.

Otherwise tonight's "smaller cemetery" is only Phase One.

7. Water, wastewater, drainage, and rural character

Amador Water Agency previously identified water constraints on this property and advised against irrigated turf. Permanent restrooms and hundreds of events per year require a real wastewater and drainage plan signed off by Environmental Health.

Repeated visitor traffic will also bring noise, litter, roadside disturbance, and pressure on wildlife and neighboring wells. Rural code enforcement is limited. "We will keep it clean" is not mitigation unless there is a funded maintenance contract and a County inspection schedule.

8. Financial capacity and perpetual care

A cemetery is a permanent land use. Roads, fire access, restrooms, drainage, and grave maintenance do not take care of themselves. Please require, before any grading or operation:

- proof of capital to build the required improvements;
- bonding for road, fire, drainage, and restroom work;
- a funded perpetual-care or endowment arrangement consistent with California cemetery requirements; and
- a financially responsible party the County can enforce against if the operator fails.

Conditions without money become a County liability.

Requested action

I respectfully request that the Planning Commission:

1. Determine that the Mitigated Negative Declaration is **not adequate**;
2. **Deny** Use Permit UP-22;2-3, or **continue** the hearing;
3. Require a full **Environmental Impact Report**;
4. Require an independent **peak-event traffic study** and a public **Fire Protection Plan**;
5. If the project ever returns, lock the scope at 1,832 graves, north-end blocks only, 60 funerals per month maximum, 50 attendees and 50 vehicles maximum, and no accessory religious building; and
6. Require financial documentation and bonding before any approval becomes effective.

Please include this letter in the public record for the September 8, 2026 hearing.

Respectfully submitted,

Jacob Rounds

17950 Holly Rd

Fiddletown, CA 95629

(925) 470-0855

Jrrounds126@yahoo.com

Dated: September 8, 2026

This letter is in protest of the Gardens of Noor Cemetery.
Our infrastructure will not support the amount of traffic that is proposed for a group that has NO ties to our community.

We expect you as the planning commission to protect our county. Every one knows that Amador County is **"GOD'S COUNTRY"**. Muslims do not believe in God.
You need to listen to the protests of the county's residents.

RECEIVED
SEP 08 2026
AMADOR COUNTY
PLANNING DEPARTMENT

Please DO NOT pass this and condemn our county.



The World's Largest Muslim Nations Didn't Used to Be Muslim

Once you allow them a foot hold in our county, our county will no longer be known as God's Country. In fact, we probably won't even recognize our county in a few years as it becomes overtaken.

Maybe this is an issue that should be tabled and put on the ballot for the county residents to decide.

STATEMENT OF FACTS ON MR. MOUNIR KADDOURA
Applicant for Amador County Use Permit UP-22; 2-3
September 4, 2026

RECEIVED
SEP 08 2026
AMADOR COUNTY
PLANNING DEPARTMENT

Review of Sacramento and Amador records shows the following areas of concern:

1. 2017 & 2018 Sacramento County Cosumnes Community Planning Advisory Committee; applicant Mounir Kaddoura, Antioch, CA. Project No. PLNP 2017-00124; **Project failed** in Cosumnes CPAC, 2018.
2. August 4, 2022, Amador County TAC Meeting, Times are in reference to the start time of the meeting at 00:00.
   34:12 Mounir Kaddoura joins Zoom meeting by phone 34 minutes late.
   52:38 Mounir Kaddoura advises he wants **a maximum of 400 attendees** for each funeral, then on advice from County Planner Krista reduces number to 50 attendees.
   Ends at 63:15; listed in our 443-page report on page 176.

3. June 11, 2026, Amador County TAC Meeting, Times are in reference to the start time of the meeting at 00:00.
   Local Ione resident Ron Woodhouse stated the failed history in Sacramento and Amador Counties.
   50:14 **Mr. Mounir Kaddoura says he never applied for a use permit in Sacramento County**
   50:40 ended statement. Listed in our 443-page report on page 393.
   51:24 **David Wardall made a statement that Mounir Kaddoura filed for a Sacramento County Use Permit with the Cosumnes Community Planning Advisory Committee, document No. PLNP 2017-00124**, at that point, David Wardall provided copies of document No. PLNP 2017-00124 to County staff and to the TAC members. This Application was rejected by the Consumnes CPAC in 2018.
   52:25 ended statement. Listed in our 443-page report on page 394.
4. May14, 2025, Yuba County Board of Supervisors Board Meeting, imposed $43,913.42 fine for **property Code violations** pertaining to electrical panel and other problems.
5. April 29, 2025, California Cemetery and Funeral Bureau, imposed $500.00 fine for **untagged bodies and/or lack of a facility room.** FD2346 IC2024 994, Code section: 16IC 1223.1: embalming, preparation and storage of bodies.

Outlook

400 yr old Blue Oak

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Tue 9/8/2026 12:17 PM
To Plan-Planning <planning@amadorcounty.gov>

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.



Please show for me at meeting tonight Ron Woodhouse

Outlook

IMG_0628

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Tue 9/8/2026 12:23 PM
To Plan-Planning <planning@amadorcounty.gov>

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

IMG_0628.MOV

Please show this video tonight at the meeting for me Ron Woodhouse

Outlook

Gardens of Noor Cemetery – UP-22;2-3: Request for Current CEQA and Project Information

From Lauren Robinson <lauren.robinson82@gmail.com>
Date Sun 8/30/2026 5:12 PM
To Plan-Planning <planning@amadorcounty.gov>
Cc Brian Oneto <BOneto@amadorcounty.gov>; EH-ACEH <aceh@amadorcounty.gov>; PW-Public Works <publicworks@amadorcounty.gov>; Kayla Dale <kdale@amadorcounty.gov>

You don't often get email from lauren.robinson82@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Planning Commission Members and Planning Department Staff,

I am writing regarding Use Permit UP-22;2-3, Gardens of Noor Cemetery, and in advance of the Planning Commission's consideration of the project.

I have been reviewing the publicly available County records, including the Technical Advisory Committee materials, and I have become increasingly concerned that the public needs a clear understanding of the environmental and land-use analysis for the current version of the project.

The project has changed substantially since the original application. The proposal has progressed from an earlier concept involving 50,000 gravesites, to 404 burial plots, and the current proposal reportedly includes approximately 1,832 gravesites, with the ability to conduct up to 60 funerals per month and accommodate up to 50 attendees per event. The actual number of people and vehicles associated with each event could reasonably be greater than the stated attendee limit when cemetery staff, clergy, funeral directors, vendors, and other personnel necessary to conduct the services are taken into account.

Because of those substantial changes, I respectfully request clarification regarding the following:

1. Current CEQA documentation

Has the County completed the current 2026 CEQA Initial Study for the project? If so, I would appreciate being provided a copy or directed to where the complete document and supporting technical materials can be reviewed. I would also appreciate copies of, or access to, any current draft or proposed Mitigated Negative Declaration, staff report, proposed conditions of approval, technical studies, agency comments, or other documents being relied upon in the current review.

2. Current project description

Please confirm that the environmental review is based upon the current proposal, including the approximately 1,832 gravesites, seven burial blocks, 60 funerals per month, current parking capacity,

permanent restrooms, access roads, grading, drainage, utilities, landscaping, and all other proposed improvements. Given the substantial changes in both the number of gravesites and the proposed frequency of funerals over the course of this application, I would like to understand how the County determined that the current environmental review adequately addresses the present proposal.

3. General Plan / MRZ compatibility

County materials identify the property as being designated MRZ (Mineral Resource Zone) under the General Plan and zoned R1A. What analysis has been performed regarding the compatibility of a permanent cemetery of this scale with the County's adopted mineral-resource policies and the requirement to evaluate discretionary development for compatibility with mineral resources and future mineral extraction?

4. Groundwater, wells and water quality

What site-specific analysis has been performed concerning groundwater depth, seasonal groundwater conditions, soil permeability, groundwater flow, nearby private or agricultural wells, surface drainage, and the proposed burial areas? In particular, what standards, setbacks, or other safeguards will ensure that the proposed burial areas do not adversely affect groundwater or neighboring water supplies?

5. Natural burial practices and wildlife

I am particularly interested in how the County has evaluated the proposed natural burial method in the context of this specific rural location. The area has significant wildlife activity, including wild pigs and coyotes. What measures are proposed to prevent wildlife from disturbing or exposing human remains, and what technical analysis supports the conclusion that those measures will be effective? I would also appreciate clarification regarding the applicable state and County requirements governing grave depth, burial practices, protection of human remains, grave construction, and any other measures intended to prevent disturbance of graves.

6. Traffic and access

Has a traffic or transportation analysis been performed based on the maximum proposed operation of 60 funerals per month and up to 50 attendees per event? I would also like to understand how the County has evaluated traffic safety, sight distance, road capacity, funeral procession traffic, overflow parking, and emergency vehicle access on the surrounding roads.

7. Fire and emergency access

Has the County evaluated emergency access and evacuation concerns associated with recurring gatherings of up to 50 attendees, particularly in the context of wildfire risk and the rural road network?

8. Biological and other environmental resources

Has a current biological assessment been completed for the entire project footprint, including burial areas, parking, access roads, drainage, utilities, and other improvements? If so, I would appreciate access to that assessment and any related agency comments.

9. Cumulative impacts

Given that the Gardens of Noor project has been identified in the County's environmental review of other development in the Ione area, how are cumulative traffic, water, biological, air-quality, noise, and

land-use impacts being addressed?

10. County departments and agencies involved in the review

Finally, I would appreciate the County identifying which County departments, special districts, or other agencies have reviewed the project and the issues identified above, and providing any reports, technical studies, correspondence, comments, or recommendations they have submitted as part of the UP-22;2-3 review. In particular, I would like to know whether Environmental Health, Public Works/Transportation, fire authorities, or other agencies with relevant expertise have reviewed the proposed burial practices, groundwater and sanitation issues, traffic and access, drainage, wildlife concerns, and emergency access.

My concerns are focused on the proposed use, its scale, its location, and whether the project complies with Amador County's General Plan, zoning requirements, CEQA, applicable cemetery regulations, environmental protections, and public-safety standards. I am asking that these issues be fully evaluated before the Planning Commission takes action on the Use Permit, particularly given the substantial changes that have occurred since the original application.

Thank you for your time and for your consideration of these questions. I would appreciate being directed to the current public documents and any available technical studies so that I can better understand the County's analysis of the proposal.

Sincerely,
Lauren Robinson
989 Carbondale Rd.
916-202-4182

Outlook

Re: Gardens of Noor Cemetery – UP-22;2-3: Request for Current CEQA and Project Information

From Plan-Planning <planning@amadorcounty.gov>
Date Wed 9/2/2026 3:51 PM
To Lauren Robinson <lauren.robinson82@gmail.com>

2 attachments (24 MB)
August 4, 2022 TAC Audio.mp3; 2025-09-18 13-04 508.mp3;

Please see the below responses to your questions.

1. Here is the link to the item packet for this project. Planning Commission Meeting | County Calendar | Amador County
2. The draft environmental document is included in the item packet, prepared by the Technical Advisory Committee. The Planning Commission will review the draft and make a determination on the adequacy of the environmental document for the project at the meeting.
3. General Plan/MRZ compatibility recommendations are based on the CEQA Initial Study findings and the Geologist Report for the property submitted with the project, included in the item packet found at the above link.
4. A geological technical report was submitted with the project materials. The property owner will have to maintain adequate setbacks from all property lines as determined by the Environmental Health Department regulations and Regional Water Quality Control Board requirements. The applicant is responsible for obtaining and maintaining any applicable permits from those departments.
5. The applicant is required to ensure adherence to the burial standards established by the State Cemetery Board. Their website may be found here: Home – Cemetery and Funeral Bureau
6. The Transportation and Public Works Department is a participating member of TAC. You will need to contact them regarding their specific methods of analysis for projects. Their phone number is (209)223-6429.
7. The Amador County Fire Protection District (AFPD) is a participating member of TAC. You can contact them regarding their specific requirements and methods of analysis for projects. Their number is (209)223-6470. Additionally, the draft Conditions of Approval required adherence to the County's Fire and Life Safety Chapter 15.30.
8. A Biological Resource Assessment was submitted with the project application, available at the above link under the Project Application section of the Planning Commission Item upload.

9. As there are no similar projects of this nature in or around the proposed project, there is no identified cumulative impacts from this project. The draft Conditions of Approval address project-related impacts. A more extensive explanation of this finding is found within the CEQA Initial Study.

10. Correspondence and comments regarding this project are uploaded at the above website. The Technical Advisory Committee meeting recordings have been attached to this email as well. The remaining TAC meetings will be attached to emails following this one, as the files are too large to all be attached to this email. There are a total of six (6) TAC meetings and recordings to look out for.

Thank you,

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorcounty.gov

From: Lauren Robinson <lauren.robinson82@gmail.com>
Sent: Sunday, August 30, 2026 5:12 PM
To:
C
<p

Outlook

Submittal of document: Statement of Objection and Appearance

From davidwardall@gmail.com <davidwardall@gmail.com>
Date Thu 9/3/2026 9:27 AM
To Plan-Planning <planning@amadorcounty.gov>
Cc 'PJ Patrick Flynn' <pjpatrickflynnbooks@gmail.com>; 'Tom McCleary' <tmacmc@aol.com>; Mike Preskar <mhpres@icloud.com>; Jim Wirfel <wirf@edcgsr.com>; Ron Woodhouse <ronwoodhouse33@gmail.com>; Ron Hess <hess3x@sbcglobal.net>; lenastiward@gmail.com <lenastiward@gmail.com>; Cam Marker <camarker48@gmail.com>; Mark Carey <markacarey@msn.com>; Mark Watt <mwwatt@yahoo.com>; 'Mark Jenkins' <markj@concretewashout.com>

1 attachment (2 MB)
Statement of Objection and Appearance.pdf;

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning!

Copy attached.

David Wardall
209-274-9160

Statement of Objection and Appearance

Application: Use Permit UP-22;2-3, Gardens of Noor Cemetery
Applicant: Mounir Kaddoura
Location: 857 Carbondale Road / 16630 Lambert Road, Ione, California
Assessor's Parcel Number: 001-220-013
Submitted to: Amador County Planning Department
Accompanies: Submittal for the Administrative Record, transmitted August 4, 2026

Purpose of this Statement

This Statement is submitted so that each person signing below appears in the administrative record of Application UP-22;2-3 in their own name, and states their own objection to approval of the application and to the environmental document proposed for it.

It is filed under Public Resources Code § 21177, which provides at subdivision (b) that a person shall not maintain an action or proceeding unless **that person** objected to the approval of the project, orally or in writing, during the public comment period or before the close of the public hearing on the project.

Each signature below is that person's own written objection. It is not made on behalf of any other person.

Statement

Each person signing below states the following in their own name:

1. I object to approval of Application UP-22;2-3 as proposed.

2. I object to the adoption of a Mitigated Negative Declaration as the environmental document for this application, and to any reliance upon it as the basis for approval. I object on the ground that the record before the County contains substantial evidence supporting a fair argument that the project may have a significant effect on the environment, so that an Environmental Impact Report is required under CEQA Guidelines § 15064(f)(1).

3. I object to approval of this application on each of the grounds set out in the submittal that accompanies this Statement, including every document and attachment within it. I adopt and join those grounds as if separately stated by me here, and I reserve each of them.

4. I object to the approval of this application on any ground identified in the administrative record by any person before the close of the public hearing on this application.

5. I request written notice, at the address I have given below, of: any hearing, continuance, or rescheduling concerning this application; any decision on it; any Notice of Determination or Notice of Exemption filed for it; and any subsequent environmental document prepared for it.

6. Where indicated below, I own or occupy real property in the vicinity of the project site. Where no property is identified, I state my objection as a person interested in the enforcement of the laws cited in the accompanying submittal.

Signatures

Each person signs for themselves. This page may be reproduced as necessary.

1.

Printed name: WESLEY DAVID WARDALL

Signature: W.D. Wardall Date: 8/15/2026

Mailing address: 17069 LAMBERT RD.

City, State, ZIP: IONE, CA 9564

Property owned or occupied in the vicinity, street address and APN if applicable:

Property: APN 001-190-009-000

2.

Printed name: Michael H. Reskar

Signature: Date: 8-17-26

Mailing address: 17901 Lambert Rd.

City, State, ZIP: Ione, CA 95640

Property owned or occupied in the vicinity, street address and APN if applicable:

Property: _____

Signature: _____ Date: 8-26-24

Mailing address: 841 Eagles Ranch Rd.

City, State, ZIP: Ione CA 95640

Property owned or occupied in the vicinity, street address and APN if applicable:

Property: _____

6.

Printed name: _____

Signature: _____ Date: _____

Mailing address: _____

City, State, ZIP: _____

Property owned or occupied in the vicinity, street address and APN if applicable:

Property: _____

Organizations or Association Entities

Each organization signing in its own name. The person signing states that they are authorized to sign on the organization's behalf.

Name of organization: _____

Name and title of signer: _____

3.

Printed name: George Ronald Woodhouse

Signature: [signature] Date: 8/17/26

Mailing address: 19500 LAMBERT RD

City, State, ZIP: IONE CA 95640

Property owned or occupied in the vicinity, street address and APN if applicable:

Property: _____

4.

Printed name: Thomas R McCleary

Signature: [signature] Date: 8/17/26

Mailing address: 945 Eagles Ranch Rd

City, State, ZIP: Ione CA. 95640

Property owned or occupied in the vicinity, street address and APN if applicable:

Property: 0

5.

Printed name: Jim Wirtel

Signature: _____ Date: _____

Mailing address: _____

City, State, ZIP: _____

Organizations or Association Entities

Each organization signing in its own name. The person signing states that they are authorized to sign on the organization's behalf.

Name of organization: EAGLE'S NEST ESTATES OWNERS ASSOCIATION

Name and title of signer: DAVID WARDALL, PRESIDENT

Signature: W. D. Wardall Date: 9/3/2026

Mailing address: 17069 LAMBERT ROAD

City, State, ZIP: IONE, CA 95640

Organizations or Association Entities

Each organization signing in its own name. The person signing states that they are authorized to sign on the organization's behalf.

Name of organization: _____

Name and title of signer: _____

Signature: _____ Date: _____

Mailing address: _____

September 4, 2026

Amador County Planning Commission
810 Court Street
Jackson CA 95642
Attn: John Gonsalves, Chairman

RE: Gardens Of Noor Cemetery Proposed Use Permit Application

Dear Mr. Chairman and Acting Commissioners,

My name is Mark Carey and I am a registered civil engineer in California specializing in development and the planning of public utilities and infrastructure to support existing and new development areas. I reside at 800 Eagle's Ranch Road in Ione, very close to the proposed cemetery project. I am writing to express my objection to this project both as an engineer who is intimately familiar with development and infrastructure needs and requirements for projects throughout the State, and as a concerned homeowner and neighbor. I am appealing to the Commission to recognize the discretionary nature of granting a use permit and to point out very clear reasons for my opposition based on the current Amador County Planning Department criteria that must be considered for a use permit to be issued, as well as very blatant problems from an engineering and supporting infrastructure perspective. My specialty includes dealing with both public treatment works, land disposal, and on-site wastewater treatment systems and their interaction with underlying groundwater. I feel approval of this project would violate well established CEQA, engineering and other in-direct planning criteria and that it is simply not a viable land use for our community as described further below.

A review of the geotechnical report noted serious concerns related to the shallow saturated clay soils and underlying fine siltstone "bedrock" (approx. 5' +/- below ground surface) as noted on page 8 of the geotechnical report:

"Considering the preliminary planning, footing excavations are anticipated to expose firm excellent bearing bedrock , a silty fine-grained Siltstone Bedrock".

"Groundwater was persistent & encountered in the geo-exploratory pit-borings; groundwater was pooling and ponded shortly following excavation of the pits . However, perched storm runoff, both surface and subsurface , from onsite and from the upper grades, should be accounted for both in construction & design documents /Specs."

The above statements, which are further supported by the 4 borings and 5 test pits by the applicants engineer, all confirm that this area is not conducive to supporting on-site treatment systems and extensive mitigation would be needed to avoid unacceptable water quality impacts. The siltstone strike and dip should be presented to Sacramento County for review since the underlying contaminated groundwater will tend to migrate west and impact aquifers and potential beneficial uses down-gradient. The proposed at grade gravel disposal field would not be considered a viable application based on my personal experience designing my own system

that was subject to Amador County's environmental review by past personnel. This concern extends to the decaying corpses that are immediately near or within the perched groundwater table that will ultimately impact areas downgradient. In the absence of detailed hydrology modeling the current analysis and recommendations cannot be supported.

Added concerns exist beyond the ability of any reasonable mitigation to address and it is captured in **section 19.56.040 of the County Code** concerning issuance of these types of discretionary use permits. This section specifies the following:

The Planning Commission must determine that:

- *The establishment, maintenance, or operation of the proposed use or building will not be detrimental to the health, safety, **peace, morals, comfort**, and general welfare of persons residing or working in the neighborhood.*
- *The use will not be detrimental or injurious to property and improvements in the neighborhood or to the general welfare of the County.*
- *The project remains consistent with the Amador County General Plan and the specific zoning district.*

The residents of Amador County and adjacent home owners must be the final arbiters of the above criteria, particularly with respect to our peace, morals, and comfort. The people have spoken concerning this matter and we defer to the Planning Commission to represent the constituency in this regard. Simply put, driving by a cemetery every time I leave my home is not a peaceful experience and morally this type of use should not be permitted in a residential area with very little supporting infrastructure and inconsistent zoning. I think I speak for the majority of those in opposition to this project concerning our comfort level with these issues. The various economic and engineering issues I am listing below, in particular the decrease in property values, aesthetic and roadway impacts, increase my concerns from both a moral and engineering perspective.

From an economic impact perspective, the stigma associated with a cemetery has documented cases whereby adjacent land and home prices are negatively affected due to the following:

- **Smaller buyer pool:** Users on Reddit agree that cultural stigmas, superstitions, or personal aversions lead to a limited buyer pool, which can depress demand.
- **Lower median prices:** Data compiled by Realtor.com indicates that median home prices in neighborhoods with a graveyard can trade around 12% lower than comparable properties elsewhere.
- **Longer market times:** Homes directly adjacent to burial grounds often spend more days on the market before finding a buyer.
- **Environmental and health fears:** Some buyers worry about potential groundwater contamination from older embalming fluids or casket materials, despite modern regulatory safeguards.
- **Traffic Impacts**: Occasional large funeral processions, extra traffic, and roadside parking can create temporary nuisances for immediate neighbors.

As an adjacent land owner, I feel the approval of this project would constitute an illegal take and negative impact on the value of my property for the above reasons.

As a civil engineer that is intimately familiar with infrastructure requirements in California I would like to emphasize the following areas of concern associated with the project that violate general engineering practices and good planning principles. It is for these reasons that we have zoning and limits on uses as defined by the County's General Plan. Specifically, I am urging the Commission to consider the following areas of concern:

- Inadequate county roads and supporting site access
- Insufficient water supply to meet current fire codes
- Severely limited on-site soils needed to support on-site-wastewater treatment systems
- Potentially severe impacts to the underlying goundwater quality due to decaying corpses
- Unacceptable impacts on oak woodlands and related aesthetics

I have elaborated below on each of the above areas of concern:

1. ***Inadequate county roads and supporting site access-*** The traffic impact analysis must include realistic projections of the near-term and cumulative long-term trip counts. Concentrated funeral processions and weekend prayer services create brief but intense bursts of traffic. Local roads lack dedicated turn lanes, acceleration pockets, or structural staging areas. This creates friction with agricultural heavy machinery and raises immediate alarms regarding **emergency evacuation and response times** for nearby homes. The intersection of Lambert and Carbondale should be evaluated for appropriate site distance and traffic standards. The estimated cars/funeral appear low and should be coupled with an assessment of all applicable access roads.

   The area roadways serving the project are currently under-sized and in severe need of rehabilitation. Any increases whatsoever will contribute to an already severely deteriorating road section with excessive potholes that County crews cannot currently maintain. The lack of adequate roadside drainage systems contribute to the failing pavement on all of the critical access roads. A full analysis of the appropriate roadway widths and section properties, and drainage for access roads including Carbondale, Forest Home, Maxwell, and Lambert at a minimum should be addressed. The on-site soils are subject to failure during the winter months due to inadequate R values to support emergency vehicles. Appropriate pavement sections and subgrade conditions must be specified for all on-site and off-site traveled ways. The extensive use of gravel roads on-site pose a serious risk due to the potential saturation of the subgrade in winter months that tend to severely limit the load bearing capacity for emergency vehicles.

2. ***Insufficient water supply to meet current fire codes-*** All commercial establishments are required to meet the minimum requirements of NFPA fire flow minimums. I understand that the minimum requirement is in the range of 1500 to 2500 gpm for 2 hours. The existing 6" line is incapable of meeting these flows and storage ranging from 180,000 to 240,000 gallons appears to be warranted along with appropriate booster pumping and standby power. Any use of the existing 6" line would exacerbate the recurrent water hammer problems that are very prevalent now and often result in outages and leaks. The existing 6" line was size for 34 single family homes that was bought and paid for the Eagle's Nest landowners with the understanding that no additional connections would be

allowed. The line is limited hydraulically to approximately 400 gpm, well below the required fire flow needs.

1. ***Severely limited on-site soils needed to support on-site-wastewater treatment systems:*** The clayey soils predominant in the area have very limited percolation and assimilation capacity. Typically, a mound system is required. Realistic projections of daily volumes must consider the long-term impacts for sizing and designing appropriate disposal facilities and full redundancy is needed in accordance with County standards. This area of unsaturated soil is referred to as the "vadose zone" and it acts as the primary natural biofilter that purifies wastewater before it recharges local water supplies. This will require more detailed percolation testing and designs by an engineer familiar with the soils that have been encountered in the area.

2. ***Potentially severe impacts to the underlying groundwater quality due to decaying corpses-*** The long-term impacts to underlying soils and goundwater, nitrogen loading, and contamination should be based on a detailed hydraulic model with appropriate mitigation included. One example noted in a 2015 article in Journal of Water and Health found that *"In the process of decomposition of a human body, 0.4-0.6 litres of leachate is produced per 1 kg of body weight. The leachate contains pathogenic bacteria and viruses that may contaminate the groundwater and cause disease…"* . This impact has not been addressed in the initial investigations and should be included in a full EIR with consideration of the role a separation from the water table for area soils to break down pollutants prior to entering the aquifer or surfacing nearby.

3. ***Unacceptable impacts on oak woodlands and related aesthetics-*** The relatively large number of oaks that must be removed to accommodate the proposed graves is of particular concern due to the change in the nature of aesthetics and rural setting. The project creates a substantial adverse effect on a scenic vista and degrades the existing visual character and quality of the site and its surroundings. Massive grave markers, commercial parking lots, and night lighting would permanently mar a pristine rural landscape. Converting agricultural tracts or foothill oak woodlands threatens the scenic and small-town identity valued by residents.

In conclusion, it is imperative that the County consider the cumulative impacts related to the above concerns. Given the un-mitigatable impacts to the peace, morals and comfort of the neighbors, impact to adjacent land values, in conjunction with the above infrastructure concerns, I strongly oppose this project.

Thank you for your consideration,

Mark A. Carey, PE
Registered California Civil Engineer 50754

Outlook

Statement of Objection and Appearance, attached document for filing in the public record

From davidwardall@gmail.com <davidwardall@gmail.com>
Date Sat 9/5/2026 9:10 PM
To Plan-Planning <planning@amadorcounty.gov>
Cc 'PJ Patrick Flynn' <pjpatrickflynnbooks@gmail.com>

1 attachment (2 MB)
Statement of Objection and Appearance.pdf;

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Please add this to the official record.
Thanks!
Dave

Statement of Objection and Appearance

Application: Use Permit UP-22;2-3, Gardens of Noor Cemetery
Applicant: Mounir Kaddoura
Location: 857 Carbondale Road / 16630 Lambert Road, Ione, California
Assessor's Parcel Number: 001-220-013
Submitted to: Amador County Planning Department
Accompanies: Submittal for the Administrative Record, transmitted August 4, 2026

Purpose of this Statement

This Statement is submitted so that each person signing below appears in the administrative record of Application UP-22;2-3 in their own name, and states their own objection to approval of the application and to the environmental document proposed for it.

It is filed under Public Resources Code § 21177, which provides at subdivision (b) that a person shall not maintain an action or proceeding unless **that person** objected to the approval of the project, orally or in writing, during the public comment period or before the close of the public hearing on the project.

Each signature below is that person's own written objection. It is not made on behalf of any other person.

Statement

Each person signing below states the following in their own name:

1. I object to approval of Application UP-22;2-3 as proposed.

2. I object to the adoption of a Mitigated Negative Declaration as the environmental document for this application, and to any reliance upon it as the basis for approval. I object on the ground that the record before the County contains substantial evidence supporting a fair argument that the project may have a significant effect on the environment, so that an Environmental Impact Report is required under CEQA Guidelines § 15064(f)(1).

3. I object to approval of this application on each of the grounds set out in the submittal that accompanies this Statement, including every document and attachment within it. I adopt and join those grounds as if separately stated by me here, and I reserve each of them.

4. I object to the approval of this application on any ground identified in the administrative record by any person before the close of the public hearing on this application.

5. I request written notice, at the address I have given below, of: any hearing, continuance, or rescheduling concerning this application; any decision on it; any Notice of Determination or Notice of Exemption filed for it; and any subsequent environmental document prepared for it.

6. Where indicated below, I own or occupy real property in the vicinity of the project site. Where no property is identified, I state my objection as a person interested in the enforcement of the laws cited in the accompanying submittal.

Signatures

Each person signs for themselves. This page may be reproduced as necessary.

1.

Printed name: WESLEY DAVID WARDALL

Signature: W.D. Wardall Date: 8/15/2026

Mailing address: 17069 LAMBERT RD.

City, State, ZIP: IONE, CA 9564

Property owned or occupied in the vicinity, street address and APN if applicable:

Property: APN 001-190-009-000

2.

Printed name: Michael H. Reskar

Signature: Date: 8-17-26

Mailing address: 17901 Lambert Rd.

City, State, ZIP: Ione, CA 95640

Property owned or occupied in the vicinity, street address and APN if applicable:

Property: _____

Signature: _____ Date: 8-26-24

Mailing address: 841 Eagles Ranch Rd.

City, State, ZIP: Ione CA 95640

Property owned or occupied in the vicinity, street address and APN if applicable:

Property: _____

6.

Printed name: _____

Signature: _____ Date: _____

Mailing address: _____

City, State, ZIP: _____

Property owned or occupied in the vicinity, street address and APN if applicable:

Property: _____

Organizations or Association Entities

Each organization signing in its own name. The person signing states that they are authorized to sign on the organization's behalf.

Name of organization: _____

Name and title of signer: _____

3.

Printed name: George Ronald Woodhouse

Signature: [signature] Date: 8/17/26

Mailing address: 19500 LAMBERT RD

City, State, ZIP: IONE CA 95640

Property owned or occupied in the vicinity, street address and APN if applicable:

Property: _____

4.

Printed name: Thomas R McCleary

Signature: [signature] Date: 8/17/26

Mailing address: 945 Eagles Ranch Rd

City, State, ZIP: Ione CA. 95640

Property owned or occupied in the vicinity, street address and APN if applicable:

Property: _____

5.

Printed name: Jim Wirtel

Signature: _____ Date: _____

Mailing address: _____

City, State, ZIP: _____

Organizations or Association Entities

Each organization signing in its own name. The person signing states that they are authorized to sign on the organization's behalf.

Name of organization: EAGLE'S NEST ESTATES OWNERS ASSOCIATION

Name and title of signer: DAVID WARDALL, PRESIDENT

Signature: W.D. Wardall Date: 9/3/2026

Mailing address: 17069 LAMBERT ROAD

City, State, ZIP: IONE, CA 95640

Organizations or Association Entities

Each organization signing in its own name. The person signing states that they are authorized to sign on the organization's behalf.

Name of organization: _____

Name and title of signer: _____

Signature: _____ Date: _____

Mailing address: _____

Outlook

Re: Updated Plans

From Tom Tomlinson <ttomlinson@amadorcounty.gov>
Date Tue 8/11/2026 1:43 PM
To Krista Ruesel <kruesel@amadorcounty.gov>; Mounir <mounirkad@yahoo.com>

Hello Mounir,

Thank you for the revision and responses, this submittal has met the 15.30 requirements as specified.

Thank you,
Tom Tomlinson - Fire Prevention Officer
AMADOR FIRE PROTECTION DISTRICT
810 Court Street Jackson, CA 95642
209-223-6391
www.amadorfire.org

From: Mounir <mounirkad@yahoo.com>
Sent: Tuesday, August 11, 2026 10:39 AM
To: Tom Tomlinson <ttomlinson@amadorcounty.gov>; Krista Ruesel <kruesel@amadorcounty.gov>
Subject: Fw: Updated Plans

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,
Please check answers t comments.
Thank you

MOUNIR KADDOURA
Bachelor of Science Degree in Civil Engineering
NOOR MORTUARY AND A. ARTS AND MONUMENTS
209 429 1543

----- Forwarded Message -----
From: Tom Tomlinson <ttomlinson@amadorcounty.gov>
To: Krista Ruesel <kruesel@amadorcounty.gov>; Bldg-Building <building@amadorcounty.gov>; Todd Barr <tbarr@amadorcounty.gov>
Cc: mounirkad@yahoo.com <mounirkad@yahoo.com>; Plan-Planning <planning@amadorcounty.gov>
Sent: Monday, August 10, 2026 at 10:28:09 AM PDT
Subject: Re: Updated Plans

Thank you Krista.

Hello Mounir,

There is a few questions I have in regard to these plans-

- What is the measurement for the turnaround at the terminus of the "Main Access Road"? Per 15.30.170, "The minimum turning radius for a turnaround shall be forty feet from the centerline of the road." Please note a "hammerhead/T" is also acceptable, not less than sixty feet in length.(**The turn around radius has been changed to 45'. See pages DP1 and DP3)**
- What is the cumulative distance of all existing roads? **(The cumulative distance of existing dirt roads is 3,130'. See plan sheet DP1 details and footnote)**
- Will there be a fire lane area located and marked within the proposed parking area? **(No Parking Fire Lane was added to the parking lot area. See plans DP1, DP2 and footnote on DP1)**
- Please revise the Fire Engine load dispersion, as it is not suitable for the majority of Fire Apparatus in the county. The majority of apparatus county-wide are 2 axle, not 3 axle. **(The design has been changed accordingly and shown on DP4. The Tire load influence line is 6' away from the nearest grave. No impact to proposed design)**
- What is the intended use of existing structures? **(it is not going to be used for cemetery related tasks)**

Please let me know if you have any questions or concerns on the above.

Thank you,
Tom Tomlinson - Fire Prevention Officer
AMADOR FIRE PROTECTION DISTRICT
810 Court Street Jackson, CA 95642
209-223-6391
www.amadorfire.org

From: Krista Ruesel <kruesel@amadorcounty.gov>
Sent: Monday, August 10, 2026 9:12 AM
To: Tom Tomlinson <ttomlinson@amadorcounty.gov>; Bldg-Building <building@amadorcounty.gov>; Todd Barr <tbarr@amadorcounty.gov>
Cc: mounirkad@yahoo.com <mounirkad@yahoo.com>; Plan-Planning <planning@amadorcounty.gov>
Subject: Fw: Updated Plans

Hi,

I wanted to confirm this was the information we would need for the Gardens of Noor Cemetery plans to be in conformance with 15.30 standards. Please let me know if you have any questions and I've cc'ed the applicant for the project as well.

Krista

From: Mounir <mounirkad@yahoo.com>
Sent: Monday, August 10, 2026 8:59 AM
To: Krista Ruesel <kruesel@amadorcounty.gov>
Subject: Updated Plans

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Krista,
I hope you are well. Please check the attached plans
Thank you

MOUNIR KADDOURA

Bachelor of Science Degree in Civil Engineering

NOOR MORTUARY AND A. ARTS AND MONUMENTS

209 429 1543

EAGLE'S NEST AIRPORT
EAGLE'S NEST ESTATES OWNERS' ASSOCIATION
EAGLE'S RANCH OWNERS' ASSOCIATION

May 3, 2026

Amador County Planning Department
810 Court Street
Jackson, CA 95642

RE: Use Permit Application UP-22; 2-3 Gardens of Noor Cemetery; APN 001220013000

Several airport residents and many area neighbors have concerns and oppose this use permit application. We have examined the 84-page Use Permit Application Package and we will briefly discuss/list many errors, omissions and misrepresentations.

We will start off by reviewing the Application for Zone Change page 26 of 84. There are 12 "Additional Information" yes/no questions. The applicant marked NO on all 12 questions.

THIS APPLICATION SHOULD BE REJECTED as 7 questions should have been marked YES.

Questions17, 18, 19, 21, 22, 26 and 28 should have been marked YES. Please see the following observations and comments:
17. *Change in existing features or any lakes or hills, or substantial alteration of ground contours*. Removal of protected native Oak Trees and regrading of upper 15 acres of land.
18. *Change in scenic views or vistas from existing residential areas, public lands, or roads.* Significant land clearing and removal of native endangered species (Ione Manzinta) and many acres of Oak Tree woodlands has occurred. California Public Resources Code 21083.4.
No. 19. *Change in pattern, scale, or character of general area of project.* This area is open ranch land and rural agriculture with ranch houses. A commercial cemetery does not fit in this rural cattle area AG and MRZ zoning.
No. 21. *Change in dust, ash, smoke, fumes, or odors in the vicinity*. The influx of 60 funerals per month with a low estimate of 50 people per funeral will clog narrow local road barely passable today and will not sustain this type of additional traffic loading. Clogged local roads will inhibit sheriff and fire department vehicle response times. Dust from interior gravel cemetery roads and gravel parking lots will be substantial.
No. 22. *Change in lake, stream, or ground water quality or quantity, or alteration of existing drainage patterns.* This property has significant storm runoff downhill towards Carbondale Road with local flooding on Lambert and Carbondale Roads. The recent land clearing has increased runoff and more flooding on the roads. Concerns remain on burial plots washout from major storm water loads.

No. 26. *Substantial change in demand for municipal services (police, fire, water, sewage, etc.).* There will be an increase for Sheriff and Fire Department services. There is NO fire protection water available for any of the buildings, very limited water for the buildings and landscaping.
No. 28. *Does this project have a relationship to a larger project or series of projects?* The applicant has indicated this is a 100-year Use Permit Application with up to 50, 000 burial plots. **However,** the current application description, details and several drawings only illustrate **1.898 acres** and only **1832 grave plots**. These limits should be included in the County Conditions of Approval.

Additional Observations and Comments:

Page 3 of 84, Project Plot Map, this plot map is misleading as it only illustrates about 20 percent of the property with Oak Trees. Page 7 of 84, Figure 1, has a photo illustrating Oak Tree actual coverage at around 70 percent and illustrates removal of about 25 percent of the original Oak Tree population. Violations of California Public Resources Code 21083.4 and California Fish and Game sections 1360 – 1372 and California Oak Woodlands Conservation Act.
Page 10 of 84, Environmental Constraints table- This table has only three listed areas:

- Land Use and Planning: Consistency with Existing Zoning
  The land use zoning is Agriculture and mineral mining. The rural land use setting is for ranch operations and not a commercial cemetery land use. INCOMPATIBLE!
- Consistency with visual character and/or quality of the project site and surrounding area
  This project is not consistent visual character of the aera, harmony in the community, etc.
- Increase in traffic
  With 60 funerals per month and at least 50 to 100 people per funeral and parking for 100 cars;
  That is 12,000 car trips to and 12,000 car trips from the cemetery per month. Our very pour roads cannot handle this type of traffic loading

Page 10 of 84, Environmental Constraints table-There are several missing Environmental concerns from the Environmental Constraints table:

1. No listing for lack of full water supply
2. No listing for local secondary road damage to 35+ year old fragile asphalt
3. No discussion on direct ground burial with no casket or concrete container;
   what are the impacts with up to 50,000 burial plots with several bodies per burial plot?
4. "Appropriate Drainage Control Measures" is not described and no engineering drawings provided nor specifications. Page 36 of 84.
5. Land contour lines have no elevations on plot plans.

Page 12 of 84, Amador Water Agency letter advising of limited water availability with a 5/8-inch water meter and no fire protection water available.
Page 32 of 84, Project Scope and Site Description, second paragraph: "… and perhaps accessory building(s)", THIS IS A VERY SERIOUS UNLIMITED PROVISION FOR ADDITIONAL

BUILDINGS WITH NO LIMITATIONS AS TO USE, SIZE, NOR LOCATION. **The conditions for approval must specifically list each building, building size, location and planned use and occupation.**

Limitations under Amador County airport zoning ordinance. Since this proposed project is adjacent to the Eagle's Nest Airport, the Amador County airport zoning ordinance will not allow any meetings inside buildings on the subject property. THIS SHOULD BE A PROVISION ON THE "CONDITIONS FOR APPROVAL".

Respectively,

W. David Wardall
209-274-9160

ADDITIONAL INFORMATION Are the following items applicable to the project or its effects? Discuss below all items checked "yes" (attach additional sheets as necessary).

YES	NO		
X	✔	17.	Change in existing features or any lakes or hills, or substantial alteration of ground contours.
X	✔	18.	Change in scenic views or vistas from existing residential areas, public lands, or roads.
X	✔	19.	Change in pattern, scale, or character of general area of project.
	✔	20.	Significant amounts of solid waste or litter.
X	✔	21.	Change in dust, ash, smoke, fumes, or odors in the vicinity.
X	✔	22.	Change in lake, stream, or ground water quality or quantity, or alteration of existing drainage patterns.
	✔	23.	Substantial change in existing noise or vibration levels in the vicinity.
	✔	24.	Site on filled land or has slopes of 10 percent or more.
	✔	25.	Use or disposal of potentially hazardous materials, such as toxic substances, flammables, or explosives.
X	✔	26.	Substantial change in demand for municipal services (police, fire, water, sewage, etc.).
	✔	27.	Substantially increase fossil fuel consumption (electricity, oil, natural gas, etc.).
X	✔	28.	Does this project have a relationship to a larger project or series of projects?

ENVIRONMENTAL SETTING

29. Describe the project site as it exists before the project, including information on topography, soil stability, plants and animals, and any cultural, historical or scenic aspects. Describe any existing structures on the site, and the use of the structures. Attach photographs of the site (cannot be returned).
30. Describe the surrounding properties, including information on plants and animals and any cultural, historical, or scenic aspects. Indicate the type of land use (residential, commercial, etc.), intensity of land use (one family, apartment houses, shops, department stores, etc.), and scale of development (height, frontage, setback, rear yard, etc.). Attach photographs of the vicinity (cannot be returned).
31. Describe any known mine shafts, tunnels, air shafts, open hazardous excavations, etc. Attach photographs of any of these known features (cannot be returned).

Certification: I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this initial evaluation to the best of my ability, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.

Date 08/27/2025

Monnie Cook
(Signature)

For _____

Outlook

RE: TAC Referral for UP-22;2-3 Gardens of Noor Cemetery for Environmental Review- June 11, 2026

From McFaddin, Lita@DCA <Lita.McFaddin@dca.ca.gov>
Date Mon 6/1/2026 11:22 AM
To Plan-Planning <planning@amadorcounty.gov>
Cc EmailCFB@DCA <emailcfb@dca.ca.gov>; Generoso, Almer@DCA <Almer.Generoso@dca.ca.gov>

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

Thank you for sending the attached submittal of Us Permit for proposed cemetery, Gardens of Noor Cemetery. There are no comments from the State at this time regarding this Use Permit.

Lita McFaddin, Licensing Analyst
Cemetery and Funeral Bureau
1625 N Market Blvd, Suite S208
Sacramento, CA 95834
(916)574-7875
Lita.McFaddin@dca.ca.gov
www.cfb.ca.gov

From: Plan-Planning <planning@amadorcounty.gov>
Sent: Wednesday, May 27, 2026 10:00 AM
Subject: TAC Referral for UP-22;2-3 Gardens of Noor Cemetery for Environmental Review- June 11, 2026

Hello,

Please see the attached submittal of Use Permit UP-22;2-3 Gardens of Noor Cemetery, to be reviewed by the Technical Advisory Committee on Thursday, June 11, 2026 at 1:00 PM in the Board of Supervisors Chambers in the Amador County Administration Center, located at 810 Court Street, Jackson, CA 95642. The Technical Advisory Committee will conduct an environmental review, determine draft conditions of approval, and make recommendations regarding the project and the proposed environmental document to the Planning Commission. Copies of the draft documents shall be provided at the meeting upon request.

For those on the CAC server within the Community Development Agency, the current drafts (CEQA Initial Study and Conditions of Approval) are available in the G://drive for review and edits. Please feel

Outlook

FW: TAC Referral for UP-22;2-3 Gardens of Noor Cemetery for Environmental Review- June 11, 2026

From Cooper, Ashley@DOT <Ashley.Cooper@dot.ca.gov>
Date Tue 6/2/2026 2:37 PM
To Plan-Planning <planning@amadorcounty.gov>

5 attachments (8 MB)
IMG_3280.jpg; IMG_3281.jpg; IMG_3282.jpg; IMG_3283.jpg; IMG_3284.jpg;

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Amador County Planning,

I received this comment from an Amador County resident about the Gardens of Noor Cemetery and wanted to direct it your way as part of your comment collection.

I also had a question regarding the project. Has a CEQA Initial Study been prepared or will be prepared?

Also, I am working on gathering Caltrans comments in this project, so please expect those by the due date.

Thank you!

Ashley Cooper

Transportation Planner
D10 - Office of Rural Planning
California Department of Transportation
Stockton, CA 95205
Cell: (209) 670-9488

From: davidwardall@gmail.com <davidwardall@gmail.com>
Sent: Thursday, May 28, 2026 10:03 AM
To: Cooper, Ashley@DOT <Ashley.Cooper@dot.ca.gov>
Subject: FW: TAC Referral for UP-22;2-3 Gardens of Noor Cemetery for Environmental Review- June 11, 2026

This Message Is From an External Sender

This message came from outside your organization. Please be careful when viewing message

Report Suspicious

Hello Ashley-
The local way undersized 20-ft wide roads cannot handle 6,000 auto trips in and another 6,000 auto trips out each month.
Will send photos of local roads.
Regards,
David Wardall

From: Plan-Planning <planning@amadorcounty.gov>
Sent: Wednesday, May 27, 2026 10:00 AM
Subject: TAC Referral for UP-22;2-3 Gardens of Noor Cemetery for Environmental Review- June 11, 2026

Hello,

Please see the attached submittal of Use Permit UP-22;2-3 Gardens of Noor Cemetery, to be reviewed by the Technical Advisory Committee on Thursday, June 11, 2026 at 1:00 PM in the Board of Supervisors Chambers in the Amador County Administration Center, located at 810 Court Street, Jackson, CA 95642. The Technical Advisory Committee will conduct an environmental review, determine draft conditions of approval, and make recommendations regarding the project and the proposed environmental document to the Planning Commission. Copies of the draft documents shall be provided at the meeting upon request.

For those on the CAC server within the Community Development Agency, the current drafts (CEQA Initial Study and Conditions of Approval) are available in the G://drive for review and edits. Please feel free to add conditions relative to your departments or submit them to Planning as comments.

Best regards,

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorcounty.gov






20
MPH

Outlook

IMG_3435

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Mon 6/1/2026 12:13 PM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from ronwoodhouse33@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

IMG_3435.MOV

Here is one of several videos I am sending regarding the flooding on the proposed Muslim Cemetary on Carbondale Rd This one is on March 18 3023 4 days after it rained notice County flood barriers Thank you Ron Woodhouse

Outlook

IMG_3523

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Mon 6/1/2026 12:25 PM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from ronwoodhouse33@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

IMG_3520.MOV

IMG_3523.MOV

The Muslim cemetary Gardens of Noor being considered by the TAC on June 11 is located on a property that regularly floods Below are 2 videos taken March 28 2023 showing water flowing out the driveway onto Carbondale. Amador Co regularly puts flooded sawhorse up at the corner of Carbondale and Lambert I will send several more videos This no place for thousands of “green” burials Can you please share with the TAC Thank you Ron Woodhouse

Outlook

IMG_3435

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Mon 6/1/2026 12:28 PM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from ronwoodhouse33@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

IMG_3435.MOV

Video of water coming out of Gardens of Noor cemetery property 4 days after rain . March 18 2023 Ron Woodhouse This happens every year

Outlook

IMG_3552

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Mon 6/1/2026 12:31 PM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from ronwoodhouse33@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

IMG_3552.MOV

Flooding April 2023 Water still flowing No place for bodies wrapped in cloth Ron Woodhouse

Outlook

IMG_3545

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Mon 6/1/2026 12:35 PM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from ronwoodhouse33@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

IMG_3544.MOV

IMG_3545.MOV

Match 31 2023

Outlook

IMG_3610

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Mon 6/1/2026 12:38 PM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from ronwoodhouse33@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

IMG_3552.MOV

IMG_3610.MOV

More videos of water coming out of the cemetery in April 3033 Dates and descriptions on video

Outlook

IMG_3673

From Ron Woodhouse <ronwoodhouse33@gmail.com>
Date Mon 6/1/2026 12:42 PM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from ronwoodhouse33@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

IMG_3673.MOV

IMG_3674.MOV

More videos on April 2023 This horns every year during heavy rainfall the intersection of Lambert and Carbondale is flooded Nearly All the water comes from the proposed Muslim Cemetery Ron Woodhouse Please share these videos with the appropriate County Agencies re the TAC meeting on the Gardens of Noor cemetary Thank you Ron Woodhouse

Outlook

AMA-104-PM 1.07 Gardens of Noor Cemetery

From Cooper, Ashley@DOT <Ashley.Cooper@dot.ca.gov>
Date Tue 6/9/2026 9:45 AM
To Plan-Planning <planning@amadorcounty.gov>
Cc Ponce, Gregoria@DOT <gregoria.ponce@dot.ca.gov>

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning, Ms. Ruesel,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery, which proposes 1832 graves sites divided among 7 blocks on the north end of the property.

Based on the description, the proposed project will not impact State Route (SR) 104. Caltrans has no additional comments. However, Caltrans requests to be included in the review process for any improvements to the encroachment on SR 104.

Kindly,

Ashley Cooper

Transportation Planner
D10 - Office of Rural Planning
California Department of Transportation
Stockton, CA 95205
Cell: (209) 670-9488

Outlook

Re: TAC Referral for UP-22;2-3 Gardens of Noor Cemetery for Environmental Review- June 11, 2026

From Ashley Anaya <aanaya@amadorcounty.gov>
Date Wed 6/10/2026 10:54 AM
To Plan-Planning <planning@amadorcounty.gov>

Good morning,

I will not be able to attend the 06/11 TAC meeting. I do not have any new comments for this project, the applicant will be required to have all roads, gates and access ways on the property meet 15.30 standards and any future buildings will require a fire water supply.

ASHLEY ANAYA - FIRE PREVENTION OFFICER
AMADOR FIRE PROTECTION DISTRICT
810 Court Street Jackson, CA 95642
Main Office: 209-223-6391
Direct Line: 209-223-6226
amadorfire.org

"This communication may contain legally privileged, non-public and confidential information including HIPAA-protected PHI sent solely for the use of the intended recipient, and the privilege is not waived by the receipt of this communication by an unintended and unauthorized recipient. If you are not the intended recipient of this communication you are not authorized to use it in any manner and must either immediately destroy it or return it to the sender without reading, saving or further distributing them. Please notify the sender immediately by telephone at (209) 223-6391 or email if you received this communication in error."

From: Plan-Planning <planning@amadorcounty.gov>
Sent: Wednesday, May 27, 2026 10:00 AM
Subject: TAC Referral for UP-22;2-3 Gardens of Noor Cemetery for Environmental Review- June 11, 2026

Hello,

Please see the attached submittal of Use Permit UP-22;2-3 Gardens of Noor Cemetery, to be reviewed by the Technical Advisory Committee on Thursday, June 11, 2026 at 1:00 PM in the Board of Supervisors Chambers in the Amador County Administration Center, located at 810 Court Street, Jackson, CA 95642. The Technical Advisory Committee will conduct an environmental review, determine draft conditions of approval, and make recommendations regarding the project and the proposed environmental document to the Planning Commission. Copies of the draft documents shall be provided at the meeting upon request.

For those on the CAC server within the Community Development Agency, the current drafts (CEQA Initial Study and Conditions of Approval) are available in the G://drive for review and edits. Please feel free to add conditions relative to your departments or submit them to Planning as comments.

Best regards,

Amador County Planning Department
810 Court Street

Outlook

Fwd: Proposed Cemetery

From Jerry Poore <jerry.friendsrealestate@gmail.com>
Date Sun 7/12/2026 11:43 AM
To Plan-Planning <planning@amadorcounty.gov>

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

---------- Forwarded message ---------
From: **Ricky Grimshaw** <ricky.grimshaw@gmail.com>
Date: Sun, Jul 12, 2026 at 11:12 AM
Subject: Proposed Cemetery
To: jerry.friendsrealestate@gmail.com <jerry.friendsrealestate@gmail.com>

Hello,

My name is Ricky M. Grimshaw and I am a resident of Amador county living in Willow Creek ranch estates just off Carbondale road in Plymouth California. I wish to voice my opposition to the proposed cemetery near eagles nest airport off Carbondale road and Lambert road in Ione California. I found out about this project over a year ago and I have attended all the public hearings at the county offices after that. The last one in June I missed because I wasn't notified of it.

I cannot for the life of me understand why the petitioner would want to bring a 50,000 plot cemetery into a small community of ranchets formed around aviation and agriculture. It doesn't fit in with our fragile rural roads and limited water and sewage infrastructure. I am told that as many as 60 funerals a month will take place and more than 9,000 vehicles can be expected to travel up and down our narrow, fragile roads that are already in distress disrupting life in and around our tranquil little community out here. And for me personally the practice of burying an unembalmed body in just a cloth without any casket or cement vault to encase it from leaching down towards the aquifer is very frightening.

No, no I am completely against this project and urge the supervisors and commissioners to reject the project too!

Thank You for your attention to this matter,

Ricky M. Grimshaw
15908 Oak Park Court
Plymouth, Ca. 95669
916-838-7838
ricky.grimshaw@gmail.com

Outlook

Re: Proposed GARDENS OF NOOR CEMETERY

From Plan-Planning <planning@amadorcounty.gov>
Date Tue 7/14/2026 3:19 PM
To patricia baxley <taz92168@att.net>

Received, thank you. Please note, the Gardens of Noor Cemetery Project proposes approximately 1,800 plots .

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorcounty.gov

From: patricia baxley <taz92168@att.net>
Sent: Tuesday, July 14, 2026 12:58 PM
To: Plan-Planning <planning@amadorcounty.gov>
Subject: Proposed GARDENS OF NOOR CEMETERY

You don't often get email from taz92168@att.net. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

John Gonsalves, Steve Christman, Justin Reese, Jerry Poore and Mark Bennett

Dir Sirs

I am emailing you to voice my objection to this project. They have tried this before but that time it included a Mosque. It was denided.
Now the comeback and just want you to allow a off zoning use for a proposed 50 thousand grave cemetery. That is more graves than there are in this entire county.
Our roads can't handle it not to mention the the fact that it would seriously impact emergency vehicles in a high impact fire area.
We do not have the law enforcement to handle the impact it will have on the community.
It will impact access to my and others access to our property due to traffic congestion on the rural roads .It will also seriously impact my property values.
I implore you to reject the use permit they are requesting.

Sincerely,

Patricia Baxley
19001 Claypit Road

Outlook

Re: Strong Opposition to Proposed 50,000-Burial-Plot Cemetery

From Rodney Minard <rodneyminard@gmail.com>
Date Tue 7/14/2026 3:14 PM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from rodneyminard@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Planning Department,

Thank you for your response.

Yes, my comments are intended for the Gardens of Noor Cemetery Project. Please include my comments in the public record.

I understand your clarification that the current permit application is for approximately 1,800 burial plots. My opposition remains the same. I believe this project will add unnecessary traffic to an area that is already heavily traveled. Carbondale and the surrounding roads already experience significant traffic, and I do not believe this community needs another development that will increase congestion, create additional safety concerns, and change the rural character of the area.

I remain concerned about the cumulative impacts of this project, including traffic, emergency access, wildfire evacuation, and the effect on nearby residents and property owners. For these reasons, I respectfully ask that the Planning Department and Planning Commission deny this application.

Thank you for adding my comments to the project record.

Sincerely,
Rodney Minard

On Tue, Jul 14, 2026 at 3:06 PM Plan-Planning <planning@amadorcounty.gov> wrote:

> Received, thank you. Please note, if this is relating to the one permit application for the Gardens of Noor Cemetery Project, there are only approximately 1,800 plots proposed. Please confirm if this is the project application this comment is regarding, and if you would like the comment to be added to that project noting the different number of burial plots proposed.
>
> Amador County Planning Department
> 810 Court Street
> Jackson, CA 95642
> (209) 223-6380
> planning@amadorcounty.gov

From: Rodney Minard <rodneyminard@gmail.com>
Sent: Tuesday, July 14, 2026 3:00 PM
To: Plan-Planning <planning@amadorcounty.gov>
Subject: Strong Opposition to Proposed 50,000-Burial-Plot Cemetery

You don't often get email from rodneyminard@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Amador County Planning Department,

I am writing to express my strong and unequivocal opposition to the proposed cemetery development containing approximately 50,000 burial plots.

As a nearby resident, I am deeply concerned and extremely disappointed that a project of this magnitude is even being considered in our rural community. This proposal is far beyond what our local roads and infrastructure were ever intended to support.

Our road already experiences heavy traffic from local residents, agricultural operations, commercial vehicles, and daily commuters. In addition, Carbondale already has more than enough traffic and does not need another major development that would add thousands of additional vehicle trips over the coming decades. The existing road network is already under strain, and this proposal would only make those problems worse.

A cemetery with 50,000 burial plots would create decades of additional traffic from funeral processions, visitors, maintenance crews, construction, deliveries, and future expansion. This would increase congestion, create dangerous driving conditions, and make it more difficult for residents to safely enter and exit their properties.

This proposal also raises serious public safety concerns. Our area already faces wildfire risks, and maintaining clear road access during an emergency is critical. Increased traffic on these roads could delay emergency responders and make evacuations more difficult when every second counts.

Beyond the traffic impacts, this development would permanently change the rural character of our community. Families choose to live here because of the peace, open space, and low-density environment. A project of this scale is incompatible with the surrounding area and would fundamentally alter the character of our neighborhood for generations.

There are also legitimate concerns regarding environmental impacts, water resources, long-term maintenance, noise, and the cumulative effect of such a large development. These issues deserve careful and transparent evaluation before any consideration is given to moving this proposal forward.

I also ask the Planning Department to consider the impact on nearby property owners. Residents have invested their savings and their futures in this community with the reasonable expectation that surrounding land would be developed in a manner consistent with the rural nature of the area. Approving a cemetery of this size could negatively affect property values and the enjoyment of our

homes while placing the burden of increased traffic and infrastructure demands squarely on the existing residents.

The people who live here deserve to have their voices heard. We ask the County to place the health, safety, and welfare of its residents ahead of a development that is simply too large and too intensive for this location.

For these reasons, I respectfully urge the Amador County Planning Department and the Planning Commission to deny this proposal.

Thank you for your time and consideration of the concerns shared by the residents who will be most directly affected.

Sincerely,

Rodney Minard

946 Carbondale rd

Ione,CA,95640

Outlook

Re: Burial plots on Carbondale!

From Jessica Sloat <aintknowsaint@gmail.com>
Date Tue 7/14/2026 3:40 PM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from aintknowsaint@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Yes I was mis informed about the number of plots but my concern about traffic, noise and disruption of our agricultural community remains the same. I think I speak for all of my neighbors on Carbondale who would be firmly against a burial ground on our road. This is not just some empty land. This land is rich in agricultural history. It's for families. It's for farming. It's not for graveyards and funeral processions! Our roads are narrow and winding. They already experience much traffic from commuting and agriculture. We have heavy water damage across Carbondale and sink holes in the area annually. More traffic will increase wear and tear on the roads and create safety concerns for residents. Not to mention. Providing 1800 burial plots makes that property tax exempt which takes money away from Amador county. Please do the right thing and say no.

On Tue, Jul 14, 2026 at 3:10 PM Plan-Planning <planning@amadorcounty.gov> wrote:

> Received, thank you. The project you may be referring to would be the Gardens of Noor Cemetery project, which proposes approximately 1800 gravesites and does not include any mosque. This project has not been scheduled yet for public review by the Planning Commission so there has not been legal notice yet. Once this project is scheduled for review by the Planning Commission for a Public Hearing, formal notification is sent to surrounding property owners and published in the newspaper, as is legally required.
>
> Thank you.
>
> Amador County Planning Department
> 810 Court Street
> Jackson, CA 95642
> (209) 223-6380
> planning@amadorcounty.gov
>
> ---
>
> **From:** Jessica Sloat <aintknowsaint@gmail.com>
> **Sent:** Tuesday, July 14, 2026 2:28 PM
> **To:** Plan-Planning <planning@amadorcounty.gov>
> **Subject:** Burial plots on Carbondale!
>
> You don't often get email from aintknowsaint@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My name is Jessica Sloat. I own 90 acres on Carbondale Road. This is my home. I was notified of plans for these burial plots on Facebook of all places. Why are notices not being sent to those who live on the area? I am totally against having burial plots and or a future mosque on this road. The county already does a terrible job keeping up with potholes. Parts of Carbondale are in bad shape. Excessive traffic and noise from funerals takes away from my safety and enjoyment of my property! I hope the planning department will deny this request. I am very unhappy about this potential burial site so close to where I live. I find the lack of transparency to be very concerning as well. We should have been properly notified.

Jessica Sloat

Outlook

Proposed Mosque and Muslim Cemetery in Plymouth.

From Debra Curry <curryus@hotmail.com>
Date Tue 7/14/2026 7:12 PM
To Plan-Planning <planning@amadorcounty.gov>

[You don't often get email from curryus@hotmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Planning Department and Commissioner,
I, Perry Curry and my wife, Debra Curry, are writing to you to voice our strong opposition of the proposal to build a Mosque and cemetery in Amador County. It will bring traffic to an area that does not have infrastructure to support it. Also, it does not represent the county's religious population. The county may need another cemetery but this will be exclusive for Muslim people only, certainly not a huge population in Amador County. We understand that the Muslim population in Amador is minimal compared to other counties in our area where it would be much more appropriate. We ask fervently that you reject this proposal. Thank you.
Sincerely,
Perry and Debra Curry (owners)
6550 and 6560 Tonzi Rd.
Ione, CA 95640
Sent from my iPhone

Outlook

Proposed Cemetery

From Ron Hess <hess3x@sbcglobal.net>
Date Wed 7/15/2026 9:18 AM
To Plan-Planning <planning@amadorcounty.gov>
Cc Georgiana Preskar <gleepres@gmail.com>; Ron Woodhouse <ronwoodhouse33@gmail.com>

You don't often get email from hess3x@sbcglobal.net. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I urge the Amador County Planning Commission to carefully review the proposed large-scale development on Carbondale Road scheduled for hearing on August 11, 2026.

This issue should be evaluated on standard land-use grounds: traffic, emergency access, fire protection, water supply, environmental impacts, groundwater safety, and compatibility with the surrounding rural area. If the project includes large gatherings and a cemetery of this size, the county must require reliable studies and full public review before any approval is granted.

Residents deserve clear answers about road safety, flooding, soil conditions, protected trees and plants, and the long-term effects on nearby properties and rural quality of life.

This is exactly the kind of proposal that requires caution, transparency, and rigorous environmental review.

Ron Hess

Amador County

Outlook

Carbondale Burial plots

From Jessica Sloat <aintknowsaint@gmail.com>
Date Wed 7/15/2026 11:45 PM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from aintknowsaint@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I am writing again to oppose the burial plots being approved in the middle of my community. I have many concerns including traffic, safety, impact to ground water, fire risk. Can you answer the following questions?

* What are the groundwater and well protections?
* Has a geotechnical and soil study been completed?
* What are the traffic impacts on Carbondale and Lambert Roads?
* How is wildfire evacuation handled during funeral services?
* Who is responsible for perpetual maintenance?
* What is the long-term build-out schedule?
* Under what conditions could future expansion beyond the initial phase occur?

Plus there's little to no financial gain to the county. Only from permits and fees. This will cost tax payers for environmental studies, Road Maintenance, Law Enforcement, Fire protection and wild fire evacuation planning, potential long term issues involving water drainage, ground water ect

Thank You

Jessica Sloat (property owner at 946 Carbondale)

On Thu, Jul 16, 2026 at 7:57 PM lena stiward <bigindiancreekranch@gmail.com> wrote:

Lena Stiward

15933 Muller Road, Plymouth, CA 95669

209-257-9655

July 11, 2026

Amador County Planning Commissioners
810 Court Street
Jackson, CA 95642
Attn: Jerry Poore

Dear Jerry Poore,

I own a house in Willow Creek Ranch Estates in Plymouth, off Carbondale Road and I also work at 841 Eagles Ranch Road in Ione off Lambert Road.

I wish to state my strong opposition and concerns regarding the mosque/cemetery project coming before the Planning Commission on August 11, 2026.

This is not a good fit to put a huge commercial business dealing in the death care industry for profit and perpetual maintenance amongst agriculture range land, the Eagle's Nest Airport and private residences.

This project needs to be in a commercial area where there is adequate freeway or highway ingress/egress and not on rambling and narrow country roads amongst ranch homes and farm estates and flanked by horses, livestock, sheep, goats, etc.

These roads are already in major disrepair and need repaving as we speak. They are filled with potholes, fatigue cracking and alligator/crocodile checkering. This will only continue to become worse with repeated traffic loads. My understanding is that Amador County does not have the funding to repair these roads. I have lived here 32 years and there has not been any significant work done on these roads and this deterioration continues day by day.

This project concerns me particularly about the secretions run off and particularly during winter storms and the flooding that I have witnessed at this parcel and hence contaminating ground water.

This project would have a negative and detrimental impact on my retirement home investment, my peace and tranquility of my community and major traffic increase and extra strain on our water resources.

Please do not allow this project to be in our county.

Respectfully,

Lena Stiward

Alicia Forberg
142 Poppy Lane
Ione, California 95640
209/712-6601
AliciaForberg@hotmail.com

July 16, 2026

To the Ione Planning Commission

Subject: Strong Opposition to Proposed 20,000 Sq. Ft. Worship Center and 50,000-Plot Cemetery

Dear Members of the Ione Planning Commission,

I am writing to voice my strenuous opposition to the proposed 20,000-square-foot worship center and 50,000-plot cemetery. As a dedicated resident of Ione, I am deeply alarmed by the severe, irreversible impacts a development of this massive scale will have on our infrastructure, our environment, and the fundamental character of our historic small town.

Our community is already facing serious structural deficiencies. Our local school is currently being condemned, and as residents, we choose to live without standard modern conveniences—such as a single drive-through restaurant—specifically to preserve Ione's small-town identity and quiet way of life. It is entirely unjust to impose a massive project of this magnitude on a community that actively sacrifices growth to maintain its rural heritage.

Furthermore, our local infrastructure is completely unequipped to handle the immense influx of people this project will bring. Ione's roads already suffer from miles of gridlock and heavy traffic, yet we do not have a single traffic light to safely manage the flow of vehicles. Adding a 20,000-square-foot facility and a 50,000-plot cemetery will draw thousands of outside visitors, paralyzing our transportation network and creating severe public safety hazards for local drivers and emergency responders.

Most disturbingly, the proposed cemetery presents an unacceptable risk to our public health. I understand that this facility plans to permit burials where bodies are wrapped only in shrouds/sheets without traditional protective caskets or vaults. As these bodies decompose and emulsify directly into the earth, the resulting runoff poses a terrifying threat of contamination to our local groundwater and municipal drinking water supply. We cannot risk the health of Ione's families and children for a commercial development.

Ione cannot absorb a project of this scale while our schools are crumbling, our roads are failing, and our water security is placed at risk. I urge the Planning Commission to listen to the citizens

who keep this town running and deny all zoning changes, permits, and approvals for this project.

Thank you for your time, your service, and your immediate attention to protecting the future of Ione.

Sincerely,

Alicia Forberg

---------- Forwarded message ---------
From: **Alicia Forberg** <aliciaforberg@hotmail.com>
Date: Thu, Jul 16, 2026 at 2:14 PM
Subject: Proposed mosque
To: jkghomes@gmail.com <jkghomes@gmail.com>, mlber

Alicia Forberg
142 Poppy Lane
Ione, California 95640
209/712-6601
AliciaForberg@hotmail.com

July 16, 2026

To the Ione Planning Commission

Subject: Strong Opposition to Proposed 20,000 Sq. Ft. Worship Center and 50,000-Plot Cemetery

Dear Members of the Ione Planning Commission,

I am writing to voice my strenuous opposition to the proposed 20,000-square-foot worship center and 50,000-plot cemetery. As a dedicated resident of Ione, I am deeply alarmed by the severe, irreversible impacts a development of this massive scale will have on our infrastructure, our environment, and the fundamental character of our historic small town.

Our community is already facing serious structural deficiencies. Our local school is currently being condemned, and as residents, we choose to live without standard modern conveniences—such as a single drive-through restaurant—specifically to preserve Ione's small-town identity and quiet way of life. It is entirely unjust to impose a massive project of this magnitude on a community that actively sacrifices growth to maintain its rural heritage.

Furthermore, our local infrastructure is completely unequipped to handle the immense influx of people this project will bring. Ione's roads already suffer from miles of gridlock and heavy traffic, yet we do not have a single traffic light to safely manage the flow of vehicles. Adding a 20,000-square-foot facility and a 50,000-plot cemetery will draw thousands of outside visitors, paralyzing our

transportation network and creating severe public safety hazards for local drivers and emergency responders.

Most disturbingly, the proposed cemetery presents an unacceptable risk to our public health. I understand that this facility plans to permit burials where bodies are wrapped only in shrouds/sheets without traditional protective caskets or vaults. As these bodies decompose and emulsify directly into the earth, the resulting runoff poses a terrifying threat of contamination to our local groundwater and municipal drinking water supply. We cannot risk the health of Ione's families and children for a commercial development.

Ione cannot absorb a project of this scale while our schools are crumbling, our roads are failing, and our water security is placed at risk. I urge the Planning Commission to listen to the citizens who keep this town running and deny all zoning changes, permits, and approvals for this project.

Thank you for your time, your service, and your immediate attention to protecting the future of Ione.

Sincerely,

Alicia Forberg



July 17, 2026

Amador County Board of Supervisors
810 Court Street
Jackson, CA 95642

Re: Opposition to the Proposed Cemetery and Religious Facility in Amador County, Lambert/Carbondale Area

Dear Chair and Members of the Amador County Board of Supervisors:

We are writing as residents of Amador County to respectfully express our opposition to the proposed cemetery and religious facility planned for the Ione area.

Based on the information available, the proposal includes a religious facility of approximately 20,000 square feet together with a cemetery containing more than 55,000 burial plots. We also understand the project anticipates hosting in excess of 2 funeral processions daily and is intended to serve not only Amador County, but also Sacramento, El Dorado, and San Joaquin Counties.

This proposal appears to be regional in nature rather than one intended primarily to serve the needs of Amador County residents. As such, we believe it would place substantial demands on our county's infrastructure, including local roads, traffic circulation, emergency response services, law enforcement, maintenance, and other public resources.

Amador County is valued for its rural character, open spaces, and limited infrastructure. A project of this magnitude raises significant concerns regarding increased traffic, noise, environmental impacts, groundwater resources, public safety, and the long-term compatibility of such an intensive land use within our community.

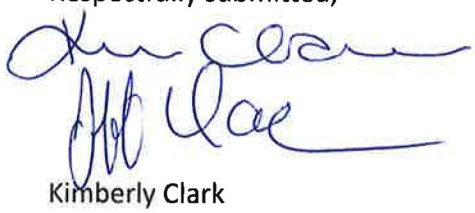
We also understand that a similar proposal was previously denied in Sacramento County. While we recognize that each application must be evaluated independently and according to applicable law, we respectfully request that Amador County conduct the same careful and thorough review. If the environmental, infrastructure, and land-use impacts cannot be adequately mitigated, we urge the Board and/or Planning Committee to deny the application.

Our concerns are not directed toward any religion or the constitutional right of individuals to practice their faith. Every religious community deserves equal treatment under the law. Rather, our concerns are based solely on the size, scope, location, and anticipated impacts of this particular development and whether it is compatible with Amador County's General Plan and the long-term interests of our community.

We respectfully ask the Board to place the interests of Amador County residents first by carefully evaluating whether this project is appropriate for our county. We encourage you to require a comprehensive environmental review, fully consider public input, and deny the proposal if it is determined that the project would create significant adverse impacts or is inconsistent with the County's planning objectives.

Thank you for your service to our community and for your thoughtful consideration.

Respectfully submitted,



Kimberly Clark
Jeffery Clark

11981 Narcissus Road

Jackson, CA 95642

Outlook

Cemetery in ione

From kaylagay19@gmail.com <kaylagay19@gmail.com>
Date Fri 7/17/2026 6:07 AM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from kaylagay19@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Amador Planning commission,

Regarding the 1800 burial plots planned for Carbondale Rd: My family and I are highly opposed to a cemetery in the middle of our neighborhood. A cemetery will disrupt the enjoyment and use of our property and home, create traffic on already worn and narrow roads. Noise, traffic, and visual impact are of particular concern. The location of this cemetery is inappropriate and unsafe. Who will enforce traffic and parking rules? Who will enforce the environmental regulations? What will be the impact the value of the surrounding homes? What about the impact of neighboring properties to have to witness funerals outside of their homes? They did not purchase their homes near a cemetery. Why would they want to live near one? I urge you to deny this application and suggest the applicant chose a location that is more suitable for higher volumes of traffic and noise.

Peggy Flynn
PO Box 35 Rail Road Flat, CA 95248
pjpatrickflynnbooks@gmail.com
(530) 368-6434

July 20, 2026

Via Email and US Mail

Amador County Planning Department
planning@amadorgov.org

Cc: Amador County Counsel; County Clerk Recorder

Re: California Public Records Act Request – Proposed Cemetery Project: Application No. UP-22; 2-3, Gardens of Noor Cemetery, Applicant: Mounir Kaddoura, 857 Carbondale Road and 16630 Lambert Road Ione, CA APN 001-220-013 / Revised Application and Prior 2021 Proposal

To Whom It May Concern:

Pursuant to the California Public Records Act, Government Code section 7920.000 et seq., this is a request for inspection and copying of all public records in the possession, custody, or control of Amador County relating to the proposed cemetery project currently under County review, including the revised project reflected in County Technical Advisory Committee review materials from approximately September 2025, as well as any earlier related proposal or application from approximately 2021 concerning the same or substantially similar project, applicant, property, ownership, or intended use.

This request is intended to include the full administrative record, whether maintained by the Planning Department, Technical Advisory Committee, Planning Commission, Board of Supervisors, County Counsel, Environmental Health, Public Works, the Clerk, or any other County department, division, consultant, or retained reviewer involved in receiving, reviewing, commenting on, processing, or scheduling the project.

Without limiting the generality of this request, please produce the following records for both the current revised project and any earlier related proposal, including the purported prior 2021 version:

- All applications, amended applications, revised applications, intake forms, project descriptions, narrative statements, site plans, plot plans, grading plans, drainage plans, maps, exhibits, legal descriptions, parcel information, APNs, ownership records submitted with the application, and all attachments.
- All materials identifying the applicant, owner, agent, consultant, engineer, planner, architect, attorney, or representative for the project, including mailing addresses, email addresses, and contact information to the extent disclosable by law.
- All Conditional Use Permit, zoning, land use, cemetery, religious use, or related entitlement records associated with this project, including any earlier application from 2021, withdrawn application, incomplete application, pre-application, conceptual review, or predecessor file.
- All correspondence between the County and the applicant or the applicant's representatives, including emails, letters, comment letters, deficiency notices, requests for additional information, completeness determinations, resubmittal requests, and responses.
- All internal County correspondence, including emails, memoranda, routing slips, staff notes, meeting notes, calendars, and communications among County staff, County Counsel, departments, and decision-makers concerning the project.
- All Technical Advisory Committee materials, including agendas, packets, staff summaries, presentation materials, comments, recommendations, marked-up exhibits, and minutes or notes from any TAC meeting at which the project was discussed, including the September 2025 meeting.
- All Planning Commission materials, including hearing notices, staff reports, draft staff reports, attachments, exhibits, presentations, public comments, revised staff reports, resolutions, findings, draft conditions of approval, continuance materials, and scheduling records for any hearing already held or anticipated.
- All Board of Supervisors materials, if any, relating to the project, including briefings, agenda materials, referrals, appeals, or scheduling discussions.

- All environmental review records, including CEQA exemption analyses, initial studies, negative declaration materials, mitigated negative declaration materials, environmental impact review materials, biological, hydrological, cultural, archaeological, traffic, circulation, septic, water, fire, emergency access, geotechnical, and drainage analyses, whether prepared internally or by outside consultants.
- All referral comments or communications from outside agencies or districts, including but not limited to transportation, environmental health, fire, water, wastewater, air quality, cemetery oversight, tribal consultation, state agencies, or federal agencies, together with all County transmittals to and from such entities.
- All notices to adjacent property owners, publication notices, mailing lists, posting affidavits, public outreach records, and any documents showing how and when the public was notified about the project.
- All records reflecting changes in project scope, size, intensity, acreage, number of burial plots, structures, phasing, access, utilities, water use, septic design, traffic generation, or future intended uses, including comparisons between earlier and revised versions of the project.
- All records sufficient to identify every file number, application number, project number, TAC number, CUP number, assessor parcel number, and County tracking identifier associated with the project or any earlier related filing.
- All audio recordings, video recordings, transcripts, or notes of hearings, staff meetings, TAC meetings, or other meetings where the project was discussed, to the extent such records exist.
- All consultant contracts, scopes of work, invoices, and billing records relating to outside review of the project.

This request specifically includes records for any predecessor, withdrawn, superseded, renamed, revised, or refiled project involving the same applicant, affiliated entity, representative, parcel, adjacent parcel, ownership group, or substantially similar cemetery and/or religious land use proposal, whether or not the County considers it a separate application.

For purposes of this request, “relating to” should be construed broadly and includes records that mention, discuss, evaluate, transmit, summarize, schedule, comment upon, revise, analyze, or

compare the project. This request also includes electronically stored information, including emails, attachments, text-based communications preserved by the County, PDFs, drafts, metadata-containing transmittals, and records stored on personal devices or accounts if used to conduct County business.

If the County contends any responsive record is exempt in whole or in part, please identify each withheld record or redaction with sufficient specificity to allow evaluation of the claimed exemption, including the legal basis for withholding and the name or title of the person asserting the exemption.

If any portion of this request is deemed unclear, overbroad, or in need of narrowing, please contact the undersigned promptly so that the request may be reasonably focused, but please do not delay producing clearly responsive records while awaiting clarification.

Please provide records in electronic format where available, including native electronic files and emails with attachments, rather than paper copies. If any records are already publicly available online, please provide the direct URL for each such record along with all non-posted responsive records.

Please confirm receipt of this request and provide the County’s determination within the time required by the California Public Records Act.

Sincerely,

Peggy Flynn

Outlook

Cemetery in ione

From kaylagay19@gmail.com <kaylagay19@gmail.com>
Date Fri 7/17/2026 6:07 AM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from kaylagay19@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Amador Planning commission,

Regarding the 1800 burial plots planned for Carbondale Rd: My family and I are highly opposed to a cemetery in the middle of our neighborhood. A cemetery will disrupt the enjoyment and use of our property and home, create traffic on already worn and narrow roads. Noise, traffic, and visual impact are of particular concern. The location of this cemetery is inappropriate and unsafe. Who will enforce traffic and parking rules? Who will enforce the environmental regulations? What will be the impact the value of the surrounding homes? What about the impact of neighboring properties to have to witness funerals outside of their homes? They did not purchase their homes near a cemetery. Why would they want to live near one? I urge you to deny this application and suggest the applicant chose a location that is more suitable for higher volumes of traffic and noise.

Outlook

proposed cemetery, Ione

From Andrea Miller <milandal209@gmail.com>
Date Thu 7/23/2026 3:01 PM
To Plan-Planning <planning@amadorcounty.gov>

1 attachment (16 KB)
Amador County Planning Commission, cemetery.docx;

You don't often get email from milandal209@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Commissioners:
Attached please find a statement of our concerns regarding the proposed cemetery in Ione.
Thank you.
Andrea Miller

Amador County Planning Commission
810 Court Street
Jackson, CA 95642

Re: Strong Opposition to Proposed Cemetery Application
July 23, 2026

Dear Commissioners,

We are writing to express our firm and unequivocable opposition to the proposed cemetery project currently under review. A 50,000-plot cemetery is not a routine land-use request; it is a massive, permanent development beyond the scale appropriate for this region that poses substantial long-term risks to the county's land, water, infrastructure, and residents. The sheer size of this project would fundamentally alter the surrounding area, overwhelm rural infrastructure, and permanently restrict future options including the improvement of roads. Nothing about this proposal aligns with the established character of Amador County.

It is our understanding that burials in this cemetery require minimal burial preparation without standard protective containment measures such as fully sealed non-porous vaults or protective liners that create acute public health, environmental, and infrastructure liabilities for our community. Combined with the sheer scale of this project, this presents an unacceptable risk of biological and chemical leachate seeping into local soil.

This projected cemetery requires perpetual care, guaranteed funding, and strict oversight. Is the guarantee of enforceable compliance even a reality? The county seems certain to inherit a neglected, contaminated and structurally unsafe site in the future. Is the county prepared to respond to permit requests within the time constraints required for these burials or will the county be liable to litigation should permits not be issued for the ideal burial within 24 hours?

The rural roads that provide access to this huge project are not designed to accommodate the strain. Unspecified or unenforceable use of this land only opens the county to the expense of emergency services, police protection, and road improvements that burden the residents not the developers.

The supporters of this project have no historic ties or sense of commitment to Amador County. The reported lack of transparency involved reveal no sense of responsibility for present or future actions of any kind. There is nothing about this project that benefits the residents of Amador County.

For these reasons, we strongly urge the Planning Commission to deny this application outright.

Thank you for your attention and your commitment to protecting Amador County's land, resources, and residents.

Sincerely,

Albert and Andrea Miller
266 Vardon Ct.
Ione, CA 95640

_____
From: Christy White <Cj-white@outlook.com>
Sent: Thursday, July 23, 2026 12:50 PM
To: Pat Crew <pcrew@amadorcounty.gov>; Dan Epperson <depperson@amadorcounty.gov>; Jeff Brown <jeffbrown@amadorcounty.gov>; Brian Oneto <BOneto@amadorcounty.gov>
Subject: VOTE NO: 20,000 sq ft Mosque & 50,000 Burial Plots on Carbondale Road in Ione, CA

Some people who received this message don't often get email from cj-white@outlook.com. Learn why this is important<https://aka.ms/LearnAboutSenderIdentification>

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Supervisors,
Respectfully, do you realize how absurd it sounds to say 20,000 sq ft Mosque & 50,000 Burial Plots on Carbondale Road in Ione, CA? Yes, read that again, say it aloud! As of 2026, there are only 9,402 residents in Ione. I moved to Ione for the serenity and a small-town feel.

I did not move here to deal with Muslims, 60 funerals per month; 75 to 500 attendees per funerals; 9,000 vehicle trips (both ways = 18,000 trips) each month on our local roads (most of which are only two-lane narrow roads). Nor did I move here to watch the destruction of protected Oak trees and protected endangered plants (e.g. Ione Manzanita, Irish Hill Buckwheat), nor to be exposed to more vehicle transmissions. Other concerns include no fire protection water availability; impediments for fire, medical and law enforcement staffing. My fire insurance is already too high!

Very concerned about 50,000 bodies wrapped in sheets with no caskets will affect groundwater contamination. Ione water currently has issues with contaminates from the Ione Water Treatment Plant.

I did move here to enjoy the rural cattle ranches, a safe sense of community, peace and tranquility. I moved here to have my property value increase not to decrease. I vehemently oppose this project and ask you to stand for Ione and vote 'NO' on this project!

Regards,

Christy White Miser
Cj-white@outlook.com
916-396-0476

Sent from Outlook<http://aka.ms/weboutlook>

Sent from Outlook<http://aka.ms/weboutlook>

_____
From: Dan Epperson <depperson@amadorcounty.gov>
Sent: Friday, July 24, 2026 2:31 PM
To: Christy White <Cj-white@outlook.com>
Subject: Re: VOTE NO: 20,000 sq ft Mosque & 50,000 Burial Plots on Carbondale Road in Ione, CA

Christy,
Thank you for sharing your concerns. I have a growing file filled with many comments re the Gardens of Noor.

If you would like to sign up for the planning commission agendas, I can forward this to our board clerk, and she would be happy to assist with that process. Also, if you have direct knowledge of the aforementioned destruction, I encourage you to reach out to our planning department and they can direct you to the proper office to address those concerns directly.
Again, thank you for taking the time share your concerns.
Dan

_____
From: Christy White <Cj-white@outlook.com>
Sent: Monday, July 27, 2026 1:17 PM
To: Dan Epperson <depperson@amadorcounty.gov>
Subject: Re: VOTE NO: 20,000 sq ft Mosque & 50,000 Burial Plots on Carbondale Road in Ione, CA

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Dan,

Yes, please forward my information to the Planning Commission.

Thank you for your prompt response!

Christy

Sent from Outlook<http://aka.ms/weboutlook>

_____
From: Dan Epperson <depperson@amadorcounty.gov>
Sent: Monday, July 27, 2026 1:22 PM
To: Heather Peek
Subject: Fw: VOTE NO: 20,000 sq ft Mosque & 50,000 Burial Plots on Carbondale Road in Ione, CA

Outlook

Proposed Cemetery at Carbondale and Lambert Roads

From Anna J. Lawrence <ajlawrence1913@gmail.com>
Date Wed 8/5/2026 6:46 PM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from ajlawrence1913@gmail.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

My husband and I would like to go on record against the proposed cemetery that is coming up for potential approval by the Amador County Planning Commission. We live off of Carbondale Road and have been here for 20 years.
We have read on-line discussions with many Amador County Residents who also oppose this cemetery and they are well thought out:
1. "Green" burials that are only 18" deep with bodies that are not embalmed and only covered with cloth
2. Wildlife that could potentially disturb the gravesites
3. Clay soil that does not perk and is subject to flooding
4. Influx of cars that could affect our local roads (estimation of 60 funerals a month with accompanying mourners)
5. Traffic Impediments for fire, medical and law enforcement in case of emergencies
6. Difficulty in locals trying to get out with their livestock in case of emergencies
7. Removal of protected Oaks; federally endangered plants (Ione Manzanita and Irish Hill Buckwheat)

Question: Is this cemetery for our local community? We have no statistically significant count of Muslims in Amador County so the proposed cemetery is **not supporting our local community** but those who come from different surrounding areas for burial.
Thank you for your consideration of our opposition. Anna J. Lawrence

Outlook

Statement of Opposition regarding Gardens of Noor Cemetery

From Western Performance Equine <wpequine@outlook.com>
Date Fri 8/7/2026 5:06 PM
To gleepres@gmail.com <gleepres@gmail.com>
Cc Plan-Planning <planning@amadorcounty.gov>; BOS-Board of Supervisors <boardofsupervisors@amadorcounty.gov>

1 attachment (793 KB)
Statement of Opposition regarding Gardens of Noor Cemetary_000934.pdf;

Some people who received this message don't often get email from wpequine@outlook.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

I've attached a Statement of Opposition with signatures opposing the Gardens of Noor Cemetery's request for use permit.

Thank you,
Alissa Helmle

Statement of Opposition

TO: The Amador County Planning Commission and the Board of Supervisors

ATTN: Amador County Planning Department, 810 Court Street, Jackson, CA 95642 (planning@amadorcounty.gov and boardofsupervisors@amadorcounty.gov)

RE: Formal Citizen Petition Opposing Request for Use Permit Application UP-22; 2-3 Gardens of Noor Cemetery

PROPERTY LOCATION: 857 Carbondale Rd. and 16630 Lambert Rd., Ione, CA 95640 (APN: 001-220-013)

CURRENT ZONING: R1A Single-Family Residential & Agricultural and has an MRZ, Mineral Resource Zone General Plan Designation

PROPOSED USE: 1832 graves sites divided among 7 blocks on the north end of the property. Proposed improvements include driveway parking for up to 100 cars, and a parking lot with 64 permanent spaces, and permanent restrooms. Proposed number of funerals is 60 funerals a month with a limit of 50 attendees per event.

We, the undersigned residents, property owners, and stakeholders of Amador County, hereby formally oppose the land use proposal referenced above. We respectfully urge the Planning Commission and the Board of Supervisors to deny this application because it is inconsistent with the Amador County General Plan, would place an undue burden on local infrastructure—including roads and water resources—would significantly alter the rural character of our community, and raises environmental concerns requiring careful consideration under the California Environmental Quality Act (CEQA).

Printed Name: Alissa R. Helmle Signature: Alissa R. Helmle

Address: 9 Stanford St Sutter Creek 95685 Date: 8/3/26

Printed Name: Sandy Fikes Signature: Sandy Fikes

Address: 5120 Buena Vista Rd Ione, CA 95640 Date: 8/2/26

Printed Name: Dylan Costello Signature:

Address: 912 Shakely Lane, Ione, CA 95640 Date: 8/3/26

Printed Name: Sara Scher Signature: [signature]

Address: 3795 Curran Rd. Ione CA 95640 Date: 8/3/26

Printed Name: MARTIN GARDNER Signature: [signature]

Address: 5130 BUENA VISTA RD IONE 95640 Date: 8/4/26

Printed Name: Brynn Cassidy Signature: [signature]

Address: 4220 Curran Rd Ione, CA 95640 Date: 8/4/26

Printed Name: _____ Signature: _____

Address: _____ Date: _____

Printed Name: _____ Signature: _____

Address: _____ Date: _____

Printed Name: _____ Signature: _____

Address: _____ Date: _____

Printed Name: Bonnie Richardson Signature: [signature]

Address: 3595 Curran Rd. Ione CA 95640 Date: 8/5/26

Printed Name: _____ Signature: _____

Address: _____ Date: _____

Printed Name: _____ Signature: _____

Address: _____ Date: _____

Peggy Flynn
Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association
PO Box 35
Rail Road Flat, CA 95248
pjpatrickflynnbooks@gmail.com
(530) 368-6434

August 13, 2026

Via Email and U.S. Mail

Chuck Beatty, Planning Director
Amador County Planning Department
810 Court Street
Jackson, CA 95642
planning@amadorgov.org

cc: Amador County Counsel
cc: Chair and Members, Amador County Planning Commission, via the Clerk of the Commission
cc: Clerk of the Amador County Planning Commission
cc: Clerk of the Amador County Board of Supervisors

RE: SUBMITTAL FOR THE ADMINISTRATIVE RECORD — Use Permit UP-22; 2-3, Gardens of Noor Cemetery, Applicant Mounir Kaddoura, 857 Carbondale Road / 16630 Lambert Road, Ione, CA, APN 001-220-013 — Comments on the Initial Study and Proposed Mitigated Negative Declaration

---

Dear Director Beatty:

This item was **removed from the August 11, 2026 Planning Commission agenda and returned to the Planning Department for further review.** The accompanying package is submitted now so that the Department has it in hand **during** that review rather than after it. Nothing in it depends on a hearing date, and the Department is asked to consider it as part of the pending review.

The package comments on the Initial Study and the proposed Mitigated Negative Declaration for UP-22;2-3. It is submitted on behalf of residents of western Amador County and is directed to a single question: whether the record before the County contains substantial evidence supporting a fair argument that the project may have a significant effect on the environment. Under CEQA Guidelines § 15064(f)(1), if it does, an Environmental Impact Report is required.

Contents

- **Executive Summary**, August 13, 2026. *Consultant.*
- **Tab A** — CEQA Initial Study Conformity and Adequacy Analysis. *Consultant.*

- **Tab B** — Examination of the CEQA Initial Study for Use Permit UP-22;2-3. *D. Wardall, M. Preskar, J. Wirfel, R. Woodhouse.*
- **Tab C** — Examination of the Conditions of Approval and the Mitigation Monitoring and Reporting Program. *D. Wardall, M. Preskar, J. Wirfel, R. Woodhouse.*
- **Tab D** — Prior Permit Acquisition and Project Segmentation, UP-22;2-3. *Consultant.*
- **Tab E** — Technical Advisory Committee Record and Process Memorandum, UP-22;2-3, **with Attachments E-1 through E-6**, a Procedural Record and Findings for each of the six Committee proceedings. *Consultant.*
- **Tab F** — Supplemental and Clarifying Request Under the California Public Records Act. *P. Flynn.*
- **Tab G** — Exhibits, tabbed and numbered.
- **Tab H** — Table of Authorities.

Tabs A, B, and C address the adequacy of the environmental document itself. Tab D addresses a certified statement in the County's own referral file that collateral permits for this project were acquired before any environmental review occurred. Tab E is **not** a CEQA document; it addresses the adequacy of the written record of the six Technical Advisory Committee proceedings on this parcel and rests on the County's own recordkeeping statements. Its six attachments set out, proceeding by proceeding, the findings the record supports and the undertakings stated on the record, and consolidate at § 10 of Tab E a single schedule of forty-one items. **That schedule asserts nothing about whether any undertaking was completed.** For each item it asks only that the Department identify the record evidencing completion, or state in writing that none exists; either response closes the item. The Department is the custodian of its own file, and the schedule is framed so that it can be worked through and closed out. Tab F is a records request and is not argument.

Two requests as to the record

First, please include this letter, the Executive Summary, and **all tabbed documents and exhibits** in the administrative record for UP-22;2-3, and please **transmit the documents themselves** — not a summary of them — to the Planning Commission in the agenda packet when the item is re-noticed.

Second, please confirm receipt in writing. I am glad to provide any tab in an alternative format, or to deliver additional hard copies for the Commission packet, on request.

A note on Tab F

The supplemental records request at Tab F seeks documents that bear on Tabs D and E — principally the collateral permit files and three written documents the County committed on the record to produce. **Tabs A, D, and E are submitted without waiting for that production**, and the Department is asked to act on the requests in each of them independently of the Public Records Act process. Where a requested record does not exist, a written statement to that effect is itself material to the pending review.

Requested action

The package asks the County to decline to adopt the Mitigated Negative Declaration and to require preparation of an Environmental Impact Report. In the alternative, and at minimum, it asks that the item be continued and that staff be directed to obtain a current Amador Water Agency will-serve determination, a fire-flow and emergency-access determination from the Fire District and CAL FIRE, a Public Works determination on commercial entrance standards at both access points, a referral to the Airport Land Use Commission, and a project-level traffic and Vehicle Miles Traveled analysis. Each of those is a document the County does not presently have, and each bears on a finding the County is required to make.

These comments are offered as part of the County's own review process and are addressed to the sufficiency of the environmental document and the completeness of the record. I appreciate the Department's consideration and am available at the telephone number and email address above to discuss any part of the submittal.

Sincerely,



Peggy Flynn
Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association

Enclosures: Executive Summary; Tabs A through H as listed above.

Table of Contents and Exhibit Index

Gardens of Noor Cemetery — Use Permit UP-22;2-3 (APN 001-220-013)

Amador County, California

August 13, 2026

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association.

Part 1 — Table of contents

Front matter

- **Transmittal Letter**, August 13, 2026. Peggy Flynn. 3 pages (Master pp. 1–3).
- **Table of Contents and Exhibit Index** (this document). 10 pages (Master pp. 4–13).
- **Executive Summary**, August 13, 2026. Consultant. 6 pages (Master pp. 14–19).

Tabbed documents

- **Tab A — CEQA Initial Study Conformity and Adequacy Analysis**, August 13, 2026. Consultant. 90 pages (Master pp. 20–109). Section-by-section review of the Initial Study against CEQA Guidelines § 15064 and the fair-argument standard. Water supply and fire flow at § 5.4; the CDFW March 3, 2022 comment letter and the April 14, 2022 review letter at §§ 5.5 and 6.2; engineered grade-raise and storm-water runoff at § 5.7; airport occupancy density at § 6.14; collateral permits summarized at §§ 3.1E and 5.6.
- **Tab B — Examination of the CEQA Initial Study for Use Permit UP-22;2-3.** D. Wardall, M. Preskar, J. Wirfel, R. Woodhouse. 13 pages (Master pp. 110–122). Independent technical examination of the Initial Study, organized by chapter.
- **Tab C — Examination of the Conditions of Approval and the Mitigation Monitoring and Reporting Program.** D. Wardall, M. Preskar, J. Wirfel, R. Woodhouse. 9 pages (Master pp. 123–131). Condition-by-condition examination, each condition quoted from the County's own document.
- **Tab D — Prior Permit Acquisition and Project Segmentation, UP-22;2-3.** Consultant. 17 pages (Master pp. 132–148). The applicant's certified statement on the September 18, 2025 Environmental Information Form that a well permit and sanitary tank permits "have been acquired"; the twelve consecutive negative responses on the same page; the contradiction with the applicant's own August 2025 Cemetery Plan; discretion under *POWER v. County of Stanislaus* and Amador

County Code Chapter 14.06; deferral under CEQA Guidelines § 15126.4(a)(1)(B) and *Sundstrom v. County of Mendocino*. Eight requested actions at § 12.

- **Tab E — Technical Advisory Committee Record and Process Memorandum, UP-22;2-3.** Consultant. 16 pages (Master pp. 149–164). Includes, at § 10, a Consolidated Schedule of Records Requested collecting the forty-one undertakings identified in Attachments E-1 through E-6.
    - **Tab E-1 — Procedural Record and Findings, March 3, 2022** (Event 7435). Consultant. 7 pages (Master pp. 165–171). Five findings; four undertakings. Transcript at Exhibit 2-A.
    - **Tab E-2 — Procedural Record and Findings, August 4, 2022** (Event 7550). Consultant. 8 pages (Master pp. 172–179). Six findings; four undertakings. Transcript at Exhibit 2-B.
    - **Tab E-3 — Procedural Record and Findings, June 1, 2023** (Event 7849). Consultant. 8 pages (Master pp. 180–187). Seven findings; seven undertakings. Transcript at Exhibit 2-C.
    - **Tab E-4 — Procedural Record and Findings, September 18, 2025** (Event 8537). Consultant. 9 pages (Master pp. 188–196). Six findings; twelve undertakings. Transcript at Exhibit 2-D.
    - **Tab E-5 — Procedural Record and Findings, May 7, 2026** (Event 9154). Consultant. 9 pages (Master pp. 197–205). Seven findings; seven undertakings. Transcript at Exhibit 2-E.
    - **Tab E-6 — Procedural Record and Findings, June 11, 2026** (Event 9168). Consultant. 10 pages (Master pp. 206–215). Eight findings; seven undertakings. Transcript at Exhibit 2-F. Adequacy of the written record of the six Technical Advisory Committee proceedings on this parcel, resting on the *County of Inyo* "accurate, stable and finite" record principle and on the County's own recordkeeping statements. **Not a CEQA document.** Seven requested actions at § 8.
- **Tab F — Supplemental and Clarifying Request Under the California Public Records Act**, August 13, 2026. Peggy Flynn. 7 pages (Master pp. 216–222). A records request, not argument. Categories A through G. Tabs A, D, and E each ask the Department to act **without waiting for this production**.
- **Tab G — Exhibits.** Seventy-three exhibits in nine categories, tabbed and numbered per Part 2 below. 215 pages (Master pp. 223–437).
- **Tab H — Table of Authorities.** Statutes, guidelines, case law, and code provisions cited across Tabs A through F, with a working citation link for each. 5 pages (Master pp. 438–442).

Total narrative pages, front matter and Tabs A through F: 222, of which Tab E and its six attachments comprise 67. Tab G (exhibits, 215 pages) and Tab H (authorities, 5 pages) are additional. Grand total, this master compilation: 442 pages (Master pp. 1–442).

Part 2 — Exhibit index

Exhibits are grouped by subject category and numbered within each category. **Status** indicates where the document is located, using the following terms:

- **Attached** — reproduced in the exhibit binder at Tab G.
- **In the County's file** — already in the County's records for UP-22;2-3; cited by reference, with the page image attached where the exhibit entry so states.
- **Requested at Tab F** — sought by the supplemental Public Records Act request; not located in the materials reviewed. Where a requested record does not exist, a written statement to that effect is requested in its place.
- **Public source** — publicly available at the citation given.
- **Provided by client; on file** — in the consultant's file and available on request.

Category 1 — Application chronology

- **1-A.** Sacramento County application "Gardens of Light," PLNP2017-00124 — project detail record. *Public source:* Sacramento County planning portal
- **1-B.** Amador County application UP-22;2-3, filed July 21, 2022 — application and plan sheets. *Requested at Tab F.*
- **1-C.** Deficiency notice following the March 3, 2022 incompleteness finding. *Requested at Tab F.*
- **1-D.** Deficiency notice and revision list dated August 5, 2022. *Requested at Tab F.*
- **1-E.** Suspension of application, September 12, 2023. *Requested at Tab F.*
- **1-F.** Application filed September 18, 2025 and rejection dated September 29, 2025. *Requested at Tab F.*
- **1-G.** Current application UP-22;2-3, filed April 24, 2026, with signed environmental information form. *Requested at Tab F.*
- **1-H.** Owner authorization documents. Owner of record is Brett L. Carlson; the applicant is not the owner. *Requested at Tab F.*

Category 2 — Technical Advisory Committee record

County staff stated on the record that the Committee keeps no written minutes and that the audio recordings are the sole record (August 4, 2022 recording at [00:20:50]). Each transcript at 2-A through 2-F is a machine transcription of the County's own published audio, offered for the County's convenience, with a request that the County verify it against its recording.

- **2-A.** Transcript, Committee meeting of **March 3, 2022** (Event ID 7435), with findings memorandum. *On file at 10_Exhibits/EX-2-A_Transcript_TAC_2022-03-03.pdf.*
- **2-B.** Transcript, Committee meeting of **August 4, 2022** (Event ID 7550), with findings memorandum. *On file at 10_Exhibits/EX-2-B_Transcript_TAC_2022-08-04.pdf.*
- **2-C.** Transcript, Committee meeting of **June 1, 2023** (Event ID 7849), with findings memorandum. *On file at 10_Exhibits/EX-2-C_Transcript_TAC_2023-06-01.pdf.*

- **2-D.** Transcript, Committee meeting of **September 18, 2025** (Event ID 8537), with findings memorandum. *On file at 10_Exhibits/EX-2-D_Transcript_TAC_2025-09-18.pdf.*
- **2-E.** Transcript, Committee meeting of **May 7, 2026** (Event ID 9154; application found complete), with findings memorandum. *On file at 10_Exhibits/EX-2-E_Transcript_TAC_2026-05-07.pdf.*
- **2-F.** Transcript, Committee meeting of **June 11, 2026** (Event ID 9168; vote to advance; proposed Mitigated Negative Declaration), with findings memorandum. *On file at 10_Exhibits/EX-2-F_Transcript_TAC_2026-06-11.pdf.*
- **2-G.** Committee agendas, packets, and staff reports for each meeting above. *Requested at Tab F.*
- **2-H.** Letter of approximately June or July 2023 summarizing all Committee comments, stated on the record June 1, 2023 at [01:33:49–01:34:12]. *Requested at Tab F, Category F.*
- **2-I.** Deficiency list following the June 1, 2023 incompleteness finding (motion at [02:00:04–02:00:29], 30-day deadline). *Requested at Tab F, Category F.*
- **2-J.** Deficiency list following the September 18, 2025 incompleteness finding, confirmed sent on the May 7, 2026 recording at [00:02:30–00:02:44]. *Requested at Tab F, Category F.*
- **2-K.** The County's written statement as to whether minutes exist for the six meetings, and the applicable records retention schedule. *Requested at Tab F, Category F.*
- **2-L.** The "separate file" of referral comments on prior iterations, described May 7, 2026 at [00:02:53–00:03:10]. *Requested at Tab F;* confirmation requested that it forms part of the administrative record.

*Exhibits 2-H through 2-L are the documentary basis of **Tab E**. Tab E is submitted without waiting for that production. Exhibits 2-A through 2-F are the transcripts of the six proceedings and are the documentary basis of Attachments **E-1 through E-6** respectively.*

Category 3 — Water supply, wastewater, and fire flow

- **3-A.** Amador Water Agency letter dated February 18, 2022, from Lucas Carthew. *Requested at Tab F.*
- **3-B.** Current Amador Water Agency will-serve determination for APN 001-220-013. *Requested at Tab F.*
- **3-C.** Excerpt, August 4, 2022 Committee transcript — Amador Water Agency testimony at [00:24:38–00:25:56] and [00:50:44–00:51:38]: 5/8-inch meter maximum; 20 gpm; 400 gallons per average day; fire flow 350–400 gpm against a 1,000 gpm standard; no public sewer; Ione plant capacity-limited. *On file at 10_Exhibits/EX-3-C_AWA_Water_Capacity_Testimony_2022-08-04.pdf.*
- **3-D.** On-site sewage disposal permit file and percolation testing for the parcel. *Requested at Tab F.* The applicant stated on August 4, 2022 at [00:47:29] that a tank was already "being put on one side of the property."

- **3-E.** Environmental Health requirements — commercial septic designed by a registered engineer; portable toilets not an acceptable substitute [00:48:20–00:49:11]. *On file at 10_Exhibits/EX-3-E_Environmental_Health_Septic_Requirements_2022-08-04.pdf.*
- **3-F.** California Fire Code Appendix B — fire-flow requirements. *Public source:* UpCodes
- **3-G.** CAL FIRE Standard 1 — Water Supply. *Public source:* CAL FIRE
- **3-H.** State Minimum Fire Safe Regulations, 14 CCR § 1270 et seq., April 1, 2023 edition. *Public source:* Cornell LII; copy provided by client; on file.

Category 4 — Roadway, access, and transportation

- **4-A.** Amador County Public Works Road Specification PW-7 — commercial entrance standards. *Provided by client; on file.*
- **4-B.** Excerpt, March 3, 2022 Committee transcript — Public Works: "both of them are going to need to be commercial entrances" [00:20:21]. *On file at 10_Exhibits/EX-4-B_Public_Works_Commercial_Entrance_2022-03-03.pdf.*
- **4-C.** Excerpt, August 4, 2022 Committee transcript — Public Works: both the Lambert Road and Carbondale Road entrances "will have to be improved for commercial standards" [00:28:10]; roadside parking prohibited for fire access [00:28:28–00:29:30]. *On file at 10_Exhibits/EX-4-C_Public_Works_Entrance_Standards_FireAccess_2022-08-04.pdf.*
- **4-D.** Encroachment permit applications and Public Works correspondence for both access points. *Requested at Tab F.*
- **4-E.** Roadway safety baseline — documented collision history, Tab A § 2.7. *On file at 10_Exhibits/EX-4-E_Roadway_Safety_Baseline_Collision_History.pdf;* sources at Tab H.
- **4-F.** Any traffic study, trip-generation memorandum, or Vehicle Miles Traveled analysis in the County file. *Requested at Tab F.*
- **4-G.** Governor's Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts under SB 743. *Public source:* OPR Technical Advisory
- **4-H.** Correspondence of Catherine Ebbett (fire response times) and John Munn (access route, December 2021), referenced on the March 3, 2022 recording at [00:00:25]. *Requested at Tab F.*

Category 5 — Airport safety and land use compatibility

- **5-A.** Public Utilities Code § 21675 — Airport Land Use Commission referral requirements. *Public source:* Justia
- **5-B.** Caltrans Division of Aeronautics — Airport Land Use Planning Handbook and program materials. *Public source:* Caltrans
- **5-C.** Amador County Airport Land Use Compatibility Plan and Safety Zone mapping for the site. *Requested at Tab F.*

- **5-D.** Excerpt, March 3, 2022 Committee transcript — a food-service application identified for Airport Land Use Commission referral on Safety Zone grounds; the Chair: "could potentially kill the project." *On file at 10_Exhibits/EX-5-D_ALUC_Safety_Zone_Referral_Comparator_2022-03-03.pdf.*
- **5-E.** Administrative file for that food-service application — the comparator. *Requested at Tab F.*
- **5-F.** Any Airport Land Use Commission referral, referral determination, or airport correspondence for UP-22;2-3. *Requested at Tab F.*
- **5-G.** 14 C.F.R. § 91.119 — minimum safe altitudes. *Public source:* Cornell LII
- **5-H.** Excerpt, August 4, 2022 Committee transcript — Agenda Item 1 aerial-firefighting testimony and resulting amended conditions [00:11:15–00:14:46]. *On file at 10_Exhibits/EX-5-H_Aerial_Firefighting_Testimony_2022-08-04.pdf.*

Category 6 — Treatment-consistency comparators

- **6-A.** Epic Wireless cell tower file (Committee, August 4, 2022, Item 1) — initial study, mitigated negative declaration, and conditions of approval including a performance bond at 100 percent of estimated removal cost and mandatory removal after six months of disuse. *Requested at Tab F.*
- **6-B.** Food-service and Airport Land Use Commission referral file — see 5-E. *Requested at Tab F.*
- **6-C.** Any other assembly or event-center use permit processed within an airport influence area in the last ten years. *Requested at Tab F.*
- **6-D.** Any other cemetery application processed by the County. *Requested at Tab F.*

Category 7 — Biological, cultural, and site resources

- **7-A.** California Department of Fish and Wildlife comment letter of March 3, 2022 on the project. *Public source:* CDFW document library
- **7-B.** Ione manzanita (*Arctostaphylos myrtifolia*) — U.S. Fish and Wildlife Service species profile and five-year review. *Public source:* USFWS profile; five-year review
- **7-C.** Ione buckwheat (*Eriogonum apricum* var. *apricum*) — California Department of Fish and Wildlife profile. *Public source:* CDFW
- **7-D.** Green burial and groundwater considerations. *Public source:* NACCHO
- **7-E.** Ten photographs of a feral swine (*Sus scrofa*) trap enclosure on land in the vicinity of APN 001-220-013. No declarant is identified in connection with these photographs and no claim is made as to who constructed or operates the enclosure, its exact distance from the project parcel, when the photographs were taken, the number or size of animals taken in it, or what permits, if any, apply to its operation. The photographs are offered solely to show that active feral swine trapping activity exists on land near the project site, consistent with the regional prevalence of feral swine documented in the sources cited at Tab A, § 5.3 (USDA/APHIS *Feral Swine* fact sheet, The Wildlife Society position statement on rooting depth, and California Department of Fish and Wildlife materials listing

cemeteries among properties damaged by wild-pig rooting). Supports **Tab A, § 5.3** (uncontrolled feral pig population and disinterment risk). *Received; on file at 10_Exhibits/EX-7-E_Photographs_Feral_Swine_Trap_Enclosure.pdf.*

- **7-F.** Amador County internal correspondence, June 2023, concerning the 2022 filing on this same parcel: (1) a June 1–5, 2023 email exchange between Deputy County Counsel Glenn Spitzer and Planning Department Planner Krista Ruesel, in which Mr. Spitzer identifies water contamination as "the most significant impact" and specifies three minimum data items (a to-scale grave-site plan, hydrological/water-table data, and a soil-profile study), and Ms. Ruesel confirms the County was drafting a deficiency letter addressing those items; and (2) a June 16–22, 2023 email exchange between Amador County Environmental Health (Debra Larson) and Amador County Public Health Officer Dr. Rita Huspen Kerr, discussing groundwater-contamination and pathogen-leaching concerns specific to this project's proposed unembalmed, shroud-only burial method, with Dr. Kerr referencing pending California human-composting legislation (AB 351) and a NACCHO green-burial guidance link for context, and Ms. Larson acknowledging the input. Obtained via a Public Records Act request by Ron Woodhouse, Eagles Nest Association; provided by client. Exhibit body pages are native email (Outlook) exports; verbatim transcriptions on file at 08_County_Source_Documents/Spitzer_email_2023-06-01_transcription.md and 08_County_Source_Documents/Larson_Kerr_email_2023-06-16-22_transcription.md. Supports **Tab A, § 5.2** (groundwater contamination from shallow green burials). *On file at 10_Exhibits/EX-7-F_County_Correspondence_Groundwater_June_2023.pdf.*

Category 8 — Regulatory and licensing

- **8-A.** Cemetery and Funeral Bureau certificate of authority requirements and endowment care fund provisions, raised by Environmental Health on March 3, 2022 at [00:22:21]. *On file at 10_Exhibits/EX-8-A_Cemetery_Funeral_Bureau_Requirements.pdf.*
- **8-B.** Amador County Code Title 19 (Zoning) — applicable chapters. *Public source:* Code Publishing
- **8-C.** Amador County General Plan — land use designation and applicable policies for the site. *On file at 10_Exhibits/EX-8-C_General_Plan_Designation_Zoning.pdf.*

Category 9 — Collateral permits and project segmentation

*This category supports **Tab D**. Exhibit 9-A is already in the County's own file and requires no production. Exhibits 9-E through 9-K are requested at Categories A through D and G of Tab F.*

- **9-A. Environmental Information Form, page 3, of the referral packet transmitted September 4, 2025 for the September 18, 2025 Technical Advisory Committee meeting** — the applicant's certified answer to the printed question listing related

permits and other public approvals required for the project: **"well Permit and Sanitart Tank Permits have been acquired"** *(sic)*. *On file at 10_Exhibits/EX-9-A_Environmental_Information_Form_p3_2025-09-04_Referral_Packet.pdf*.

- **9-B. Environmental Information Form, page 4** — the twelve consecutive "No" responses, items 17 through 28, including item 22 (ground water quality, quantity, and drainage), item 26 (municipal services), and item 28 (relationship to a larger project or series of projects). *On file at 10_Exhibits/EX-9-B_Environmental_Information_Form_p4_2025-09-04_Referral_Packet.pdf*.
- **9-C.** Indemnification agreement signed 08/27/2025, describing the project as "the **discretionary** land use approval." *In the County's file*.
- **9-D-1.** Applicant's Cemetery Plan, page 2, § 2.2, **as circulated at page 10 of the referral packet transmitted September 4, 2025** — *"A permit **is applied for** a well on the property by Rumsey Lang Well Drilling and Pump Inc."* This is the copy that appears seven pages after Exhibit 9-A in the same referral packet. *On file at 10_Exhibits/EX-9-D_Cemetery_Plan_p2_Two_Copies.pdf*.
- **9-D-2.** Applicant's Cemetery Plan, page 2, § 2.2, **as it appears in the application file copy** — containing the same well statement and, in addition, the paragraph headed "Sewage Disposal System," which states that the applicant's engineer "has **submitted the permit and plans to the ACEH for approval**." This copy also states that "[t]he gravel parking lot can accommodate **64 car parking spots**," where the copy at Exhibit 9-D-1 states that the site "will have parking to fit **35 cars**." The two copies of the same page are not identical. *On file at 10_Exhibits/EX-9-D_Cemetery_Plan_p2_Two_Copies.pdf*.
- **9-D-3.** Applicant's Cemetery Plan, page 5, § 3.1 (Site Design), **as circulated at page 13 of the same referral packet transmitted September 4, 2025** — the Plan's own description of the excavate-vault-backfill lot-development method: the lot is excavated to two feet below the surface, concrete liners are placed, and the excavated soil is used to cover the liners, so that "**the new ground profile will be two feet higher**." Supports the Tab A Hydrology and Water Quality discussion of the engineered two-foot grade change. *On file at 10_Exhibits/EX-9-D-3_Cemetery_Plan_p5_Grading_Method.pdf*.
- **9-E.** The well permit itself — application, plot plan, issued permit, permit number, issue and expiration dates, conditions, inspection records, and the driller's report required by Code § 14.06.110(C). *Requested at Tab F, Category A*.
- **9-F.** Any second or renewed well permit issued for APN 001-220-013 after mid-2025, or the County's written statement that the earlier permit lapsed under Code § 14.06.110(A)–(B). *Requested at Tab F, Category A*.
- **9-G.** On-site sewage disposal and sanitary tank permits — application, soil site evaluation, percolation testing, engineered design, and issued permit. *Requested at Tab F, Category B;* see Code § 14.06.050.

- **9-H.** The County's written determination whether the well permit was ministerial or discretionary, and any Bulletin 74 Standard 8.A separation analysis. *Requested at Tab F, Category A*.
- **9-I.** The well-to-interment separation research referenced June 1, 2023 at [01:06:24–01:07:13] — *"so I have a little more research to do"* — and any resulting written determination. *Requested at Tab F, Category G*.
- **9-J.** Any Notice of Exemption, Notice of Determination, or ministerial determination filed or made for any permit on APN 001-220-013. *Requested at Tab F, Category D*.
- **9-K.** Building, grading, encroachment, and tree-removal permits, and any code enforcement record, site inspection, or notice of violation for the parcel; relates to the June 1, 2023 public comment at [01:34:44–01:36:20]. *Requested at Tab F, Category C*.
- **9-L.** Amador County Code Chapter 14.06 — Water Supply Wells. *Public source:* Code Publishing
- **9-M.** Department of Water Resources Bulletin 74-81 and 74-90, Standard 8.A, adopted by reference at Code §§ 14.06.010 and 14.06.170. *Public source:* DWR
- **9-N.** Amador Water Agency letter, footer dated April 10, 2023 — 5/8-inch meter, one Equivalent Dwelling Unit, approximately 400 gallons per average day; the well described as supplying approximately 2 gpm to *"supplement water needs."* *Provided by client; on file*.

Part 3 — Summary of the exhibit set

Seventy-three exhibits are indexed in nine categories.

- **Attached** — 20
- **In the County's file** — 1
- **Requested at Tab F** — 33
- **Public source** — 15
- **Provided by client; on file** — 2
- **Received; on file in 10_Exhibits/** — 1 (Exhibit 7-E, photographs)
- **On file in 10_Exhibits/, obtained via third-party PRA request** — 1 (Exhibit 7-F, county correspondence)

Thirty-three of the seventy-three exhibits are County records that have been requested and not yet produced. Tabs A, D, and E are submitted without waiting for that production and each asks the Department to act on the requests it contains independently of the Public Records Act process.

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association. Client documents cited "(provided by client; on file)." Quotations from

Technical Advisory Committee proceedings are drawn from machine transcriptions of the County's published meeting audio; the County has confirmed that no written minutes exist. Verify each quotation against the recording at the timestamp cited before entering it into the administrative record.

Executive Summary

Gardens of Noor Cemetery — Use Permit UP-22;2-3 (APN 001-220-013)

Amador County, California

August 13, 2026

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association.

Submitted for entry into the administrative record for Use Permit UP-22;2-3. This summary states conclusions only. Every assertion in it is supported in the tabbed documents at the section cited, and nothing in this summary should be relied upon without reference to the supporting tab.

---

1. The project and the action under review

The applicant proposes a cemetery on a 46-acre parcel at 857 Carbondale Road, also identified as 16630 Lambert Road, Ione. The application as currently framed proposes 1,832 grave sites in seven blocks on approximately 1.7 acres, 64 parking spaces plus driveway parking for up to 100 vehicles, approximately 60 funeral events per month at a stated maximum of 50 attendees per event, and a stated increase of "an average of 20 Vehicles per day." The parcel is zoned R1A and is designated **MRZ** — mineral resource — in the General Plan.

The Planning Department has prepared an Initial Study and proposes adoption of a **Mitigated Negative Declaration**. The Technical Advisory Committee found the application complete on May 7, 2026 and voted to advance it on June 11, 2026. The item was **removed from the August 11, 2026 Planning Commission agenda and returned to the Planning Department for further review.**

This package is submitted so that the Department has it during that review rather than after it.

---

2. The standard of review

The question before the County is not whether the impacts identified below are certain, or even likely. It is narrower.

Under **CEQA Guidelines § 15064(f)(1)**, if there is substantial evidence in light of the whole record that a project **may** have a significant effect, the agency **"shall prepare a draft EIR."** A single credible line of evidence is sufficient. The agency may not weigh competing evidence and choose the more favorable account. Two related rules apply directly to this parcel: significance "may vary with the setting," and an activity insignificant in an urban area "**may be significant in a rural area**" (§ 15064(b)); and compliance with an adopted threshold "**does not relieve the lead agency of the obligation to consider substantial evidence**" that effects may still be significant (§ 15064(b)(2)). See **Tab A § 7**.

The submittal is therefore directed at a single question: does the record contain substantial evidence supporting a fair argument of a significant effect? It does, on multiple independent grounds, each of which is sufficient by itself.

---

3. Where substantial evidence supports a fair argument

Transportation, and the absence of any quantified analysis. The Initial Study performed no trip-generation and no Vehicle Miles Traveled calculation. It relied on a qualitative narrative and on the application's own internally inconsistent figures — 60 funeral events per month at up to 50 attendees each, against "20 vehicles per day." Those two statements cannot both be true; 50 attendees is 17 to 25 vehicles per event, not per day. The County's own operational cap yields roughly **2,400 to 3,000 one-way trips per month**, at or above the state screening threshold, before any assembly use is counted. **Tab A §§ 2.1–2.3, 1.**

The transportation chapter contradicts itself, and answers the operative criterion "No Impact." The Initial Study's checklist reproduces the pre-2019 Appendix G transportation items, including the level-of-service and congestion-management criteria the 2019 amendments removed, and appends the current vehicle-miles-traveled criterion as item (g). Items (a) and (b) are checked in the **"Less Than Significant Impact"** column — the column that signifies no mitigation is required — while the discussion of those same two items concludes there "would be a less than significant with mitigations incorporated" and imposes **Mitigation Measure TRA-1**. The table and the text state different findings, with different legal consequences, on one page. The effect the discussion identifies is reduction in level of service and intersection congestion, which Public Resources Code § 21099(b)(2) and CEQA Guidelines § 15064.3(a) direct shall not be treated as a significant environmental impact. Item (g), the criterion CEQA does make operative, is checked **"No Impact."** And the two safety criteria that were marked as requiring mitigation — hazards from a design feature, and inadequate emergency access — are mitigated by measures that reach the driveway encroachment and "all roads, gates and access ways **on the property**," not the receiving County roads where those hazards arise. **Tab A § 2.1A.**

Traffic safety, which the checklist requires and the Initial Study never reached. Separate from volume, the transportation checklist asks whether the project would substantially increase hazards from a design feature or cause inadequate emergency access. The Initial Study did not address it. The access roads carry a documented record of fatal collisions, and the County's **own 2024 Regional Transportation Plan** describes them as narrow, sight-limited, and safety-deficient, and flags the SR-104 / Michigan Bar segment for safety spending. **Tab A § 2.7.**

Mitigation that cannot be enforced. The entire impact analysis rests on an operational cap of 50 attendees and two events per day. The County's own **Mitigation Monitoring and Reporting Program** confirms rather than cures the gap: across 31 numbered conditions, Code Enforcement is named as a monitor **zero times**, and not one condition establishes ongoing monitoring of attendance, vehicle counts, or cumulative interments. If the cap is exceeded, nothing in the record restores the assumed conditions. **Tab A § 2.5A; Tab C throughout.**

Water supply and fire flow, deferred rather than demonstrated. The Amador Water Agency has capped service at a 5/8-inch meter and approximately **400 gallons per average day**. Fire flow at

this location was testified to be roughly **350 to 400 gpm against a 1,000 gpm standard**. Adjacent-parcel well experience in the same formation is ten wells at roughly 700 feet, best sustained yield about 0.75 gpm, of poor quality. The County's fire officer flagged a likely requirement for one or more fire water tanks, which appear nowhere in the project description or on any site plan. **Tab A §§ 5.4, 9(7).**

Groundwater and burial method. The applicant's own geotechnical report found groundwater "actively seeping" and "pooling." The application describes shrouded burial at 18 inches over that groundwater. Deputy County Counsel stated on the record that open-bottom caskets over groundwater "just jumps out as a pretty big concern," and confirmed he could locate **no well-to-grave separation standard** in the County's Local Agency Management Program, the Health and Safety Code, or Title 16. Where the regulatory framework supplies no numeric standard, the significance determination cannot be deferred to compliance with one. **Tab A §§ 5.2, 9(4).**

Biological resources. The Initial Study does not address whether the project would result in take of federally listed plant species, or whether consultation with the U.S. Fish and Wildlife Service is required. The April 14, 2022 review letter in the County's own file states that the federally endangered Ione buckwheat and federally threatened Ione manzanita are documented in the area and on immediately adjacent properties and very likely occur on this parcel, and that federal consultation and permits are likely required. Neither the letter nor the question it raises appears anywhere in the environmental document. **Tab B, Chapter 4; Tab A §§ 5.5, 6.2.**

Airport proximity. The parcel lies within approximately one-half mile of the Eagle's Nest airstrip. The Initial Study contains no aviation-safety or airport-land-use-compatibility analysis. The point is one of occupancy density and does not depend on the character of the assembly: **it does not matter who the occupants are; on this record there cannot be any. Tab A § 6.14; Tab C, Condition 11.**

---

4. The project analyzed is not the project proposed

The scope has been reduced on paper while the parcel has not. This is the third application on this same 46-acre parcel — 2022, 2025, and 2026 — and the fourth cemetery application by this applicant overall. The 2022 filings proposed up to **50,000 burial sites** and an assembly building. The 2026 application reduces the stated scope to 1,832 plots **while retaining the same acreage**, and no instrument restricts the remainder. **Tab A §§ 3.1, 3.1D.**

The arithmetic returns to the original figure. At the applicant's own stated 60 events per month, 1,832 plots are exhausted in about **2.5 years** — while the applicant's own Cemetery Plan states the site is designed over a **100-year timeframe** and will serve the community "for the next 100 years" at full build-out. One hundred years at that rate is 72,000 interments. Independently, 1,832 graves on 1.7 acres is a density of about 1,078 per acre; applied to 46 acres that density yields **approximately 49,572 graves** — within about one percent of the 50,000 figure the County itself circulated in 2022. **Tab A § 3.1B.**

The applicant's own drawings label the phases. The 2022 engineering sheets for this same permit number and parcel are annotated "**STAGE 1 PROPOSED GRAVE SITES**," "**STAGE 1**

PROPOSED 20' WIDE," "**STAGE 2 PROPOSED 10,000 SQFT BUILDING 30 FT HIGH WITH OCCUPANCY OF 1200 PEOPLE**," and "**STAGE 2 ROAD**." The 2026 project — grave sites and an internal road, no structure — is Stage 1 of the applicant's own two-stage plan. This converts the question from an inference about intent into a documentary contradiction, and it triggers **CEQA Guidelines § 15165**, which requires a single environmental document for the ultimate project where a phased project is to be undertaken. **Tab A §§ 3.1A, 3.2, 3.6A.**

The applicant said so on the record. On September 18, 2025 the applicant stated he would "be applying in six months for another addition" and would "proceed with more proposals later on." Expansion is not speculative on this record. **Tab A § 6A.1.**

A component was certified as already permitted before any environmental review. On the Environmental Information Form in the September 18, 2025 referral packet, answering the printed question requiring the applicant to list other related permits and public approvals required for the project, the applicant wrote: **"well Permit and Sanitart Tank Permits have been acquired"** *(sic)*. On the same page he answered **"No"** to whether the project has a relationship to a larger project or series of projects, and certified the form on **August 27, 2025**. The applicant's own August 2025 Cemetery Plan says the opposite — that a well permit "**is applied for**." No permit number, issue date, copy, plot plan, or driller's report appears anywhere in the packet. **Tab D, in full; summarized at Tab A §§ 3.1E, 5.6.**

The plot plan shows no project. The sole plot plan in the April 24, 2026 package is the 2022 drawing with the project erased, captioned "EXISTING PLOT MAP." It depicts no grave blocks, no building, no parking, no restrooms, no internal road, and no delineation of the 1.7-acre burial area, although the County's form requires a plot plan "showing location of request." The application was deemed complete on that record. A project description that is not "accurate, stable and finite" cannot support any environmental finding (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193). **Tab A § 3.1D.**

---

5. Procedural defects in the record itself

The County advanced a layout it had already determined would change. On June 11, 2026 the Committee advanced the project, the Initial Study, and the proposed Mitigated Negative Declaration while stating that the site plan does not comply with County Code § 15.30 and that "everything just needs to be shifted south," and then stated after the vote that the hearing would not be scheduled until a revised site plan was received. The environmental document analyzes a layout the County has already said will not be built. **Tab A § 6A.4.**

A declared technical objection was reversed without the step the County ordered. The General Plan (MRZ) inconsistency was declared a Committee "technical objection" on June 1, 2023 and the applicant was directed to file a **General Plan Amendment**. No amendment was ever filed. The objection was reversed on September 18, 2025 by a speaker who stated "I'm not an engineer" in the same sentence, on the strength of a geotechnical report that cannot answer a land-use consistency question. **Tab A § 6A.3.**

Deferral was identified by staff and then not applied. Staff articulated the correct anti-deferral standard in this very proceeding and did not apply it. Deferred formulation of mitigation is prohibited by **CEQA Guidelines § 15126.4(a)(1)(B)**, whose three-part exception is conjunctive and is not satisfied here. *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296 holds that a study conducted after approval "will inevitably have a diminished influence on decisionmaking," and that an agency "should not be allowed to hide behind its own failure to gather relevant data." **Tab A §§ 6A.5, 9(4); Tab D § 7.**

There is no written record of six proceedings. All six Technical Advisory Committee meetings on this parcel have been transcribed from the County's published audio because the County has confirmed that **no written minutes exist** — the recordings are the sole record. Three written documents the County committed on the record to produce cannot be located in the file. This is a records-adequacy question, it rests on the *County of Inyo* "accurate, stable and finite" principle and on the County's own recordkeeping statements rather than on CEQA, and it is presented separately for that reason. **Tab E, in full.**

The County's own completeness standard has not been applied consistently. The County twice found *this* application incomplete for want of a to-scale grading and drainage plan, an engineered septic design sized to maximum visitation, and verified water supply. It now advances the project on a record still missing that information. This is the same completeness and CEQA rigor the County successfully defended in *Old Golden Oaks LLC v. County of Amador* (2025) 111 Cal.App.5th 794. The request is simply that this project be held to the standard the County applies to others and previously applied to this project. **Tab A § 4A.**

---

6. An independent, non-CEQA ground

Amador County Code § 19.56.040 requires the Planning Commission to find affirmatively that the use "**will not** … be detrimental to the health, safety, peace, morals, comfort and general welfare of persons residing or working in the neighborhood." That finding is a precondition to approval, and the present record does not support it.

The same section provides that where the use "may cause injury or damage beyond normal wear and tear to any county road," the Commission "**shall require**" a finalized agreement between the applicant and the Board of Supervisors, and "**No use permit which requires the formation of an agreement … shall be effective until said agreement has been finalized.**" On the documented condition of Carbondale, Lambert, Forest Home, and Maxwell Roads, that provision is triggered. **Tab A § 1.1.**

---

7. Requested action

It is respectfully requested that the County:

1. **Decline to adopt the Mitigated Negative Declaration.**

2. **Require preparation of an Environmental Impact Report** addressing the whole of the action, including the reasonably foreseeable build-out of the parcel and the true multi-body interment capacity.
3. **In the alternative, at minimum, continue the item** and direct staff to obtain, before any further action:
    a. a current will-serve determination from the Amador Water Agency;
    b. a fire-flow and emergency-access determination from the Fire District and CAL FIRE;
    c. a Public Works determination on commercial entrance standards at both access points;
    d. a referral to the Airport Land Use Commission; and
    e. a project-level traffic and Vehicle Miles Traveled analysis.
4. **Place this package and all attachments in the administrative record** for UP-22;2-3 and transmit them to the Planning Commission in the agenda packet.

The alternative in item 3 is not offered as a concession. Each of those five items is a document the County does not presently have, and each bears directly on a finding the County must make.

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association. Client documents cited "(provided by client; on file)." Quotations from Technical Advisory Committee proceedings are drawn from machine transcriptions of the County's published meeting audio; the County has confirmed that no written minutes exist. Verify each quotation against the recording at the timestamp cited in the supporting tab before entering it into the administrative record.

CEQA Initial Study Conformity & Adequacy Analysis

Gardens of Noor Cemetery — Use Permit UP-22;2-3 (APN 001-220-013)

Amador County, California

August 13, 2026

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association.

Submitted for entry into the administrative record for Use Permit UP-22;2-3. This revision supersedes all prior drafts of this analysis, which should not be cited.

Executive Summary

This analysis compares the applicant's **Application for Project Approval** (Cemetery Plan and supporting attachments) against the Amador County Planning Department's **CEQA Initial Study (IS)** and proposed **Mitigated Negative Declaration (MND)**, and evaluates whether the IS adequately identified and mitigated the project's potential impacts. It gives close attention to the **transportation/traffic** element, as requested, and then addresses four site-specific physical conditions the IS did not meaningfully analyze: **floodplain/annual flooding, groundwater contamination from shallow green (shroud) burials, uncontrolled feral pig populations, and the absence of adequate domestic and fire-suppression water.** The project also does not fit the surrounding rural, low-density character (a destination-scale commercial operation in an area served by minimal infrastructure), and it compounds and restricts emergency-vehicle response capabilities on the sole access corridor.

Bottom-line conclusions:

1. **The traffic analysis is not substantial evidence.** The IS performed no quantified trip-generation or Vehicle Miles Traveled (VMT) calculation. It relied on a bare "qualitative" narrative and the applicant's internally contradictory figures (60 funerals/month at up to 50 attendees each, yet only "20 vehicles per day"). Even the County's *own* operational cap yields roughly **2,400–3,000 one-way vehicle trips per month** and **80–100 trips on a two-funeral day** — at or above the state screening threshold — and realistic attendance at a large, multi-county destination facility drives that figure well into the thousands, plausibly **up to ~18,000–24,000 trips per month** under the scenario ranges below (§2.3). A "less than significant with mitigation" finding on this record is not supported. Separately, the transportation chapter applies the **pre-2019** checklist items for level of service and congestion management, and rests its "less than significant with mitigation" conclusion on preventing "a significant reduction to the existing level of service" — an effect that Public Resources Code § 21099(b)(2) and CEQA Guidelines § 15064.3(a) direct **shall not** be treated as a significant environmental impact. The operative vehicle-miles-traveled criterion, appended as item (g), was marked **"No Impact"** (§ 2.1A). Separately, the IS also **never**

analyzed the distinct physical-*safety* question the transportation checklist requires — whether the added traffic would "substantially increase hazards due to a design feature" or cause "inadequate emergency access" — the transportation checklist items reproduced in the Initial Study itself. The sole access roads carry a **documented record of fatal collisions** (Irish Hill/Carbondale, Mar. 2023; SR-16, Jan. 2026; SR-104, July 2026), and the County's *own* 2024 Regional Transportation Plan describes these roads as narrow, sight-limited, and safety-deficient and flags the SR-104/Michigan Bar segment for safety spending — substantial evidence supporting a fair argument the safety question needed study, which the IS's one-sentence VMT rationale never addressed (§ 2.7).

2. **The mitigation is legally and practically unenforceable in perpetuity.** The traffic "mitigation" is a driveway encroachment permit plus an undefined traffic-mitigation fee. The 50-attendee / 2-funeral-per-day operational cap that the *entire* impact analysis depends on has no monitoring mechanism, no metering, and no enforcement trigger. If exceeded — even tenfold — the County has committed to nothing that would restore the assumed conditions. **The County's own subsequently issued Mitigation Monitoring and Reporting Program (MMRP) confirms this defect rather than curing it:** of 31 numbered conditions, Code Enforcement is named as a monitor zero times, and not one condition establishes ongoing monitoring of funeral attendance, vehicle counts, or cumulative interments (§2.5A).

3. **The Application and the Initial Study do not conform on the most impact-relevant facts** — burial method (casket + concrete liner vs. shrouded green burial at 18 inches), fenced burial area (1.2 acres vs. 7.3 acres), water source (public line vs. new well), and event intensity. A CEQA document must analyze the project actually proposed; the IS analyzes a smaller, milder project than the Application describes.

4. **Four physical conditions were dismissed without site-specific evidence**: documented annual flooding and shallow, fracture-fed groundwater (the applicant's own geotechnical report found groundwater "actively seeping" and "pooling"); shallow unembalmed burials over that groundwater; an uncontrolled feral-pig population capable of rooting to ~1 meter (deeper than the 18-inch minimum burial depth); and the lack of any proven domestic or fire-suppression water supply.

5. **The project has been unlawfully "piecemealed."** This is the applicant's *fourth* cemetery application overall and the *third on this same ~46-acre Amador parcel* (2022, 2025, 2026); the first (2016) was a companion ~44,000-grave proposal in Sacramento County (see §3.1). The prior Amador filings proposed dramatically larger scope — up to **50,000 burial sites and a 20,000 sq-ft assembly building**. The 2026 application slashes the *stated* scope to 1,832 plots while retaining the *same acreage*. At the applicant's own 60-funerals/month pace, the stated project fills in **~2.5 years**, leaving ~85–97% of the parcel undeveloped — strong evidence that further expansion is a **reasonably foreseeable consequence** of this approval. CEQA prohibits "chopping up" a project to evade review of the whole. Moreover, because **each plot holds up to three bodies**, the true interment capacity of the *stated* project alone is **~5,496 bodies, not 1,832** — roughly tripling the operational life, traffic, groundwater-contamination exposure, and other impacts the IS should have analyzed. **The applicant has now certified in writing that a component of the project was already permitted before any environmental review occurred.** On the Environmental Information

Form submitted with the September 18, 2025 referral packet, in answer to the printed question asking the applicant to "[l]ist and describe any other related permits and other public approvals required for this project," the applicant wrote: **"well Permit and Sanitart Tank Permits have been acquired"** *(sic; applicant's spelling)*. On the same form the applicant answered **"No"** to the printed question whether the project "ha[s] a relationship to a larger project or series of projects," and certified the whole under penalty of accuracy on **August 27, 2025**. A companion memorandum submitted with this analysis develops the point in full: *Prior Permit Acquisition and Project Segmentation — UP-22;2-3* (August 13, 2026). See also § 3.1E below.

6. **Two additional, entirely code-based grounds independently constrain approval.** First, **Amador County Code § 19.56.040** requires the Planning Commission to affirmatively find the use "will not … be detrimental to the health, safety … and general welfare" of the neighborhood — a finding the present record does not support — and, because the use may injure county roads, it **"shall require"** a finalized applicant/Board-of-Supervisors **road agreement** before any permit is effective (§1.1). Second, the parcel sits **within ~½ mile of the private Eagle's Nest airstrip**, raising a **FAA 14 CFR § 91.119(b)** open-air-assembly conflict and **Education Code § 17215 / PUC §§ 21670–21675** airport-compatibility concerns the IS never analyzed (§6.14). A **400-gallon-per-day** Amador Water Agency supply cap and the low-percolation **Ione clay** soils further undercut the water-and-sewage feasibility the IS defers (§5.4, §6.6).

7. **New documentary evidence shows the application misstates baseline conditions and omits mandatory fire-access design — and the record now supports an EIR under CEQA Guidelines § 15064.** The applicant's own environmental questionnaire (application p. 26, signed 08/27/2025) answers **"NO" to all twelve environmental questions**, when at least seven should be "YES"; the project **plot plan depicts only ~20% oak coverage where the site actually carries ~70%**; and a **comparative aerial documents that the upper ~15 acres (~25% of the parcel) were already cleared and regraded without permits** before any CEQA review (§6.11, §6.14). The Initial Study also never analyzes the project against **mandatory Cal Fire / California Fire Code on-site fire-apparatus-access standards** (≥20-ft width; 13'6" vertical clearance for a private-entrance driveway, but 26 ft where a commercial two-lane road entrance applies; ≥75,000-lb load capacity; ≤20% grade; and compliant dead-end turnarounds), which will force additional grading, oak removal, and paving beyond the plot plan (§6.12a). An independent estimate puts road reconstruction at **~$6–13 million per mile** — bracketing and exceeding the community's ~$84 million figure and calling the feasibility of road mitigation into question (§6.13). Under **CEQA Guidelines § 15064**, significance "may be significant in a rural area," bare threshold compliance does not defeat contrary substantial evidence, and a fair argument "**shall**" trigger a draft EIR (§7).

8. **The County has not applied its own completeness standards or CEQA's standard of care consistently.** The County twice found *this* application **incomplete** for want of substantive environmental information — a to-scale grading/drainage site plan, an engineered septic design sized to maximum visitation, and verified water supply (Sept. 29, 2025 deficiency letter; Aug. 5, 2022 requirements; Dec. 21, 2022 Planning Director determination) — yet now advances the project on a Mitigated Negative Declaration built on a record still missing that information (§4A). This is the same completeness-and-CEQA rigor

the County successfully defended in court against a housing applicant in *Old Golden Oaks LLC v. County of Amador* (2025) 111 Cal.App.5th 794. The **neutral, equal-treatment** point is that the County should hold this project to the same completeness rules and CEQA standard of care it applies to others and previously applied to this very project — evaluated on a complete record before any approval (§4A).

9. **The County's own hearing record — now fully transcribed — supplies direct evidence on the contested questions, and contains two defects that are independently sufficient to defeat approval.** All six Technical Advisory Committee (TAC) proceedings on this parcel have been transcribed from the County's published audio (March 3, 2022; August 4, 2022; June 1, 2023; September 18, 2025; May 7, 2026; June 11, 2026); the County has confirmed that **no written TAC minutes exist**, so the recordings are the sole record. That record establishes, in the County's and the applicant's own words: (a) the applicant stated on September 18, 2025 that he intends to **"be applying in six months for another addition"** and would **"proceed with more proposals later on"** — removing the piecemealing question from the realm of speculation (§6A.1); (b) staff invoked a future use-permit amendment **six times in one hour** on June 11, 2026 as the answer to every question about the project's limits (§6A.2); (c) the **General Plan (MRZ) inconsistency was declared a TAC "technical objection"** on June 1, 2023 and the applicant was **directed to file a General Plan Amendment — no amendment was ever filed**, and the objection was reversed on September 18, 2025 by a speaker who stated **"I'm not an engineer"** in the same sentence, on the strength of a geotechnical report that cannot answer a land-use-consistency question (§6A.3); and (d) on June 11, 2026 the committee advanced the project, the Initial Study, and the proposed MND **while stating that the site plan does not comply with County Code § 15.30 and that "everything just needs to be shifted south"** — then stated, after the vote, that the hearing would not be scheduled "until we have a revised site plan" and the conditions were amended (§6A.4). The environmental document therefore analyzes a layout the County has already determined will not be built, and rests on a General Plan finding the County itself once refused to make.

10. **The applicant's own site plans label the project in two stages — and the current application is Stage 1.** The engineering plot sheets submitted with the 2022 application for this same permit number and this same parcel are annotated, in the applicant's own hand, "**STAGE 1 PROPOSED GRAVE SITES**," "**STAGE 1 PROPOSED 20' WIDE**" (the internal road), "**STAGE 2 PROPOSED 10,000 SQFT BUILDING 30 FT HIGH WITH OCCUPANCY OF 1200 PEOPLE**," and "**STAGE 2 ROAD**." The 2026 project — grave sites plus an internal access road, no structure — is Stage 1 of the applicant's own two-stage plan. The applicant nevertheless certified **"No"** to the County's Environmental Information Form question whether the project "ha[s] a relationship to a larger project or series of projects" on **July 8, 2022** (in the very package containing those drawings) and again on **August 27, 2025**. This converts the piecemealing issue from an inference about intent into a documentary contradiction, and it triggers **CEQA Guidelines § 15165**, which requires a single environmental document for the **ultimate** project where "a phased project is[] to be undertaken," and requires the document to "address itself to the scope of the larger project" where the first phase "is a necessary precedent for action on a larger project." The same 2022 package also marks **two** use categories on the County's use-permit form — the

boxes printed “Cemetery” and “Church” *(the County form’s own labels, quoted as written)* — and carries a plot map whose title block reads “**PROPOSED ZONE CHANGE FOR CEMETERY**.” See §§ 3.1A, 3.6A.

11. **The permitted capacity is exhausted in about two and a half years, while the applicant’s own plan states a one-hundred-year design life — and the density being permitted, extended across the parcel, reproduces the 2022 figure of 50,000 graves almost exactly.** At the applicant’s own stated rate of 60 funeral events per month (720 per year), the 1,832 permitted grave sites are filled in **2.5 years** at one interment per grave, **5.1 years** at the Cemetery Plan’s own two-caskets-per-grave allowance, and **7.6 years** at three interments per grave. Yet the Cemetery Plan states its purpose is “to illustrate development of the Gardens of Noor Cemetery over a **100-year timeframe**” and that “**[a]t full build-out**, the cemetery will have gravesites enough to serve the anticipated needs of [the] community **for the next 100 years**.” One hundred years at 720 interments per year is **72,000 interments**. Separately, 1,832 graves on the permitted 1.7 acres is a density of about 1,078 graves per acre; applied to the 46-acre parcel that density yields **≈ 49,572 graves** — within about one percent of the “50,000 gravesites at the maximum build-out in 2122” the County itself circulated in 2022. The current application is therefore not a smaller project; it is arithmetically the first phase of the same one. See § 3.1B.

12. **The 2022 package stated an occupant load of 1,200 and described parking that the Fire Code prohibits.** The applicant’s own sheets state “OCCUPANCY OF 1200” and “PARKING IS ALONGSIDE 20 FT X 2,000 FT GRAVEL ROAD” beside an internal road he labeled “STAGE 1 PROPOSED 20' WIDE.” An occupant load of 1,200 generates 343 to 600 arriving vehicles; the County circulated “parking for up to 100 cars.” And on a 20-foot fire-apparatus access road, roadside parking is barred outright — CFC § 503.2.1 requires 20 feet “exclusive of shoulders” and § 503.4 forbids obstruction “including the parking of vehicles,” with regional fire-district standards permitting no parking on either side of a roadway narrower than 28 feet. **No reviewing agency was ever told the occupant load:** the County’s July 21, 2022 cover sheet described a “3,000 sq. ft. worship building” and omitted occupancy entirely, and the only agency that quantified anything deferred the assembly use to “a traffic mitigation fee … at the time of building permit application.” See § 3.1C.

13. **The sole plot plan in the April 24, 2026 package is the 2022 plot map with the project erased, and it is captioned “EXISTING PLOT MAP.”** It is demonstrably the same drawing — identical parcel outline, road geometry, north arrow, “EXISTING LANDSCAPE” callout, tree symbols, and 316/700/527-foot interior dimensions — with the proposed building, the “INSIDE RD AND PARKING PLACE” label, and the “PROPOSED ZONE CHANGE FOR CEMETERY” title removed, and the perimeter dimensions conformed to the 2022 **Stage 2** engineering sheets. It shows **no** grave blocks, no building, no 64-space lot, no restrooms, no internal road, and no delineation of the 1.7-acre burial area, although the County’s form requires a plot plan “showing location of request.” The County deemed the application **complete on May 7, 2026** on that record and recommended the environmental document on **June 11, 2026**. Meanwhile the figures that generate the impacts — 60 funerals per month, the 100-year horizon, the 46-acre parcel, and the “No” answer to Environmental Information Form item 28 — are **unchanged** from 2022. The scope representations shrank; the program did not. See § 3.1D.

Individually and cumulatively, these support the position that one or more **potentially significant impacts** exist, which under CEQA requires either enforceable mitigation supported by substantial evidence or preparation of an **Environmental Impact Report (EIR)** — not a Mitigated Negative Declaration. Independently of CEQA, the County **cannot make the § 19.56.040 findings** required to grant the use permit on this record.

---

1. The Governing Documents and What Each One Says

Document	Key operational assumptions
Application / Cemetery Plan (Kaddoura, Mar. 30, 2026)	1,832 graves in 7 blocks over a 100-year build-out; 64 permanent parking spaces + driveway parking for up to 100 cars; **50 attendees per event; ~60 funeral events per month**; "an increase of an average of **20 vehicles per day**"; connected to Amador Water Agency water *and* a well permit applied for; sewage via engineered septic.
County Staff Transmittal (Ruesel, May 27, 2026)	"Proposed number of funerals is **60 funerals a month with a limit of 50 attendees per event**."
CEQA Initial Study (June 2026)	Operational cap treated as **"50 attendees per funeral event with a maximum of two per day"** (≈100 people/day). Every impact area concluded "No Impact," "Less Than Significant," or "Less Than Significant with Mitigation Incorporated." Determination: **Mitigated Negative Declaration.**
Community "Examination" (Wardall, Preskar, Wirfel, Woodhouse, June 2026)	Contends the IS is built on incorrect assumptions and understated numbers; estimates ~225 attendees / ~150 vehicles → ~18,000 vehicle trips/month; argues multiple impacts "cannot be mitigated" and an EIR is required.

The internal inconsistency is immediate and material: **60 funerals/month at 50 attendees each cannot be served by "20 vehicles per day."** Sixty funerals per month is roughly two funerals per day; 50 attendees at any plausible vehicle-occupancy rate is 17–25 vehicles *per funeral*, not per day. The Application's own traffic line understates the Application's own event program by an order of magnitude, and the Initial Study adopted the low framing without reconciling it.

1.1 The governing approval standard — Amador County Code § 19.56.040

The CEQA determination does not stand alone. Any use permit for this project must satisfy the **mandatory findings** of **Amador County Code § 19.56.040 ("Action by planning commission")**,

which sets a substantive, neutral land-use standard the Planning Commission must affirmatively find is met:

> "In order to grant any use permit, the findings of the planning commission shall be that the establishment, maintenance or operation of the use or building applied for **will not** under the circumstances of the particular case be **detrimental to the health, safety, peace, morals, comfort and general welfare of persons residing or working in the neighborhood** of such proposed use or be **detrimental or injurious to property and improvements in the neighborhood** or to the general welfare of the county ..." (Amador County Code § 19.56.040; Ord. 537 §1, 1975; Ord. 351 §14.3, 1962).

Two features of this ordinance are decisive for this project:

- **The findings are a precondition to approval, not a formality.** The Commission must be able to make an affirmative, evidence-supported finding that the use "**will not**" be detrimental to neighborhood health, safety, peace, comfort, and welfare, or injurious to neighboring property. Where the CEQA record contains unrebutted evidence of significant traffic-safety, water-supply, wastewater, wildfire, and biological impacts (see §§2–5), the County cannot make that "will not be detrimental" finding on substantial evidence — and a use permit issued without it is vulnerable. This is a **neutral, code-based hook** that does not depend on the identity or nature of the applicant or the use.
- **The mandatory county-road agreement.** Section 19.56.040 further provides that **if** the Commission finds the proposed use "**may cause injury or damage beyond normal wear and tear to any county road, or may impair the public's use thereof, or may endanger persons or property on or adjacent to any county road,**" the Commission **"shall require as a condition to the issuance of any use permit that the applicant and the board of supervisors enter into an agreement"** restricting road use as necessary to protect the roads, requiring the applicant to pay for road injury/damage and any special maintenance or improvements, and — critically — **"No use permit which requires the formation of an agreement ... shall be effective until said agreement has been finalized."** Given the documented condition of Carbondale, Lambert, Forest Home, and Maxwell Roads and the funeral-procession traffic at issue (see §2 and §6.13), this provision is squarely triggered: any approval must be conditioned on a finalized Board-of-Supervisors road agreement, and the permit cannot take effect until that agreement exists. This dovetails with the CEQA road-improvement mitigation (County Standard PW-7) discussed below.

Bottom line: § 19.56.040 gives the County an independent, non-CEQA basis to deny or heavily condition the permit, and it converts the roads evidence into a **mandatory** ("shall require") condition rather than a discretionary one. Every neutral impact documented in this analysis should be tied back to the "will not be detrimental" finding the Commission is legally required to make.

---

2. Transportation / Traffic — Detailed Adequacy Review

2.1 What the Initial Study actually did

The IS Transportation chapter (pp. 49–51) checks boxes "a" and "b" in the **"Less Than Significant Impact"** column, while the discussion of those same two items concludes there "would be a less than significant with mitigations incorporated" and imposes Mitigation Measure TRA-1 (that discrepancy is taken up at § 2.1A). Its entire quantitative basis is the following reasoning:

> "Based on the qualitative analysis of the project as proposed, cemetery use is not a particularly significant use when evaluating for Vehicle Miles Traveled (VMT) based on the infrequency of visitation for particular individuals to these sites."

That is the whole of the VMT analysis. There is: - **No trip-generation estimate** (no daily, peak-hour, peak-day, or monthly trips); - **No VMT calculation** and no comparison to any adopted threshold; - **No count of funeral processions**, procession length, or funeral-day peaking; - **No analysis of the receiving roads' physical capacity** (lane width, shoulders, pavement condition, one-lane segments, gravel segments); and - **No cumulative or "whole of the action" analysis**, which CEQA Guidelines §15063 expressly requires (on-site + off-site, project + cumulative, direct + indirect).

The mitigation (TRA-1) is a **driveway encroachment permit** and a **traffic-mitigation fee "as determined adequate" by Public Works** — neither of which is quantified or tied to any performance standard. TRA-3 adds a routing restriction (avoid Maxwell Rd., Claypit Rd., Mustang Alley) enforced only by "THE PLANNING DEPARTMENT SHALL MONITOR THIS CONDITION."

2.1A The checklist entries and the chapter's own discussion state two different conclusions, and the operative criterion was answered "No Impact"

The Initial Study's transportation checklist is not the current CEQA Guidelines Appendix G form. It reproduces the **pre-2019** transportation items (a) through (f) — including the level-of-service and congestion-management criteria the 2019 amendments removed — and appends the **post-2019** vehicle-miles-traveled criterion as item (g). The chapter's own source line cites "California Environmental Quality Act (CEQA) Guidelines 2019" (IS p. 51).

The entries as marked (IS p. 49). The columns are legible in the County's document. Each row is marked as follows:

Checklist item	Column marked
a) Conflict with an applicable plan, ordinance or policy establishing measure of effectiveness for the performance of the circulation system …	**Less Than Significant Impact**
b) Conflict with an applicable congestion management program, including … level of service standards and travel demand measures …	**Less Than Significant Impact**
c) Result in a change in air traffic patterns …	Less Than Significant Impact

Checklist item	Column marked
d) Substantially increase hazards due to a design feature … or incompatible uses …	**Less Than Significant Impact with Mitigation Incorporated**
e) Result in inadequate emergency access?	**Less Than Significant Impact with Mitigation Incorporated**
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities …	No Impact
g) Conflict with or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	**No Impact**

First: the table and the text disagree on items (a) and (b). The boxes for (a) and (b) are marked "Less Than Significant Impact" — the column that signifies no mitigation is required. The discussion for those same two items concludes the opposite:

> "The proposed project would potentially introduce a substantial increase in traffic if the facility at maximum operational capacity. **Mitigation Measure TRA-1** includes the payment of a Traffic Mitigation Fee to the County Public Works Department and improvement/introduction of an adequate commercial encroachment to address the potential uses would prevent a significant reduction to the existing level of service, and address potential congestion at the intersection of Lambert and Carbondale Rd. … There would be **a less than significant with mitigations incorporated**." (IS p. 49, items A&B.)

The document therefore says, on a single page, both that the traffic effect is less than significant without mitigation and that it is less than significant only with mitigation incorporated. Those are different findings with different legal consequences. The "with mitigation incorporated" column is the entry that obliges the lead agency to adopt the measure, incorporate it into a mitigation monitoring and reporting program, and make it enforceable; the "less than significant" column carries no such obligation. The checklist as marked does not support imposing TRA-1, and the discussion as written does not support the box that was checked. The County should state which conclusion it intends.

Second: the effect the chapter identifies is one CEQA directs shall not be treated as significant. The A&B discussion grounds its conclusion on preventing "a significant reduction to the existing level of service" and addressing "potential congestion at the intersection of Lambert and Carbondale Rd." Public Resources Code § 21099(b)(2) provides that, upon certification of the implementing guidelines, "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any." Nothing in the record identifies this location as such an exception. CEQA Guidelines § 15064.3(a) states a parallel rule: "Except as provided in subdivision (b)(2) below (regarding roadway capacity), a project's effect on automobile delay shall not constitute a significant environmental impact." That section "shall apply statewide" beginning July 1, 2020 (§ 15064.3(c)).

Nothing prevents the County from treating a general plan level-of-service policy as a plan-consistency question. But the chapter does not do that. It treats reduction in level of service and intersection congestion as *the transportation effect that mitigation is needed to prevent* — which is the use § 21099(b)(2) and § 15064.3(a) foreclose.

Third: the criterion CEQA does make operative was answered "No Impact." Item (g) is checked in the No Impact column, and the discussion concludes: "There is **no impact** to the implementation of this project with respects to CEQA Guidelines §15064.3(b)." The basis given is that "cemetery use is not a particularly significant use when evaluating for Vehicle Miles Traveled (VMT) based on the infrequency of visitation for particular individuals to these sites."

Section 15064.3(b)(1) provides that "[v]ehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact." The chapter identifies no threshold, performs no trip generation, and calculates no vehicle miles traveled. It invokes the Guidelines' qualitative-analysis allowance, which permits a qualitative treatment where "existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered," but it does not state that models or methods are unavailable — only that a rural setting makes qualitative treatment "more feasible." And the reasoning offered addresses how often a given individual visits a cemetery. Vehicle miles traveled is a measure of the amount and distance of automobile travel attributable to the project, not the frequency with which any one person makes a trip. On the application's own program — 60 funeral events per month, 50 attendees per event, a service area the applicant describes as "Amador County, Sacramento County, Placer County and surrounding areas" — the trip volumes set out in § 2.3 below are what the criterion asks about, and they are nowhere in the chapter.

Fourth: the two safety criteria were marked as requiring mitigation, and the mitigation adopted does not reach the roads at issue. Items (d) and (e) survive in identical substance in both the pre-2019 and current forms of Appendix G, so no checklist-edition question affects them. Both are marked "Less Than Significant Impact with Mitigation Incorporated" — meaning the County affirmatively found that, without mitigation, hazards from a design feature and inadequate emergency access could be significant. The measures adopted are:

> "**TRA-1** The property must maintain a primary access onto a County road and obtain all necessary encroachment permits (Chapter 12.10) and grading permits (Chapter 15.40) required for the proposed uses, as regulated by the Amador County Department of Transportation and Public Works (Mitigation Measure HYD-1). Additionally, the proposed project would require the payment of a traffic mitigation fee as determined adequate by the Transportation and Public Works Department **to offset road maintenance costs** of improvements relative to the property's increased use through this project."
>
> "**TRA-2** The proposed project must comply with the Fire and Life Safety Ordinance (Chapter 15.30). The applicant will be required to have all roads, gates and access ways **on the property** meet 15.30 standards and any future buildings will require a fire water supply." (IS p. 50.)

TRA-1 reaches the driveway encroachment and the grading permit, and its fee is described by its own terms as offsetting *road maintenance costs* rather than mitigating an environmental effect. TRA-2 reaches roads, gates, and access ways **on the property**. Neither measure reaches

Carbondale, Lambert, Forest Home, or Maxwell Roads — the receiving roads on which the design-feature hazard and the emergency-access question actually arise, and whose documented condition is set out at §§ 2.4 and 2.7 below. A mitigation measure confined to the parcel boundary cannot support a finding that off-site hazards and off-site emergency access have been reduced to less than significant.

What the record needs. The County should reconcile the checklist entries for items (a) and (b) with the discussion of those items and state which finding it adopts; should identify the threshold of significance, if any, against which item (g) was evaluated, and state whether models or methods for estimating vehicle miles traveled were unavailable within the meaning of § 15064.3(b)(3); and should identify what evidence supports reducing the item (d) and (e) impacts to less than significant given that TRA-1 and TRA-2 operate at the driveway and on the parcel. Sources: Pub. Resources Code § 21099 · CEQA Guidelines § 15064.3 · Appendix G (OAL-approved Dec. 28, 2018; effective Jan. 3, 2019; prospective Apr. 27, 2019) · Initial Study, ch. 17, pp. 49–51.

2.2 The VMT / trip-generation framework the IS should have used

SB 743 shifted CEQA transportation analysis from congestion ("level of service") to **Vehicle Miles Traveled (VMT)** (CEQA Guidelines §15064.3; Pub. Resources Code §21099). The Governor's Office of Planning and Research (OPR) *Technical Advisory on Evaluating Transportation Impacts in CEQA* provides the controlling recommendations most California lead agencies adopt (OPR Technical Advisory, Dec. 2018):

- **Screening threshold:** Projects generating **fewer than 110 trips per day** may generally be presumed to have a less-than-significant transportation impact (OPR Technical Advisory). Above that, a real analysis is expected.
- **Significance thresholds:** For land-use projects OPR recommends a VMT-per-capita or VMT-per-employee level **15% below the existing regional average** as the point at which impacts may be significant (OPR Technical Advisory; MTC Threshold Best Practices).
- **Cemeteries are a "special generator."** They are not one of OPR's three modeled land-use categories (residential/office/retail). For such uses OPR directs agencies to use **trip-based or tour-based estimation** or the **ITE *Trip Generation Manual***, and, if no model applies, a *documented* qualitative analysis — not a conclusory sentence. A comparable California memorial-park project quantified its impact using ITE acreage-based rates and found roughly **100–108 one-way daily trips** (Monte Vista Memorial Gardens Focused Traffic Study, Alameda County) — already near the 110-trip screening line for a *routine*, locally-serving cemetery, before accounting for this project's much larger, multi-county service radius and correspondingly larger per-event attendance.

The IS invoked the *label* "qualitative analysis" from §15064.3(b) but did none of the substantive work that a defensible qualitative analysis requires (transit availability, proximity to destinations, documented trip characteristics). Reciting the guideline is not the same as satisfying it.

2.3 Trip generation the record actually supports

The Application itself discloses that this is not a local-serving facility: the Application states that the cemetery is intended to provide a burial place serving **"Amador County, Sacramento County, Placer County and surrounding areas"** — a multi-county service radius far larger than a routine neighborhood cemetery. Destination-scale facilities that draw attendees from a wide multi-county radius routinely produce (a) larger single-event attendance than a purely local facility, because the eligible population is regional rather than local, and (b) **lower average vehicle occupancy** than local trips, because attendees travel individually or in small family groups over long distances rather than carpooling from a single nearby neighborhood. Both effects push realistic trip generation well above the applicant's "20 vehicles/day" figure.

Using the *County's own* event program (60 funerals/month), the following one-way vehicle-trip estimates result. (Round trip = 2 one-way trips; typical local funeral vehicle occupancy 2.0–2.5 persons, falling toward 1.5 for a regional, long-distance-travel facility.)

Scenario	Attendees /event	Persons/ vehicle	Vehicles/ funeral	One-way trips/funeral	Avg trips/day	Trips/ month	Peak (2-funeral) day
Applicant's stated figure	—	—	~10	~20	~20	~600	—
County cap (low occ.)	50	2.0	25	50	**100**	**3,000**	**100**
County cap (high occ.)	50	2.5	20	40	80	2,400	80
Mid	150	2.5	60	120	240	7,200	240
Mid-high (community est.)	225	2.5	90	180	360	10,800	360
Mid-high, regional/long-distance occupancy (community est.)	225	1.5	150	300	600	**18,000**	600
High	300	2.5	120	240	480	14,400	480
Very high	500	2.5	200	400	800	24,000	800

Note: figures count only attendee round-trips; add hearse, staff, grounds crew, and maintenance/delivery traffic. The regional/long-distance-occupancy row reflects the community's

own traffic estimate (Wardall et al., Community Examination of the CEQA Initial Study, June 2026 — provided by client; on file), which applies a lower per-vehicle occupancy to reflect that attendees are traveling individually from across a multi-county radius rather than carpooling locally.

What this shows: - Even taking the County's cap at face value, the project generates **80–100 one-way trips on any two-funeral day**, which meets or exceeds OPR's **110-trip screening threshold** on peak days and sits far above the applicant's claimed "20 vehicles per day." The IS's premise that this is a *de minimis* generator is contradicted by its own operating assumptions. - The community's ~225-attendee estimate (≈10,800–18,000 trips/month depending on assumed vehicle occupancy) is squarely within the plausible range for a regional, multi-county cemetery and is **not** the outlier the IS treats it as. The applicant's "20 vehicles/day" is the true outlier. - The **baseline** is critical: the surrounding area supports roughly **20 residents within a 5–10 mile radius**, so existing traffic and existing VMT on these roads are near-zero. A project adding hundreds of peak-day trips onto roads carrying almost none represents a **very large *percentage* increase** over baseline — exactly the kind of change a VMT/impact analysis is designed to capture, and exactly what the qualitative "infrequency of visitation" narrative obscures.

2.4 Receiving-road capacity — the missing physical analysis

The IS never analyzes whether **Carbondale, Lambert, Forest Home, and Maxwell Roads** can physically carry funeral-procession traffic. On the record and on documented site conditions, these are **old (35–45 year), rutted asphalt roads, in places a single ~10-foot paved lane, in places gravel, with no shoulders and eroded, non-culverted drainage ditches.** The transportation checklist reproduced in the Initial Study requires evaluation of whether the project would "[s]ubstantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)" (checklist item d) and would "[r]esult in inadequate emergency access" (item e). (The Initial Study reproduces the pre-2019 form of the CEQA Guidelines Appendix G transportation checklist; the current form phrases the first item as "geometric design feature" and letters these items (c) and (d).) A slow funeral procession of dozens of vehicles on a one-lane rural road, meeting oncoming traffic or ranch equipment with no shoulder to pull onto, is precisely the "substantial safety hazard" and "inadequate emergency access" the checklist contemplates. The IS checked these "No Impact"/"Less Than Significant" without any capacity, sight-distance, or emergency-egress evidence.

The community identifies **specific, named improvements** the added traffic would require, none of which the IS analyzes or funds (concern #3): **reconstruction and widening** of the receiving roads to a standard capable of carrying the funeral-procession and event traffic; a **traffic signal (or equivalent sight-distance treatment) at the blind Carbondale Road / Lambert Road intersection**, where limited sight distance already presents a hazard; and a **new/upgraded bridge on Forest Home Road** adequate to carry the added load. Each of these is a physical prerequisite tied to a **substantial-safety-hazard** and **emergency-access** finding under the checklist, and each ties directly to the **mandatory county-road agreement** the Planning Commission "shall require" under § 19.56.040 before any permit becomes effective (§1.1).

2.5 The enforceability / "in perpetuity" problem

This is the analytical core of the enforceability question, and it is well-founded under CEQA law.

- **The entire "less than significant" conclusion rests on a single unenforceable assumption — the 50-attendee / 2-funeral-per-day cap.** Remove that assumption and every downstream finding (air quality, greenhouse gas, noise, traffic, emergency access) is undermined.
- **CEQA requires mitigation to be enforceable** through permit conditions, agreements, or other legally binding measures (CEQA Guidelines §15126.4(a)(2)); a lead agency may not defer the formulation of mitigation or rely on measures that are speculative or unenforceable. A numeric attendance cap with **no metering, no gate counts, no attendance logs, no reporting requirement, and no defined enforcement consequence** is not enforceable mitigation — it is an unmonitored hope.
- **"The Planning Department shall monitor this condition"** (TRA-3) is not a monitoring *program*. It identifies no metric, frequency, responsible funding source, or remedy on violation. A single large funeral — an entirely foreseeable event for a facility serving a multi-county population — would exceed the cap, and nothing in the MND/MMRP restores the analyzed condition.
- **Foreseeability matters.** CEQA analyzes the "whole of the action" including reasonably foreseeable operation. It is reasonably foreseeable that a regional, multi-county cemetery will host funerals well above 50 attendees. Analyzing only a capped scenario that the operator has every commercial and practical incentive to exceed, without an enforceable mechanism to hold that cap, is the classic **"piecemeal / understated project description"** defect.

2.5A The Mitigation Monitoring and Reporting Program confirms the gap — zero Code Enforcement, zero operational monitoring

On 6/11/26 the County issued its formal **Conditions of Approval & Mitigation Monitoring and Reporting Program (MMRP)** for this project — 31 numbered conditions across 6 pages (11 general Conditions of Approval plus 20 mitigation measures keyed to CEQA Appendix G categories). A condition-by-condition review of every "shall monitor" assignment does not cure the enforceability defect described in §2.5 above — it documents it:

Monitoring department(s) named	# of conditions	Nature of what's checked
Planning Department (sole)	12	Fees, signed conditions, detrimental-use finding, compliance/revocation clause, pre-construction surveys, noise buffers, traffic-routing signage — all one-time
Planning + Building Dept. (joint)	3	Building permit; lighting and fencing plan review (AES-1, AES-2)
Building Department (sole)	2	Grading plan (HYD-1); fire/life-safety at construction (TRA-2)
Environmental Health Dept.	3	Septic design, hazmat plan,

Monitoring department(s) named	# of conditions	Nature of what's checked
		sewage permit
Air District	1	Idling-time BMP
Fire District	1	CFD annexation/special-tax election
Transportation & Public Works	1	Encroachment permit, traffic fee
Waste Management Dept.	1	Will-serve statement
No monitor named	**7**	Days/hours of operation, remains storage, interment method, landscaping, airport easement, groundwater BMPs (HYD-2), well-quality re-eval (UTL-2)
Code Enforcement	**0**	—

(12 + 3 + 2 + 3 + 1 + 1 + 1 + 1 + 7 = 31, verified against the full text of the source document.)

Two findings stand out. **First, Code Enforcement — the County's own field-inspection and complaint-response body — is not named as a monitor in any of the 31 conditions.** Every named monitor is a permit-issuing desk or single-purpose agency whose role begins and ends at a specific paperwork or construction milestone. **Second, not one condition establishes recurring inspection, periodic reporting, or any counting mechanism for the two figures the entire MND's "less than significant" conclusion depends on:** funeral attendance/vehicle counts, and cumulative interments measured against the stated 1,832-plot capacity. This confirms, on the face of the record, that the operational cap §2.5 describes as an "unmonitored hope" is precisely that — no department, agency, or process in this MMRP would ever detect whether the cemetery hosted 500 attendees at a funeral instead of 50, or interred 50,000 bodies instead of 1,832.

The revocation backstop exists on paper but cannot be triggered. Amador County Code **§ 19.56.060 ("Revocation")** already provides a general enforcement mechanism for any use permit: written notice of alleged noncompliance, a 30-day cure period, and — if uncured — a public hearing before the Planning Commission, with appeal rights under § 19.64.040 (Amador County Code, Chapter 19.56). General Condition 4 of the MMRP ("may be subject to revocation proceedings") is almost certainly a reference to this section. But § 19.56.060's trigger — "the permittee has not substantially complied with the conditions" — can never be reached for the operational caps at issue here, because, per the table above, nothing in the MMRP produces evidence of noncompliance in the first place. A revocation mechanism sitting unused because there is no evidence-generating monitoring feeding into it is not enforceable mitigation under **CEQA Guidelines § 15126.4(a)(2)** — it is the same "unmonitored hope" problem restated with more paperwork.

What enforceable mitigation would require, at minimum: (1) a named ongoing monitor with field/complaint authority — i.e., Code Enforcement, not solely Planning — assigned specifically to

the attendance-cap and interment-cap conditions; (2) a defined metric (vehicle/attendee counts per funeral; a running interment log reconciled against the 1,832-plot / ~5,496-body true capacity, see §2.6); (3) a **monthly** written report from the *applicant* — not County staff — to Planning and Code Enforcement, subject to unannounced spot verification; and (4) a defined numeric trigger (e.g., three verified over-cap events, or verified underreporting, within a rolling 12-month period) that formally constitutes grounds for § 19.56.060 revocation proceedings, so the existing statutory clock has something to start on.

Document-quality note. Pages 2–6 of the County's MMRP document carry the running header "CONDITIONS OF APPROVAL UP-21;7-2 Lyons Commercial Storage and Residence" — an unrelated project. This indicates the document was generated from another project's template and not fully corrected before issuance, consistent with the pattern of incomplete review already documented at §4A.

2.6 Total build-out traffic is understated three-fold — each plot holds up to three bodies

A critical fact absent from the IS's framing: **each of the 1,832 grave plots can hold up to three (3) bodies.** The project's true interment capacity is therefore **up to ~5,496 bodies, not 1,832.** Because each interment is a separate funeral event with its own procession, the total operational life and cumulative traffic of even the *stated* project are roughly **three times** what a plot-count reading implies:

Metric	If 1 body/plot	If 3 bodies/plot (stated capacity)
Total interments (funeral events)	1,832	**5,496**
Years to fill at 60 funerals/month	~2.5 yrs	**~7.6 yrs**
Cumulative one-way trips (at County-cap 40–50/funeral)	~73,000–92,000	**~220,000–275,000**

The IS analyzed neither the funeral-event count nor the multi-body capacity. A transportation and air-quality/GHG analysis that silently assumes one interment per plot understates the project's lifetime trip generation by a factor of about three.

2.7 Documented roadway-safety baseline — and the Initial Study's failure to analyze physical hazard

CEQA's transportation checklist asks **two distinct questions**, not one. The first is a *vehicle-miles-traveled (VMT)* question — an efficiency/climate metric under SB 743 and CEQA Guidelines § 15064.3 (analyzed in §§ 2.1–2.3 above). The second, entirely separate, is a *physical-safety* question: whether the project would **"substantially increase hazards due to a geometric design feature (e.g., a sharp curve or dangerous intersection) or incompatible uses"** and whether it would **"result in inadequate emergency access"** (CEQA Guidelines Appendix G, Transportation checklist items (c)–(d)). **The Initial Study answered only the first question and left the second effectively blank.** On the physical-hazard item, the IS Transportation chapter marks the impact

"Less Than Significant" and offers, as its entire rationale, that "cemetery use is not a particularly significant use when evaluating for Vehicle Miles Traveled (VMT) based on the infrequency of visitation" (IS pp. 49–51). That is a VMT rationale. It does not address road geometry, sight distance, curve or intersection design, or the corridor's collision history at all. **A VMT finding is not a substitute for a roadway-safety finding**, and the record here contains substantial evidence that the safety question is a real one requiring study. (This subsection rests on *independently verified, publicly sourced* records; it complements the receiving-road capacity discussion in § 2.4, which draws in part on community and site-knowledge characterizations of road condition.)

The access corridor. The site sits at the northern fork of the Carbondale Road / Lambert Road intersection, roughly 4 miles northwest of Ione, ~3.5 miles south of State Route 16, and ~3.5 miles north of State Route 104 (project file, Amador County CEQA Report, Parts 1–2). It is reached by two routes over two-lane, undivided rural roads: from the Ione side, **SR-104 → Michigan Bar Road → Carbondale Road → site**; from the Sacramento side, **SR-16 → Carbondale Road → site. Carbondale Road is the shared spine of both routes** — all project traffic, from either direction, funnels onto it. This is the same road the Initial Study itself describes as a **"county-maintained minor collector"** (IS, Hazards discussion) — a road classification designed for low-volume local circulation, not for destination-scale event and procession traffic.

The County's own characterization of these roads. The Amador County Transportation Commission's **2024 Regional Transportation Plan** describes the county's non-state-highway network — the classification Carbondale and Michigan Bar Roads fall within — as roads that "can be narrow, curvy, have limited sight distance, and minimal shoulders" (2024 Amador County RTP). The same plan reports that the region's most frequent collision type is **"hit object"** and its leading contributing factors are **"wrong side of the road"** and **"unsafe speeds,"** and it flags the **SR-104 / Michigan Bar Road** location for future intersection-safety improvements and the broader SR-104 segment (Michigan Bar to Foothill Blvd) for a multi-million-dollar improvement program. It also notes Amador's local-road pavement conditions have ranked among the **worst-rated in the state** (2024 Amador County RTP). In short, **the County's own transportation planning documents identify this corridor's roads as narrow, curving, sight-limited, and already targeted for safety spending.** That is the baseline against which the project's added traffic must be measured — and the Initial Study measures it against nothing.

Documented fatal collisions on the corridor. Independent, publicly reported records confirm at least **three fatal collisions on the corridor's roads within roughly the last three years**, each reflecting exactly the physical hazards the County's own RTP identifies (run-off-road/"hit object," crossing to the wrong side, and reduced visibility):

Date	Location on corridor	Outcome	Reported cause	Source
March 2, 2023	**Irish Hill Road at/near its junction with Carbondale Road**, unincorporated Amador County	**3 killed** — a driver (40) and his two sons, ages 7 and 5	Single vehicle lost control at high speed, left the roadway, and struck a large roadside oak tree; alcohol not	Ledger Dispatch; KCRA coverage

Date	Location on corridor	Outcome	Reported cause	Source
			a factor per CHP	
January 24, 2026	**State Route 16, east of Carbondale Road** (Sacramento-side access route)	**1 killed** — a 1-year-old passenger; two drivers hospitalized	Heavy fog; a vehicle was struck by an oncoming vehicle; alcohol/drugs not believed a factor per CHP	myMotherLode.com
July 22, 2026	**State Route 104, north of Five Mile Drive, west of Ione** (Ione-side access route)	**1 killed**; a 3-year-old passenger and two other drivers hospitalized	A vehicle crossed into the oncoming lane, sideswiped one vehicle, and struck another head-on; cause under CHP investigation	CBS Sacramento; CHP Fatal Accident Feed

These incidents are cited **precisely by location** — two are on the state-highway approaches (SR-16 and SR-104) that feed the corridor, and one is at the Irish Hill/Carbondale junction on the corridor itself. They are offered not for their individual tragedy but as **verified evidence that the physical hazards the County's own RTP describes are real and recurring on these specific roads** — the "hit object," "wrong side of the road," and reduced-visibility failure modes are not hypothetical here; they have produced fatalities within the immediate access network.

Why this is a fair-argument gap, not a matter of degree. Under the **fair-argument standard** (CEQA Guidelines § 15064(f)), if substantial evidence in the record supports a *fair argument* that a project may have a significant effect, the lead agency must prepare an EIR — even if other evidence supports a contrary conclusion. A documented multi-year record of fatal collisions on the exact access roads, on a network the County itself calls narrow, sight-limited, and safety-deficient, is substantial evidence supporting a fair argument that adding destination-scale event and procession traffic may **"substantially increase hazards due to a design feature"** and may **"result in inadequate emergency access."** The Initial Study's one-sentence VMT rationale does not engage this evidence at all — and under the fair-argument standard, an agency cannot discharge its duty by simply not analyzing the question.

The project's own routing condition is an implicit admission. The Initial Study's mitigation **TRA-3** directs that guests be required to avoid Maxwell Road, Claypit Road, and Mustang Alley and to route all access via Carbondale Road (IS p. 51). A condition that *restricts which roads the traffic may use* is a tacit acknowledgment that portions of the surrounding network are **not adequate** to absorb the project's traffic — yet the IS pairs that admission with a "less than significant" safety finding and no supporting hazard analysis. The two positions cannot both stand on this record.

And the measure is unenforceable in practice — on the County's own advice. At the September 18, 2025 Technical Advisory Committee meeting, the County's Public Works Director advised the applicant directly that route direction cannot be relied upon: **"unless you're directing your patrons to go a specific route, they'll follow their GPS, that's just the way it is, so it's just a concern"** [00:19:26–00:19:42] *(machine transcript of County meeting audio; September 18, 2025 TAC; verify at the cited timestamp before entering into the record)*. The County's proposed implementation of TRA-3 is the posting of directions — no performance standard, no monitoring, no enforcement trigger, and no consequence for noncompliance. **A mitigation measure that the lead agency's own engineering department has stated on the record will not function cannot support a less-than-significant finding.** CEQA requires mitigation to be fully enforceable (Guidelines § 15126.4(a)(2)), and an agency may not adopt or continue to rely on a mitigation measure while disregarding record evidence that it will not function, without stating a legitimate reason supported by substantial evidence — by analogy to *Lincoln Place Tenants Assn. v. City of Los Angeles* (2005) 130 Cal.App.4th 1491 [agency may not disregard an adopted mitigation condition without a stated reason, substantial evidence, and supplemental CEQA review]). This defect compounds — it does not cure — the routing condition's implicit admission above.

Two further corridor-hazard items, identified by source and evidentiary weight. These are recorded separately from the verified table above because they rest on resident observation rather than published records, and the distinction is stated deliberately:

- **A historic fatal rollover at the sharp curve on Carbondale Road at the east end of Lambert Road** — that is, at the project's own access point. This is offered as a resident-observed historic collision at a specifically identified curve, attributed to the observer, pending records verification; no date or source has yet been established, and it is **not** counted among the three documented fatalities above. Its significance is locational: it identifies the geometric design feature at the project driveway itself, which is precisely the Appendix G item (c) question the Initial Study never asked.
- **Air-ambulance landings at Eagle's Nest Airport to evacuate local traffic-collision victims**, offered as declarant testimony from **David Wardall** (retired CAL FIRE, air tanker operations, fire-planning training) — a background that establishes his competence to testify to the practice. No dispatch log has yet been obtained, and **no frequency is asserted here**. The observation matters because it links the corridor's collision record to the airport constraint (§6.14): the same airspace and airstrip the project would place assembly under is in use for trauma evacuation from this road network.

Records to convert these from testimony into documented evidence (Public Records Act requests, Gov. Code § 7920.000 et seq.): (1) **CAL FIRE and Amador County EMS air-ambulance dispatch and landing records for Eagle's Nest Airport**; and (2) **CHP SWITRS / TIMS collision data for the Carbondale Road – Lambert Road segment**, including the curve at the east end of Lambert Road. If the records are produced, both items convert from resident observation into record evidence and should be restated accordingly.

Data note (for completeness and candor). A precise, quantified collision count for each corridor road can be obtained from the official state databases — the **UC Berkeley Transportation Injury Mapping System (TIMS)** drawing on SWITRS data (tims.berkeley.edu) and the **California Crash Reporting System (CCRS)**, the CHP's current statewide crash database

(data.ca.gov/dataset/ccrs); state-highway segments (SR-104, SR-16) are additionally tracked in Caltrans' TASAS system through **Caltrans District 10**. This Analysis does **not** assert a specific corridor-wide collision total, because a defensible figure requires a formal query of those systems; the group's counsel or a retained traffic engineer should pull that data for the record before the hearing. What the Analysis does establish, on independently verified sources, is (1) the County's own characterization of these roads as narrow, sight-limited, and safety-deficient; (2) a documented pattern of fatal collisions on the specific access roads; and (3) the Initial Study's complete failure to analyze the physical-safety checklist items — any one of which supports requiring the environmental review the County skipped.

The § 19.56.040 nexus. Independent of CEQA, the Planning Commission cannot issue the use permit unless it can affirmatively find the use "will not … be detrimental to the health, safety, peace, … comfort and general welfare" of the surrounding area (Amador County Code § 19.56.040). A documented fatal-collision record on the sole access roads, combined with an Initial Study that never studied whether the project's added traffic worsens that hazard, is substantial evidence directly bearing on the "health, safety… and general welfare" finding — a finding that, unlike a CEQA impact, has **no override mechanism.** The safety record therefore does double duty: it supports requiring further environmental review under CEQA, and it undercuts the affirmative safety finding the permit itself requires.

Conclusion on traffic: The transportation finding is not supported by substantial evidence; the project description understates event intensity and total interment capacity (by ~3×); the trip/VMT analysis is essentially absent; road capacity and emergency access were not evaluated; the physical-safety checklist items were marked "less than significant" with no hazard analysis despite a documented fatal-collision record on the access roads and the County's own characterization of those roads as narrow, sight-limited, and safety-deficient (§ 2.7); and the sole mitigation depends on an unenforceable, unmonitored operational cap. This is a **potentially significant impact** that, on the current record, is not mitigated to less-than-significant — an EIR-level issue.

---

3. Improper Piecemealing — The Reduced-Scope Application Problem

This is one of the most consequential defects in the current review, and it is presented here so that it appears on the administrative record before the environmental determination is made.

3.1 The applicant's history shows a documented four-application pattern of scope reduction

Same applicant, four attempts. The applicant, **Mounir Kaddoura**, has pursued a large regional cemetery — and, in the earlier attempts, a large assembly building — across **four applications since 2016**. The stated goal, as documented in a history of the application record prepared by David Wardall (June 13, 2026, Draft A), was to build a large assembly building and ultimately a 50,000-grave site cemetery. The four attempts (three of them on the **same ~46-acre Amador parcel, APN 001-220-013**) are:

#	Filing / Record	Site & jurisdiction	Stated scope	Outcome
1	**Filed Apr. 2016**	Dillard Rd. at	Cemetery +	**Rejected by**

#	Filing / Record	Site & jurisdiction	Stated scope	Outcome
	(Sacramento record PLNP2017-00124), "Gardens of Light"	Meiss Rd. (13199 Meiss Rd., Sloughhouse / Cosumnes community), **Sacramento County** — ~43–45 ac, AG-20 (former fish farm) — a **different parcel**	possible assembly building; concept documents describe **~44,000 grave burials over 100 years** (≈22,000 at 4×8 ft, ≈15,400 at 6×10 ft, ≈6,600 oversized 20×30 ft with **mausoleums**); ~130-car parking; claimed traffic of "~10 vehicles/day"	**Cosumnes CPAC (2017); Closed** — "significant technical issues and significant community opposition" (Wardall History) (Sacramento County Planning Documents Viewer, PLNP2017-00124)
2	**Filed July 21, 2022 — UP-22;2-3**	857 Carbondale Rd., Ione, **Amador County** — ~46 ac, R1A (**same parcel**, APN 001-220-013)	**50,000 gravesites** plus a **10,000 sq-ft, 30-ft-tall assembly building (occupancy 1,200)**, office building, caretaker building, equipment building, and additional accessory buildings; max build-out **2122**	**Suspended / found incomplete** (Planning Dept. email dated Sept. 12, 2023)
3	**Filed Sept. 18, 2025 — UP-22;2-3**	16630 Lambert Rd., Ione, **Amador County** (**same parcel**, APN 001-220-013)	**Downsized** project	**Rejected by Planning Department letter dated Sept. 29, 2025**, for several deficiencies
4	**Filed Apr. 24, 2026 — UP-22;2-3 ("Gardens of Noor," current)**	857 Carbondale Rd., Ione, **Amador County** (**same parcel**,	**1,832 plots**, no assembly building; **50 people/funeral,**	**TAC voted on June 11, 2026 to advance the project to the**

#	Filing / Record	Site & jurisdiction	Stated scope	Outcome
		APN 001-220-013)	**60 funerals/month**; claimed "~20 vehicles/day"	**Amador County Planning Commission** with draft conditions, the Initial Study, and a proposed **Mitigated Negative Declaration**; Planning Commission hearing set for **August 11, 2026** and subsequently removed from that agenda

(Source for the four-attempt chronology and scopes: Wardall, D., chronology of the applicant's prior applications (June 13, 2026, Draft A); corroborated by the Sacramento County portal record, the 2022 Amador application file and planning emails, and the Sept. 29, 2025 Amador Planning Department rejection letter — all discussed below.)

Note on the Sacramento filing date. The Wardall chronology dates the first application to **April 19, 2016** (the CPAC submittal), while the Sacramento County online record lists a **filing date of 4/20/2017** and an application number prefixed "PLNP2017." Both refer to the **same project** (Record No. PLNP2017-00124). The most likely reconciliation is that the concept was first submitted to the Cosumnes CPAC in **2016** and the county's formal application/record was opened in **2017**; the CPAC workshop request form itself is a "Rev. 04-19-2016" form. Either way, this was the applicant's first attempt and it was rejected/closed.

Note on how to count the filings — rows 2, 3, and 4 are one continuously pending permit. Rows 2 through 4 above are presented as separate "applications" because they are separate submittals, but every one of them was made under the **single application number UP-22; 2-3**, on the same parcel, by the same applicant. The 2022 application was found incomplete; it was never denied and never withdrawn. The 2025 and 2026 submittals are revisions to that same pending application. This matters in two directions. It defeats any argument that the 2022 record — the 50,000 gravesites, the 20,000 and 10,000 sq-ft figures, the "STAGE 2" annotations, the two agency comment letters, and the July 8, 2022 certification — belongs to some earlier, closed proceeding that the current environmental document need not address. It is the **same proceeding**, and the whole of it is the administrative record. It also means the applicant has held an entitlement application open on this parcel continuously since **February 2022**, through four rounds of agency referral, without ever reducing the acreage under application. Only the

Sacramento County filing (row 1) is genuinely a separate proceeding in a separate jurisdiction.

This four-application record is the heart of the piecemealing argument:

- **A stepwise reduction in *stated* scope on the *same* land.** On the identical ~46-acre Amador parcel, the applicant moved from **50,000 gravesites + a 10,000 sq-ft assembly building (2022)**, to a "downsized" project (2025, rejected), to just **1,832 plots and no assembly building (2026)** — while never reducing the acreage under application. At the applicant's own pace (60 funerals/month), 1,832 plots fill in about **2.5 years** — or ~7.6 years at three bodies per plot (see §2.6) — after which **roughly 85–97% of the 46-acre parcel would remain undeveloped.** CEQA requires review of the whole of the action, including reasonably foreseeable future phases (CEQA Guidelines §§ 15165, 15378(a)). On this record, development of the remaining acreage is reasonably foreseeable rather than speculative: the acreage under application was never reduced, no instrument restricts the remainder, and the applicant's own prior filings on this parcel describe a substantially larger program (below). The County should analyze the ultimate project, or, in the alternative, identify on the record the enforceable instrument that limits development to the 1.7 acres now described.
- **The full-scale end state is documented in the applicant's own filings and by the County's own consulting agency.** The applicant's July 21, 2022 application on **this same parcel** (APN 001-220-013) sought **50,000 gravesites** together with a **10,000 sq-ft, 30-ft-tall assembly building with occupancy for 1,200 people**, plus office, caretaker, equipment, and accessory buildings. Independently, **CDFW's March 3, 2022 comment letter** (see §5.5) describes the very same parcel as a **"50,000 gravesite"** project with a **"20,000 sq. ft. religious building"** at maximum build-out in **2122** — CDFW's characterization, quoted as written. The full-scale end state is therefore not speculative and does not rest on inference: it is stated in the applicant's own prior application and independently confirmed in a state agency's comment letter addressed to this exact parcel.
- **The "understated numbers" problem recurs across filings.** In Sacramento the applicant claimed "~10 vehicles/day" for a 44,000-grave cemetery; in Amador, "~20 vehicles/day" for the current project. In *both* cases the stated traffic figure is facially incompatible with the stated burial program (see §2) — a **recurring, documentable pattern** of impact understatement by the same applicant.
- **A prior reviewer already caught the math.** See §3.5 — an attorney's 2017 letter to Sacramento County demonstrated that the applicant's own plot dimensions and counts could not physically fit the stated acreage, alleging the scope was "grossly miscalculated or intentionally misstated." The same species of internal inconsistency appears in the Amador application.

3.1A The applicant's own site plans divide the project into "Stage 1" and "Stage 2"

The piecemealing argument does not depend on inference about the applicant's intent. **The applicant labeled the phases himself, on the drawings he submitted to the County.**

The 2022 application package for UP-22; 2-3 *(provided by client; on file)* includes four engineering plot sheets for APN 001-220-013. The sheets carry the following printed annotations, quoted exactly as they appear:

Sheet annotation (verbatim)	What it labels
"**STAGE 1 PROPOSED GRAVE SITES**"	the burial blocks
"**STAGE 1 PROPOSED 20' WIDE**"	the internal access road serving those blocks
"**STAGE 2 PROPOSED 10,000 SQFT BUILDING 30 FT HIGH WITH OCCUPANCY OF 1200 PEOPLE**"	the assembly building
"**STAGE 2: PROPOSED 10,000 SQFT BUILDING / 30 FT HIGH / OCCUPANCY IS 1200**" (on-site callout)	the same building, located on the parcel
"**STAGE 2 ROAD**"	the access road serving that building

The division is unambiguous and it is the applicant's own: **Stage 1 is the grave sites and the road that serves them. Stage 2 is the 10,000 sq-ft, 30-ft-tall structure with an occupant load of 1,200, and the road that serves it.**

This is precisely the 2026 application. The project now before the County is grave sites plus an internal access road, with no structure — Stage 1 of the applicant's own two-stage plan, submitted under the same application number, on the same parcel, by the same applicant. The 2025 and 2026 engineering sheets for this parcel show **no building of any kind**; the structure was not abandoned in the drawings, it was simply removed from them. Nothing in the record shows the applicant withdrawing Stage 2, disclaiming it, or reducing the acreage under application.

The applicant simultaneously certified that no such larger project exists. The County's Environmental Information Form asks, at item 28: "**Does this project have a relationship to a larger project or series of projects?**" *(the County form's printed question, quoted as written)*. The applicant answered **"No"** and certified the form on **July 8, 2022** — in the same application package whose drawings are labeled Stage 1 and Stage 2 — and answered **"No"** to the identical question again on **August 27, 2025**. On this record the two documents cannot both be accurate. Either the drawings mean what they say, in which case the certification is false; or the certification is accurate, in which case the applicant must explain what "Stage 2" on his own plans refers to. **The lead agency is not entitled to resolve that conflict silently in the applicant's favor, and the Initial Study does not disclose that the conflict exists.**

Why the label is legally decisive. CEQA Guidelines § 15165 ("Multiple and Phased Projects") states:

> "Where individual projects are, or **a phased project is**, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the lead agency shall prepare a **single program EIR for the ultimate project** as described in Section 15168. **Where an individual project is a necessary precedent for action on a larger project, or commits the lead agency to a larger project, with significant environmental effect, an EIR must address itself to the scope of the larger project.**"

(Cal. Code Regs. tit. 14, § 15165; full text as reproduced by CalRecycle, *CEQA Environmental Documents Types*).

Section 15165 removes the need to argue foreseeability at all. Under § 15165, a **phased** project requires a single environmental document for the **ultimate** project, and a first phase that is a "necessary precedent" for the larger project requires the document to "address itself to the scope of the larger project." Stage 1 grading, road construction, fencing, water service, and the site's entire circulation system are physical precedents for Stage 2 — the Stage 2 road is drawn as an extension of the Stage 1 road on the same sheets. Approving Stage 1 builds the infrastructure Stage 2 needs.

It also independently satisfies both prongs of the *Laurel Heights* test set out in § 3.2 below. Prong 1 (reasonably foreseeable consequence) is no longer a matter of inference from acreage and burial rates: the applicant wrote "Stage 2" on his own plan. Prong 2 (change in scope, nature, or effects) follows from the figures on the label — a 1,200-occupant assembly building on a parcel limited to **one Equivalent Dwelling Unit of water service, approximately 400 gallons per day** (§ 6.6), adjacent to a public-use airport (§ 6.13), transforms every impact category in the Initial Study.

Two further features of the 2022 package bear on the scope question.

- **The application sought two uses, not one.** On the County's printed "Application Procedure for Use Permit" form, under "Use Permit Applied For," the 2022 application marks **two** boxes: the box labeled "Cemetery" and the box labeled "Church" *(both are the County form's own printed category labels, quoted as written; the terms are the County's, not this analysis's)*. The application was, on its face, an application for two distinct uses on the same parcel. The 2026 Initial Study evaluates one.
- **The plot map is titled as a rezoning.** The 2022 plot map's title block reads "**PROPOSED ZONE CHANGE FOR CEMETERY**" *(the applicant's wording, quoted as written)*. A zone change is a legislative act requiring Board of Supervisors action and its own environmental review — a materially different and larger undertaking than the use permit the County has been processing. The record should establish whether a rezoning was ever applied for, whether it was abandoned, and if so when and by what document.
- **A fourth floor-area figure appears on the same package.** The 2022 plot map labels a "**PROPOSED BUILDING — 2,500 sqft**." See § 3.6A: the same structure is described in the 2022–2026 record at **2,500**, **3,000**, **10,000**, and **20,000** square feet, and finally as not existing at all.

Record requests arising from this section.

1. Produce every version of the applicant's site plan and plot map submitted since 2016 for APN 001-220-013, and identify by document and date the first submittal in which the "Stage 1"/"Stage 2" annotations no longer appear.
2. Produce any writing in which the applicant withdraws, abandons, or disclaims Stage 2, or states that no structure will be built on the parcel.
3. Produce the County's written analysis, if any, reconciling the "Stage 1"/"Stage 2" annotations and the two use-permit boxes marked on the County's form — those printed "Cemetery" and "Church" *(the form's own labels)* — with the applicant's "No" answers to Environmental Information Form item 28 on July 8, 2022 and August 27, 2025.

4. Produce any application, fee receipt, or staff determination concerning a **zone change** for this parcel, and any document terminating that request.
5. State whether the County considered CEQA Guidelines § 15165 in selecting a Mitigated Negative Declaration as the environmental document for this application, and produce the analysis.

3.1B The permitted capacity is exhausted in about two and a half years, while the applicant's own Cemetery Plan states the site is designed for one hundred years

This is the single most economical demonstration of piecemealing in the record, because it requires no inference about intent, no comparison between applications, and no disputed figure. **Every number used below is taken from the applicant's own March 30, 2026 Cemetery Plan and the County's own April 24, 2026 and May 27, 2026 referral cover sheets** *(provided by client; on file)*.

The four figures the record supplies.

Figure	Source	Wording
1,832 grave sites, 7 blocks	County referral cover sheets, Apr. 24 and May 27, 2026	"proposes 1832 graves sites divided among 7 blocks on the **north end of the property**"
60 funerals per month	Cemetery Plan § 2.2; County referral cover sheets	"The anticipated funeral events will be about 60 per month"; "60 funerals a month with a limit of 50 attendees per event"
Approximately 1.7 acres	Cemetery Plan § 3.2, *Ground Cover*	"The burial sections with an area approximately 1.7 acres will be developed"
One hundred years	Cemetery Plan § 1 and § 3.1	"The purpose of this Plan is to illustrate development of the Gardens of Noor Cemetery over a **100-year timeframe**"; "**At full build-out**, the cemetery will have gravesites enough to serve the anticipated needs of [the] community **for the next 100 years**"

(All quotations are the applicant's or the County's own wording, quoted as written. In the last cell a demographic descriptor used by the applicant has been replaced with a bracketed neutral term, because the capacity analysis turns on how many interments the site must accommodate and over what period, and not on who is interred. The unaltered sentence is in the Cemetery Plan at page 4 and is available to any reader of the record.)

The arithmetic. At the applicant's own stated rate of 60 funeral events per month — **720 per year** — the permitted 1,832 grave sites are exhausted in:

Assumption	Interment capacity	Years to exhaustion at 720/yr
One interment per grave	1,832	**2.5 years**
Two caskets per grave (the Cemetery Plan's own allowance)	3,664	**5.1 years**
Three interments per grave (§ 2.6 of this Analysis)	5,496	**7.6 years**

The Cemetery Plan states a **one-hundred-year** design horizon. Serving 720 interments per year for one hundred years requires **72,000 interments** — which is **24,000 to 72,000 grave sites** depending on the occupancy assumption. **The application before the County supplies 1,832.**

The two documents cannot both be true of the same project. Either the site is a one-hundred-year facility, in which case the 1,832-grave permit is the first two-and-a-half to seven-and-a-half years of it and the remaining ninety-plus years are a future undertaking the Initial Study does not evaluate; or the project genuinely ends at 1,832 graves, in which case the applicant's own Cemetery Plan — the document submitted to satisfy the County's use-permit requirement, and the document that states its own purpose is to "illustrate development … over a 100-year timeframe" — materially misdescribes the project. **The lead agency is not entitled to adopt whichever reading makes the environmental document smaller.** Under CEQA Guidelines § 15165 (quoted at § 3.1A), where a project is phased the lead agency "shall prepare a single program EIR for the ultimate project." The ultimate project is stated on the face of the applicant's own plan.

The density arithmetic closes the loop back to 50,000. The permitted burial area is approximately **1.7 acres** holding **1,832** graves — a density of about **1,078 graves per acre**, or roughly 40 square feet per grave. Applied to the **46-acre** parcel the applicant owns and has placed under this permit, that same density yields:

$$1{,}832 \div 1.7 \times 46 \approx \textbf{49,572 grave sites}$$

and, run in the opposite direction, **50,000** graves at the density now being permitted requires **46.4 acres** — the parcel. The 2022 application's "50,000 gravesites at the maximum build-out in 2122" is therefore not a discarded, superseded, or unrelated number. **It is the arithmetic result of building out the whole of this parcel at exactly the density the County is now being asked to approve on 1.7 acres of it.** Any reviewer with a calculator can verify this in one line, and the County has never been asked to explain it.

Three further features of the 2026 referral description reinforce the point, and each is the County's own wording.

- **"On the north end of the property."** The County's own project description locates the seven blocks on the **north end** of a 46-acre parcel. It thereby states affirmatively that roughly **44 acres are not being developed under this permit**, while the environmental document analyzes only the developed fraction. The Initial Study does not identify what the

remaining 44 acres are for, and the record contains no deed restriction, conservation easement, covenant, or condition of approval preventing their later development.

- **The stated service area is regional, not local.** The Cemetery Plan states that the "primary objective … is to provide a burial place for the growing … community in **Amador County, Sacramento County, Placer County and surrounding areas**" *(the applicant's wording, quoted as written, with the demographic descriptor elided as explained above)*. A facility serving three named counties "and surrounding areas" cannot be reconciled with an Initial Study whose transportation analysis rests on "[a]n increase of an average of 20 Vehicles per day" *(Cemetery Plan § 5, quoted as written)*. **The applicant has stated a multi-county service population and a 20-vehicle-per-day traffic impact in the same document.**
- **"At full build-out" is the applicant's own phrase, and it is not what is being permitted.** The Cemetery Plan's capacity representation is expressly conditioned on "full build-out." The permit application is not for full build-out. The document therefore concedes, in its own words, that what the County is evaluating is a phase.

Record requests arising from this section.

1. State the County's position on the following question and produce any analysis supporting it: **what happens when the 1,832 permitted grave sites are full?** Identify the document, if any, in which the applicant commits to seeking no further interment capacity on APN 001-220-013.
2. Produce any deed restriction, conservation easement, covenant, condition of approval, or other recorded or proposed instrument that would prevent development of the approximately 44 acres outside the 1.7-acre burial area.
3. Produce the County's written reconciliation of the Cemetery Plan's one-hundred-year design horizon and "full build-out" language with a 1,832-grave permit and a stated rate of 60 funeral events per month.
4. Produce the County's written analysis of whether a facility stated to serve Amador, Sacramento, and Placer Counties "and surrounding areas" generates 20 vehicle trips per day.
5. State whether the County has performed the density calculation set out above, and if so produce it.

3.1C The 2022 package stated an occupant load of 1,200 and provided parking for at most 100 vehicles — and the parking it did describe is barred by the Fire Code

The 2022 application package establishes an internal impossibility that is independent of the floor-area dispute in § 3.6A and independent of the phasing question in § 3.1A. It is worth isolating because it is arithmetic, not judgment.

What the package states. The 2022 package contains three engineering sheets on a standard "DIVISION OF DESIGN" plan border, all at 1,730 × 1,170 × 630 feet. The **Stage 1** sheet (scale 1" = 200') carries three bulleted notes: "**PROPOSED 10,000 SQFT BUILDING 30 FT HIGH WITH OCCUPANCY OF 1200**"; "**IRRIGATION OF SHRUBS WILL BE BY AMADOR WATER AGENCY**"; and "**PARKING IS ALONGSIDE 20 FT X 2,000 FT GRAVEL ROAD**." The same sheet labels the internal circulation "**EXISTING 20' WIDE**" and "**STAGE 1 PROPOSED 20' WIDE**," and the grave blocks "**STAGE 1 PROPOSED GRAVE SITES**." The two **Stage 2** sheets — one line drawing, one aerial

overlay of "857 Carbo[ndale]" — carry the bullet "**STAGE 2 PROPOSED 10,000 SQFT BUILDING 30 FT HIGH WITH OCCUPANCY OF 1200 PEOPLE**," an on-plan callout "**STAGE 2: PROPOSED 10,000 SQFT BUILDING 30 FT HIGH OCCUPANCY IS 1200**," and a labeled "**STAGE 2 ROAD**" *(all of the foregoing are the applicant's wording, quoted as written)*. Against those figures, the County's July 21, 2022 referral cover sheet — the document that described this application to sixteen agencies and nine tribes — states only that "[p]roposed improvements include **parking for up to 100 cars**, a proposed 3,000 sq. ft. worship building and 50,000 gravesites at the maximum build-out in 2122" *(the County's wording, quoted as written)*.

Note what those annotations establish about the parking, before any arithmetic. The road the parking is "alongside" is **20 feet wide**, and on the Stage 1 sheet the internal road is drawn and labeled as **"STAGE 1 PROPOSED 20' WIDE"** — that is, the 20-foot width is not an existing constraint the applicant inherited but the width he proposed. The parking scheme and the road width were designed together, on the same sheet, by the same hand.

The arithmetic. An occupant load of 1,200 generates, at ordinary vehicle-occupancy assumptions:

Persons per vehicle	Vehicles arriving
2.0	**600**
2.5	**480**
3.0	**400**
3.5	**343**

Even at an unusually generous 3.5 persons per vehicle, the stated occupant load requires **more than three times** the parking the application described, and at a conventional 2.5 it requires nearly **five times**. The 2022 package proposed accommodation for, at best, **17 to 29 percent** of the vehicles its own stated occupant load would generate. There is no shuttle, no off-site lot, no transit provision, no valet or stacking plan, and no overflow area anywhere in the package.

And the trip generation was calculated for funerals only. The traffic figure carried through the record — "[a]n increase of an average of 20 Vehicles per day" — is derived from funeral events. Nothing in the 2022 package, and nothing in the 2026 Initial Study, analyzes the trip generation, peak-hour arrival and departure pattern, queuing, or parking demand of a 1,200-occupant assembly use operating on a **recurring weekly** schedule. That is not a conservative estimate of the assembly use; it is the **absence** of any estimate. A single weekly event at the stated occupant load generates, at 2.5 persons per vehicle, roughly **480 arrivals and 480 departures compressed into two short windows** — a peak-hour condition categorically different from two funeral processions a day, and one that the record's single-gate, sub-standard-frontage access has never been tested against (see §§ 2.4, 2.7, 6.13).

The described parking scheme is independently unlawful. The applicant's annotation places parking "alongside" a **20-foot** gravel road. That road is the project's fire-apparatus access road. The California Fire Code requires a fire apparatus access road to have an "unobstructed width of not less than 20 feet …, **exclusive of shoulders**" (**CFC § 503.2.1**) (California Fire Code § 503.2.1, UpCodes), and separately provides, under the heading "Obstruction of Fire Apparatus Access Roads," that "[f]ire apparatus access roads **shall not be obstructed in any manner, including the**

parking of vehicles. The minimum widths and clearances established in Sections 503.2.1 and 503.2.2 shall be **maintained at all times**" (**CFC § 503.4**) (California Fire Code § 503.4, UpCodes). Regional fire-district standards apply that prohibition as a width table. The **Sacramento Metropolitan Fire District** — the adjacent metropolitan district, whose standard is representative of regional practice — publishes it as: access roadway width "**Less Than 28**' → **No parking either side**"; "28' to 35' → Parallel parking one side only"; "Over 35' → Parking allowed both sides" (Sacramento Metropolitan Fire District, *Fire Apparatus Access Roads*, FPS-3 (rev. July 2025), "PARKING"; see also Sacramento Metropolitan Fire District, *Fire Access Lanes*). The same standard notes that "[v]ehicles parked in fire lanes are subject to citation and/or towing."

The consequence is a closed contradiction, and it does not depend on the occupant load at all. On a 20-foot access road, roadside parking is prohibited outright. The applicant's stated parking method and the mandatory fire-access standard for the road he drew **cannot both be satisfied on the same 20 feet of pavement**. Either the road is widened — which enlarges the graded footprint, the oak removal, and the impervious area the Initial Study has never quantified (see §§ 6.1, 6.12a) — or the parking does not exist. Note further that even taken on its own terms the scheme does not reach 100 vehicles legally: 2,000 feet of shoulder at roughly 22 feet per parallel-parked vehicle yields about **91 spaces on one side and 182 on both**, and both configurations are barred at this width.

And a 30-foot-tall building sits exactly on the threshold that raises the required width to 26 feet. The same annotation states the structure is "**30 FT HIGH**." The Fire Code's aerial-apparatus provision requires that "[w]here the vertical distance between the grade plane and the highest roof surface **exceeds 30 feet** ..., approved aerial fire apparatus access roads shall be provided," and that such roads "shall have a minimum unobstructed width of **26 feet ..., exclusive of shoulders**, in the immediate vicinity of the building" (**CFC § 503.1.4.1–.2**; model-code **Appendix D, § D105**) (Aerial fire apparatus access roads, California Fire Code, UpCodes). The Code also fixes the measuring datum: "the highest roof surface shall be determined by measurement to the **eave** of a pitched roof, the intersection of the roof to the exterior wall, or the top of parapet walls, **whichever is greater**" (*id.*). A structure annotated at "30 FT HIGH" therefore either clears the trigger by inches or falls just under it, depending entirely on the datum used — and the record does not state whether the applicant's 30 feet was measured to eave, plate, or ridge. **This is a determination for the fire code official, on the record, and it has never been made.** If the trigger applies, the required access width in the vicinity of the building is 26 feet, not 20 — which the applicant's drawings do not provide, and which is again "exclusive of shoulders."

Why this belongs in the piecemealing section rather than only in the traffic chapter. The 1,200-occupant assembly use was **never analyzed by any agency**, in 2022 or since. The County's July 21, 2022 cover sheet — the document that put the project in front of the Department of Transportation and Public Works, Caltrans District 10, ACTC, Amador Transit, Cal Fire, and AFPD — described a "3,000 sq. ft. worship building" *(the County's wording, quoted as written)* and **omitted the occupant load entirely**. No reviewing agency was ever told the number 1,200. The one agency that quantified anything, the Department of Transportation and Public Works, wrote on February 18, 2022 that "[a] traffic mitigation fee will be collected for the proposed 20,000 SF religious building at the time of building permit application" *(the Director's wording, quoted as written)* — deferring the entire question to a future building permit that would follow a future application. **The assembly use has been carried through this record for four years as a fee to be calculated later, and**

never once as an impact to be analyzed. That is the mechanism of the piecemealing, stated in the County's own file.

Record requests arising from this section.

1. Produce any parking study, trip-generation analysis, or peak-hour queuing analysis prepared at any time for an assembly use on APN 001-220-013, and any County analysis of the parking demand generated by an occupant load of 1,200.
2. Identify every reviewing agency that was informed, in writing and before commenting, of the applicant's stated occupant load of 1,200. If none, so state.
3. Produce the fire code official's determination of the required fire-apparatus access road width for this parcel, including whether CFC Appendix D, § D105.1 aerial-apparatus access applies to a structure stated at 30 feet in height, and the height datum used.
4. Produce any County analysis of whether roadside parking "alongside" a 20-foot access road complies with CFC §§ 503.2.1 and 503.4.
5. Produce all records concerning the traffic mitigation fee referenced in the February 18, 2022 email, including whether a fee category for this use has since been adopted and whether any fee study analyzed a 1,200-occupant assembly use.

3.1D What changed and what did not between the 2022 and 2026 submittals

The April 24, 2026 referral package permits a direct comparison against the July 21, 2022 package on identical County forms. The pattern is consistent: **the annotations and checkboxes that disclosed a larger project were removed; the operational figures that generate the impacts were not.**

Element	July 21, 2022 package	April 24, 2026 package
Use-permit boxes marked	**Two** — the boxes printed "Cemetery" and "Church" *(the County form's own labels)*	**One** — only the box printed "Cemetery"
Site-plan phase annotations	"STAGE 1 PROPOSED GRAVE SITES," "STAGE 1 PROPOSED 20' WIDE," "STAGE 2 PROPOSED 10,000 SQFT BUILDING 30 FT HIGH WITH OCCUPANCY OF 1200 PEOPLE," "STAGE 2 ROAD"	**None.** No phase labels appear anywhere in the package
Structure shown	"PROPOSED BUILDING — 2,500 sqft" (plot map); "PROPOSED 10,000 SQFT BUILDING 30 FT HIGH WITH OCCUPANCY OF 1200" (engineering sheets)	**No proposed building of any kind on the plot map.** Only "EXISTING METAL SHED"
Internal circulation shown	"INSIDE RD AND PARKING PLACE" (plot map); "EXISTING 20' WIDE," "STAGE 1	**The internal road and parking label are gone.** Only a short unlabeled loop remains at the

Element	July 21, 2022 package	April 24, 2026 package
	PROPOSED 20’ WIDE,” “STAGE 2 ROAD” (engineering sheets)	west entrance
Plot-map bottom title block	“PROPOSED ZONE CHANGE FOR CEMETERY” / “MOUNIR KADDOURA”	“**EXISTING PLOT MAP**” — both lines replaced
Plot-map dimension callouts	Plot map: 1754 / 1302 / 784 / 316 / 700 / 527 ft. Engineering sheets: 1,730 / 1,170 / 630 ft	1730 / 1170 / 630 / 316 / 700 / 527 ft — the plot map’s three perimeter dimensions have been **replaced with the 2022 engineering sheets’ values**, while the three interior dimensions are unchanged
Plot-map content	Proposed improvements drawn	Labeled “**EXISTING** LANDSCAPE,” “**EXISTING** METAL SHED,” “**EXISTING** PLOT MAP” — the sheet depicts only current conditions
Grave sites	50,000 at maximum build-out in 2122	1,832 in 7 blocks on the north end
Design horizon	Build-out **2122** (100 years from 2022)	“100-year timeframe” / “full build-out” (Cemetery Plan, Mar. 30, 2026) — **unchanged**
Funeral rate	60 per month	60 per month — **unchanged**
Attendees per event	Not stated on the cover sheet	50 per event
Traffic	Funeral trips only; fee deferred to building permit	“[a]n increase of an average of 20 Vehicles per day”
Driveway parking	“parking for up to 100 cars”	“driveway parking for up to 100 cars” — **unchanged** — plus a 64-space lot
Parcel size	46 acres	46 acres — **unchanged**
Supervisorial District	2	5
Property owner named	Brett Carlson	Not stated
Applicant telephone	925 584 1664	(209) 429-1543
Checklist items left blank	5 (Assessor Plat Map), 7 (fees), 8 (Environmental Information Form), 9 (Indemnification)	5, 7, 8, 9 — **unchanged**, though an Assessor’s plat map (Bk. 1, Pg. 22) is in fact bound into the package and an Environmental Information Form was certified Aug. 27,

Element	July 21, 2022 package	April 24, 2026 package
		2025
Environmental Information Form item 28 (“relationship to a larger project”)	“No,” certified July 8, 2022	“No,” certified Aug. 27, 2025 — **unchanged**

The two rows that matter most are the ones that did not change. The **100-year horizon**, the **60-funerals-per-month rate**, the **46-acre parcel**, and the **“No” answer to item 28** are identical across the two packages. The scope representations shrank; the operational program and the design life did not. A project whose stated design life and stated event rate are unchanged, on an unchanged parcel, while its disclosed capacity falls from 50,000 to 1,832, has not been reduced — **it has been divided.** That is the definition CEQA Guidelines § 15165 addresses.

It is the same drawing. The April 24, 2026 plot map is not a new plan sheet. It is the **2022 plot map with elements deleted** — identical parcel outline, identical road geometry, identical north arrow, identical “EXISTING LANDSCAPE” callout with the same three leader lines, identical “46 ACRES” interior label, identical “ENTRANCE/EXIT” annotations on both frontages, identical tree symbols, and identical 316-, 700-, and 527-foot interior dimensions. What was removed between the two versions is precisely and only the set of elements that disclosed a project: the proposed building, the “INSIDE RD AND PARKING PLACE” label and the internal road it named, and the “PROPOSED ZONE CHANGE FOR CEMETERY” title. The perimeter dimensions were simultaneously conformed to the 2022 **Stage 2** engineering sheets, which confirms that the 2026 sheet was prepared with the staged drawings in hand.

And that produces a defect on the face of the application. The County’s printed application form requires, at item 6, a “**Plot Plan** … of parcel showing **location of request** in relation to property lines, road easements, other structures, etc.” *(the County form’s own wording, quoted as written)*. The sole plot plan in the April 24, 2026 package is captioned “**EXISTING PLOT MAP**” and shows **no proposed improvement of any kind** — no grave blocks, no building, no 64-space parking lot, no restroom, no internal road, no fencing, and no delineation of the 1.7-acre burial area. Item 6 is nonetheless marked with an X. The County then deemed this application **complete on May 7, 2026** and, on **June 11, 2026**, recommended the environmental document (see § 6A.6). A plot plan that depicts only existing conditions cannot show “location of request,” and an environmental document cannot rest on it: the project description is not “accurate, stable and finite” (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193) if the only site plan in the file affirmatively shows nothing being built. This is also the mechanism by which the § 3.1B geography question — where on the 46 acres the seven blocks sit, and what becomes of the other 44 acres — remains unanswerable from the record.

Record requests arising from this section.

1. Produce the applicant’s transmittal letters and the County’s completeness correspondence for the 2025 and 2026 submittals, and identify the document and date on which the “Church” use-permit box, the “Stage 1”/“Stage 2” annotations, the proposed structure, the “INSIDE RD AND PARKING PLACE” label, and the “PROPOSED ZONE CHANGE FOR CEMETERY” title block were each removed, together with any staff direction requesting or approving those removals.

2. Produce every site plan, plot plan, or exhibit in the County's file that depicts the **location** of the 1,832 grave sites, the seven blocks, the 64-space parking lot, the restrooms, and the internal circulation on APN 001-220-013. If the file contains none, so state in writing.
3. Produce the County's written determination that application item 6 was satisfied by a plot plan captioned "EXISTING PLOT MAP," and identify the staff member who made it.

3.1E The applicant certified that collateral permits for this project were already acquired before any environmental review

The segmentation analyzed above is not confined to grave counts and building sizes. The record now establishes that **physical infrastructure serving this project was permitted while the project's environmental review was still pending.**

Page 3 of the Environmental Information Form in the **September 18, 2025** referral packet poses the County's printed question: *"List and describe any other related permits and other public approvals required for this project, including those required by city, regional, state, and federal agencies."* The applicant's answer reads:

> **"well Permit and Sanitart Tank Permits have been acquired."** *(sic; applicant's spelling)*

The answer is corroborated at two Technical Advisory Committee meetings. On **June 1, 2023** at **[00:52:09 – 00:52:22]** the applicant stated: *"Yes I already got the well permit I'm just waiting for the well digger to come and start digging,"* and staff confirmed at **[00:52:34 – 00:52:35]**: *"You already obtained the permit."* On **September 18, 2025** at **[00:23:41 – 00:23:45]** staff stated: *"And then as far as the well, the site has been approved but it hasn't been drilled yet."*

Five consequences follow for this analysis.

First, the same form contradicts itself. Twelve consecutive printed questions immediately following — items 17 through 28 — are answered **"No,"** including item 22 (effects on ground water quality or quantity and on drainage), item 26 (demand on municipal services), and item 28 (relationship to a larger project or series of projects). A project for which a well permit and sanitary tank permits have already been acquired is a project with a relationship to other approvals and with an interaction with groundwater. The Initial Study accepted the twelve negatives and did not reconcile them against the answer three questions earlier on the same page.

Second, the County's own file contradicts the form. The applicant's Cemetery Plan, cover-dated **August 2025** and prepared for Amador County, states at § 2.2 that *"[a] permit is applied for a well on the property by Rumsey Lang Well Drilling and Pump Inc."* — present tense, pending — in the same submittal cycle in which the Environmental Information Form states the permit **has been acquired**. The County has not reconciled the two.

Third, no permit document is in the record. The referral packet contains no permit number, no issue date, no copy of either permit, no well plot plan, and no driller's report. Amador County Code § 14.06.110(C) requires a driller's report within thirty days of completion, and § 14.06.110(A) sets a one-year permit life extendable once under subsection (B). If a permit existed by June 1, 2023, its maximum life with extension ran to approximately mid-2025 — yet on September 18, 2025 the well was described as approved and undrilled. Either the permit lapsed, or a **second permit** was issued in 2025. The record discloses neither.

Fourth, the well permit was not necessarily a ministerial act exempt from review. In *POWER v. County of Stanislaus* (2020) 10 Cal.5th 479, the Supreme Court held that a county "may not categorically classify all these projects as ministerial," because Standard 8.A of Department of Water Resources Bulletin 74 confers judgment on the enforcing agency where a contamination source lies near a proposed well. Amador County adopts Bulletin 74 by reference at Code § 14.06.170, and its ordinance confers **more** discretion than the Stanislaus ordinance at issue there: § 14.06.080 authorizes "any other conditions or requirements found by the department to be necessary to protect public health"; § 14.06.090(B) authorizes refusal where the work "would create a health hazard, aggravate a preexisting health hazard, or violate any of the standards established by this chapter"; and § 14.06.040(F) requires "[o]ther information as may be necessary to determine if the underground water will be adequately protected." The circumstance that engages that discretion is present on this parcel and was identified by the County itself: on June 1, 2023 at **[01:06:07 – 01:06:14]** a Committee member described graves "open ended on the bottom with water sources underneath" as "a pretty big concern," and staff then searched for and could not locate a well-to-interment separation standard, concluding at **[01:06:40 – 01:07:13]**: *"so I have a little more research to do."* No such determination has been produced.

Fifth, Amador County Code § 14.06.050 required the sewage disposal permit first. That section provides that "[w]here the well is to serve a dwelling or other structure requiring on-site sewage disposal, an on-site sewage disposal permit shall be issued prior to the issuance of a well permit." The record contains no on-site sewage disposal permit. It contains the opposite: on June 1, 2023 at **[01:15:43 – 01:16:00]** the applicant stated that the septic design was halted because *"they said well no you're not going to do this till you get the use permit and it's after the fact that you get the use permit so we put a hold on that one."*

The pattern this establishes. A well permit obtained before environmental review; an on-site wastewater evaluation expressly deferred until after the discretionary approval; and reports of clearing and grading on the parcel that drew no County response. These are the components of a single project being approved one piece at a time, in the sequence CEQA Guidelines § 15004(b)(4) and *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116 are written to prevent, while the environmental document for the whole remains unwritten.

→ This subsection summarizes the companion memorandum submitted with this analysis: *Prior Permit Acquisition and Project Segmentation — UP-22;2-3* (August 13, 2026), which sets out the full documentary record, the deferred-wastewater analysis under CEQA Guidelines § 15126.4(a)(1)(B) and *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, and the outstanding file deficiencies.

3.2 The controlling CEQA law: the "whole of the action" and the *Laurel Heights* test

CEQA defines a "project" as **"the whole of an action"** (CEQA Guidelines §15378) and forbids a lead agency from **"chopping up" or "segmenting"** a project into smaller pieces to avoid disclosing the environmental impacts of the whole (*Bozung v. Local Agency Formation Com.* (1975) 13 Cal.3d 263; *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376).

The California Supreme Court in **Laurel Heights I** established the controlling two-part test. An environmental document **must analyze the effects of future expansion or action if:** > **(1) it is a reasonably foreseeable consequence of the initial project; and (2) the future expansion or action will likely change the scope or nature of the initial project or its environmental effects.**

(*Laurel Heights I*, as summarized in the OPR/CEQA-at-40 materials; Casetext analysis of *Laurel Heights*). In *Laurel Heights* itself, the University had acquired a building, stated some future uses, but failed to assess use of the *entire* building; the EIR was held **inadequate** for omitting those reasonably foreseeable future uses (Berkeley Keep Jets case summary distinguishing Laurel Heights).

3.3 Application to Gardens of Noor

Both prongs of the *Laurel Heights* test are met on this record:

- **Reasonably foreseeable (prong 1):** On this **very parcel**, the applicant sought **50,000 gravesites plus a 10,000 sq-ft assembly building in 2022** and a "downsized" version in 2025 — roughly **27×** the current stated plot count — before arriving at the 1,832-plot 2026 proposal, all while retaining the same ~46 acres. Acquiring and entitling a full ~46 acres while proposing a project that fills in ~2.5 years is affirmative evidence that expansion is intended and foreseeable. Unlike *Berkeley Keep Jets* — where the disputed runways had "no apparent need" and were held *not* foreseeable — here the applicant's own **prior same-parcel applications** (and a CDFW letter describing this parcel as a 50,000-gravesite project built out to 2122) supply the "apparent need" and intent.
- **Changes scope/nature or effects (prong 2):** Expanding from 1,832 plots back toward the **50,000 gravesites** previously sought on this parcel — and/or restoring the **10,000 sq-ft, 1,200-occupancy assembly building** and the office, caretaker, equipment, and accessory buildings described in the 2022 application — would massively change the project's traffic, water, wastewater, air-quality, GHG, noise, and biological impacts.

Because both prongs are satisfied, **CEQA requires the environmental document to analyze full-parcel build-out — not the artificially truncated 1,832-plot slice.** Reviewing only the reduced 2026 increment is textbook improper piecemealing. A Mitigated Negative Declaration that ignores the reasonably foreseeable build-out of the remaining ~44 acres cannot stand.

3.4 Cumulative-impact obligation (independent of piecemealing)

Even setting aside intent, CEQA independently requires analysis of **cumulative impacts** — the project's incremental effects combined with other past, present, and **reasonably foreseeable future** projects (CEQA Guidelines §15130; §15355). Courts have set aside environmental documents for failing to evaluate cumulative impacts of reasonably foreseeable related development (*Berkeley Keep Jets Over the Bay Com. v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344). The foreseeable future expansion of this very parcel is precisely the kind of cumulative development the IS was obligated to — and did not — address. **This point should be expressly stated in the administrative record** so that a reviewing court sees the piecemealing/cumulative-impact objection was timely raised (exhaustion of administrative remedies, Pub. Resources Code §21177).

3.5 Prior-record precedent: the applicant's numbers were formally challenged as physically impossible in 2017

The Sacramento County record for the applicant's 2017 "Gardens of Light" proposal contains a **formal comment letter that made essentially the same quantitative objection now applicable to this project.** It is cited here because it documents that the arithmetic question raised below is not new to this applicant and was placed in a public agency record in 2017.

- **Author / date:** Robert W. Wright, Attorney at Law (Solana Beach, CA), letter dated **May 22, 2017**, addressed to Sacramento County Assistant Planner Thomas Vogt, referencing the **May 24, 2017 Cosumnes CPAC** agenda item for PLNP2017-00124 (Sacramento County Planning Documents Viewer, PLNP2017-00124 — "PublicComment_Re_Gardens_of_Light_052217").
- **Core objection:** Using the applicant's *own* stated plot dimensions and counts from the Concept Plan (≈22,000 plots at 4×8 ft; ≈15,400 at 6×10 ft; ≈6,600 oversized 20×30-ft mausoleum plots), the letter calculated that the burial program would require **well over 100 acres** — roughly **three times** the ~43–45-acre site — before even accounting for roads, setbacks, parking, and structures. The letter characterized the application's scale as having been "grossly miscalculated or intentionally misstated" and asked that the item not proceed until the public received accurate notice of the project's true scope.
- **Relevance to Amador:** This is the *same applicant* whose current Amador application again pairs a large stated program with a facially incompatible traffic figure ("~20 vehicles/day") and internally inconsistent burial-method and footprint numbers (see §2 and §4). A neutral, numbers-based objection — that the applicant's stated project cannot physically or operationally match its stated impact figures — is therefore not novel to this project; it was **already raised and documented against the same applicant** in a prior jurisdiction. That prior record supports requiring the applicant to reconcile its own numbers before any CEQA determination is made.

Note on the scope of this record. The Sacramento project was processed as an "Early CPAC Workshop," a preliminary informational item, and the county's online system does not post a hearing outcome or a stated closure reason; it shows the record as "Closed." The chronology of the applicant's prior applications states that the Cosumnes Community Planning Advisory Council rejected the project in 2017 amid "significant technical issues and significant community opposition." The outcome is therefore characterized here as **rejected at CPAC / closed**, and the 2017 comment letter is cited for the technical and quantitative objections it documents rather than for the disposition.

3.6 The Amador record itself documents the scope reduction — and unresolved technical defects carried forward

The 2022 application file, the associated planning correspondence, and the September 29, 2025 rejection letter directly corroborate the piecemealing pattern and show that **core technical problems flagged years ago were never cured** — yet several of these documents do not appear to have been carried forward into the current 2026 Initial Study or application. Each of the following should be placed in the administrative record.

(a) 2022 application — the full-scale project on this parcel. The July 21, 2022 Use Permit application (UP-22;2-3, APN 001-220-013) described **50,000 gravesites** together with a **10,000 sq-ft, 30-ft-tall assembly building with occupancy for 1,200 people**, plus office, caretaker, equipment, and additional accessory buildings. This is the concrete "whole of the action" against which the reduced 2026 proposal must be measured for piecemealing purposes.

(b) August 5, 2022 planning meeting summary (Planner Krista Ruesel). A follow-up email listing nine required revision items records several admissions and defects that remain directly relevant to the 2026 review:

- **Item 8 — capacity/funeral mismatch:** the County told the applicant that **"50,000 is not realistic with the amount of funerals you proposed"**, unless graves would be "occupied without funerary services." This is the County's own contemporaneous acknowledgment that the applicant's burial numbers and funeral/traffic numbers do not reconcile — the same defect that persists in the 2026 application (see §2).
- **Item 6 — water:** the applicant was directed to **remove all references to "city water,"** because it was "verified that the existing services are not sufficient to supply the property"; the applicant would be required to "provide well service or supplement AWA systems." The 2026 documents nonetheless still contain conflicting water-source statements (see §4), indicating the 2022 correction was not fully carried through.
- **Item 7 — wastewater:** "There is no sewer service and you will need to have engineered septic … prepared by an engineer qualified to design such systems." This confirms the site's wastewater constraint predates the current application.
- **Items 1–5, 9 —** removal of the building from the proposal, a to-scale site plan with parking count, defined maximum/average visitation and event schedule, restroom locations, and a fuller operations narrative (hours, equipment, on-site employees).

(c) February 2023 septic-hold emails. Correspondence among the applicant's representative (Abdikarim Ali), Planner Krista Ruesel, and Environmental Health (Scott Meyer) documents that the County placed the **septic/sewage-disposal system design on hold** until a Use Permit was approved, while noting that **soil profiles/soil logs for the parcel had been conducted and were on file** with Environmental Health. Any current claim that septic feasibility is simply deferred to a later condition should be tested against these existing soil records.

(d) September 29, 2025 Planning Department rejection letter (Planner Krista Ruesel). Following the September 18, 2025 TAC meeting, the County found the (downsized) application **incomplete** and enumerated the minimum items required to move forward — several of which go to the adequacy of the current project description:

- **Site plan** lacked sufficient information; the County required a **to-scale plan** showing road widths/dimensions, encroachment dimensions, parking-area location and dimensions, restroom-building location, **number of graves in each block**, and **topographic contours with existing/proposed grading and drainage**.
- **On-site sewage disposal:** the County required a formal septic application, a soil-profile investigation with ACEH, and a preliminary septic design — reiterating the wastewater constraint.

- **Equipment/fuel storage:** because the equipment building had been removed, the County required disclosure of where equipment, hazardous materials, or fuels would be stored.
- **Operational information:** the County required stated **days/hours of operation** ("sunrise to sunset is fine") and a statement that **bodies would be prepared off-site with only burial on-site.**
- **Application consistency:** the County directed the applicant to **remove references to the previously-proposed building** and to make "all project descriptions … consistent to avoid confusion" — an express prior warning about the very project-description instability that the current application still exhibits.

Why this matters for CEQA. These records establish three things for the administrative record: (1) the reduced 2026 scope is a documented down-scaling of a **50,000-gravesite + assembly-building** project on the **same parcel** (piecemealing, §3.1–3.3); (2) the County itself has repeatedly identified **capacity/funeral-mismatch, water-supply, wastewater, grading/drainage, and project-description-consistency** problems that a Mitigated Negative Declaration must actually resolve, not defer; and (3) to the extent the 2022 emails, the septic/soil records, and the prior rejection letters were **not brought forward into the 2026 IS**, the IS rests on an incomplete record and should be supplemented before any CEQA determination. If any of these documents were omitted from the file transmitted to decision-makers, that omission should be raised on the record (Pub. Resources Code §21177).

3.6A Four irreconcilable sizes for the same structure, and the halving of the proposal between two referrals of the same permit

The 2022 record does not contain one project description of the assembly building. It contains **four, all circulated by the County or generated in response to County transmittals, and none reconciled anywhere in the record** — followed in 2026 by a fifth state of the description in which the structure does not exist at all.

Stated size	Date	Source document	Whose words
20,000 sq. ft.	**Feb. 18, 2022**	Email, Director, County Dept. of Transportation, to the Planning Department	A **County department director's**, reading the applicant's February 2022 submittal
20,000 sq. ft.	**Mar. 3, 2022**	CDFW comment letter (H. Tran, Region 2)	**CDFW's** — a Trustee and Responsible Agency, reading the same submittal
2,500 sq ft — "PROPOSED BUILDING"	2022 plot map, in the July 2022 package	Applicant's plot map, title block "PROPOSED ZONE CHANGE FOR CEMETERY"	The **applicant's**

Stated size	Date	Source document	Whose words
10,000 sq-ft, 30 ft, occupancy 1,200, labeled **"STAGE 2"**	Filed **July 21, 2022**	Applicant's engineering plot sheets, County Planning Department file	The **applicant's** — the operative proposal
3,000 sq. ft.	**July 21, 2022**	County Early Consultation Referral cover sheet	The **County Planning Department's**
no structure of any kind	2025–2026 sheets and the 2026 Initial Study	Applicant's 2025/2026 plot sheets; County Initial Study	Both

Two figures in the record are *not* part of this discrepancy, and should not be argued as though they were. The "30X50 EXISTING STEEL SHED" on the plot sheets and the "1,500 SqFt steel building" in the 2025 Cemetery Plan are the **same existing structure**, and the figures agree exactly (30 × 50 = 1,500 sq ft). The 25' × 50' (1,250 sq ft) open storage equipment shed in the 2025 Cemetery Plan is a separate, newly proposed accessory building. *(Correction: an earlier working note in this file treated the 1,500 sq ft figure as a fourth floor-area figure for the assembly building. It is not. Raising it as a discrepancy would be inaccurate and would weaken the four genuine ones.)*

The 10,000 sq-ft figure carries the applicant's own "STAGE 2" label — see § 3.1A. That is not merely another size; it is the applicant's own statement that the structure belongs to a later phase of the same project.

The February 18, 2022 email is in the backup to the July 21, 2022 Early Consultation Application Referral *(provided by client; on file)*. The July 21, 2022 cover sheet was transmitted to **sixteen County departments and outside agencies and nine California Native American tribes.** *(Correction: earlier revisions of this Analysis stated twelve tribes, and one revision stated that the County had added three tribes after 2022. Both statements were wrong and are withdrawn. Every referral cover sheet examined — July 21, 2022, April 24, 2026, and May 27, 2026 — names the same **nine** tribes in the same order: Buena Vista, Calaveras, Chicken Ranch, Ione, Jackson Rancheria, Nashville Enterprise Miwok-Maidu-Nishinam, Shingle Springs, United Auburn Indian Community, and Washoe. The distribution list did not change; the only element removed from the sheet between 2022 and 2026 is the Pub. Resources Code § 21080.3.1 notification footnote. The Sept. 4, 2025 sheet has not been examined.)*

The referral that produced the two 20,000 sq. ft. responses has now been located. It is an email from the Amador County Planning Department sent **Thursday, February 17, 2022 at 4:45 p.m.**, subject line "TAC Project Referral - UP-22;2-3 Gardens of Noor Cemetery," signed **Krista Ruesel, Planner**. It survives because CDFW quoted it in full beneath its own March 3, 2022 comment letter, at page 116 of the application file *(provided by client; on file)*. Its entire text is:

> "Greetings, Please see attached submittal of Use Permit Application UP-22;2-3 Kaddoura Cemetary, to be reviewed by the Technical Advisory Committee on Thursday, March 3, 2022 at 1:00 PM in the Board of Supervisors Chambers in the Amador County

> Administration Center, located at 810 Court St., Jackson, CA 95642. The Technical Advisory Committee will review the project for completeness."

The transmittal states no floor area, no occupant load, no gravesite count, and no structure description of any kind. It transmits an attachment. The 20,000 sq. ft. figure therefore did not originate with the County's cover email and did not originate independently with two agencies — it came from **the submittal attached to the February 17, 2022 referral**, that is, from the applicant's own February 2022 application package. That is confirmed by the internal consistency of CDFW's description, which reproduces a cluster of figures no reviewer would invent: "parking for up to 100 cars, a proposed 20,000 sq. ft. religious building and 50,000 gravesites at the maximum build-out in 2122" *(CDFW's wording, quoted as written)*.

This is materially more damaging to the County's process than an unexplained number would have been. It establishes that the application referred out on February 17, 2022 described a structure of **20,000 sq. ft.**, and the application on file five months later described **10,000 sq-ft at an occupancy of 1,200** — the proposal was **cut in half between two referrals of the same permit**. The record contains no re-referral of the reduced description to the Department of Transportation and Public Works or to CDFW, and no document in which either agency was told the structure it had analyzed had changed size. Both agencies' comments therefore remain in the file as commentary on a superseded description, and the July 21, 2022 cover sheet then introduced a **third** figure, 3,000 sq. ft., that matches neither the February nor the July application.

The operative figure for the project actually proposed is the **applicant's own: 10,000 sq-ft, 30 feet tall, occupancy 1,200.** That is the figure this Analysis uses in §§ 3.1–3.6, and the impact analyses at §§ 6.6 and 6.12 are keyed to the applicant's own **occupant load of 1,200** rather than to any floor area, precisely because the floor-area figures in the County's record do not agree.

Three defects follow, each independent of which number is "right."

(1) Two reviewing agencies analyzed a building twice the size of the one proposed. A County department director on February 18, 2022 and CDFW on March 3, 2022 — independently, two weeks apart — both described a **20,000 sq. ft.** structure. Two agencies do not arrive at the same wrong figure by coincidence; both were working from a County-supplied description that said 20,000. CDFW's substantive comments on oak-woodland removal, nesting birds, and special-status species were therefore formed against a footprint **twice** that of the application. CEQA requires a project description that is "accurate, stable and finite" (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185); commenting agencies cannot discharge their Trustee and Responsible Agency functions against a description that is none of those things.

(2) The County's own July 21, 2022 referral understated the applicant's stated floor area by seventy percent. The cover sheet transmitted to sixteen departments and agencies and nine tribes described "a proposed **3,000 sq. ft. worship building**" *(the County's wording, quoted as written)* on the same day the applicant filed documents describing a **10,000 sq-ft** structure with an occupancy of **1,200**. The single document by which the County solicited agency and tribal review misstated the size of the only structure on the site — and omitted the occupant load entirely, which is the figure that actually drives water demand, wastewater load, parking, and airport-safety occupancy density (§§ 5.4, 6.6, 6.12, 6.13). Every agency and tribe that relied on that cover sheet reviewed a materially smaller project than the one on file.

The County's position on this issue is already on the record, in its own words. On **August 5, 2022** the Planning Department directed the applicant to make "**all project descriptions … consistent to avoid confusion**" (§ 3.6(b), item 9). The County thus identified project-description inconsistency as a completeness defect — two weeks after transmitting a referral describing a 3,000 sq. ft. structure to sixteen agencies and nine tribes, in a proceeding in which its own department director and CDFW had already described that structure at 20,000 sq. ft. The standard the County applied to the applicant is the standard by which its own transmittals should be measured (see § 4A).

(3) The structure was reduced by half between two referrals of the same permit, and the agencies that had already commented were never asked again. The February 17, 2022 referral put a **20,000 sq. ft.** structure before the Technical Advisory Committee and the outside agencies; the Department of Transportation and Public Works responded on February 18 and CDFW on March 3, both analyzing that structure. The application on file by July 21, 2022 described **10,000 sq-ft at an occupancy of 1,200** — half the floor area — and the County's cover sheet that day described **3,000 sq. ft.** Nothing in the record re-refers the reduced description to either agency, retracts their comments, or asks whether their conclusions hold at the smaller size. This matters in both directions: the Department of Transportation's traffic-mitigation-fee determination was expressly keyed to "the proposed 20,000 SF religious building" *(the Director's wording, quoted as written)*, and CDFW's oak-woodland, nesting-bird, and Ione manzanita comments were formed against a footprint twice the size later proposed. An agency comment obtained on a superseded project description is not substantial evidence that the current project is adequately mitigated, and the County cannot rely on it as concurrence.

The same defect recurs in **2026**, at greater scale: the Initial Study now describes **no assembly building at all**, a fifth state of the project description, and the applicant's own Environmental Information Form of **July 8, 2022** — and again of **August 27, 2025** — certified **"No"** to the question whether the project "ha[s] a relationship to a larger project or series of projects" — on the same parcel for which 50,000 gravesites and a 20,000 sq. ft. structure had been referred out in February 2022.

Record requests. (a) **The submittal attached to the February 17, 2022, 4:45 p.m. TAC Project Referral email** — the attachment is the source of the 20,000 sq. ft. figure and is the single most important missing document on this issue; (b) the March 3, 2022 TAC Staff Referral Packet for UP-22;2-3 in full; (c) every County-generated or applicant-generated project description of the assembly building between January 1 and July 21, 2022, in date order; (d) any re-referral, notice, or correspondence informing the Department of Transportation and Public Works or CDFW that the structure had been reduced from 20,000 sq. ft.; and (e) any document reconciling the 2,500, 3,000, 10,000, and 20,000 sq-ft figures, or a statement that none exists.

---

4. Application ↔ Initial Study Conformity Defects

A CEQA document must describe and analyze **the project actually proposed**. The following are material non-conformities between the Application and the IS (and internal contradictions within the Application itself):

Topic	Application says	Initial Study says	Why it matters
Burial method	Two competing descriptions: (a) Cemetery Plan narrative — bodies in **caskets** with **concrete liners**, graves **4.5–6 ft** deep, ground raised 2 ft; (b) Burial-practice attachment — **shrouded** bodies (three layers of cotton), buried as shallow as **18 inches** (soil thickness "18–48 inches").	Treats internment generically; HYD-2 defers to "State Cemetery Board" and RWQCB "best management practices."	Green (shroud, unembalmed) burial at 18 inches has a *fundamentally different* groundwater-contamination and disinterment profile than a casketed, lined, 5-ft burial. The IS never analyzes the actual green-burial method, and the Application itself is internally inconsistent about which method applies.
Fenced burial area	Northern **1.2 acres** (IS project description) vs. community's measured **7.3-acre** fenced area.	Repeats "northern 1.2 acres."	Understated development footprint understates grading, runoff, biological take, and visual impact.
Water supply	"Connected to Amador Water Agency water" *and* "a permit is applied for a well."	"Not located within the service area of an existing public water system"; requires the applicant to *verify* well adequacy later (UTL-1/UTL-2).	The documents disagree on whether public water even serves the site; water adequacy is deferred rather than demonstrated.
Event intensity	60 funerals/month, 50 attendees, "20 vehicles/day."	50 attendees, max 2/day.	Internally inconsistent numbers adopted without reconciliation (see §2).
Accessory buildings	"and perhaps accessory buildings"; "ancillary … accessory structures."	Not bounded or analyzed.	Open-ended "blank check" scope; CEQA requires a stable, finite project description.
General Plan designation	—	Site is **MRZ (Mineral Resource Zone)**; zoning **R1A**. IS calls the conflict "less than significant."	A cemetery in an MRZ/R1A rural-residential/agricultural area raises a General Plan consistency question the IS

Topic	Application says	Initial Study says	Why it matters
			resolves conclusorily.

The recurring pattern is that the IS **analyzes a smaller, milder, better-served project than the Application describes.** Where the underlying project description is unstable or understated, downstream impact conclusions inherit the defect.

4A. Inconsistent Application of the County's Own Completeness Standards and CEQA Standard of Care

This section raises a **procedural-integrity and equal-treatment** concern that is independent of any single impact area: **the County has not applied its own application-completeness requirements — or CEQA's standard of care — consistently to this project over time, or evenhandedly as against other applicants.** This is a neutral, process-based objection. It does not depend on the identity, character, or beliefs of the applicant or of any user of the facility; it depends only on the County holding every project to the same code and the same CEQA standard.

4A.1 The County's own prior determinations set the completeness bar for this exact project

The administrative record shows the County repeatedly told **this applicant, for this project,** that the application was **incomplete** and could not advance until specific information was supplied:

- **September 29, 2025 — Deficiency letter (post-TAC).** Following the September 18, 2025 Technical Advisory Committee meeting, the County's Community Development Agency found the application **incomplete** and issued a written list of the **minimum** information "required in order to move the project forward," expressly cautioning that "receipt of the below mentioned items does not constitute a finding of completion" and that "during the evaluation process, additional studies will be needed." The enumerated prerequisites included: (1) an engineer- or surveyor-prepared, to-scale **site plan** showing road widths, encroachment dimensions, parking, restroom location, **number of graves in each block**, and **topographic contours with grading/drainage improvements**; (2) an **on-site sewage disposal system application** with soil-profile site investigation and a preliminary engineered septic design "capable of treating waste for maximum proposed visitors"; (3) **equipment/fuel/hazardous-materials storage** information; (4) an **operational statement** (days/hours; confirmation that bodies are prepared off-site and only burial occurs on-site); and (5) **application consistency** — removal of references to project components since deleted. *(Amador County Planning Department deficiency letter, Sept. 29, 2025; provided by client; on file.)*
- **August 5, 2022 — Resubmittal requirements.** An earlier County list required, among other things, a preliminary **engineered septic design** "capable of treating waste for maximum proposed visitors," **well/water adequacy** verification (with an express finding that existing Amador Water Agency service "[is] not sufficient"), and a **recalculation of gravesites relative to funerals and capacity** because the then-proposed numbers were "not

realistic." *(Amador County Planning Department email, Aug. 5, 2022; provided by client; on file.)*

- **December 21, 2022 — Planning Director determination.** Planning Director Chuck Beatty confirmed in writing that the Conditional Use Permit application "remains incomplete (deficiencies list attached), has not been through environmental review, and has not been approved by the Planning Commission," and that no building, well, septic, or encroachment permits could issue for anything other than a single-family dwelling until a CUP issued "following **adequate environmental review**, public notice, and a public hearing." *(Amador County Planning Department email, Dec. 21, 2022; provided by client; on file.)*

4A.2 The current MND treats several of those same items as resolved or deferred without the information the County itself demanded

The completeness deficiencies the County identified are **substantive environmental-information items**, not clerical ones — a to-scale site plan with grading/drainage and grave counts, an engineered septic design sized to maximum visitation, water-supply adequacy, and hazardous-materials storage. Yet the current Initial Study/MND:

- carries forward the **unresolved water-supply question** (§4 above; the IS both states the site is not in a public-water service area and elsewhere references AWA connection, and defers well adequacy to a later verification condition rather than demonstrating it);
- **defers sewage/on-site wastewater** adequacy rather than establishing it with the engineered design the County said was the "minimum required" — notwithstanding that the record shows the septic design was expressly placed "on hold" pending the use permit *(Feb. 7–8, 2023 emails; provided by client; on file)*;
- relies on a **project description with the same site-plan and footprint inconsistencies** the deficiency letters sought to cure (see §4: 1.2-acre vs. 7.3-acre fenced area; grave counts; grading/drainage); and
- resolves the **land-use/General-Plan-consistency** and operational-intensity questions **conclusorily** (§§2, 4, 6.8) rather than on the completed record the County's own letters said was a prerequisite.

The concern is not that the County asked for this information in 2022 and 2025 — it was right to. The concern is that the County appears to have **advanced the project to a proposed MND and Planning Commission hearing without the very information it previously deemed the "minimum required"** to evaluate the project, and without the "additional studies" its own letter anticipated. An agency does not satisfy CEQA by first identifying the information necessary to evaluate a project and then declining to obtain it before certifying a negative declaration. *(See* Pub. Resources Code § 21080(c)–(d); CEQA Guidelines 14 CCR § 15063 (initial study must identify environmental effects and the information needed to evaluate them); § 15064.)*

4A.3 The County's contemporaneous litigating position confirms the standard it should apply here

The County's expectation that an applicant must supply detailed environmental and completeness information **before** an application is deemed complete is not unique to this project — it reflects the County's stated understanding of its own code and of CEQA. In ***Old Golden Oaks LLC v. County of***

***Amador* (2025) 111 Cal.App.5th 794**, a published Third Appellate District decision, the County successfully defended its authority to **condition the completeness of a grading-permit application on additional environmental (CEQA) information**, on the ground that its permit checklist and code put the applicant on notice that CEQA compliance was required. The Court of Appeal **affirmed** the County on that point (Justia; JD Supra, CEQA News You Can Use, Aug. 2025; Perkins Coie, 2025 Land Use Case Summaries). **That decision is final.** The California Supreme Court **denied review on September 17, 2025** (No. S291821), and the opinion remains published and citable (Supreme Court minutes, Sept. 17, 2025).

The relevance here is **not** the permit type or the outcome of that dispute; it is the **standard of care** the County itself invoked and the Court endorsed: Amador County both **can and does** require thorough, project-specific environmental information as a condition of application completeness, and it treats CEQA compliance as a completeness prerequisite. The neutral, evenhanded-treatment point for the record is simply this — **the County should apply that same completeness rigor and CEQA standard of care to this project.** Having demanded (in *Old Golden Oaks*) and obtained judicial endorsement of a robust up-front environmental-information requirement for one applicant, and having itself twice found this application incomplete for want of comparable information, the County should not now advance this project on a Mitigated Negative Declaration built on a record it previously deemed insufficient.

4A.4 Why this matters legally

- **Consistency is a hallmark of non-arbitrary decision-making.** Where an agency applies its completeness and environmental-review standards more rigorously to some applicants than to others, or more rigorously to a project at one stage than at a later stage without explanation, the later, more lenient treatment is vulnerable as **arbitrary and capricious** and as an abuse of discretion. The remedy the record supports is not special scrutiny of this applicant, but **equal scrutiny** — holding this project to the same completeness and CEQA standards the County has applied to others and previously applied to this very project.
- **Completeness is intertwined with the fair-argument test.** The information the County itself said was "the minimum required" — engineered septic sized to maximum visitation, a to-scale grading/drainage site plan, verified water supply — is precisely the information needed to determine whether substantial evidence supports a fair argument of significant effects on groundwater, water supply, drainage, and wildfire access (§§2, 5, 6.12a). Certifying an MND without it does not make those effects less than significant; it leaves them **unstudied**, which under CEQA counts against the agency, not the objectors.
- **Basis of objection.** This objection is entirely process- and code-based. It asks the County to do what it has told this applicant, and told the courts, it requires: apply its completeness rules and CEQA's standard of care uniformly, on a complete record, before any approval.

---

5. Site-Specific Physical Impacts the IS Dismissed

5.1 Floodplain and annual flooding

- **The IS says the site is "Flood Zone X … of minimal flood hazard"** and "not in any FEMA mapped DFIRM Flood Zones," and therefore finds flood impacts less than significant.

- **This conflicts with the documented on-the-ground condition** reported by adjacent landowners (annual flooding) and with the community's account, given in testimony at the TAC meetings of May 7 and June 11, 2026, that when it rains the County puts up saw horses marked "flooded" on Carbondale and Lambert Roads, with eroded, non-culverted ditches and cave-in delineators. FEMA Zone X mapping is coarse and frequently omits **local, shallow, and repeated flooding** on small rural drainages; a "Zone X" label is not substantial evidence that the *site* does not flood. CEQA requires analysis of actual conditions, not just the FEMA overlay.
- **The interaction the IS never evaluates:** shallow (18-inch) unembalmed burials + annual flooding + documented erosion on cleared ground = a foreseeable risk of **inundation and exhumation of remains and of decomposition products entering flood/runoff water.** This is a water-quality and public-health impact pathway that the Hydrology chapter does not address at all.

5.2 Groundwater contamination from shallow green burials

This is one of the strongest technical points, because the applicant's **own geotechnical report undercuts the County's finding.**

- **The applicant's Hallenbeck/Allwest geotechnical report states:** "**Groundwater was consistently encountered, actively seeping** at the time of drilling. Groundwater appears to **seep through fractures in the siltstone bedrock**," and "groundwater was **persistent** … **pooling and ponded** shortly following excavation of the pits."
- **The established environmental-health literature on green burial** holds that the bulk of the contaminant load from a decomposing unembalmed body is released to the subsurface **within the first ~5 years**, and that risk to groundwater is **highest in shallow, permeable, or fractured settings, in warm climates with high precipitation** — and that **"soils composed of gravel, or fractured rock should be avoided as they will maximize the migration of contaminants to the groundwater"** (NACCHO, *Environmental Health Implications of Green Burials*).
- The site presents **exactly the disfavored combination**: fracture-fed shallow groundwater in siltstone bedrock, ~35 inches of annual rainfall (per the Application), warm summers, shallow 18-inch burials, and no embalming or casket barrier. Yet the IS's Hydrology chapter concludes "less than significant with mitigation" and its mitigation (HYD-2) merely **defers** to unspecified "best management practices" and future RWQCB permits — classic **improperly deferred mitigation** under CEQA.
- **The County's own counsel identified this exact impact as the most significant one, in writing, three years ago — and the record does not show the requested studies were ever produced.** In a June 1, 2023 email to the Planning Department regarding the 2022 application on this same parcel, Deputy County Counsel Glenn Spitzer wrote: "The most significant impact I see is water contamination. This is our opportunity (and our obligation) to ask for all the studies/data that would help us analyze those impacts in the environmental review process. I don't think we should deem the application complete until we have this." He specified three minimum items: (1) "a detailed, to-scale site plan showing grave sites (including depths), all proposed hardscape and landscape, fencing, walkways, proposed structures, etc."; (2) "hydrological data showing potential flood areas and water table

depths in the areas of the potential grave sites"; and (3) "a study showing basic soil profiles for the grave site areas" *(email correspondence, Deputy County Counsel Glenn Spitzer to Amador County Planning Department, June 1, 2023; obtained via a Public Records Act request by Ron Woodhouse, Eagles Nest Association, and provided by client; Exhibit 7-F)*. None of these three items — a to-scale grave-depth site plan, water-table/flood-area hydrological data specific to the grave sites, or a soil-profile study of the grave-site areas — appears in the current 2026 Initial Study or its technical appendices; the Hydrology chapter instead relies on the generalized geotechnical report discussed above and defers the rest to future BMPs. This is the same completeness gap the County itself flagged as essential in 2023, still unresolved on the current record (see also §4A).

- **The County's own Environmental Health and Public Health staff raised the identical concern two to three weeks later, and specifically flagged pathogen leaching.** In a June 16–22, 2023 email exchange, Amador County Environmental Health (Debra Larson) told Amador County Public Health Officer Dr. Rita Huspen Kerr: "This is new territory for us. We are evaluating groundwater contamination potential from burials. The overriding burial method at this proposed facility is that the bodies would be wrapped in cloth, buried with a concrete surround (open at the bottom), no embalming, and no caskets. We are wondering about disease and disease treatment pathogens or chemicals that could leach to groundwater or that are persistent." Dr. Kerr responded by pointing Environmental Health to the Cemetery and Funeral Bureau's guidance on embalming and natural burial and to then-pending state legislation (AB 351) directing the State Department of Public Health to set standards "to preserve the public health and safety and to ensure the destruction of pathogenic microorganisms" for a different disposition method — underscoring that, as of 2023, the state itself had not yet finished writing pathogen-destruction standards even for a regulated alternative, let alone for this project's unregulated shroud-burial method *(email correspondence, Amador County Environmental Health and Amador County Public Health Officer, June 16–22, 2023; obtained via a Public Records Act request by Ron Woodhouse, Eagles Nest Association, and provided by client; Exhibit 7-F)*. Like the Spitzer email, this exchange predates the current 2026 filing by roughly three years, and the pathogen-leaching question it raises does not appear to have been analyzed in the current Initial Study or its technical appendices.
- **Well/drinking-water pathway:** adjacent landowners report that no one within ~10 miles has drilled an adequate domestic well, and the community reports the founding families' 10 wells (to 700 ft) with dry or high-iron/sulfur results. Placing a burial ground over the same fractured aquifer that the surrounding community relies on for (marginal) domestic water raises a contamination-of-supply question the IS does not analyze.

5.3 Uncontrolled feral pig population and disinterment risk

- **Damage by feral swine to burial grounds is documented in federal agency materials.** The U.S. federal government's own materials confirm feral swine damage **"cemeteries … burial grounds"** and can **"disturb soil and land"** at such sites (USDA/APHIS, *Feral Swine* fact sheet, GovInfo).
- Feral swine root **as deep as ~1 meter (~39 inches) in soft soils** (The Wildlife Society, *Feral Swine in North America*) — **deeper than the project's 18-inch minimum burial depth.**

California Department of Fish and Wildlife materials expressly list **cemeteries** among properties damaged by wild-pig rooting (CDFW Wild Pig Forum, 2022).

- California hosts an estimated **200,000–400,000+ feral pigs across 56 of 58 counties**, uncontrolled and expanding, with adults commonly **150–500 lbs** (Los Angeles Times; Alta / NBC Bay Area).
- **Site-specific evidence of the condition is in the record.** Photographs at **Exhibit 7-E** show a feral swine trap enclosure on land in the vicinity of this parcel, submitted without a declarant and without site-specific claims as to distance, dimensions, or dates; the photographs are offered only to show that active trapping activity exists nearby, consistent with the regional agency and academic sources cited above. Independently of Exhibit 7-E, the absence of any discussion of feral swine in the Initial Study is a gap in the project's own baseline.
- **The IS never mentions feral swine.** Given (a) shallow unembalmed burials, (b) a documented uncontrolled population, (c) rooting depths exceeding burial depth, and (d) the express federal recognition of cemetery/burial-ground damage, this is a **foreseeable impact to human remains, water quality, and biological/soil resources** that at minimum required analysis and an enforceable containment measure (e.g., engineered fencing designed to swine-exclusion standards, burial-depth minimums keyed to rooting depth). The Application's 5-ft perimeter fence is not analyzed for swine resistance. Published trapping guidance specifies livestock panels of no less than 5 feet in height, anchored to driven posts, for enclosures intended to hold wild pigs (Mississippi State University, *Wild Pig Info*), and federal guidance directs that exclusion fencing be reinforced into the ground to prevent animals from digging under it (USDA/APHIS, *Fencing out Feral Swine*). The proposed fence matches the panel height used to *contain* these animals while the record contains no analysis of any below-grade component at all.

5.4 Domestic water and fire-suppression adequacy

- **The Amador Water Agency has formally capped this parcel at ~400 gallons per average day.** In a written summary to the Planning Department (April 10, 2023), AWA Assistant Engineer Lucas Carthew stated that the water line serving the Eagle's Nest area is **"undersized and susceptible to low pressure dips when demand is high,"** and that AWA has therefore **limited APN 001-220-013 to a 5/8-inch meter with one (1) Equivalent Dwelling Unit of capacity — "1 EDU is approximately 400 gallons per average day"** *(provided by client; on file)*. A proposed on-site well was described as supplying only **~2 gpm** to *supplement* — not replace — that supply, and AWA noted that any fire-protection needs "required by the fire protection authority" would be a separate, owner-funded installation. **This 400-gpd cap is decisive:** a facility hosting up to ~60 funeral events per month (and, at build-out, a large assembly/event use with restrooms, plus irrigation for trees, grass, and shrubs) cannot plausibly operate within a single-dwelling-equivalent water budget. The IS treats water supply as a deferred, conditionable detail; the AWA letter shows the supply is already **physically constrained at the source**, which bears on domestic-water adequacy (concerns #4, #7, #17), building fire-protection water (concern #6), and the wastewater-generation math below (§5.2 / §6.6).
- **Fire flow:** California/CAL FIRE standards require a minimum of roughly **1,000 gpm for 2 hours** for smaller structures, with larger demands under CFC Appendix B / NFPA 1142 for

rural sites (CAL FIRE SLO Standard 1 – Water Supply; California Fire Code Appendix B, UpCodes). A site with no proven well and an at-capacity/undersized public line cannot demonstrate this.

- **The IS defers rather than demonstrates.** TRA-2 requires future compliance with the Fire and Life Safety Ordinance (Ch. 15.30) and "any future buildings will require a fire water supply"; UTL-2 requires the applicant to *later* verify well adequacy. **No evidence in the record shows adequate water exists.** For a facility drawing large gatherings into a high-fire-risk rural landscape (the IS itself places the site in a "Moderate Fire Risk Zone" within a State Responsibility Area context), unproven fire-suppression water is a safety and wildfire-impact issue, and deferring the entire question to a post-approval study is improper deferral of mitigation.
- The IS's Public Services / Wildfire chapters also contain **apparent copied-in errors** (the community notes a Lake Camanche-area description, wrong fire-station distance, and wrong highway orientation), which further undermines confidence that site-specific conditions were actually analyzed.

5.5 Biological resources — special-status species and the 2022 CDFW / agency letters

- **Formal CDFW comment letter, March 3, 2022 (Harvey Tran, Environmental Scientist, CDFW Region 2).** CDFW submitted formal comments as a Trustee Agency (Fish & G. Code, §§ 711.7, 1802; CEQA Guidelines, § 15386) and as a Responsible Agency (CEQA Guidelines, § 15381) during Early Consultation. CDFW described the project it was asked to review in these words:

  "The Project would construct a cemetery located on 857 Carbondale Rd., Ione in Amador County. The 46-acre parcel will have parking for up to 100 cars, a proposed 20,000 sq. ft. religious building and 50,000 gravesites at the maximum buildout in 2122. Th [*sic*] Project will remove at least 2 acres of oak woodland habitat and an unknown acreage of chapparal [*sic*] and ruderal grassland habitat."

  (Quoted in full and reproduced as written, including the original's typographical errors, because the project description CDFW was given is itself the point — it is the benchmark against which the County's other contemporaneous descriptions of the same project are compared in § 3.6A. The letter is identified at Exhibit 7-A and attached at EX-C.) **The 20,000 sq-ft figure is the one CDFW was given: it comes from the submittal attached to the County's February 17, 2022, 4:45 p.m. referral, and it does not match the application on file by July 21, 2022 (10,000 sq-ft, occupancy 1,200) or the County's own referral cover sheet of that same day (3,000 sq. ft.) — see § 3.6A. CDFW therefore commented against a footprint twice that of the later proposal, and was never re-consulted after the reduction.** The letter raised three specific concerns that go directly to the current review:

  - **Nesting birds** — mature trees in the south portion of the parcel (oak woodland) provide potential nesting habitat for migratory birds and raptors; CDFW identified an avian nesting season of **February 1 to August 31**, recommended review of **Fish and Game Code §§ 3503, 3503.5, 3515, 4150, and 4152**, and stated that the project "should disclose all future potential activities that may incur a direct or indirect take to nongame nesting birds within the Project footprint and its close vicinity,"

recommending species-specific work windows, biological monitoring, and installation of noise-attenuation barriers.

- **Ione manzanita** — the California Natural Diversity Database shows chaparral **0.2 mile north and 0.4 mile east** of the parcel within the presumed extent of Ione manzanita (*Arctostaphylos myrtifolia*), a species listed as **threatened under the federal Endangered Species Act** and ranked **1B.2** by the California Native Plant Society, as stated in the letter; CDFW recommended the lead agency evaluate suitable chaparral on the **north portion of the parcel** and conduct floristic (rare-plant) surveys per CDFW's 2009 protocols.
- **Oak woodland** — significant oak-woodland habitat exists on site; any environmental document should analyze direct, indirect, and cumulative impacts to oak woodlands under the Oak Woodlands Conservation Act (Fish & Game Code §§ 1360–1372). CDFW cited CEQA Guidelines § 15096(f), which requires it, acting as a responsible agency, to consider the lead agency's environmental document before reaching its own decision, and closed by stating that addressing its comments and disclosing potential project impacts on **CESA-listed species** and any river, lake, or stream, with adequate avoidance, minimization, mitigation, monitoring, and reporting measures, would assist CDFW in the Early Consultation. This March 3, 2022 letter should be expressly identified in the record and the County asked whether these recommendations were addressed in the current IS.

- **April 14, 2022 review letter to Amador County Planning & Environmental Health** (stamped received by the Amador County Planning Department on **APR 14 2022**). This detailed review of the Gardens of Noor application and its biological review makes findings that remain squarely relevant: it states that the applicant "certified the information in the application to be true and correct, yet a cursory review finds some of the applicant's and the applicant's biologist's responses factually inaccurate"; that questions 29 and 30 of the environmental-information form neglected required plant/animal information beyond an oak-woodland review; and that the federally **endangered** Ione buckwheat (*Eriogonum apricum*) and federally **threatened** Ione manzanita (*Arctostaphylos myrtifolia*) are documented in the area and on immediately adjacent properties and "very likely occur on this project's property." It notes the parcel appears to sit **in the center of the most robust population** of the threatened manzanita (per the USFWS/CDFW 5-Year Review), warns that the project proposes to **remove acres of chaparral including manzanita** — potentially a **federal crime under the Endangered Species Act** if listed plants are taken — and concludes that **consultation with, and permits from, the U.S. Fish and Wildlife Service are likely required**, with significant liability to "all involved" if the County approves the project as described. Because the parcel and habitat are unchanged, these findings apply directly to the 2026 application; the County should be asked on the record whether it consulted USFWS/CDFW and how these concerns were resolved. **Failure to disclose or address known agency concerns is itself an information-adequacy defect** under CEQA.

- **Continuity of the record across applications:** because this is the applicant's fourth cemetery application overall — and the **third on this same Amador parcel** (2022, 2025, 2026; see §3) — biological evidence and agency correspondence generated during the earlier iterations are part of the environmental setting the County is charged with knowing. An Initial Study that treats the 2026 application as if it arose on a blank slate — ignoring the

March 3, 2022 CDFW letter and the April 14, 2022 review — does not reflect the "whole of the action" or the true baseline. **These materials should be expressly identified in the record and addressed** in any environmental document, so that the piecemealing, cumulative-impact, and biological-resource questions are answered on the record before the determination is made.

- **The five special-status plants and three oak species are now specifically identified by the neighboring landowners and their expert.** The citizens' group (working with a **UC Davis Agricultural Extension** expert) identifies **five federally/state-sensitive plant species** documented in the immediate area and on adjacent parcels — **Bisbee Peak rush-rose, Ione manzanita, Ione buckwheat, Irish Hill buckwheat, and Perry's horkelia** — and **three oak species** on the property: **Valley Oak, Live Oak (Coast/Interior), and Blue Oak**. This aligns with the March 3, 2022 CDFW letter and the April 14, 2022 review. **The analytical point is a direct evidentiary conflict:** neighbors report these listed plants and three oak species on their own adjacent properties (same soils, same Ione-formation chaparral, same slope/aspect), yet the applicant's outsourced biological assessment reports **no threatened or endangered plants and only a single oak species** on the project parcel. Under the CEQA **"fair argument"** standard, this contradiction — supported by CNDDB records, CDFW's own letter, and a qualified extension expert — is precisely the kind of substantial evidence that undercuts the applicant's consultant's negative findings and supports requiring protocol-level floristic surveys and an EIR. The County should be asked on the record to reconcile the applicant's biologist's conclusions against CDFW's documented concerns and the adjacent-property observations before relying on that report to support a Mitigated Negative Declaration.

*(Note: the April 14, 2022 review references the **Moore Biological report** included in the application as the source that documented and even requested removal of manzanita/grasses — a point worth cross-checking against the current application's biological attachment.)*

5.6 On-site wastewater — a third deferral, and a second reliance on residential soils data

The Initial Study's wastewater analysis is not supported by substantial evidence. The deficiency is not new; it has been raised and deferred in three consecutive County proceedings.

- **The intensity figure is the County's own.** Amador County's fire prevention officer, computing from the applicant's own attendance figures at the September 18, 2025 TAC meeting, stated the project anticipates **"approximately 3,000 people per month that he's estimating"** [00:28:06–00:28:13] — roughly **36,000 visitors per year** *(machine transcript of County meeting audio; verify at the cited timestamp before entering into the record)*. This figure is used here in preference to any independently derived attendance estimate precisely because a County official stated it on the record, computing from the applicant's own numbers.
- **Three deferrals.** Wastewater adequacy was raised in August 2022, again on June 1, 2023, and again on September 18, 2025, and deferred each time. As of the September 18, 2025 meeting, **no septic application had been filed, no soil site investigation had been**

conducted, and no system had been designed — Environmental Health had to advise the applicant that this should be "one of your first steps."

- **Scale, in the County's words.** Environmental Health stated the requirement would be **"several on-site sewage disposal systems or one large one — so that's a lot of people you're proposing to have on site."** No engineered design, no percolation data for the proposed disposal area, and no capacity calculation appears anywhere in the record.
- **Twice, the record relies on soils work performed for a single-family residence.** On June 1, 2023 the septic question was treated as resolved by borrowing residential soils data from **"within 20 feet,"** on soils with **"not even 24 inches of soil."** On September 18, 2025 the applicant relied on a plan prepared for the prior owner, to which Environmental Health responded: **"Yeah, that might be for his house."** Soils work sized for one dwelling is not evidence of capacity for a public-assembly facility.
- **Legal consequence.** This is improper deferral of mitigation formulation under CEQA Guidelines § 15126.4(a)(1)(B) and *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296. A lead agency may not find a wastewater impact less than significant while the design, the soils investigation, and the capacity calculation all remain to be performed after approval.
- **The deferral is stated on the record as County position, not inference.** On June 1, 2023 at **[01:15:43 – 01:16:00]** the applicant explained that the septic design was halted because *"they said well no you're not going to do this till you get the use permit and it's after the fact that you get the use permit so we put a hold on that one,"* and at **[01:21:02 – 01:21:14]** that his engineer was told *"we're not going to give you any information till you get the use permit."* *Sundstrom* is directly on point: "[b]y deferring environmental assessment to a future date, the conditions run counter to that policy of CEQA which requires environmental review at the earliest feasible stage in the planning process," and "[a] study conducted after approval of a project will inevitably have a diminished influence on decisionmaking." The three-part proviso in § 15126.4(a)(1)(B) is conjunctive and **none of its three requirements is met** here: no committed mitigation, no adopted performance standard, and no identified action type capable of achieving one. *Sundstrom* also supplies the answer to any argument that the gap in the record cuts against the objector: **"Deficiencies in the record may actually enlarge the scope of fair argument by lending a logical plausibility to a wider range of inferences,"** and "[t]he agency should not be allowed to hide behind its own failure to gather relevant data." This point is developed at length in the companion memorandum *Prior Permit Acquisition and Project Segmentation — UP-22;2-3* (August 13, 2026), § 9, including the design-flow problem: an on-site wastewater system is sized from a design flow derived from occupancy and event intensity, and this record carries 50 attendees per event, "approximately 3,000 people per month," a 1,200-person occupant load, and a 400-gallon-per-day metered supply cap, all unreconciled. **The County cannot defer the wastewater evaluation and simultaneously decline to fix the numbers that would give the deferred evaluation a design basis.**

*(Note on figures: a per-day visitor estimate and a specific water-tank volume that appear elsewhere in the public comment record have **not** been used in this analysis. Neither has a shown derivation or a cited source in the County's file. The figures used here are the County's own.)*

5.7 Engineered grade-raise across the burial footprint — an unanalyzed grading, drainage, and surface-water effect

The Cemetery Plan itself discloses a permanent, engineered change to the ground surface as the standard method of developing a burial lot — a mechanism the Hydrology and Water Quality analysis above (§5.1, §5.2) never addresses, because that analysis is confined to floodplain designation and to groundwater contamination from the burials themselves, not to the grading operation that precedes every burial.

- **The applicant's own words.** The Cemetery Plan states: "Excavated soil will either go to low spots on the land or stay on the lot. When a lot is developed, the lot will be excavated to two feet below the surface. Concrete liners are laid then. The excavated soil will be covering the concrete liners. Thus the new ground profile will be two feet higher." *(Cemetery Plan (March 30, 2026), p. 5; quoted as written.)* On the same page, the Plan states the Stage 1 burial section "with an area approximately 1.7 acres will be developed" — the same 1.7-acre figure used throughout this analysis — and that Amador County's climate "accounts for 35.4 inches of precipitation annually," consistent with the ~35 inches already noted at §5.2 *(Cemetery Plan (March 30, 2026), p. 5, §§ 3.1–3.2)*.
- **The mechanism is described as the general method of "lot" development, not as a Stage-1-only feature.** The Plan does not say the two-foot rise applies only to the acreage now before the County; it describes excavate-vault-backfill as what happens "when a lot is developed." This analysis has already established, at §§3.1A–3.1D, that the current 1,832-grave/1.7-acre phase is the applicant's own Stage 1 of a design the same Cemetery Plan describes as reaching a "100-year timeframe" and "full build-out," and that the permitted density extended across the full 46 acres reproduces the County's own previously circulated figure of approximately 50,000 gravesites (§3.1B). A grading method the applicant discloses as routine for developing any lot is, on this record, reasonably foreseeable to recur lot-by-lot as the reasonably foreseeable build-out proceeds — permanently raising the ground surface by two feet over a correspondingly larger share of the 46-acre parcel, not merely the 1.7 acres now under review. Whether the actual first-phase footprint is nearer 1.7 or approximately 1.6 acres does not change this: the two figures are consistent with each other and with the Plan's own acreage statement, and neither changes the fact that the grading method is described as unbounded by acreage.
- **This is a distinct impact category the Hydrology and Water Quality checklist is designed to catch, and the Initial Study does not analyze it at any scale.** The CEQA Guidelines Appendix G Hydrology and Water Quality checklist asks, among other things, whether a project would substantially alter the site's existing drainage pattern in a manner causing substantial on- or off-site erosion or siltation, or substantially increase the rate or amount of surface runoff in a manner causing on- or off-site flooding. As established above, the Initial Study's flood-related finding rests on the FEMA Zone X overlay and documented on-the-ground flooding is not analyzed (§5.1), and its groundwater-related finding addresses contamination from burials, not the elevation and drainage-pattern change that the burial method itself requires (§5.2). An engineered two-foot rise in ground elevation across an expanding burial footprint — on a parcel the record already shows floods on adjoining roads (§5.1) — is a hydrologic modification of the site, independent of and in addition to the

contamination pathway already discussed, and it does not appear to have been analyzed under either checklist item at any scale, Stage 1 or full build-out.

- **An independent body of California law confirms why a site-specific, quantitative engineering analysis — not a qualitative finding — is the applicable standard for an artificial elevation change that can redirect surface water onto neighboring land.** California follows a "reasonable use" rule for surface waters, adopted by the California Supreme Court in *Keys v. Romley* (1966) 64 Cal.2d 396 (Justia), on facts in which a landowner raised the level of land during improvements, increasing the flow of surface water onto a lower neighboring parcel. The court held that California follows a "modified civil law rule": an upper landowner may alter natural drainage only where there is reasonable necessity for the alteration and reasonable care is taken to avoid unnecessary injury to the land below, while the lower landowner must in turn take reasonable precautions against the resulting flow; the opinion separately described — without adopting as California's rule — a four-factor "reasonable use" test followed by a minority of other states, weighing (a) the reasonable necessity for the drainage alteration, (b) reasonable care to avoid unnecessary injury to the land receiving the water, (c) whether the utility of the alteration reasonably outweighs the resulting harm, and (d) whether practicable natural or improved drainage systems were used. Both the reasonableness standard actually applied and the alternative formulation described presuppose exactly the kind of civil-engineering showing — quantified pre- and post-project drainage patterns, runoff rates and volumes, and downstream effects at the actual scale of the alteration — that is absent from this record at any scale. Recording that legal framework here is offered only to identify the type and rigor of technical analysis CEQA's hydrology review should require of an engineered grade change of this kind; it is not a characterization of, or prediction about, any dispute between any parties.
- **Recommended remedy.** A civil-engineer-prepared grading and drainage analysis, evaluating the Cemetery Plan's own excavate-vault-backfill, two-foot elevation-increase mechanism at the reasonably foreseeable full-build-out scale established at §3 (not solely the Stage 1 footprint), addressing pre- and post-project drainage patterns, on- and off-site runoff rate and volume, and interaction with the flooding conditions already documented at §5.1, should be completed before the Hydrology and Water Quality checklist item can be found "less than significant."

---

6. Additional Environmental Factors the Initial Study Failed to Adequately Analyze

The sections above address the impact core: transportation/traffic (§2), improper piecemealing (§3), Application-to-IS conformity (§4), and the four site-specific physical impacts the IS dismissed (§5). This section evaluates the **remaining** CEQA Appendix G environmental factors on which the Initial Study's "less than significant" determinations are not supported by substantial evidence, each assessed against the governing statute, checklist item, or agency standard. The analysis is grounded in the Initial Study, the Application, and primary legal authority; where a community-submitted document (the *Examination of CEQA Initial Study*, Wardall et al., a comment document

in the administrative record) raises a parallel point, that is noted as corroboration, but each factor below stands on the IS's own deficiencies.

6.1 Oak trees & the State oak-woodland / tree-preservation framework

The IS does not perform the oak-woodland conversion analysis the project plainly requires. The record indicates ~25% of the 46-acre parcel was already cleared (an apparent **pre-application take**), with the remaining ~75% (30+ acres) being Live Oak, Blue Oak, and Valley Oak woodland slated for eventual removal — a condition corroborated by the community Examination and by the comparative aerial imagery on file (§6.11).

- **California Public Resources Code §21083.4** requires a county, as part of its CEQA determination, to decide whether a project **"may result in a conversion of oak woodlands that will have a significant effect on the environment,"** and if so to impose oak-woodland mitigation (conservation easements, replacement planting, or payment to the Oak Woodlands Conservation Fund) (PRC §21083.4, Justia; CA AEP CEQA Statute & Guidelines Handbook). The IS's failure to perform this required oak-woodland conversion analysis is a discrete legal defect.
- **Pre-application clearing does not launder the impact.** Where a lead agency has evidence that oaks were removed *before* application approval, that removal is still attributable to the project; some county ordinances impose replacement penalties **up to 10:1** for premature removal (Butte County Draft Oak Woodland Mitigation Ordinance). The alleged unpermitted clearing should be documented and quantified (aerial/satellite imagery timeline) for the record.
- **Replacement planting, standing alone, is not adequate mitigation.** Oak seedling and sapling mortality in unirrigated foothill conditions is high, and a replacement measure without a specified **survivorship standard**, a defined **monitoring period**, a **remedial replanting obligation**, and an **identified responsible party** does not reduce the impact to less than significant — it records an intention. Any oak mitigation adopted here should specify a minimum survivorship percentage measured at defined intervals (commonly seven to ten years in California oak mitigation practice), with mandatory replacement to maintain that standard. **This is a verifiable, binary test against the County's own document:** the UP-22;2-3 Conditions of Approval / MMRP should be checked for whether any oak measure carries a survivorship standard and monitoring term. The MMRP gap analysis found **zero operational monitoring** across all 31 conditions (§2.5A); if no oak survivorship standard exists either, the defect is documented rather than argued. Cross-reference the companion Examination of the Conditions of Approval and MMRP.
- **Honest caveat on the "cannot be mitigated" framing:** PRC §21083.4 *does* provide statutory mitigation pathways, and it contains an **agricultural-land exemption**. So the oak-woodland impact is better argued as **"significant and not adequately analyzed or mitigated in the IS"** (compelling an EIR) than as categorically unmitigable. The strongest, cleanest version of the argument is procedural: the County **skipped the required §21083.4 determination entirely.**

6.2 Federally and state-protected plants (Biological Resources, IS Ch. 4)

Five special-status plants documented on or near this parcel are not adequately analyzed by the IS. Two are **federally listed and therefore protected under the federal Endangered Species Act**, independent of CEQA:

- **Ione manzanita (*Arctostaphylos myrtifolia*)** — federally **threatened** (USFWS species profile).
- **Ione buckwheat (*Eriogonum apricum* var. *apricum*)** — federally **endangered**; the USFWS 5-year review names **"residential and commercial" development as a major threat** to both species (USFWS 5-Year Review; CDFW Ione Buckwheat).
- The others (**Irish Hill buckwheat**, **Bisbee Peak rush-rose**, **Perry's horkelia**) are CEQA-relevant special-status/CRPR-ranked plants (CDFW Ione endemic plants recovery). These are the Ione-chaparral endemics that make this specific parcel biologically sensitive.
- **Potential vernal pools** and **fencing that would impede migratory-animal movement** are CEQA biological-resource checklist items (special-status habitat; wildlife-corridor/movement interference) that the IS did not analyze. The IS's BIO-3 / BIO-4 mitigations are **under-analyzed** given federally listed species may be present. Where a federally listed plant may be affected, USFWS consultation and an EIR-level analysis are the appropriate path.

6.3 Aesthetics (IS Ch. 1)

- **Visual character:** removal of 25% (and eventual 75%) of the oak canopy degrades the "existing visual character and quality of public views" of a scenic rural corridor — a checklist item the IS treats lightly.
- **AES-1 internal contradiction:** the Use Permit is sought for **daylight-hours-only** operation, yet **Mitigation Measure AES-1 provides the facility closes at 10 PM** (and elsewhere "at dusk"). That inconsistency is another example of the IS not conforming to the Application (see §4) and should be reconciled.
- **Screening:** whether landscaping/fencing adequately screens headstones/structures is raised but is a minor point.

6.4 Agriculture & Forest Resources (IS Ch. 2)

- The IS does not adequately analyze the **incompatibility of an intensive assembly/interment use with the surrounding agricultural/ranch character** (2,500–6,000-acre ranches; Ag-40/Ag-80 parcels) and R1A zoning, nor the **removal of a 30+ acre oak forest**. This overlaps the oak-woodland (§6.1) and land-use (§6.8) analyses and reinforces the General Plan-consistency question.

6.5 Air Quality (IS Ch. 3) and Greenhouse Gas (IS Ch. 8)

- Both chapters are **downstream of the understated traffic numbers** (§2). If realistic attendance produces thousands — the community's ~18,000 — vehicle trips per month rather than the applicant's "20/day," the air-quality and GHG conclusions (built on the low number) collapse. A corrected trip estimate must feed corrected AQ/GHG analyses (criteria-pollutant thresholds and GHG significance).

- **Decomposition odors:** odor from unembalmed (green) burials is an air-quality/nuisance checklist item the IS does not analyze. This ties to the shallow-burial method (§4, §5.2) and is a legitimate, if secondary, nuisance-impact point.

6.6 Geology & Soils (IS Ch. 7)

- **Erosion:** clearing ~25% of the parcel to bare dirt increases stormwater runoff, siltation, and topsoil loss on Carbondale/Lambert Roads — compounding the flooding concern (§5.1), adding to the on-site wastewater and drainage loading addressed at §5.6, and threatening to **expose buried remains.**
- **Septic/leach fields — the Ione Clay formation.** A specific, named soils problem is not resolved by the IS: the parcel sits on the **Ione (clay) formation**, and clay soils have **very low percolation rates**, which makes conventional on-site sewage disposal (septic + leach field) difficult or infeasible — especially for the **assembly building the applicant's own 2022 application rated at an occupancy of 1,200**, generating restroom loads well beyond a single residence. (Fixture-unit and wastewater loads are driven by **occupant load**, not by floor area, so the analysis below is keyed to the applicant's own stated occupancy rather than to any floor-area figure — see § 3.6A on the divergent floor areas in the record.) The soils will require an **engineered septic system with flood-drainage barriers around the leach field.** Siting leach fields in the same shallow, fracture-fed, seasonally saturated, low-permeability clay ground identified in the applicant's own geotechnical report (§5.2) is a wastewater/groundwater concern the IS did not resolve. This connects directly to the water constraint above: a **400-gpd single-EDU water supply (§5.4)** and **clay soils that resist percolation** together make the daily water-in / sewage-out math for a 500-capacity event use physically questionable, and the 2022–2025 record shows the County repeatedly required (and held) a soil-profile investigation and engineered septic design before it would treat the system as feasible (§3.6). The IS's deferral of the entire septic question to a later condition should be tested against these known soil constraints and the existing soil logs on file with Environmental Health.

6.7 Noise (IS Ch. 13)

- The Amador County General Plan sets a **60 dBA CNEL** limit for single-family residences; the rural ambient level is estimated at **~45 dBA CNEL.** Two funerals per day plus long processions (and horn noise on clogged one-lane roads) would raise ambient noise — an increase the IS does not quantify against the General Plan standard.
- **Amplified outdoor sound.** Any amplified outdoor sound source at the facility is a noise-ordinance question the IS does not analyze against the General Plan dBA limit. The question is properly analyzed as a **content-neutral amplified-sound** question — any amplified outdoor sound source, regardless of purpose. A content-neutral condition capping amplified outdoor sound to the General Plan dBA limit is the defensible approach.

6.8 Land Use & Planning (IS Ch. 11)

- The central land-use deficiency: the IS does not adequately support its "less than significant" finding where the project is **inconsistent with the Amador County General Plan and R1A zoning**, would **"divide an established community,"** and injects an intensive quasi-commercial use into a low-intensity rural-residential/agricultural area. "Physically

dividing an established community" is an express CEQA land-use checklist item. The General Plan is also cited as specifically calling out protection of Ione manzanita and the other listed plants — linking land-use consistency to the biological findings (§6.2).

- The consistency finding cannot be evaluated from the Initial Study alone, because the document does not identify the specific **Amador County General Plan** land-use, conservation and open-space, or noise policies against which consistency was measured. The County should state, on the record, which General Plan policies it applied and how the project was found consistent with each.

6.9 Population & Housing (IS Ch. 14)

- Growth inducement is a CEQA checklist consideration the Initial Study does not analyze. The question presented here is limited to **infrastructure-driven** growth inducement: whether new water supply, wastewater capacity, or road improvements constructed to serve this project would remove an existing constraint on development of surrounding parcels. That is a physical-effects question and should be addressed on that basis.

6.10 Public Services / Wildfire (IS Ch. 15) — wrong-project text

- The strongest information-adequacy point here is that the IS's Public Services discussion **appears copied from a different project near Lake Camanche**: it attributes fire protection to the **Jackson Valley Fire Protection District**, misstates **Highway 88 as northwest when it lies east**, and says the fire station is **~2 miles away when Ione's is ~7 miles east.** Copied, site-inaccurate text is powerful evidence that the IS did not analyze *this* site's actual conditions — an information-adequacy defect that infects the reliability of the whole document. (Fire-water adequacy itself is covered in §5.4.)

6.11 Site-description factual errors (IS pp. 4–6)

The IS's project/site description contains factual errors that matter because CEQA impact findings rest on an accurate baseline: - **Wrong phone number** (209-233-6380 vs. 209-223-6480) — minor, but symptomatic. - **"No existing structures" / "vacant"** — contradicted by an alleged **double-wide, a large structure, semi-trailers, and sea containers** on site, plus the ~25% already-graded area. An inaccurate "vacant" baseline understates existing disturbance and code issues. - **Fenced burial area 1.2 ac vs. 7.3 ac** (already addressed in §4). - **"…and perhaps accessory buildings"** — an open-ended, undefined "blank check" scope (already addressed in §4). - **Project plot plan misrepresents current site conditions (oak coverage).** The applicant's **"46 Acres" project plot plan** depicts the parcel with only **sparse, scattered tree symbols — on the order of ~20% oak/tree coverage** — whereas the application's own **Figure 1 (site photo/exhibit, p. 7) and pre-disturbance aerial imagery show dense oak woodland covering roughly ~70% of the parcel** (plot plan and figure provided by client; on file). A plot plan that understates existing oak canopy by roughly two-thirds is not a harmless drafting error: under CEQA it **understates the biological and oak-woodland baseline** on which every impact finding depends (see §5.5 and §6.1, PRC § 21083.4 oak-conversion analysis), and it materially misstates the "existing conditions" against which tree-removal and habitat impacts must be measured. - **Comparative aerial imagery documents already-completed, unpermitted tree removal and grading.** A **side-by-side Google Earth comparative aerial** (earlier date vs. current) shows that a large contiguous block of the **upper ~15 acres of the parcel has already been cleared of oak woodland and regraded**, amid otherwise

dense surrounding canopy — i.e., an estimated **~25% of the site's oak woodland was removed and the ground disturbed before any CEQA review or permit** (comparative aerial provided by client; on file). This documentary evidence (a) confirms the "~25% already graded" condition of the parcel, (b) directly contradicts the applicant's plot-plan depiction and the environmental questionnaire's "NO" answers on tree removal and grading (see §6.14), and (c) constitutes **pre-application 'take'/premature commitment** that CEQA does not permit an agency to treat as part of the baseline. The County should require the applicant to account for the unpermitted clearing/grading, restore the true pre-disturbance baseline for impact analysis, and address whether the prior work triggers enforcement, restoration, or oak-mitigation obligations under PRC § 21083.4 (see §6.1) rather than rewarding it by measuring impacts from the already-degraded condition.

6.12 Infrastructure/paving, dust, and water-storage points

- **Parking supply vs. event capacity.** The parking math works out unfavorably against the assembly component when measured against the applicant's **own stated occupant load of 1,200** (2022 application file). At **2 persons per vehicle**, a full-occupancy event generates roughly **600 vehicles**; at a mid-range **~500-person event**, roughly **250 vehicles**. Both figures run against the application's **64 permanent spaces** (plus up to ~100 informal driveway spaces) — a maximum of about **164** — leaving a shortfall of roughly **86 vehicles at the 500-person case and roughly 436 at the applicant's own stated capacity.** Because occupant load, not floor area, is what drives parking demand, this analysis is unaffected by the divergent floor-area figures in the record (§ 3.6A). Even discounting to the IS's capped funeral scenario, the on-site parking supply is far below the demand the full assembly use would generate, forcing overflow onto the same sub-standard one-lane rural roads analyzed in §2 — a circulation, emergency-access, and safety concern. The IS should analyze parking supply against the **largest reasonably foreseeable event**, not only the capped funeral figure.
- **Interior roads/paving:** on-site circulation and parking must be **paved and built to a full structural base capable of carrying an ~80,000-lb fire engine/tanker**, and paved to control dust — a fire-access and air-quality (dust) point the IS does not analyze. The specific Cal Fire / California Fire Code fire-apparatus-access standards that govern this on-site circulation — and that the Initial Study does not appear to analyze — are set out in the new subsection **§6.12a** below.
- **Water storage:** storage tanks are **unmonitored, go dry or grow algae** — reinforcing that deferred, tank-based fire/domestic water (§5.4) is not a demonstrated reliable supply.

6.12a On-site fire-apparatus access roads and circulation — unaddressed Cal Fire / California Fire Code standards

Separate from the *off-site* receiving-road capacity analyzed in §2, the project must provide **on-site fire-apparatus access roads and internal circulation** that meet mandatory Cal Fire / California Fire Code (CFC) standards. The Initial Study does not appear to analyze on-site circulation against these standards at all — an information gap that is significant because the parcel sits in a high-fire-hazard rural setting, is served by a single sub-standard access point, and would host large gatherings. The governing design standards are:

- **Minimum width — 20 feet unobstructed.** Fire apparatus access roads must have an **unobstructed width of not less than 20 feet**, exclusive of shoulders (**CFC § 503.2.1**) (California Fire Code § 503.2.1, UpCodes). Where a fire hydrant is located on the access road, the minimum width increases to **26 feet** (**CFC Appendix D, § D103.1**) (CFC Appendix D, UpCodes).
- **Vertical clearance — 13 feet 6 inches.** An **unobstructed vertical clearance of not less than 13'6"** must be maintained over the entire access road, including tree canopy, wires, and structures (**CFC § 503.2.1 / § 503.2.2**) (California Fire Code § 503.2.1, UpCodes). This directly implicates the parcel's dense oak canopy, which would require limbing/removal along every internal route — an additional oak-woodland impact the IS does not quantify (see §6.1).
- **Surface / load capacity — 75,000 pounds, all-weather.** Access roads must be **designed and maintained to support the imposed load of fire apparatus weighing at least 75,000 pounds** and be surfaced (asphalt, concrete, or approved equivalent) to provide **all-weather driving capability** (**CFC § 503.2.3**; Cal Fire SRA Fire Safe Regulations, **14 CCR § 1273.02**) (SRA Fire Safe Regulations 2020, § 1273.02, CAL FIRE SLO). Decomposed granite or loose gravel generally does **not** satisfy this without an engineered structural section and a written variance. The IS's silence on an engineered pavement section for a ~75,000-lb load is a defect.
- **Grade — 16% maximum (20% only by exception).** Under the Cal Fire SRA Fire Safe Regulations, road grades **shall not exceed 16 percent, and may exceed that figure only up to 20 percent with approval from the local jurisdiction and mitigations providing the "Same Practical Effect"** (**14 CCR § 1273.03**) (SRA Fire Safe Regulations 2020, § 1273.03, CAL FIRE SLO). Given the already-regraded upper ~15 acres (see §6.11), the IS should demonstrate that all internal routes comply with the 16% standard, or that the County has approved and the record documents the exception to 20% with the required mitigations.
- **Turning radius — minimum inside/outside radii.** Turns must provide a minimum **horizontal inside radius of curvature of not less than 50 feet on roadway curves, and a turnaround radius of not less than 40 feet (or a 60-foot hammerhead/T) at dead ends and driveway termini** (**Amador County Code § 15.30.160**; **14 CCR § 1273.04**) (Amador County Code § 15.30.170; Cal. Code Regs. tit. 14 § 1273.05, Cornell LII).
- **Dead-end roads / turnarounds.** A dead-end fire apparatus access road **more than 150 feet long must be provided with an approved turnaround** — a **120-foot hammerhead, a 60-foot "Y," or a 96-foot-diameter cul-de-sac** per **CFC Appendix D, Table D103.4** (CFC Appendix D / Table D103.4, UpCodes). A large-parcel cemetery with internal loop drives and a single access point must show that every dead-end segment terminates in a compliant turnaround so a ~75,000-lb engine can turn around without backing out.
- **Commercial-use bar on "Driveway" classification — a threshold defect independent of width or surfacing.** The Cal Fire State Minimum Fire Safe Regulations separately define a **"Driveway"** as a vehicular pathway that "serves no more than four (4) Residential Units and any number of non-commercial or non-industrial … Buildings on each parcel," and state expressly that **"[a] Driveway shall not serve commercial or industrial uses at any size or scale"** (**14 CCR § 1270.01(i)**) (Cal. Code Regs. tit. 14, § 1270.01, Cornell LII). A cemetery/mortuary operation with four commercial-rated buildings, paid interment services, and up to ~60 funeral events per month is a commercial use on its face. If the

project's internal access — including the gravel section beyond the first 50 feet that TRA-1/TRA-2 leave unaddressed (see §6.13 below) — is built or classified as a "Driveway" rather than a "Road," the regulation bars that use outright, independent of whether the pathway is ever widened or paved to Road standard. The Initial Study does not identify which classification governs the applicant's internal access, and this threshold question should be resolved before any fire-apparatus-access adequacy finding is made.

- **Gate-entrance clearance.** Independent of CFC § 503.2.1's general 20-foot minimum (above), the State Minimum Fire Safe Regulations specifically require any gate to be "at least two (2) feet wider than the width of the traffic lane(s) serving that gate," with a minimum of 14 feet unobstructed horizontal clearance and 13'6" vertical clearance (**14 CCR § 1273.09(a)**) (Cal. Code Regs. tit. 14, § 1273.09, Cornell LII). This directly bears on the single-gate, no-two-way-traffic bottleneck already identified at §6.13 — the record does not show the existing or proposed gate meets this standard.
- **Turnout and turnaround spacing.** Where a driveway/access road exceeds 150 feet, a turnout "near the midpoint" is required; beyond 800 feet, turnouts are required "no more than 400 feet apart," each a minimum of 12 feet wide by 30 feet long (**14 CCR §§ 1273.05(c), 1273.06**). Any driveway over 300 feet requires a turnaround within 50 feet of the building, with a minimum 40-foot turning radius (**14 CCR § 1273.05(b), (d)**) (Cal. Code Regs. tit. 14, § 1273.05, Cornell LII). Given the parcel's ~46-acre depth and the multiple interior blocks and buildings described in the Application, the record does not demonstrate that these spacing requirements are met anywhere on the site plan.

Why this matters for CEQA and the § 19.56.040 findings. These are not aspirational guidelines — they are mandatory design standards enforced by the fire code official, and compliance can materially change the project's footprint: 20-foot-plus paved, load-bearing internal roads with 13'6" canopy clearance, compliant turnarounds, and ≤20% grades will **require additional grading, additional oak removal, and additional impervious surface** beyond what the plot plan shows — impacts the Initial Study has not analyzed. The County should require the applicant to submit an **engineered on-site fire-apparatus-access and circulation plan, reviewed and signed off by CAL FIRE / the Amador County fire authority**, before the IS's fire-protection and biological-impact conclusions can be considered adequate, and should condition any approval on full CFC / 14 CCR Article 2 compliance.

6.13 Requested remedies and County risk exposure

The following remedies and County risk-exposure points should be preserved in the record: - **Road mitigation to County Standard PW-7** (12-ft paved lanes + 5.25-ft structural gravel shoulders) for Carbondale, Lambert, Forest Home, and Maxwell Roads. - **County Standard PW-7 itself corroborates the Collector-tier figures used throughout this record.** Amador County Public Works Agency Standard Plan PW-7 ("Typical Section for Streets and Roads," adopted 03/03/97) sets out three road tiers *(PW-7 standard plan; provided by client; on file)*:

Tier	Right-of-way	Paved width	Travel lanes (major / minor)	Minimum shoulder
Major/Minor Arterial	100 ft	70 ft	24 ft / 17 ft	8.25 ft

Tier	Right-of-way	Paved width	Travel lanes (major / minor)	Minimum shoulder
Major/Minor Collector	80 ft	38.5 ft	14 ft / 12 ft	5.25 ft
Major/Minor Local	60 ft	30.5 ft	12 ft / 11 ft	3.25 ft

Carbondale, Lambert, Forest Home, and Maxwell Roads function as Collector-tier receiving roads in this record, which independently confirms the 12-foot paved lane / 5.25-foot structural shoulder figures used as the road-mitigation baseline above and in the resulting ~$84 million bonding estimate — this is the County's own adopted standard, not a figure the community selected. - A **performance bond of ~$7 million/mile × 12 miles = ~$84 million** in County-acceptable escrow for road engineering/construction. - **Independent road-reconstruction cost estimate corroborates the magnitude.** A separate cost estimate obtained for the project — for reconstructing the receiving roads to a **60-foot right-of-way with 12-foot travel lanes and 5-foot gravel shoulders** — puts rural road reconstruction at roughly **$6–8 million per mile at the low end and $9–13 million per mile on average** (estimate provided by client; on file, citing latestcost.com road construction cost data). Applied over the ~12 miles of sub-standard receiving roads identified in §2, this **independently brackets and exceeds the community's ~$84 million figure** (roughly **$72–$96 million at the low range and well over $100 million on an average-cost basis**), and confirms that bringing the road network "up to par" for a project of this scale is a **capital undertaking on the order of tens to hundreds of millions of dollars.** This magnitude is directly relevant to (a) the **feasibility** of any road-mitigation condition, (b) the mandatory **Board-of-Supervisors road-agreement condition** under § 19.56.040 (see §1.1) — which renders the permit ineffective until a binding, funded road agreement is finalized — and (c) whether the applicant can realistically fund mitigation sufficient to support a Mitigated Negative Declaration rather than an EIR. - **Reject the project or require a full EIR prepared by an *independent* CEQA consultant at the applicant's expense** (rather than an in-house document).

6.14 Airport proximity, aviation safety, and land-use compatibility

The project parcel lies **within approximately one-half mile of the private Eagle's Nest airport/airstrip** immediately to the north (the IS itself acknowledges the site "leads northward to the Eagle's Nest Subdivision and Airport" and that a private airport is associated with that development). This proximity triggers **two independent, codified concerns** that the Initial Study does not analyze:

- **FAA minimum-safe-altitude rule — 14 CFR § 91.119(b).** Over "any congested area of a city, town, or settlement, or over any **open air assembly of persons**," aircraft must maintain an altitude of **1,000 feet above the highest obstacle within a horizontal radius of 2,000 feet** (14 CFR § 91.119, eCFR). A cemetery/event use that regularly gathers dozens to hundreds of people in the open — funerals, graveside services, and, at build-out, a large assembly/event component — creates exactly such an "open air assembly of persons" **directly off the end of, and adjacent to, an active airstrip.** That is a two-sided safety conflict: it constrains lawful flight operations over the assembly, and it places assembled people beneath low-level takeoff/landing operations. The IS should have identified the airstrip, mapped the

runway approach/departure geometry, and analyzed the assembly-vs.-aviation conflict as a public-safety hazard (CEQA checklist hazards items on airport-area safety), rather than omitting it.

- **Airport land-use compatibility and the school-siting analogue — Education Code § 17215 and PUC § 21675.** California treats risk-sensitive uses near runways as a distinct safety category. **Education Code § 17215** requires that any site proposed for **school purposes within two nautical miles** of "an existing or proposed runway — whether public, private, civilian, or military" be evaluated by the Caltrans Division of Aeronautics before acquisition or lease (Caltrans, School & State Building Evaluations Near Airports; CDE, Proposed School Sites – Airport Runways Review). To the extent the project includes **any instructional/classroom or teaching component** associated with the assembly building — regardless of subject matter or who uses it — that educational element within one-half mile of the Eagle's Nest runway falls squarely within the two-nautical-mile trigger and its safety rationale. The statute applies to the *use* (an educational occupancy near a runway) and the *number of people assembled*, not to any characteristic of the occupants, which is precisely why it is a neutral, statute-based reason such a use is disfavored at this location. More broadly, Caltrans' **Airport Land Use Planning** guidance and **Public Utilities Code §§ 21670 –21675** direct that assembly uses, places of worship, mortuaries, and schools near runways be reviewed for population-density and safety compatibility, and that certain risk-sensitive uses "should be avoided regardless of the number of people involved" (Caltrans, Airport Land Use Planning; PUC § 21675, Justia).

- **Amador County airport zoning ordinance — prohibition on indoor assembly/"meetings" adjacent to the airport.** The **Eagle's Nest Airport, Estates & Ranch Owners' Association** (letter dated **May 3, 2026**, from **W. David Wardall**, on behalf of the association) advises the County that because the subject parcel is directly adjacent to the Eagle's Nest private airport, the applicable **County airport-area zoning restriction will not permit meetings/assemblies inside buildings** on the property — i.e., the codified airport-compatibility overlay bars the very indoor-assembly ('event center'/gathering-hall) use that the project depends upon (letter provided by client; on file). This is a **codified land-use restriction** tied solely to airport safety and overflight geometry, and it goes directly to whether the project as designed can even be operated lawfully at this location. The County should (a) identify the specific airport-compatibility zoning provision on the record, (b) determine whether the proposed assembly/education building is a prohibited use under it, and (c) at minimum, if the project advances, adopt an **express Condition of Approval prohibiting indoor meetings/assemblies** consistent with the ordinance — a condition that alone may render the applicant's stated program infeasible and warrants re-examination of the whole project description. *(Recommended action: obtain and cite the exact Amador County airport-compatibility zoning section for the administrative record.)*

- **Applicant's own environmental-information form contradicts the airport and site conditions (application misrepresentation).** The association's letter further documents that on the **environmental "Additional Information" questionnaire (application page 26 of 84), signed by applicant Mounir Kaddoura and dated 08/27/2025, the applicant marked "NO" to all twelve questions (Q17–Q28)** — including questions on tree removal, grading/regrading, sensitive habitat, agricultural/mineral-resource conversion, dust, storm-

water runoff/flooding, fire-water availability, and long-term project scope. The association identifies **at least seven (Q17, 18, 19, 21, 22, 26, 28) that should have been answered "YES"** given the site's dense oak woodland, the already-completed regrading of the upper acreage, the Ione manzanita/oak-woodland resources, the AG/MRZ designation, dust and drainage exposure, the absence of on-site fire water, and the undisclosed 50,000-plot/100-year build-out scope (form and letter provided by client; on file). Because CEQA review is only as reliable as the environmental-information the applicant certifies, these **facially incorrect "NO" answers undermine the factual foundation of the Initial Study** and independently support the conclusion that the record contains a *fair argument* the project may have significant effects the applicant did not disclose (see §3, §4, and §7).

Net effect: the airstrip proximity is a documented physical condition of the site that bears directly on the § 19.56.040 "will not be detrimental to … health, safety …" finding and on CEQA's public-safety/hazards analysis. Its complete omission from the IS — coupled with the airport association's documented airport-zoning restriction and the applicant's uniformly "NO" environmental questionnaire — is an information-adequacy gap that supports further study.

6.15 Property values, County tax base, and the "relocate to an appropriate zone" point

- **Zoning / General Plan mismatch.** The parcel is zoned **R1A (Single-Family Residential and Agriculture)** and carries a General Plan designation of **MRZ (Mineral Resource Zone)** — an AG/mining character. The neutral planning argument is **not** that a cemetery is inherently objectionable, but that an intensive assembly/interment use with regional draw is a **poor fit for a rural-residential/agricultural, mineral-resource-designated parcel on sub-standard roads with a single-EDU water cap**, and that such a use is more appropriately sited in a **commercially or institutionally zoned area** with adequate infrastructure. The IS resolves the R1A/MRZ consistency question **conclusorily** ("less than significant"); the County should be asked to make an express, evidence-based General Plan-consistency finding, and to explain why the designated mineral-resource land is being converted to an incompatible use (see §6.8 and the § 19.56.040 findings standard in §1.1). *(Additional General Plan data supporting non-conversion of MZ-designated land, once obtained, should be incorporated; this analysis should be updated when that documentation is available.)*
- **Property values and County property-tax revenue — framed correctly.** A perceived **decline in neighboring property values is generally *not*, by itself, a physical environmental impact under CEQA**, and arguments framed purely as "this will lower my property value" carry little legal weight and can appear self-interested. The defensible way to preserve these concerns is to tie them to the **neutral, physical impacts** that drive them — traffic, dust, noise, loss of oak woodland and rural character, and infrastructure strain — which *are* CEQA impacts and which, in turn, are what affect surrounding property. Likewise, the **County property-tax point** is best framed as a land-use/fiscal-policy consideration for the decision-makers (converting taxable, developable, mineral-resource-designated land to a tax-exempt use), presented to the Planning Commission and Board of Supervisors as a policy factor — not as a CEQA significance conclusion. Both concerns are therefore recorded here, but deliberately **anchored to neutral land-use criteria** rather than advanced as stand-alone CEQA impacts.

6.16 Environmental-factor coverage index

The table below indexes the environmental and land-use factors evaluated in this analysis, cross-referencing where each is addressed, so the reader can confirm the full range of IS deficiencies is captured. All items are framed on **neutral planning/CEQA and code criteria** (traffic, water, soils, biology, safety, General Plan consistency, § 19.56.040 findings). (Numbering in the first column preserves the reference labels used in the administrative-record comment documents for cross-referencing convenience.)

Ref.	Environmental / land-use factor	Where addressed
1	Zoning is AG & MZ (mineral resource) — relocate to commercial zone	§6.15; §6.8; §1.1
2	Incompatible land use; General Plan should not convert MZ land (data forthcoming)	§6.15; §6.8 *(update on receipt of GP data)*
A	Narrow country roads can't handle traffic / impede emergency response	§2.4; §1.1 (road agreement)
3	Roads need reconstruction/widening; signal at blind Carbondale/Lambert; new Forest Home Rd bridge	§2.4; §1.1
4	Water limited to ~400 gal/day (AWA letter)	§5.4
5	Three or more oak species on property	§5.5; §6.1
6	No building fire-protection water	§5.4
7	No grounds water for trees/grass/shrubs	§5.4
8	No schools within 2 miles of airport (Educ. Code) — instructional component	§6.14
9	Loss of neighboring property values	§6.15 (framed via neutral physical impacts)
10	Reduced County property-tax revenue	§6.15 (framed as policy factor)
B	FAA 14 CFR § 91.119(b): open-air assembly restricts flight	§6.14

Ref.	Environmental / land-use factor	Where addressed
	ops (1,000 ft/2,000 ft)	
11	Oak habitat (Live/Valley/Blue Oak); some destruction already occurred	§5.5; §6.1; §6.6 (pre-clearing)
12	Federally listed endangered plants	§5.5; §6.2
13	Serious sewage problems with Ione Clay formation	§6.6; §5.2
14	State/County regs bar approving projects harming peace/property (§ 19.56.040)	§1.1
15	Parking supply far below the assembly use's own stated occupant load of 1,200 (≈600 vehicles at full occupancy, ≈250 at a 500-person event, vs. 64 permanent spaces)	§6.12
16	Interior roads/parking need paving (fire-load + dust)	§6.12; §6.5 (dust)
17	Daily water/sewage load + minimum bathrooms vs. 400 gal/day	§5.4; §6.6
18	Ione clay sewage disposal for an assembly building rated at occupancy 1,200	§6.6
18(a)	Four irreconcilable sizes for the same 2022 structure — 20,000 sq. ft. (February 17, 2022 referral attachment, as analyzed by the County Transportation Director 2/18/22 and CDFW 3/3/22), 10,000 sq-ft / occupancy 1,200 labeled "STAGE 2" (engineering sheets on file by 7/21/22), 2,500 sq ft (plot map in the same package), 3,000 sq. ft. (County referral cover sheet 7/21/22) — then no structure at all in 2025–2026; no re-referral to the two	§3.6A

Ref.	Environmental / land-use factor	Where addressed
	agencies that commented on the largest version	
18(b)	Applicant's own sheets label the project "STAGE 1" (graves + road) and "STAGE 2" (10,000 sq-ft / occupancy 1,200 building + road), while the applicant certified "No" to Environmental Information Form item 28 on 7/8/22 and 8/27/25 — phased project under CEQA Guidelines § 15165	§3.1A
18(c)	2022 application marks two use-permit categories ("Cemetery" and "Church" — the County form's printed labels); plot-map title block reads "PROPOSED ZONE CHANGE FOR CEMETERY"; scope of the entitlement actually sought is unresolved	§3.1A
18(d)	July 21, 2022 referral carries the Pub. Resources Code § 21080.3.1 formal-notification footnote verbatim; the 2025 and both 2026 referrals omit it while retaining the asterisk markers, and three tribes were added to the list in the same interval	§4A; Referral Analysis §4
19	Environmental inspection incomplete/inadequate — five listed plants + three oaks; discredit applicant's consultant	§5.5; §6.2
19(a)	Bisbee Peak rush-rose, Ione manzanita, Ione buckwheat, Irish Hill buckwheat, Perry's horkelia	§5.5; §6.2
19(b)	Valley Oak, Live Oak, Blue Oak (UC Davis extension expert)	§5.5; §6.1

Ref.	Environmental / land-use factor	Where addressed
20	Engineered two-foot grade-raise across the burial footprint (Cemetery Plan's own excavate-vault-backfill lot-development method) and unanalyzed stormwater/drainage effect at full-buildout scale	§5.7

6A. The TAC Hearing Record — Admissions, Determinations, and a Reversal

All six Technical Advisory Committee (TAC) proceedings concerning this parcel have now been transcribed from the County's published meeting audio: **March 3, 2022; August 4, 2022; June 1, 2023; September 18, 2025; May 7, 2026; and June 11, 2026.** The findings below rest on that record.

Provenance and completeness of this record. These six proceedings are not a selection. They are **the complete set identified by the County itself.** In response to a request for the meeting audio for all TAC meetings at which this applicant appeared on the agenda, the **Amador County Planning Director identified these six meetings, by date, with links to the County's own calendar entries for each** (email produced to the Association; provided by client; on file). The record analyzed in this section is therefore co-extensive with the record the County's own custodian identified as responsive — there is no seventh agendized TAC proceeding on this parcel. *(One qualification, stated for accuracy: the Director's list is scoped to meetings at which the applicant appeared **on the agenda**, and would not capture a proceeding in which the parcel was discussed without being agendized.)*

> **Note on the status of this record.** The material in this section is drawn from machine transcription of the County's own published meeting audio. It is **not** an official County transcript, and **the County has confirmed that no written TAC minutes exist** — the recordings are the sole record of these proceedings. Every quotation below has been verified against the recording at the cited timestamp. The Commission and any reviewing court are invited to do the same. Where the transcription is ambiguous, that is noted.

The significance of this material is that it is **the County's own record, in the County's own words.** None of the findings below depends on the opinion of any member of the public, on any expert retained by an objector, or on any inference about anyone's intentions. Each rests on a statement made by the applicant or by County staff at a public meeting.

6A.1 The applicant stated on the record that he intends to apply to expand — and gave a timeframe

This is the most direct evidence in the record on the piecemealing question analyzed in **§3**, and it comes from the applicant.

At the September 18, 2025 TAC meeting, the Planning Director calculated on the record that the plot count then shown would be exhausted almost immediately at the applicant's own stated burial rate:

> "And if that rough number, based on the calculation I did, is about 14 or 1500, **at 720 a year, that's your full in a couple of years.**" — Planning Director Chuck Beatty, **[00:30:10 –00:30:20]**

The applicant answered:

> "**Well, that's why we wanna be applying in six months for another addition.** It depends on how our organizations or groups respond to this. **We need to proceed with more proposals later on.**" — Applicant Mounir Kaddoura, **[00:30:20–00:30:41]**

(Transcription note: the recording at [00:30:25–00:30:27] renders as "another edition"; in context the word is "addition." The meaning — a further application to add capacity — is unambiguous from the surrounding exchange.)

Staff then stated the legal consequence, and the applicant confirmed it:

> Staff: "if what's shown on the site plan is all that's included in the use permit, **that's all the Planning Commission could approve** when it gets to them, and then **any expansion to that would require an amended use permit** at some point in the future." Applicant: "**True.**" — **[00:30:41–00:31:07]**

Why this matters. CEQA requires review of the "whole of the action," including reasonably foreseeable future phases (§3.2). The standard County response to a piecemealing objection is that future expansion is speculative. On this record it is not speculative: the applicant, asked directly, stated an intention to apply for additional capacity **within six months**, and explained that further proposals would follow. That statement was made to the County, at a County meeting, and is preserved in the County's own audio. The Initial Study does not disclose it, analyze it, or acknowledge that it was made.

Three further statements from the June 11, 2026 meeting corroborate the same planning horizon:

Statement	Speaker	Timestamp
"if later on **the demand is too persistent** on using our cemeteries, **can we go ahead and proceed with an amendment** or no?"	Applicant	[00:15:53–00:16:06]
"said, oh, go ahead and **throw everything in there**... that way	—	[00:57:33–00:57:39]

Statement	Speaker	Timestamp
you don’t have to explain yourself later”		
“that will stand for **tens of years to come ahead**”	—	[00:56:31–00:56:48]

The 2023 record supplies a further intensity comparison. At the June 1, 2023 meeting the project was described as **“100 events annually,”** confirmed on the record to mean new burials rather than visitation [01:25:50–01:26:14]. The current application states **60 funerals per month — 720 per year, a 7.2-fold increase in stated operational intensity** for the same parcel. Neither the Initial Study nor the MMRP discloses or explains this escalation.

→ Carries into §3.1–3.3 (piecemealing) and §2 (trip generation).

6A.2 “It would require an amendment to the use permit” was the County’s answer to every scope question

At the June 11, 2026 meeting, staff invoked a future use-permit amendment **six times in one hour** as the response to each question about the project’s limits:

Subject	Statement	Timestamp
Additional buildings	“Any additional buildings that are proposed through this project **would require an amendment to the use permit.** So it is only limited to that one building that’s proposed.”	[00:08:58–00:09:07]
Expanded burial methods	“if at some point the applicant wanted to expand those uses, **they would need an amendment to the use permit.**”	[00:11:33–00:11:45]
Embalmed remains	“**it would require an amendment to the use permit conditions** if that were the case. But obviously… that’s a fairly lengthy process.”	[00:16:06–00:16:18]
Embalmed remains, restated	“And I can put a note too in the condition that **if this future needs changed, it would require an amendment from the use permit.**”	[00:17:26–00:17:32]

Subject	Statement	Timestamp
Landscaping	"if you were going to be changing landscaping, then **you would just need to amend the use permit** to allow for that."	[00:17:59–00:18:03]
Preservation method	"if there's embalming fluid or embalmed bodies proposed **that would require an amendment.**"	[00:30:05–00:30:30]

Why this matters. The amendment mechanism is being used as a substitute for present analysis. Each invocation identifies a real, foreseeable change in the project's physical demands — additional structures, different burial methods, embalming fluid entering the soil column, altered landscaping and therefore altered irrigation demand — and defers analysis of each to a future proceeding that has no scheduled date, no defined trigger, and no required environmental review of its own. Taken together with §6A.1, the record shows an applicant who has stated he will seek expansion and a County that has pre-identified six categories in which expansion would be entertained, while certifying an environmental document that analyzes none of them.

→ Carries into §3 (piecemealing), §4A (deferral), and §7 (cumulative impacts).

6A.3 The General Plan inconsistency was a declared TAC "technical objection," the applicant was directed to apply for a General Plan Amendment, no amendment was ever filed, and the objection was later reversed by a self-identified non-engineer

This is a discrete, serious, and independently sufficient defect that the Initial Study does not address at all. It unfolds across three meetings.

Step 1 — June 1, 2023: the inconsistency is identified and formally characterized as a technical objection.

The parcel carries a **Mineral Resource Zone (MRZ)** General Plan designation. At the June 1, 2023 meeting, staff stated:

> "the whole mineral resources zone general plan designation — so a cemetery would definitely… have impact potential… access to mineral resources on site. So in that way… **it is consistent with the zoning but it is inconsistent with the general plan designation**… the issue with the general plan not being consistent is **definitely a technical objection that TAC would have at this point.**" — **[01:22:23–01:23:07]**

The Planning Director stated the consequence:

> "if the application didn't include a request for a general plan amendment, **the planning commission is going to have a hard time approving an application when TAC has a**

> **technical objection to the basic land use on the parcel.**" — Planning Director Chuck Beatty, **[01:23:33–01:23:49]**

Step 2 — the same meeting: the County identifies that both available paths require environmental evaluation.

> "even if you were to apply for a general plan amendment to change it to something that's consistent with the existing zoning, the evaluation of that general plan amendment would also include that **removing it from mineral resources zone is going to restrict access to mineral resources on site**… right, so isn't that kind of a **lose-lose situation**… **it still has to be evaluated.**" — **[01:23:49–01:24:18]**

Deputy County Counsel added that a designation change is "really a legislative decision so there's wide discretion," while confirming "**there are the environmental issues to be assessed**" [01:24:19–01:24:32].

Step 3 — the same meeting: the applicant asks for direction and is directed to file a General Plan Amendment.

> Staff: "**if you would want to apply for a general plan amendment to a different designation**…" Applicant: "I'm looking for a direction from you on guidance." Staff: "**so that would be the guidance to apply for a general plan amendment**… I can send you over the information." — **[01:24:43–01:25:28]**

Step 4 — September 18, 2025: the objection is reversed, on the strength of an applicant-funded report, by a speaker who disclaims the relevant expertise in the same breath.

> "one thing to note was the general plan designation of the property is MRZ… And the applicant has responded to potential concerns with that with a **geotechnical study** that has been included in the packet. So that would be used to determine if this project is consistent or inconsistent with that MRZ designation. From — **I'm not an engineer**, but from what I looked through, I mean, **it definitely appears like a very comprehensive report.** So **I don't personally have any concerns at this point as far as this project being inconsistent with the general plan designation.**" — **[00:05:36–00:06:20]**

Why this matters, and why it is independent of every other defect in this analysis.

1. **No General Plan Amendment was ever filed.** The County directed the applicant to file one in June 2023. The current application does not include one. The record contains no document withdrawing that direction, no analysis explaining why it is no longer required, and no finding that the inconsistency was resolved.

2. **The stated basis for the reversal does not reach the question.** A geotechnical investigation characterizes soil and subsurface conditions for engineering purposes. It does not, and cannot, determine whether a use is **consistent with a General Plan land-use designation.** That is a planning and legal determination, not a geotechnical one. The reversal therefore rests on a category error, and the speaker's own qualification — "I'm not an engineer" — concedes that the report was not evaluated by anyone competent to evaluate it. The determination is that the report "appears" comprehensive and that the

speaker has no "personal" concerns. Neither is a finding, and neither is substantial evidence.

3. **The County itself identified the analysis that has never been performed.** At [01:23:49–01:24:18] the County stated that removing the parcel from the MRZ designation would restrict access to mineral resources on site, and that this "still has to be evaluated." That evaluation does not appear in the Initial Study. The Initial Study's mineral-resources discussion does not address the MRZ designation, the 2023 technical objection, the direction to file a General Plan Amendment, or the effect of the project on access to the designated resource.

4. **General Plan consistency is a mandatory finding, not a discretionary one.** County Code § 19.56.040 requires a finding that the use is consistent with the General Plan. An approval cannot rest on a record in which the County declared a technical objection to the basic land use, directed a corrective application, never received it, and then set the objection aside without analysis.

→ New mandatory-finding defect. Carries into §7 (mandatory findings) and §8.

6A.4 The County advanced the project, the Initial Study, and the proposed Mitigated Negative Declaration while stating on the record that the site plan does not comply and must be redrawn

At the June 11, 2026 meeting, staff stated that the site plan as filed cannot accommodate the internal road at County standard, and cannot accommodate the roadside parking the project proposes:

> "So I did notice in the site plan that you proposed, **there's not sufficient, I guess, room on the northern end of the property as it's shown for that road to meet 15.30 and then also for it to accommodate any road parking.** … So I think you'll probably want to review and revise that site plan **because it would be required to be changed anyways to accommodate for 15.30 standards.**" — **[00:26:20–00:26:51]**
>
> "because the way that is shown, **it looks like everything just needs to be shifted south** to accommodate for that… **But we would want to see that before we move forward** just to make sure that everything's consistent as far as you having an application that is adequately addressing the mitigations that are proposed." — **[00:27:14–00:27:46]**

The committee then voted to recommend the project, the Initial Study, and a proposed **Mitigated Negative Declaration** forward to the Planning Commission [00:58:56–00:59:52]. **After** that vote, staff added:

> "so **I will wait to schedule it definitively for that planning commission meeting until we have a revised site plan** that shows the adequate space for any roadside parking you're proposing as well as meeting the 15.30 requirements for that internal road… But once we receive that **and amend those conditions**, we'll schedule it." — **[01:00:04–01:00:41]**

Why this matters. A CEQA document must analyze a **stable, finite, and accurate project description**; that is the sine qua non of a legally adequate review. Here the County recommended adoption of an environmental document while simultaneously stating on the record that:

- the site plan the document analyzes **does not comply** with County Code § 15.30;
- the site layout **must be redrawn**, with "everything… shifted south";
- the conditions of approval **will have to be amended** once the redrawn plan is received; and
- the redrawn plan had **not been produced or reviewed** at the time of the vote.

The environmental document therefore analyzes a site configuration that the County has already determined will not be built, and the mitigation measures were endorsed before the layout they attach to was known. The internal road is the sole access for every vehicle trip the project generates, and its alignment governs turning radii, emergency-vehicle access, grave-to-road setback, and the location of every parking space — precisely the physical parameters the transportation and fire-access analyses depend on (§2, §6).

This defect is also fatal on its own terms: **a project description that the lead agency admits will change is not a project description.** No amount of mitigation can cure the analysis of a layout that will not exist.

→ Carries into §4 (Application ↔ IS conformity), §2 (traffic), §6 (fire access), and §8.

6A.5 Staff stated the correct anti-deferral standard, in this proceeding, and then did not apply it

At the June 11, 2026 meeting, asked whether a change in the project's scope could be handled later, staff answered:

> "It would delay moving the application forward to the planning commission because we'll have to evaluate that with — **that ought to be part of the environmental review and then hasn't been.** … And **there's no way we couldn't defer that.**" — **[00:16:18–00:16:35]**

Why this matters. This is the County articulating the correct legal standard: a matter that ought to be part of the environmental review cannot be deferred out of it. The standard was stated once, in response to one question, and was not applied to the six deferral categories catalogued in §6A.2, to the septic design deferred until after conditions issue, to the fire-water quantity never calculated, to the interment best-management practices deferred to agencies that the County's own prior record shows have no applicable standard, or to the site plan the County acknowledged must be redrawn. **The record thus contains the County's own statement of the rule alongside a pattern of departures from it** — which is the evidentiary core of the inconsistent-application argument in §4A.

→ Carries into §4A (inconsistent application of standards and CEQA standard of care).

6A.6 Procedural chronology from the TAC record

Date	Proceeding	What the record establishes
Mar. 3, 2022	TAC referral, UP-22;2-3	CDFW early-consultation comment letter issued for the full-scale project on this parcel (§3.6, §5.5)
Aug. 4, 2022	TAC	Water agency states the parcel's 5/8-inch meter is the largest permittable on the line — "a tiny amount of water," ~20 gpm / 400 gpd; area fire flow ~350–400 gpm, "substandard for pretty much everything"; upsizing "cost prohibitive." No public sewer; lone treatment-plant capacity limits. Applicant states four burials a month, maximum 50 attendees
June 1, 2023	TAC	General Plan (MRZ) inconsistency declared a **TAC "technical objection"**; applicant **directed to apply for a General Plan Amendment**; County identifies that either path requires environmental evaluation; project described as **100 events annually**
Sept. 18, 2025	TAC	General Plan objection **reversed** by a self-identified non-engineer on an applicant-funded geotechnical report; applicant states he will **apply within six months for additional capacity**; application subsequently **found incomplete and rejected** (letter dated Sept. 29, 2025)
May 7, 2026	TAC	Application found **complete** while the committee stated it had not read the airport ordinance bearing on the

Date	Proceeding	What the record establishes
		assembly the project proposes; decision not to require a traffic impact study made in an undocumented conversation; fire-water requirement acknowledged but never quantified
June 11, 2026	TAC	Project, Initial Study, and proposed **MND advanced to the Planning Commission** while staff stated the **site plan does not comply and must be redrawn**; six deferrals to a future use-permit amendment; anti-deferral standard stated once and not applied

6A.7 Verification and record requests

Every quotation in this section has been verified against the County's published audio at the cited timestamp. Because the County has confirmed that **no written TAC minutes exist**, the recordings are the only record of these proceedings, and the Commission is asked to take administrative notice of them. The recordings analyzed here are those the **Planning Director identified as the complete set** of TAC proceedings at which this applicant appeared on the agenda (see the provenance note at the head of § 6A).

The following are requested for the administrative record:

1. The site plan as it existed on June 11, 2026; any revised site plan submitted after that date; all correspondence transmitting or commenting on the revision; and the amended conditions referenced at [01:00:04–01:00:41].
2. All documents constituting or evidencing the General Plan Amendment packet transmitted to the applicant following the June 1, 2023 direction [01:25:07–01:25:28], and any document withdrawing or superseding that direction.
3. The geotechnical investigation relied upon at the September 18, 2025 meeting, together with any County review of it and the identity and qualifications of every person who reviewed it for General Plan consistency purposes.
4. All records of the conversation in which the decision not to require a traffic impact study was made.
5. The complete audio recordings of all six TAC proceedings listed above.

7. Cumulative and Mandatory Findings

CEQA's **Mandatory Findings of Significance** (checklist Ch. 21) ask whether impacts are "cumulatively considerable" and whether the project causes "substantial adverse effects on human beings." The IS answers "less than significant with mitigation." But the combination analyzed above — understated traffic on incapable rural roads, unenforceable operational caps, shallow green burials over fracture-fed shallow groundwater in an annually flooding area, an engineered grade-raise with no drainage analysis at any scale, an uncontrolled disinterment vector, and no proven fire water — is exactly the kind of **interacting, cumulative set of impacts** that CEQA says a lead agency "should not ignore … simply because each individual step can be described as modest on its own." Where substantial evidence supports a *fair argument* that **any one** impact may be significant, an **EIR is required** (CEQA Guidelines §15064(f)(1); the "fair argument" standard). The record here supports a fair argument on multiple independent grounds.

The governing significance standard — CEQA Guidelines § 15064 (14 CCR § 15064). Three provisions of the significance-determination rule apply directly here (all provided in the record; official text at Cal. Code Regs. tit. 14 § 15064, Westlaw/OAL):

- **Duty to prepare an EIR on a fair argument.** "If there is substantial evidence, in light of the whole record before the lead agency, that a project may have a significant effect on the environment, the agency **shall prepare a draft EIR**" (§ 15064(f)(1)). A single credible line of evidence suffices; the agency may not weigh competing evidence to reach a Mitigated Negative Declaration.
- **Significance varies with the setting — the rural-area rule.** "An **ironclad definition of significant effect is not always possible because the significance of an activity may vary with the setting.** For example, an activity which may not be significant in an urban area **may be significant in a rural area**" (§ 15064(b)). This is squarely on point: impacts to oak woodland, special-status Ione-formation plants, groundwater, dark-sky character, and a sub-standard one-lane road network that might be trivial in a built-up setting are **magnified in this rural, mineral-resource, high-fire-hazard location** — and must be evaluated against *this* setting, not a generic urban baseline.
- **Threshold compliance does not end the inquiry.** Compliance with an adopted environmental standard or threshold of significance is relevant, but "the fact that a project complies with a threshold or standard **does not relieve the lead agency of the obligation to consider substantial evidence** indicating that the project's environmental effects may still be significant" (§ 15064(b)(2)). Thus the applicant/County cannot rest "less than significant" conclusions on bare threshold compliance while ignoring the contrary substantial evidence catalogued in §§2–6 (the biological assessment, the aerial/plot-plan discrepancy, the airport-association letter, the groundwater and fire-water evidence, and the documented physical condition of the access roads — narrow, aged, and carrying sharp curves and sight-limited intersections (§2.7)).

Taken together, § 15064 requires the County to (a) evaluate significance against this rural setting, (b) credit the substantial contrary evidence in the record, and (c), because that evidence supports a fair argument of one or more significant effects, **prepare an EIR** rather than adopt a Mitigated Negative Declaration.

8. Recommended Findings (Issue-by-Issue)

Impact area	IS finding	Supported by substantial evidence?	Recommended finding
Piecemealing / reduced scope	(not addressed)	**No** — same 46 ac; prior 50,000-site proposals; fills in ~2.5 yrs	**Analyze full build-out; → EIR**
Phased project (CEQA Guidelines § 15165)	(not addressed)	**No** — applicant's own sheets label "STAGE 1"/"STAGE 2"; Stage 1 infrastructure is a necessary precedent for Stage 2	**Single document for the ultimate project; → program EIR**
Multi-body plots (3× capacity)	1,832 plots	**No** — true capacity ~5,496 interments; 3× traffic ignored	**Re-analyze at true capacity**
Transportation / Traffic (trips, VMT)	LTS w/ mitigation	**No** — no trip/VMT quantification; understated project	**Potentially Significant → EIR**
Emergency access / road capacity	LTS / No Impact	**No** — no capacity or egress analysis	**Potentially Significant → EIR**
Enforceability of attendance cap	(implicit)	**No** — no monitoring/enforcement	**Inadequate mitigation; revise or EIR**
Hydrology / groundwater (green burial)	LTS w/ mitigation	**No** — contradicted by applicant's geotech; deferred BMPs	**Potentially Significant → EIR**
Flooding / floodplain	LTS	**No** — relies on coarse Zone X; ignores documented flooding	**Potentially Significant → EIR**
Grading / stormwater runoff (engineered grade-raise)	(not addressed)	**No** — Cemetery Plan's own excavate-vault-backfill, two-foot ground-profile-raise method for lot development (p. 5) never analyzed at any scale	**Civil-engineer-prepared grading/drainage analysis at full-buildout scale; → EIR**
Feral swine / disinterment	Not addressed	**No** — omitted entirely	**Analyze; potentially significant**
Biological resources	LTS/limited	**No** — ignores the 2022	**Potentially**

Impact area	IS finding	Supported by substantial evidence?	Recommended finding
(special-status species)		agency letters	**Significant → EIR**
Oak woodlands (PRC §21083.4)	Not analyzed	**No** — required conversion determination skipped	**Potentially Significant → EIR**
Federally listed plants (manzanita/buckwheat)	LTS w/ BIO-3/4	**No** — under-analyzed; ESA consult absent	**Potentially Significant → EIR**
Aesthetics (canopy loss; AES-1 hours conflict)	LTS	**No** — visual analysis thin; internal conflict	**Revise / Potentially Significant**
Air Quality & GHG	LTS	**No** — built on understated trips	**Recompute at real trips → likely PS**
Geology/Soils (erosion; septic in wet ground)	LTS w/ mitigation	**No** — erosion + leach-field siting unresolved	**Potentially Significant → EIR**
Noise (60 dBA CNEL; amplified sound)	LTS	**No** — no ambient study; processions/amplified sound	**Potentially Significant → EIR**
Land Use / General Plan / R1A + MRZ consistency	LTS	**No** — conclusory; MRZ-to-cemetery conversion unexplained; County declared a TAC "technical objection" (6/1/23), directed a General Plan Amendment, received none, and reversed the objection on a non-engineer's read of a geotechnical report (9/18/25) (§6A.3)	**Cannot make the § 19.56.040 General Plan consistency finding on this record; require the directed General Plan Amendment and evaluate mineral-resource access → EIR**
Stability of the project description (site plan)	—	**No** — County stated on 6/11/26 that the site plan does not meet County Code § 15.30, that "everything just needs to be shifted south," and	**Recirculate on the revised site plan; no approval on a layout the County has determined will change**

Impact area	IS finding	Supported by substantial evidence?	Recommended finding
		that conditions must be amended — then advanced the IS/MND anyway (§6A.4)	
Reasonably foreseeable expansion (applicant's own statement)	(not addressed)	**No** — applicant stated 9/18/25 he would apply "in six months for another addition" and "proceed with more proposals later on" (§6A.1); staff pre-identified six amendment categories (§6A.2)	**Analyze the whole of the action, including the stated next phase → EIR**
Stated operational intensity over time	60 funerals/month	**No** — same parcel described as "100 events annually" on 6/1/23; a 7.2× escalation is undisclosed and unexplained (§6A.1)	**Disclose and analyze the escalation; recompute all trip-dependent findings**
Airport proximity / aviation safety (FAA §91.119(b); Educ. Code §17215; PUC §21675)	Not addressed	**No** — ½-mi airstrip and open-air assembly omitted	**Analyze; potentially significant safety hazard**
§ 19.56.040 use-permit findings & mandatory road agreement	(not addressed)	**No** — "will not be detrimental" finding unsupported; road agreement not formed	**Cannot make required findings on this record; condition on finalized BOS road agreement**
Public Services / Wildfire (wrong-site text)	LTS w/ mitigation	**No** — copied Lake Camanche text; site errors	**Redo with site-specific facts**
Site-description accuracy ("vacant," structures)	—	**No** — inaccurate baseline	**Correct & recirculate**
Water supply / fire suppression	LTS w/ mitigation	**No** — adequacy deferred, not demonstrated	**Potentially Significant → EIR**

Impact area	IS finding	Supported by substantial evidence?	Recommended finding
Population/Housing (growth inducement)	LTS/No Impact	Not analyzed — no infrastructure-capacity discussion	**Address on an infrastructure-capacity basis**
Stated design life vs. permitted capacity	(not addressed)	**No** — Cemetery Plan states a 100-year horizon and "full build-out"; 1,832 graves at 720 interments/yr = **2.5 yrs** (5.1 at 2/grave; 7.6 at 3/grave); 100 yrs requires ~72,000 interments	**Analyze the ultimate project; → EIR (§ 15165)**
Permitted density extended to the parcel	(not addressed)	**No** — 1,832 ÷ 1.7 ac × 46 ac ≈ **49,572 graves**, within ~1% of the County's own 2022 "50,000 gravesites" figure	**County must reconcile on the record**
Undeveloped remainder (~44 of 46 acres)	(not addressed)	**No** — "north end of the property"; no deed restriction, easement, covenant, or condition prevents later development	**Analyze or restrict; → EIR**
Regional service area vs. 20 vehicles/day	LTS	**No** — Cemetery Plan states service to Amador, Sacramento, and Placer Counties "and surrounding areas" against "an increase of an average of 20 Vehicles per day"	**Potentially Significant → EIR**
Assembly-use parking (occupant load 1,200)	(not addressed)	**No** — 343–600 vehicles required; 100 offered; no shuttle, off-site lot, transit, or overflow	**Potentially Significant → EIR**
Assembly-use trip generation (weekly peak)	(not addressed)	**No** — trips derived from funerals only; ~480	**Potentially Significant → EIR**

Impact area	IS finding	Supported by substantial evidence?	Recommended finding
		arrivals/departures per weekly event never analyzed	
Roadside parking on a 20-ft fire access road	(not addressed)	**No** — CFC §§ 503.2.1, 503.4 bar parking; <28 ft = no parking either side	**Unlawful as described; resolve before any finding**
Aerial-apparatus access (30-ft building height)	(not addressed)	**No** — CFC App. D § D105.1 may require 26 ft; height datum unstated	**Fire code official determination required**
Agency notice of the occupant load	—	**No** — no referral to any agency stated "1,200"; the cover sheet omitted occupancy	**Re-refer with corrected description**
Plot plan showing "location of request" (Item 6)	Deemed complete 5/7/26	**No** — sole plot plan is captioned "EXISTING PLOT MAP" and depicts no proposed improvement	**Application incomplete; project description not "accurate, stable and finite"**
Project description conformity	—	**No** — internally inconsistent, understated	**Stabilize & recirculate**

9. What a Legally Adequate Review Would Require

1. **A stable, accurate project description** reconciling burial method (green/shroud at 18 in. vs. casket/liner), fenced acreage, water source, and a *defined, enforceable* maximum event program.
2. **A quantified transportation study**: trip generation (ITE and/or trip-based estimation for a large-assembly use), peak funeral-day analysis, VMT against Amador County's adopted SB 743 threshold and the OPR baseline, and a **road-capacity/emergency-egress analysis** of the actual rural road network (lane widths, gravel/one-lane segments, sight distance, flood closures).
3. **Enforceable, monitored mitigation** for any operational cap (attendance logs, gate counts, reporting, defined violation remedies) — or analysis of the uncapped, reasonably foreseeable scenario.
4. **Site-specific hydrogeology**: depth-to-groundwater monitoring, contaminant-transport analysis for shallow unembalmed burials over fractured siltstone, and RWQCB coordination

and permit filing *before* the significance determination — not deferred to a later BMP. Coordination is a conversation; a filed permit application is a verifiable act, and requiring the filing before the significance determination closes the deferral loophole. The need for site-specific analysis here is confirmed by the County's own counsel: on June 1, 2023 Deputy County Counsel Glenn Spitzer stated that open-bottom caskets over groundwater "just jumps out as a pretty big concern" [01:06:08] and confirmed that he could locate **no well-to-grave setback standard** in the County's Local Agency Management Program, the Health & Safety Code, or Title 16 CCR [01:06:24] *(machine transcript of County meeting audio; June 1, 2023 TAC; verify at the cited timestamps before entering into the record)*. Where the regulatory framework supplies no numeric standard, the significance determination cannot be deferred to compliance with one.

5. **Flood analysis** based on local flooding history, not solely the FEMA Zone X overlay.

6. **A civil-engineer-prepared grading and drainage analysis** evaluating the Cemetery Plan's own excavate-vault-backfill, two-foot ground-profile-raise method of lot development (p. 5) at the reasonably foreseeable full-buildout scale, not solely the Stage 1 footprint — addressing pre- and post-project drainage patterns and on- and off-site runoff rate and volume, and its interaction with the flooding conditions at item 5 (§5.7).

7. **A feral-swine impact and exclusion analysis** (fencing to swine-exclusion standard; burial depth relative to rooting depth).

8. **Demonstrated (not deferred) water supply** for domestic use and code-required fire flow, established *before* the significance determination. At a minimum this requires: (a) a current **will-serve letter** from the Amador Water Agency stating the service capacity actually available to the parcel; (b) a **completed well with a driller's log** documenting sustained yield and water quality — the well is presently approved but undrilled, and its location was missing from the site map; and (c) a **fire-flow calculation** demonstrating compliance with the applicable standard at the point of delivery. The record now runs the other way on every element: AWA has capped service at a 5/8-inch meter / ~400 gallons per average day (§5.4); fire flow at this location was testified to be roughly **350–400 gpm against a 1,000 gpm standard** (August 4, 2022 TAC); adjacent-property well experience is **10 wells, ~700 feet deep, best sustained yield ~0.75 gpm**, poor quality, at a cost exceeding $100,000, in the Ione Formation with clay; and the County's fire officer flagged a likely requirement for **one or more fire water tanks**, which appear nowhere in the project description or on the site plan.

9. **Full-parcel (whole-of-the-action) analysis** covering the reasonably foreseeable build-out of all ~46 acres and the true multi-body interment capacity (~5,496), not the 1,832-plot slice — with the March 3, 2022 CDFW letter and the April 14, 2022 agency review letter addressed on the record.

10. **Airport land-use / aviation-safety analysis** given the parcel's location within ~½ mile of the Eagle's Nest airstrip — addressing the FAA § 91.119(b) open-air-assembly conflict, the Education Code § 17215 school-siting rule for any instructional or classroom component, and airport land-use-compatibility review under PUC §§ 21670–21675.

11. **The Amador County Code § 19.56.040 findings** must be independently satisfied: the Planning Commission must be able to find on substantial evidence that the use "will not be detrimental to the health, safety … and general welfare" of the neighborhood, and — because the use may injure county roads — it **"shall require"** a finalized applicant/Board-of-Supervisors **road agreement** as a condition, with the permit ineffective until that agreement exists.

On the strength of the record — particularly the traffic understatement, the unenforceable cap, the 400-gpd water cap, the airport-proximity omission, and the applicant's own groundwater findings — the appropriate CEQA outcome is **preparation of an EIR** (or, at minimum, a substantially revised and recirculated Initial Study curing the defects above), rather than adoption of the Mitigated Negative Declaration. Independently, the County **cannot make the § 19.56.040 findings** required to grant the use permit on the present record.

Sources

- California Fire Code § 503.4, *Obstruction of Fire Apparatus Access Roads* ("shall not be obstructed in any manner, including the parking of vehicles") — UpCodes, CA Fire Code ch. 5
- California Fire Code § 503.1.4 / model-code Appendix D § D105, *Aerial fire apparatus access roads* (26-foot width; "exceeds 30 feet"; eave-measurement datum) — UpCodes
- Sacramento Metropolitan Fire District, *Fire Apparatus Access Roads*, Fire Prevention Standard FPS-3 (rev. July 2025) — roadway-width/parking table ("Less Than 28' — No parking either side") — metrofire.ca.gov
- Sacramento Metropolitan Fire District, *Fire Access Lanes* — metrofire.ca.gov
- Amador County Planning Department, *Early Consultation Application Referral*, UP-22; 2-3, July 21, 2022 (parking for up to 100 cars; 3,000 sq. ft. worship building; 50,000 gravesites at maximum build-out in 2122; Supervisorial District 2; property owner Brett Carlson) *(provided by client; on file)*
- Amador County Planning Department, *Early Consultation Application Referral*, UP-22; 2-3, April 24, 2026, and accompanying application package, 11 pp. (application form; "EXISTING PLOT MAP"; Assessor's plat map Bk. 1, Pg. 22; Cemetery Plan cover dated March 30, 2026) *(provided by client; on file)*
- Applicant's 2022 application package, UP-22; 2-3, 12 pp., including three "DIVISION OF DESIGN" engineering sheets annotated "STAGE 1 PROPOSED GRAVE SITES," "STAGE 1 PROPOSED 20' WIDE," "PARKING IS ALONGSIDE 20 FT X 2,000 FT GRAVEL ROAD," and "STAGE 2 PROPOSED 10,000 SQFT BUILDING 30 FT HIGH WITH OCCUPANCY OF 1200 PEOPLE" *(provided by client; on file)*
- Gardens of Noor Cemetery Plan (March 30, 2026), §§ 1, 2.2, 2.3, 3.1, 3.2, 5 (100-year timeframe; "at full build-out"; ~1.7 acres; 60 funeral events per month; 50 attendees per event; 64 parking spaces; "an increase of an average of 20 Vehicles per day"; p. 5, excavate-vault-backfill lot-development method and resulting two-foot ground-profile rise; 35.4 in/yr precipitation per US Climate Data) *(provided by client; on file)*

- *Keys v. Romley* (1966) 64 Cal.2d 396 (California's "modified civil law rule" for surface waters, requiring reasonable necessity and reasonable care by an upper landowner altering natural drainage and reasonable precautions by the lower landowner; the opinion separately describes, without adopting, a four-factor "reasonable use" balancing test followed by a minority of other states) — Justia
- CEQA Guidelines Appendix G, Hydrology and Water Quality checklist (drainage-pattern alteration; erosion/siltation; increased runoff rate or amount causing flooding) — CA Natural Resources Agency CEQA Guidelines
- *Laurel Heights Improvement Assn. v. Regents of the Univ. of Cal.* (1988) 47 Cal.3d 376 (future-expansion / whole-of-action test) — Justia; test summary, UC Davis Law; Casetext analysis
- *Berkeley Keep Jets Over the Bay Com. v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344 (cumulative impacts; foreseeability) — Justia; CEQA Portal summary
- *Bozung v. Local Agency Formation Com.* (1975) 13 Cal.3d 263 (anti-segmentation / "whole of the action") — CEQA project-definition summary
- *Aptos Council v. County of Santa Cruz* (2017) 10 Cal.App.5th 266 (piecemeal doctrine; foreseeability threshold) — Holland & Knight analysis
- California Public Resources Code §21083.4 (oak-woodland conversion determination & mitigation) — Justia; CA AEP 2024 CEQA Statute & Guidelines Handbook
- Oak-woodland mitigation & premature-removal penalties (illustrative county ordinance) — Butte County Draft Oak Woodland Mitigation Ordinance
- U.S. Fish & Wildlife Service, *Ione Manzanita (Arctostaphylos myrtifolia)* — federally threatened — fws.gov
- U.S. Fish & Wildlife Service, *Ione Buckwheat & Manzanita 5-Year Review* (development a major threat) — ecos.fws.gov; CDFW *Ione Buckwheat (Eriogonum apricum)* — wildlife.ca.gov
- CDFW, *Conservation and Recovery of Ione Endemic Plants* — nrm.dfg.ca.gov
- Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA* (2018) — lci.ca.gov; Nov. 2017 draft
- Metropolitan Transportation Commission, *VMT Thresholds of Significance Best Practices* — mtc.ca.gov
- Institute of Transportation Engineers guidance / comparable cemetery study, *Monte Vista Memorial Gardens Focused Traffic Study* (Alameda County) — acgov.org
- NACCHO, *Environmental Health Implications of "Green Burials"* — naccho.org
- USDA/APHIS *Feral Swine* fact sheet (cemeteries/burial grounds) — govinfo.gov
- The Wildlife Society, *Feral Swine in North America* (rooting depth ~1 m) — wildlife.org
- CDFW Wild Pig Forum presentations (2022) — nrm.dfg.ca.gov
- Los Angeles Times, *Feral pigs are biological time bombs* — latimes.com
- CAL FIRE SLO *Standard 1 – Water Supply* (fire flow) — calfireslo.org
- California Fire Code Appendix B (fire-flow requirements) — UpCodes
- Applicant's prior proposal — *Gardens of Light Cemetery Early CPAC Workshop*, Sacramento County, Application No. PLNP2017-00124 (13199 Meiss Rd., Sloughhouse; ~43–45 ac AG-20; ~44,000 graves; applicant Mounir Kaddoura; filed 4/20/2017; status Closed) and its

published Concept Plan, Site Plan, CPAC Early Workshop Request Form, and May 22, 2017 attorney opposition letter (R. Wright) — Sacramento County Planning Documents Viewer

- Wardall, D., chronology of the applicant's prior applications (June 13, 2026, Draft A) — applicant Mounir Kaddoura; chronology of the 2016 Sacramento (PLNP2017-00124), 2022 (UP-22;2-3), 2025, and 2026 (UP-22;2-3) applications *(provided by client; on file)*
- Amador County engineering plot sheets and "Pojoect Plot Map" [sic] for APN 001-220-013 submitted with the 2022 application (provided by client; on file) — bearing "STAGE 1 PROPOSED GRAVE SITES," "STAGE 1 PROPOSED 20' WIDE," "STAGE 2 PROPOSED 10,000 SQFT BUILDING 30 FT HIGH WITH OCCUPANCY OF 1200 PEOPLE," "STAGE 2 ROAD," "PARKING IS ALONGSIDE 20 FT X 2,000 FT GRAVEL ROAD," "IRRIGATION OF SHRUBS WILL BE BY AMADOR WATER AGENCY," "30X50 EXISTING STEEL SHED," "PROPOSED BUILDING — 2,500 sqft," and the title block "PROPOSED ZONE CHANGE FOR CEMETERY."
- Cal. Code Regs. tit. 14, § 15165 (CEQA Guidelines, "Multiple and Phased Projects") — Cornell LII; full text reproduced in CalRecycle, *CEQA Environmental Documents Types*
- Amador County Planning Department application file, *UP-22;2-3 Gardens of Noor Cemetery* (filed July 21, 2022; 50,000 gravesites, 10,000 sq-ft / 30-ft assembly building, occupancy 1,200, plus office/caretaker/equipment/accessory buildings; APN 001-220-013) *(provided by client; on file)*
- Amador County Planning Department (Planner Krista Ruesel), meeting-summary email of Aug. 5, 2022 (nine required revision items, incl. "50,000 is not realistic with the amount of funerals you proposed," removal of "city water" references, engineered-septic requirement) and Feb. 2023 septic-hold emails (Ruesel / S. Meyer / A. Ali) *(provided by client; on file)*
- Amador County Early Consultation Application Referral cover sheets, Planning Department, re: *Use Permit Application UP-22; 2-3 Gardens of Noor Cemetery*, dated July 21, 2022; Sept. 4, 2025; Apr. 24, 2026; and May 27, 2026 (provided by client; on file) — distribution to sixteen County departments and outside agencies, plus the same **nine** California Native American tribes in the same order on each of the three sheets examined (July 21, 2022; Apr. 24, 2026; May 27, 2026); the July 21, 2022 sheet states "a proposed 3,000 sq. ft. worship building" and carries the Pub. Resources Code § 21080.3.1 formal-notification footnote, which both 2026 sheets omit while retaining the double-asterisk markers that footnote answered. The Apr. 24, 2026 and May 27, 2026 sheets each describe "1832 graves sites divided among 7 blocks on the **north end of the property**," "driveway parking for up to 100 cars, and a parking lot with 64 permanent spaces, and permanent restrooms," and "60 funerals a month with a limit of 50 attendees per event" — the County's wording, quoted as written. The July 21, 2022 sheet also names Brett Carlson as property owner and places the parcel in Supervisorial District 2; the 2025 and 2026 sheets place it in District 5.
- Email, Director, Amador County Department of Transportation, to the Amador County Planning Department, re: Gardens of Noor referral, Feb. 18, 2022, in the backup to the July 21, 2022 Early Consultation Application Referral (provided by client; on file) — describes a 20,000 sq. ft. structure.
- California Department of Fish and Wildlife (Harvey Tran, Environmental Scientist, Region 2), CDFW Early Consultation comment letter re: *TAC Project Referral — UP-22;2-3 Gardens of Noor Cemetery*, Mar. 3, 2022 (nesting birds, Ione manzanita, oak woodland; project then described by CDFW as 50,000 gravesites / a "20,000 sq. ft. religious building" / build-out 2122 — CDFW's wording, quoted as written) *(provided by client; on file)*

- Amador County Planning & Environmental Health biological/application review letter, stamped received Apr. 14, 2022 (Ione buckwheat & Ione manzanita likely on site; ESA-take and USFWS-consultation warnings; references Moore Biological report) *(provided by client; on file)*
- Amador County Planning Department (Planner Krista Ruesel), *UP-22;2-3 Gardens of Noor Cemetery — Deficiencies following September 18, 2025 TAC Meeting*, rejection/incompleteness letter dated Sept. 29, 2025 (to-scale site plan, on-site sewage disposal, equipment/fuel storage, operational information, project-description consistency) *(provided by client; on file)*
- Amador County Planning Director Chuck Beatty, email determination of Dec. 21, 2022 (CUP application "remains incomplete (deficiencies list attached), has not been through environmental review, and has not been approved by the Planning Commission"; CUP required "following adequate environmental review, public notice, and a public hearing") *(provided by client; on file)*
- *Old Golden Oaks LLC v. County of Amador* (2025) 111 Cal.App.5th 794 (Cal. Ct. App., 3d Dist., No. C099948, filed May 30, 2025; published) — County may condition grading-permit application completeness on additional CEQA/environmental information; **review denied Sept. 17, 2025, Cal. Supreme Court No. S291821; decision final and citable** — Justia; Supreme Court minutes, Sept. 17, 2025; JD Supra, CEQA News You Can Use, Aug. 2025; Perkins Coie, 2025 Land Use & Development Law Case Summaries
- Amador County Code § 19.56.040 ("Action by planning commission") — use-permit findings standard ("will not … be detrimental to the health, safety, peace, morals, comfort and general welfare") and mandatory county-road-agreement condition (Ord. 537 §1, 1975; Ord. 351 §14.3, 1962) *(code section provided by client / citizens' group; on file)*
- Citizens' group, *Event Center Main Points of Concern* (19-point concern list, incl. 400-gpd AWA limit, airport/FAA and Education Code concerns, Ione clay sewage, five special-status plants and three oak species identified with a UC Davis Agricultural Extension expert) *(provided by client; on file)*
- Amador Water Agency (Lucas Carthew, Assistant Engineer), water-service summary email to the Amador County Planning Department, Apr. 10, 2023 (Eagle's Nest line "undersized"; APN 001-220-013 limited to a 5/8" meter / 1 EDU ≈ 400 gallons/average day; proposed well ~2 gpm supplemental; separate owner-funded fire-service requirement) *(provided by client; on file)*
- 14 C.F.R. § 91.119(b), *Minimum safe altitudes: General* (1,000 ft above the highest obstacle within a 2,000-ft radius over any open-air assembly of persons) — eCFR; Cornell LII
- California Education Code § 17215 (Caltrans Aeronautics review for school sites within two nautical miles of any runway — public, private, civilian, or military) — Caltrans, School & State Building Evaluations Near Airports; CDE, Proposed School Sites – Airport Runways Review
- California Public Utilities Code §§ 21670–21675 (airport land-use compatibility; two-mile vicinity) and Caltrans *Airport Land Use Planning* guidance (risk-sensitive uses — schools, places of worship, assembly — near runways) — PUC § 21675, Justia; Caltrans, Airport Land Use Planning

- Eagle's Nest Airport, Estates & Ranch Owners' Association (W. David Wardall, 209-274-9160), comment letter to Amador County re: UP-22;2-3 Gardens of Noor Cemetery, dated May 3, 2026 — documents the applicant's environmental questionnaire (application p. 26 of 84, signed Mounir Kaddoura 08/27/2025) marked "NO" to all twelve questions Q17–Q28 (at least seven should be "YES"), the 1.898-ac/1,832-plot vs. 50,000-plot/100-year mismatch, the incomplete three-item Environmental Constraints table, and the County airport-zoning restriction barring indoor meetings/assemblies adjacent to Eagle's Nest Airport *(provided by client; on file)*
- Applicant environmental "Additional Information" questionnaire, UP-22;2-3 Application p. 26 of 84 (Questions 17–28 all marked "NO"; signed Mounir Kaddoura, 08/27/2025) *(provided by client; on file)*
- California Code of Regulations, Title 14, § 15064 (CEQA Guidelines — *Determining the Significance of the Effects Caused by a Project*): § 15064(b) (significance varies with setting; "may be significant in a rural area"; threshold compliance does not relieve the duty to consider contrary substantial evidence) and § 15064(f)(1) ("shall prepare a draft EIR" on a fair argument) — Cal. Code Regs. tit. 14 § 15064, Westlaw/OAL; CA Natural Resources Agency CEQA Guidelines
- Applicant's project plot plan ("46 Acres") and Figure 1 site exhibit (p. 7) — documentary evidence that the plot plan depicts ~20% tree/oak coverage while the site exhibit and pre-disturbance imagery show ~70% oak woodland *(provided by client; on file)*
- Comparative Google Earth aerial imagery (earlier vs. current) — documents already-completed, unpermitted clearing and regrading of the upper ~15 acres (~25% of the parcel's oak woodland) prior to CEQA review *(provided by client; on file)*
- Hallenbeck/Allwest Geotechnical Engineering Consultants (East Bay Office, P.O. Box 1473, El Cerrito, CA 94530; 650-219-4290), project geotechnical report — groundwater "actively seeping" through siltstone fractures, "pooling and ponded" after excavation (see §5.2) *(provided by client; on file)*
- Road-reconstruction cost estimate for the receiving roads (60-ft ROW / 12-ft lanes / 5-ft gravel shoulders): ~$6–8 million/mile (low) and ~$9–13 million/mile (average) — latestcost.com road construction cost data *(estimate provided by client; on file)*
- California Fire Code (2019/2022) § 503.2.1–503.2.4 (fire-apparatus access road width ≥20 ft, vertical clearance 13'6", surface load ≥75,000 lb, turning radius) and Appendix D / Table D103.4 (dead-end roads & turnarounds; 26-ft width where hydrant present) — California Fire Code § 503, UpCodes; CFC Appendix D / Table D103.4, UpCodes
- CAL FIRE / Board of Forestry SRA Fire Safe Regulations, 14 CCR §§ 1273.00–1273.11 (roads support ≥75,000-lb apparatus with aggregate base § 1273.02; 16% maximum grade (20% by exception) § 1273.03; turnarounds/turnouts) — SRA Fire Safe Regulations 2020, CAL FIRE SLO; Cal. Code Regs. tit. 14 § 1273.05 (turnarounds), Cornell LII
- California Code of Regulations, Title 14, § 1270.01(i) (State Minimum Fire Safe Regulations — "Driveway" definition; "[a] Driveway shall not serve commercial or industrial uses at any size or scale") — Cal. Code Regs. tit. 14, § 1270.01, Cornell LII; California Code of Regulations, Title 14, § 1273.09 (gate-entrance clearance) — Cal. Code Regs. tit. 14, § 1273.09, Cornell LII; State Minimum Fire Safe Regulations, as of April 1, 2023 (informational compilation) *(document provided by client; on file)*

- Amador County Public Works Agency, Standard Plan PW-7, *Typical Section for Streets and Roads* (drawn 9/30/95; rev. 2/11/08; adopted 03/03/97) — Arterial/Collector/Local road-tier right-of-way, paved-width, lane-width, and shoulder specifications *(standard plan provided by client; on file)*
- Deputy County Counsel Glenn Spitzer (County of Amador), email to Amador County Planning Department staff, June 1, 2023 (identifying water contamination as "the most significant impact" of the 2022 application on this parcel and recommending the application not be deemed complete absent a to-scale grave-site plan, hydrological/water-table data, and a soil-profile study) *(obtained via a Public Records Act request by Ron Woodhouse, Eagles Nest Association; provided by client; Exhibit 7-F)*
- Amador County Environmental Health (Debra Larson) and Amador County Public Health Officer Dr. Rita Huspen Kerr, M.D., email exchange, June 16–22, 2023 (evaluating groundwater-contamination and pathogen-leaching potential from the project's proposed unembalmed, shroud-only burial method) *(obtained via a Public Records Act request by Ron Woodhouse, Eagles Nest Association; provided by client; Exhibit 7-F)*

Roadway-safety baseline (§ 2.7): - Amador County Transportation Commission, *2024 Regional Transportation Plan* (county rural roads "narrow, curvy, [with] limited sight distance, and minimal shoulders"; most-frequent collision type "hit object"; leading factors "wrong side of the road" and "unsafe speeds"; SR-104/Michigan Bar Road flagged for intersection-safety improvements; Amador local-road pavement conditions among the worst-rated in the state) — actc-amador.org - Fatal collision, Irish Hill Road at/near Carbondale Road, Amador County, Mar. 2, 2023 (driver and two children killed; ran off road, struck oak tree) — Ledger Dispatch; KCRA coverage - Fatal collision, State Route 16 east of Carbondale Road, Jan. 24, 2026 (fog; 1-year-old passenger killed, two drivers hospitalized) — myMotherLode.com - Fatal collision, State Route 104 north of Five Mile Drive, west of Ione, July 22, 2026 (head-on; one killed, 3-year-old passenger and two drivers hospitalized) — CBS Sacramento; CHP Fatal Accident Feed - Official collision-data sources for a formal quantified count (not asserted in this Analysis pending a formal query): UC Berkeley Transportation Injury Mapping System (TIMS / SWITRS) — tims.berkeley.edu; California Crash Reporting System (CCRS), current CHP statewide crash database — data.ca.gov/dataset/ccrs; Caltrans TASAS via District 10 for state-route segments (SR-104, SR-16) - CEQA Guidelines Appendix G, Transportation checklist items (c)–(d) ("substantially increase hazards due to a geometric design feature"; "inadequate emergency access") and § 15064(f) (fair-argument standard) — Cal. Code Regs. tit. 14 § 15064, Westlaw/OAL

Project documents reviewed: UP-22;2-3 Application / Cemetery Plan and attachments; Amador County CEQA Initial Study (Parts 1 & 2, OCR); County staff transmittal (May 27, 2026); Conditions of Approval / MMRP references within the IS. This analysis is an independent adequacy-and-conformity evaluation of the Initial Study / MND against the Application and primary legal authority; the community-submitted "Examination of CEQA Initial Study" (Wardall et al.) is a separate comment document in the administrative record and is referenced here only where it corroborates a factual observation.

EXAMINATION OF CEQA INITIAL STUDY FOR USE PERMIT UP-22;2-3

Gardens of Noor Cemetery • APN 001-220-013

June 2026

Prepared by David Wardall, Dr. Michael Preskar, Jim Wirfel, and Ron Woodhouse — residents of western Amador County, Ione, CA

The Initial Study under review was prepared in-house by the Amador County Planning Department.

Conclusion

After reviewing this report, we determined that this Initial Study is full of incorrect assumptions and inaccurate findings and determinations; ignores several important facts; violates CEQA; violates Amador County codes; violates State Acts; violates Federal laws; makes no findings of significance despite known major problems; and excludes many important conditions that should be met and proven before this project is sent to the Planning Commission.

Examination Process

We will follow the 60-page CEQA Initial Study, point out errors, omissions, and incorrect determinations, and then justify each with correct facts.

We will submit recommended findings and determinations. Where the Initial Study's analysis of a serious problem is inadequate and its proposed mitigation is not supported by substantial evidence, we identify it as a significant impact that is not adequately analyzed or mitigated on this record — the standard that supports preparation of an Environmental Impact Report.

Project Overview and Site Characteristics

Project Overview — Initial Study Page 4

1. Phone number incorrect: listed as 209-233-6380; the correct number is 209-223-6480.

Site Characteristics — Initial Study Page 4, First Paragraph

The existing site description is incorrect. The Initial Study states: "The area is largely disturbed, characterized by open areas and chaparral including manzanita, chamise, and oak thickets."

Deficiencies / errors / omissions:

1. The recently cleared area is about 25% of the 46-acre parcel.
2. There was an illegal take of oak trees in violation of the California Oak Tree Preservation Act.
3. There was destruction of up to five federally protected plant species:

a) Bisbee Peak Rush-Rose (Helianthemum suffrutescens)

b) Ione Manzanita (Arctostaphylos myrtifolia)

c) Ione Buckwheat (Eriogonum apricum var. apricum)

d) Irish Hill Buckwheat (Eriogonum apricum var. prostratum)

e) Perry's Horkelia (Horkelia parryi)

4. The remaining 75% of the property holds three species of oak trees: Live Oak, Blue Oak, and Valley Oak.

The taking of oak trees is against the State Oak Tree Preservation Act and is a significant impact the Initial Study did not adequately analyze or mitigate. The taking of federally endangered plants is a Federal crime and is a significant impact not adequately analyzed or mitigated on this record.

Site Characteristics — Initial Study Page 5, Second Paragraph

"There are no existing structures or improvements on the property, and proposed improvements would be the following:"

- 7 blocks of grave sites (1,832 total) distributed throughout the northern 1.2 acres of the property
- Paved encroachment and on-site circulation and parking areas
- Perimeter security fencing
- Identification signage (complying with Amador County Code 19.32, Signage)
- Security lighting and monitoring equipment
- Landscaping and other forms of visual screening
- A restroom to serve guests
- A storage / utility building accessory to the cemetery use for equipment storage
- Utilities and ancillary improvements or accessory structures related to the construction and/or operation of the above facilities

Deficiencies / errors / omissions:

1. Bullet 1 — The listed area is 1.2 acres; the actual fenced area for the 1,832 graves is 7.3 acres.
2. **Bullet 2 — Due to extreme traffic loading, these areas need a full structural base and paving to accommodate an 80,000-pound fire engine / tanker, and to mitigate dust on all interior roads and control vehicle-generated dust.**
3. Bullet 3 — Perimeter security fencing: what about 350-pound wild hogs? Will the fence sustain attack by these animals?
4. Bullet 4 — No comment.
5. Bullet 5 — No comment.
6. Bullet 6 — Will the fence and landscaping screen grave statues and headstones?
7. Bullet 7 — How many square feet? Fire-protection water?
8. **Bullet 8 — There is a void in this bullet point. Page 32 of 153 of the County's handout dated May 27, 2026, under Hallenbeck / Allwest Associates, Section 1.0, second paragraph, lists "... and perhaps accessory buildings." This is undefined — a blank check for whatever buildings may appear in the future.**
9. **Bullet 9 — This point lists "... and ancillary improvements or accessory structures related to the ... operation of the above facilities." How many more undefined buildings?**

Land Use — Initial Study Page 6

Last two sentences: "The property is currently graded and vacant in the majority of the northern 50% of the site, and retains natural vegetation along the Carbondale frontage. There is one storage building on the site."

Deficiencies / errors / omissions:

a) The top area of the property has been illegally graded on about 25% of the property. The property is not vacant: it has at least one double-wide, one possible large structure other than the equipment structure, and several semi-trailers and sea containers.

Lead Agency — Initial Study Page 6

Amador County is the Lead Agency.

Probable Environmental Effects and Scope of Mitigated MND / MMRP

Initial Study Page 6

Paragraph one, last sentence: “In the case that no unmitigable significant impacts are identified through the IS, a Mitigated Negative Declaration (MND) will be filed pursuant to CEQA requirements. Mitigation measures proposed serve to aid in the avoidance, minimization, rectification, reduction, or elimination of impacts.”

Paragraph two, first sentence: “In the case that, through the Environmental Assessment / Initial Study, it is determined that there will be significant unmitigable impacts, an Environmental Impact Report (EIR) may be required prior to project approval.”

Deficiencies / errors / omissions:

1. If major significant impacts are found, the Lead Agency must follow CEQA to justify a mitigation that will not reduce the significant impact.
2. CEQA is clear that if significant impacts cannot be mitigated, an EIR is required.

Further, several major significant impacts are not adequately analyzed or mitigated on this record, and the project should be denied or an Environmental Impact Report required.

Evaluation of Environmental Impacts per CEQA

Initial Study Page 7

Paragraph 3, last sentence: “If there are one or more ‘Potentially Significant Impact’ entries when the determination is made, an EIR is required.”

Paragraph 5(c), Early analysis and mitigation:

Deficiencies / errors / omissions:

1. CEQA is very exact on several details pertaining to documenting determinations when an effect is “mitigated down to less than significant.” A review of this report shows many incorrect assessments and determinations; not one finding of significant impact was made across the 60-page report. This project has several major issues that will require an EIR.
2. Mitigation measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” the report must describe the measures incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project. This document has several findings of “Less than Significant with Mitigation Incorporated.” Several of these findings are not supported by substantial evidence and are not adequately analyzed or mitigated on this record.

Environmental Factors Potentially Affected

Initial Study Page 8

The Initial Study lists 21 factors. Thirteen factors have issues and are listed below:

Environmental Factor	Significant Impact	Can Impact Be Mitigated?
A. Aesthetics	Yes	Maybe
B. Agriculture and Forest Resources	Yes	No
C. Air Quality	Yes	No
D. Biological Resources	Yes	No

Environmental Factor	Significant Impact	Can Impact Be Mitigated?
E. Land Use / Planning	Yes	No
F. Transportation / Traffic	Yes	No
G. Hazards and Hazardous Materials	Yes	No
H. Mineral Resources	Yes	Maybe
I. Greenhouse Gas Emissions	Yes	No
J. Hydrology / Water Quality	Yes	No
K. Noise	Maybe	Maybe
L. Wildfire	Yes	No
M. Mandatory Findings of Significance	Yes	No

Please refer to Page 8 of the Initial Study for the checklist of Environmental Factors Potentially Affected and the County's CEQA determination.

Determination (to be completed by the Lead Agency) — Page 8

The Amador County Planning Department is the Lead Agency. Amador County has selected:

> *"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 or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared."*

This selection is not supported by substantial evidence and is not adequately analyzed or mitigated on this record; a full EIR should be required. Further, this project should have been denied in 2022.

Pages 9 through 16 of the Initial Study are maps and photos provided by the applicant.

Chapter-by-Chapter Findings

Chapter 1 — Aesthetics (Initial Study Pages 17–18)

Deficiencies / errors / omissions (checklist items keyed to CEQA Appendix G, Section I — Aesthetics):

(b) Damage to scenic resources. Substantial damage has occurred to 25% of the property through the illegal take of many protected oak trees. The remaining 75% of the property has hundreds of oak trees.

(c) Degradation of visual character. The existing removal of 25% of the oak trees and the planned future removal of the remaining 75% will cause a serious degradation of the existing visual character and quality of public views.

(d) New source of light or glare / internal inconsistency. The proposed Use Permit is for daylight hours only, yet Mitigation Measure AES-1 on Page 18 provides that the facility closes at 10 p.m. This is a conflict and an error in the CEQA documents, which elsewhere provide the facility will close at dusk.

Chapter 2 — Agriculture and Forest Resources (Initial Study Pages 19–20)

Deficiencies / errors / omissions (checklist items keyed to CEQA Appendix G, Section II — Agriculture and Forest Resources):

(b) Conflict with agricultural zoning. The proposed project would conflict with agricultural zoning. This massive commercial operation is not compatible with agricultural zoning, nor with the rural community.

(d) Loss of forest land. This project will remove a protected oak-tree forest of at least 30 acres.

Chapter 3 — Air Quality (Initial Study Pages 21–22)

Deficiencies / errors / omissions (checklist items keyed to CEQA Appendix G, Section III — Air Quality):

(a)–(c) Conflict with air-quality plan / cumulative and sensitive-receptor impacts. With an estimated 18,000 vehicle trips per month, the air-quality plan will be impacted; this significant impact is not adequately analyzed or mitigated on this record.

(d) Objectionable odors. Decomposing bodies will emit foul odors. How is this mitigated?

Chapter 4 — Biological Resources (Initial Study Pages 23–27)

There are several major biological problems that violate Amador County, State, and Federal codes and regulations.

Deficiencies / errors / omissions:

(a) Substantial adverse effect on special-status species. The illegal take of three species of oak trees and the removal of up to five federally protected rare plant species:

1. Bisbee Peak Rush-Rose (Helianthemum suffrutescens)
2. Ione Manzanita (Arctostaphylos myrtifolia)
3. Ione Buckwheat (Eriogonum apricum var. apricum)
4. Irish Hill Buckwheat (Eriogonum apricum var. prostratum)
5. Perry's Horkelia (Horkelia parryi)

(b) Riparian habitat / sensitive natural community. Potential vernal pools and some endangered plants.

(c) Federally protected wetlands. Potential vernal pools that may qualify as federally protected wetlands.

(d) Interference with wildlife movement corridors. Fences will impede migratory animal movements, including wild feral pigs.

(e) Conflict with local biological-resource policies / ordinances. Direct violation of oak-tree removal rules — violation of the State Oak Tree Preservation Act.

(f) Conflict with an adopted habitat conservation plan / General Plan. Research would show this project has problems complying with the Amador County General Plan, which emphasizes protecting wildlife habitats, sensitive environments, aquatic habitats, oak woodlands, and special-status species (e.g., Ione manzanita and four other federally protected plants). It requires compliance with state and federal laws for discretionary projects and encourages oak-woodland preservation.

The listed mitigations for BIO-3 and BIO-4 are grossly under-analyzed and do not comply with CEQA, the Amador County General Plan, Amador County codes, State regulations, or Federal laws on endangered and protected plants. Several of these problems are not adequately analyzed or mitigated on this record.

The Initial Study also does not address whether the project would result in the take of federally listed plant species, or whether consultation with the U.S. Fish and Wildlife Service is required before the County may act. That question is squarely raised by a document already in the County's own file.

The April 14, 2022 review letter to the Amador County Planning and Environmental Health Departments states that the federally endangered Ione buckwheat (Eriogonum apricum) and the federally threatened Ione manzanita (Arctostaphylos myrtifolia) are documented in the area and on immediately adjacent properties and "very likely occur on this project's property"; that the parcel appears to lie within the most robust population of the threatened manzanita; that the project proposes to remove acres of chaparral including manzanita; and that consultation with, and permits from, the U.S. Fish and Wildlife Service are likely required.

Neither that letter, nor the take question it raises, nor the consultation requirement it identifies, appears anywhere in the Initial Study or its technical appendices. An initial study that omits a known agency concern bearing directly on a federally listed species does not supply the information a decision-maker needs, and the omission is itself an information-adequacy defect. The County should state on the record whether it consulted the

U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, and how the concerns raised in the April 14, 2022 letter were resolved.

Chapter 5 — Cultural Resources (Initial Study Pages 28–29)

No comments.

Chapter 6 — Energy (Initial Study Page 30)

No comments.

Chapter 7 — Geology and Soils (Initial Study Pages 31–34)

There are two concerns: erosion and septic leach fields.

Deficiencies / errors / omissions:

(b) Soil erosion / loss of topsoil. There are very heavy flood flows during winter storms, with continuous erosion problems in the drainage along Lambert and Carbondale Roads. With the removal of topsoil, vegetation, and oak trees, the bare 25% of the land will increase rain runoff, flooding, and topsoil erosion. This is a major concern for exposing buried bodies. The applicant's geology report identifies the soil as water-laden, which would further contaminate the aquifers with human-body decomposition waste.

(e) Soils incapable of supporting septic systems. This soil will require an engineered septic system with flood-drainage barriers around the leach field.

Chapter 8 — Greenhouse Gas Emissions (Initial Study Page 35)

This project will significantly increase automotive vehicle emissions.

Deficiencies / errors / omissions:

(a) Significant greenhouse-gas emissions. With an estimated 18,000 funeral vehicle trips per month, there would be a significant increase in greenhouse gases. How would Amador County mitigate or explain away this problem?

(b) Conflict with a GHG-reduction plan, policy, or regulation. This project would conflict with an applicable plan, policy, or regulation.

Chapter 9 — Hazards and Hazardous Materials (Initial Study Pages 36–38)

This project imposes a huge traffic load on narrow country roads that do not meet Amador County Road Specification PW-7; in fact, some adjacent roads have one lane of pavement 10 feet wide.

Deficiencies / errors / omissions:

With 18,000 vehicle trips per month, the roads will be clogged with slow funeral processions of 25–45 vehicles, plus additional non-procession vehicles. These narrow, no-shoulder roads will make emergency egress from the project site impossible and impose profound constraints on emergency-response vehicles. This is a serious safety problem that is not adequately analyzed or mitigated on this record.

The prospect of bodies buried without a casket and as shallow as 18 inches is a significant impact that is not adequately analyzed or mitigated on this record.

Chapter 10 — Hydrology and Water Quality (Initial Study Pages 39–40)

Has the State Water Quality Control Board been contacted and a permit issued for this project? There are five significant problems within Chapter 10 that would be impacted:

Deficiencies / errors / omissions:

(a) Violation of water-quality standards. Violates water-quality standards, with excessive runoff and a heavy silt load.

(c)(i) Altered drainage / on- or off-site erosion. With fresh graves, heavy rains will cause erosion and silt runoff.

(c)(ii) Altered drainage / increased runoff. 25% of the property has been cleared to bare dirt. With all vegetation removed, there will be a significant increase in runoff, silt, and flooding on Carbondale and Lambert Roads.

(c)(iii) Contribution of runoff exceeding drainage-system capacity / flooding. Heavy-rain flooding occurs now on Carbondale and Lambert Roads; the County routinely puts up "Flooded" warning signs. The cleared, bare land will add significant flood waters; the non-culverted drainage ditches are vastly eroded in heavy rains, and warning delineators mark cave-ins.

(e) Degradation of water quality. Body waste from non-casket burials will produce dissolved products that enter the water runoff, along with odors. How is this problem mitigated?

(e-1) The County's own counsel flagged this exact impact in writing, in 2023, and the requested studies do not appear in this record. In a June 1, 2023 email to the Planning Department regarding the 2022 application on this same parcel, Deputy County Counsel Glenn Spitzer wrote that "the most significant impact I see is water contamination" and that the application should not be deemed complete without: (1) a to-scale site plan showing grave sites including depths; (2) hydrological data showing potential flood areas and water-table depths in the grave-site areas; and (3) a soil-profile study for the grave-site areas (email correspondence, Deputy County Counsel Glenn Spitzer to Amador County Planning Department, June 1, 2023; provided by client; on file). None of these three items appears in the current Initial Study or its appendices. This is a completeness gap the County's own counsel identified as essential three years ago, and it remains unresolved on this record.

Chapter 11 — Land Use and Planning (Initial Study Page 41)

The Land Use and Planning assessment by the Amador County Planning Department is incorrect, has many errors and omissions, and reaches unsupported determinations.

Deficiencies / errors / omissions:

(a) Physically divide an established community. This project will divide the community by allowing a heavy commercial business in a vast, wide-open rural ranch area of 2,500- to 6,000-acre ranches and a few Ag-80 and Ag-40 parcels. This project is not consistent with the General Plan and does not fit the community. This is a major conflict that is not adequately analyzed or mitigated on this record.

(b) Conflict with an applicable land-use plan, policy, or regulation. This project is not consistent with the Amador County General Plan and not consistent with local R-1A zoning. There will be several major impacts to the community discussed throughout this report: huge traffic problems, no fire-protection water, illegal taking of oak trees and rare and protected plants, air-quality impacts, and more. These are major conflicts that are not adequately analyzed or mitigated on this record.

(c) Conflict with a habitat conservation / natural community conservation plan. Although there may not be a local habitat or conservation plan in place, the General Plan is very specific and lists the Ione manzanita and federally protected plant species as necessary to consider and protect. This is a major conflict that is not adequately analyzed or mitigated on this record.

Chapter 12 — Mineral Resources (Initial Study Pages 42–43)

No comment.

Chapter 13 — Noise (Initial Study Pages 44–45)

This project will raise the low rural ambient noise level through roughly 18,000 additional vehicle trips per month, plus honking horns from clogged roads and impeded traffic movements.

Deficiencies / errors / omissions:

(a) Substantial permanent increase in ambient noise. The Amador County General Plan lists a noise limit of 60 dBA CNEL for a single-family residence. This rural ranch area has an ambient noise level around 45 dBA CNEL. This

project would raise the ambient level with two funerals every day of the year (on average). The County's proposed ground cover or fences are useless across the area against long funeral processions traveling to and from the project property. This project would contribute to a substantial permanent increase in ambient noise in the immediate and extended project areas above levels existing without the project.

Chapter 14 — Population and Housing (Initial Study Page 46)

No comment.

Chapter 15 — Public Services (Initial Study Page 47)

This project description appears to be borrowed from a different project near Lake Camanche. It states that fire protection is from the Jackson Valley Fire Protection District and lists State Highway 88 as being to the northwest, when it is east of the proposed project site.

Deficiencies / errors / omissions:

(a) Fire-protection services. There is no fire-protection water available to this land. The Eagle's Nest pipeline is at capacity. The Ione fire station is 7 miles east, not 2 miles away. The applicant states he will install a well. The Eagle's Nest founding families drilled 10 wells as deep as 700 feet; several attempts on the east side of Lambert Road were dry (less than ½ GPM), and the water had high iron and sulfur content. The applicant has listed four commercial buildings. Storage tanks are unmonitored and go dry or accrue algae. With no fire-protection water, this deficiency is not adequately analyzed or mitigated on this record.

Chapter 16 — Recreation (Initial Study Page 48)

No comment.

Chapter 17 — Transportation (Initial Study Pages 49–51)

The transportation impacts of this project are large. The Amador County Planning Department used the applicant's extremely low funeral-attendance and vehicle counts. Research indicates the average funeral in this context draws from 50 to 200 people, and well-known community members can draw 500 or more. For this analysis we use an average of 225 attendees driving 150 vehicles — about 18,000 vehicle trips per month.

Deficiencies / errors / omissions (checklist items keyed to CEQA Appendix G, Section XVII — Transportation):

(a)–(b) Conflict with circulation plans / VMT. The proposed project will significantly increase traffic, clog local and collector roads, greatly restrict emergency-vehicle response times, and significantly erode and damage 35- to 45-year-old asphalt pavement.

The County's attempt to explain away several major issues is flawed and violates CEQA Guidelines Section 15064.3, subdivisions (a)(1), (b)(1), and (b)(2). An application for a driveway encroachment permit and payment of a token traffic-mitigation fee will do nothing to mitigate the significant issues in this report. The applicant's attendance estimates are unacceptably low; likewise, the daily and monthly vehicle-trip counts are extremely low, and the Planning Department accepted these figures.

A real road-mitigation measure would provide for the following:

- Improve all impacted collector and minor roads to County Standard PW-7 (12-foot paved lanes and 5.25-foot structural gravel shoulders) for Carbondale Road, Lambert Road, Forest Home Road, and Maxwell Road.
- Post a performance bond with a County-acceptable escrow company for engineering and construction cost at $7 million per mile × 12 miles = $84 million.

County Standard PW-7 itself confirms these figures. Amador County Public Works Agency Standard Plan PW-7, "Typical Section for Streets and Roads" (adopted 03/03/97), sets three road tiers: Major/Minor Arterial — 100-ft right-of-way, 70-ft paved, 24-ft/17-ft lanes, 8.25-ft minimum shoulder; Major/Minor Collector — 80-ft right-of-

way, 38.5-ft paved, 14-ft/12-ft lanes, 5.25-ft minimum shoulder; Major/Minor Local — 60-ft right-of-way, 30.5-ft paved, 12-ft/11-ft lanes, 3.25-ft minimum shoulder (PW-7 standard plan; provided by client; on file). Carbondale, Lambert, Forest Home, and Maxwell Roads are Collector-tier receiving roads, so the 12-foot lane / 5.25-foot shoulder figures used above are the County's own adopted Collector standard — not a figure this examination invented.

- Per CEQA, reject the project, or require a full CEQA EIR prepared by an independent, legitimate CEQA consultant at the applicant's expense.

(b) VMT threshold omission. The Initial Study has significant omissions regarding CEQA Section 15064.3(b)(1), Land Use Projects: "Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact." What is the threshold? The applicant plainly exceeds all thresholds with 18,000 vehicle trips per month. This significant impact is not adequately analyzed or mitigated on this record.

(c) Geometric-design hazard. This proposed project would substantially increase traffic on very narrow existing roads with limited travel lanes not conforming to County Standard PW-7, including a blind intersection at Carbondale and Lambert Roads.

(d) Inadequate emergency access. The heavy traffic loading would significantly inhibit timely response for fire engines, medical equipment, and sheriff vehicles. This significant impact can only be mitigated by reconstruction of local roads.

Items (c)–(d) in detail — documented roadway-safety baseline and the Initial Study's failure to analyze physical hazard

(i) CEQA's transportation checklist asks **two distinct questions**, not one. The first is a *vehicle-miles-traveled (VMT)* question — an efficiency/climate metric under SB 743 and CEQA Guidelines § 15064.3. The second, entirely separate, is a *physical-safety* question: whether the project would **"substantially increase hazards due to a geometric design feature (e.g., a sharp curve or dangerous intersection) or incompatible uses"** and whether it would **"result in inadequate emergency access"** (CEQA Guidelines Appendix G, Transportation checklist items (c)–(d)). **The Initial Study answered only the first question and left the second effectively blank.** On the physical-hazard item, the IS Transportation chapter marks the impact "Less Than Significant" and offers, as its entire rationale, that "cemetery use is not a particularly significant use when evaluating for Vehicle Miles Traveled (VMT) based on the infrequency of visitation" (IS pp. 49–51). That is a VMT rationale. It does not address road geometry, sight distance, curve or intersection design, or the corridor's collision history at all. **A VMT finding is not a substitute for a roadway-safety finding**, and the record here contains substantial evidence that the safety question is a real one requiring study.

(ii) The access corridor. The site sits at the northern fork of the Carbondale Road / Lambert Road intersection, roughly 4 miles northwest of Ione, about 3.5 miles south of State Route 16, and about 3.5 miles north of State Route 104 (project file, Amador County CEQA Report, Parts 1–2). It is reached by two routes over two-lane, undivided rural roads: from the Ione side, **SR-104 → Michigan Bar Road → Carbondale Road → site**; from the Sacramento side, **SR-16 → Carbondale Road → site. Carbondale Road is the shared spine of both routes** — all project traffic, from either direction, funnels onto it. This is the same road the Initial Study itself describes as a **"county-maintained minor collector"** (IS, Hazards discussion) — a classification designed for low-volume local circulation, not for destination-scale event and procession traffic.

(iii) The County's own characterization of these roads. The Amador County Transportation Commission's 2024 Regional Transportation Plan describes the county's non-state-highway network — the classification Carbondale and Michigan Bar Roads fall within — as roads that "can be narrow, curvy, have limited sight distance, and minimal shoulders." The same plan reports that the region's most frequent collision type is **"hit object"** and its leading contributing factors are **"wrong side of the road"** and **"unsafe speeds,"** and it flags the **SR-104 / Michigan Bar Road** location for future intersection-safety improvements and the broader SR-104 segment (Michigan Bar to Foothill Blvd.) for a multi-million-dollar improvement program. It also notes Amador's local-road pavement conditions have ranked among the **worst-rated in the state**. In short, the County's own transportation-planning

documents identify this corridor's roads as narrow, curving, sight-limited, and already targeted for safety spending. That is the baseline against which the project's added traffic must be measured — and the Initial Study measures it against nothing.

(iv) Documented fatal collisions on the corridor. Independent, publicly reported records confirm at least **three fatal collisions on the corridor's roads within roughly the last three years**, each reflecting exactly the physical hazards the County's own RTP identifies (run-off-road / "hit object," crossing to the wrong side, and reduced visibility):

Date	Location (as reported)	Outcome	Source
Mar. 2, 2023	Irish Hill Road at/near Carbondale Road, Amador County	3 killed (a parent and two children); vehicle ran off the road and struck an oak tree at high speed	Ledger Dispatch
Jan. 24, 2026	State Route 16, east of Carbondale Road (Sacramento-side access route)	1 killed (a one-year-old passenger); two drivers hospitalized; heavy fog a factor	myMotherLode
July 22, 2026	State Route 104, north of Five Mile Drive, west of Ione (Ione-side access route)	1 killed; a 3-year-old passenger and two drivers hospitalized; head-on, vehicle crossed into oncoming lane	CBS Sacramento

These incidents are cited precisely by their reported locations. A quantified, corridor-wide collision count can be obtained from the State's official crash databases (SWITRS via UC Berkeley TIMS; the California Crash Reporting System; and Caltrans TASAS for the state-route segments) and should be pulled for the record; this examination does not assert a specific corridor-wide total pending that formal query.

Mitigation Measures TRA-1 and TRA-2

The County's Mitigation Measures TRA-1 and TRA-2 are inadequate and do not address the significant matters that remain unresolved:

- TRA-1 addresses only the access-entry geometry for the first 50 feet into the project. It does not identify the extremely narrow, very poor pavement on the local roads with no shoulders.
- TRA-2 references the County's Fire and Life Safety Ordinance. But the interior gravel driveway (beyond the first 50 feet inside the property) is non-compliant. For a commercial operation with four buildings and no fire-protection water, heavy fire trucks and water tankers would be responding while visitors are departing. The County did not provide for paved interior roads meeting County Road Specification PW-7.
- TRA-1/TRA-2 also fail to address a threshold classification defect. The Cal Fire State Minimum Fire Safe Regulations define a "Driveway" as a pathway serving no more than four residential units and non-commercial buildings, and state that "**[a] Driveway shall not serve commercial or industrial uses at any size or scale"** (14 CCR § 1270.01(j)). A cemetery/mortuary operation with four commercial-rated buildings and paid interment services is a commercial use. If the interior gravel access is built or classified as a "Driveway" rather than a "Road," the regulation bars the use outright — independent of whether it is ever widened or paved. Neither TRA-1 nor TRA-2 identifies which classification governs, and this threshold question is unresolved.

Chapter 18 — Tribal Cultural Resources (Initial Study Pages 52–53)

No comment.

Chapter 19 — Utilities and Service Systems (Initial Study Pages 54–55)

This chapter pertains to utilities and related services. This property is in the Ione Formation and is a clay-based property. The property is water-laden but not water-bearing. There is one Amador Water Agency water meter

installed — a 5/8-inch meter limited to 20 GPM and a maximum of 400 gallons per day. Who will monitor this meter for compliance? Likewise, clay-based soils will have percolation problems for a sewer leach field.

Deficiencies / errors / omissions (checklist items keyed to CEQA Appendix G, Section XIX — Utilities and Service Systems):

(a) Stormwater / drainage facilities. The County storm-water drainage is a ditch on each side of Lambert and Carbondale Roads. These ditches routinely overflow and flood the traffic lanes; removal of vegetation on the upper 25% of the land will increase storm runoff through the burial grounds, and silting will occur. **This project will require a Storm Water Pollution Prevention Permit from the State Water Resources Control Board.**

(b) Sufficient water supplies available. There is no fire-protection water — the Eagle's Nest pipeline is at capacity, and a proposed added well is unlikely to produce water in the clay-based Ione Formation. The single 5/8-inch AWA meter (20 GPM; 400 gallons per day) is inadequate for the proposed commercial use. The County's Mitigation Measure UTL-2 is inadequate: there is no water east of Lambert Road, and the County itself required the adjacent airport-land subdivision to demonstrate a producing well of at least 6 GPM in each quarter section, where test wells drilled to 700 feet found no water. A producing well of at least 6 GPM should be required PRIOR to Planning Commission approval and verified by the Environmental Health Department. The lack of fire-protection water is not adequately analyzed or mitigated on this record.

(c) Wastewater treatment capacity. There is no public wastewater service to this property. Because the clay-based soils have poor percolation, an engineered above-ground mound leach field will be required, and its adequacy for the proposed use is not demonstrated in the record.

We find it notable that the Initial Study requires the applicant to obtain a County grading permit "in order to regulate stormwater drainage and runoff," while the County concurrently finds "No Impact." That is internally inconsistent.

Chapter 20 — Wildfire (Initial Study Pages 56–57)

The Wildfire section has several areas that are not adequately analyzed or mitigated on this record:

- No fire-protection water;
- Existing County roads too narrow, with limited sight distance and no shoulders;
- No interior two-lane roads to allow fire engines in and visitors out simultaneously;
- Four added commercial-use buildings will not have fire-protection sprinklers.

Deficiencies / errors / omissions (checklist items keyed to CEQA Appendix G, Section XX — Wildfire):

(a) Impair an adopted emergency response or evacuation plan. Existing County roads are too narrow, have no shoulders, and have sharp turns. Cemetery traffic will clog these roads and delay emergency-vehicle response and any evacuation. Emergency-vehicle access is through a narrow gate that does not permit two-way traffic and does not meet County Standard PW-7, creating a bottleneck — fire engines attempting to enter while visitors attempt to exit.

(c) Infrastructure adequacy (roads and emergency water sources). The interior gravel driveway will not support 75,000- to 80,000-pound fire trucks and water tenders. There is no fire-protection water for wildfires, and the four commercial-rated buildings are not proposed with fire-protection sprinklers. The absence of adequate emergency water sources and fire-apparatus access is not adequately analyzed or mitigated on this record.

(c-1) Commercial-use bar on the "Driveway" classification. The Cal Fire State Minimum Fire Safe Regulations define a "Driveway" as a pathway serving no more than four residential units and non-commercial buildings, and state expressly that "**[a] Driveway shall not serve commercial or industrial uses at any size or scale"** (14 CCR § 1270.01(i)). This is a commercial cemetery/mortuary use with four commercial-rated buildings. If the interior gravel access is built or classified as a "Driveway" rather than a "Road," it is barred outright by this regulation, independent of width or surfacing. The record does not identify which classification governs.

(c-2) Gate clearance. The State Minimum Fire Safe Regulations separately require any gate to be at least two feet wider than the traffic lane(s) it serves, with a minimum of 14 feet horizontal and 13′ 6″ vertical clearance (14 CCR § 1273.09(a)). This bears directly on the single-gate bottleneck described above — the record does not show the gate meets this standard. Turnout and turnaround spacing requirements for driveways/access roads over 150 and 300 feet (14 CCR § 1273.05) are likewise unaddressed on this ~46-acre parcel with multiple interior buildings.

(Items (b) and (d) of the Section XX checklist — slope/wind-driven fire spread and post-fire runoff/landslide exposure — are not separately contested here; the deficiencies above fall under items (a) and (c).)

Chapter 21 — Mandatory Findings of Significance (Initial Study Pages 58–60)

This summation of "Mandatory Findings of Significance" is flawed and contains errors, omissions, and unsupported assessments and determinations.

The Initial Study answers each of the three mandatory-findings questions — (a) degradation of the environment / reduction of habitat, (b) cumulatively considerable impacts, and (c) substantial adverse effects on human beings — as "Less Than Significant with Mitigation Incorporated." The record does not support those conclusions, and the "Potentially Significant Impact" determination should have been selected for findings (a), (b), and (c).

Finding (a) — Degrade the quality of the environment / reduce habitat or the range of a rare or endangered species:

The Initial Study concludes the project would not degrade the environment and would not significantly affect habitat, wildlife populations, or plant and animal communities. That conclusion is not backed by the record. The project would remove protected oak trees and would reduce the number or restrict the range of rare or protected plant species documented on and adjacent to the site.

Mitigation measures relied upon — gaps on the face of the record:

The Initial Study lists mitigation measures that, as written, do not address several of the impacts identified elsewhere in this Examination:

- AIR-1 (construction-equipment idling limits) does not address the large increase in vehicle-trip mileage each day, month, and year generated by ongoing operations;
- BIO-1 (special-status animal species) does not address feral-pig movement or its effect on interred remains;
- BIO-3 (special-status plant-species mitigation, developed in conjunction with CDFW, USFW, and CNPS) does not address the removal of federally protected endangered plants and State-protected oak trees;
- BIO-4 (pre-disturbance plant survey) relies on an applicant biological survey that omitted four federally protected plant species; a separate 1999 biological survey of 600 adjoining acres, prepared by a qualified biologist, is offered as a more reliable baseline (provided by client; on file);
- HAZ-1 (hazardous-materials upset and release) does not address vehicle exhaust or the potential for groundwater contamination from shallow interments;
- HYD-1 / HYD-2 (drainage/grading and interment best-management practices) do not address winter flooding, potential washout, or animal disturbance of interment areas;
- TRA-1 (encroachment permit) does not resolve that the affected County roads cannot accommodate the projected monthly vehicle trips; TRA-2 (Fire and Life Safety Ordinance compliance) is not demonstrated where no fire-protection water is identified;
- UTL-2 (applicant verification of sufficient water, well service, and quality per the Environmental Health Department) is inadequate: there is no water east of Lambert Road, and the County itself required the adjacent airport-land subdivision to demonstrate a producing well of at least 6 GPM per quarter section where test wells drilled to 700 feet found no water; it also does not address CAL FIRE fire-protection water requirements for the four commercial-rated buildings.

Finding (b) — Cumulatively considerable impacts:

The Initial Study's cumulative-impacts finding reads, in the County's own words:

> *"No past, current, or probable future projects were identified in the project vicinity that, when added to project-related impacts, would result in cumulatively considerable impacts. The intent of the project is [to] provide a cemetery for the community. […] Though the project does increase the scope of allowed activities, uses are consistent with the zoning code subject to obtaining a Use permit. Due to the unique characteristics of the site in the context of the application, [it] does not propose uses inherently inconsistent with the surrounding area. The proposed project is not inconsistent with the Amador County General Plan and no cumulatively considerable impacts would occur with development of the proposed project. Impacts would be less than significant with mitigation incorporated."*

The foregoing passage is quoted from the County's Initial Study and is reproduced solely for record accuracy. One sentence of the County's text has been elided, as indicated by the bracketed ellipsis, because it describes the community the facility would serve; that description is the County's own characterization, it is immaterial to the cumulative-impacts question examined here, and the authors take no position on it. This Examination rests exclusively on neutral CEQA, planning, engineering, and public-safety criteria.

That reasoning fails on its own terms. Treating the project as "independent and unique" does not excuse the required cumulative-impacts analysis: CEQA requires that analysis regardless of whether a comparable facility already exists in the vicinity. The finding is also unsupported — the Initial Study identifies no specific County code section and no adopted threshold of significance, as CEQA Guidelines § 15064.7 contemplates. Reasonably foreseeable expansion — amendments to the Use Permit for additional interment capacity, with corresponding additional traffic and additional groundwater-contamination and emergency-response burdens — is cumulatively considerable and is not analyzed.

Finding (c) — Substantial adverse effects on human beings:

The Initial Study concludes there would be no substantial adverse effects on human beings and that all potentially significant impacts have been mitigated to a less-than-significant level. The record instead shows multiple significant impacts that cannot be adequately mitigated on this record — among them the roadway-safety and emergency-access deficiencies, the absence of fire-protection water, and the water-supply constraints identified in the preceding chapters.

For the reasons above, the mandatory-findings determinations in the Initial Study are not supported by substantial evidence, and the fair-argument standard is met for each of findings (a), (b), and (c).

EXAMINATION OF THE CONDITIONS OF APPROVAL AND MITIGATION MONITORING AND REPORTING PROGRAM FOR USE PERMIT UP-22;2-3

Gardens of Noor Cemetery • APN 001-220-013

July 2026

Prepared by David Wardall, Dr. Michael Preskar, Jim Wirfel, and Ron Woodhouse — residents of western Amador County, Ione, CA

Companion document to the author's Examination of CEQA Initial Study for Use Permit UP-22;2-3. The Conditions of Approval and Mitigation Monitoring and Reporting Program (MMRP) under review were prepared in-house by the Amador County Planning Department (dated June 11, 2026).

Purpose and Scope of This Examination

This document examines the Conditions of Approval and Mitigation Monitoring and Reporting Program (MMRP) for UP-22;2-3 on a condition-by-condition basis, in the same format used in the author's Examination of the CEQA Initial Study: each condition is quoted from the County's own document, followed by findings on adequacy, monitor assignment, and enforceability.

The MMRP contains 31 numbered items — 11 general "Conditions of Approval" and 20 mitigation-monitoring measures keyed to specific CEQA impact categories (AES, AIR, BIO, CULTR, GEO, HAZ, HYD, NOI, PUB, TRA, UTL).

Two different questions are examined for each condition, and they are kept separate throughout:

- Monitoring and enforcement adequacy — does the condition name a monitor, define a metric, set a reporting frequency, and specify a consequence for noncompliance, as CEQA Guidelines § 15126.4(a)(2) requires? This question applies uniformly and is addressed for all 31 conditions.
- Substantive/technical adequacy — is the mitigation measure itself, on its scientific or engineering merits, sufficient to reduce the impact? A full substantive critique already exists in the author's companion record for traffic (TRA-1/TRA-2/TRA-3), water supply and groundwater (HYD-1/HYD-2, UTL-1/UTL-2), and one biological measure (BIO-3). For the remaining conditions, this Examination states the monitoring/enforcement findings, which apply regardless, and flags — rather than fabricates — where a deeper technical critique has not yet been developed and should be obtained from a qualified specialist (e.g., a biologist, geotechnical engineer, or acoustical consultant) before the record closes.

Document Integrity Note

Pages 2 through 6 of the County's Conditions of Approval and MMRP document carry a running page header reading "CONDITIONS OF APPROVAL UP-21;7-2 Lyons Commercial Storage and Residence" — an unrelated project. This is consistent with the template-contamination problem already identified elsewhere in the record and raises a fair question about the care taken in preparing the administrative record for this specific project. It does not by itself invalidate any individual condition, but it is noted here because it affects confidence in the document as a whole and should be corrected before the Planning Commission hearing.

Cross-Cutting Findings — All 31 Conditions

Before turning to each condition individually, four findings recur across the document as a whole:

1. No condition assigns Code Enforcement as a monitor.

Every named monitor in the MMRP is a permitting or design-review body — the Planning Department, Building Department, Environmental Health Department, the Amador Air District, the Amador Fire Protection District, or the Department of Transportation and Public Works. None of the 31 conditions names the County's Code

Enforcement Division, the body actually equipped to investigate field complaints and verify ongoing operational compliance.

2. Every named monitor's role is limited to a one-time, pre-construction or pre-occupancy check.

Where a monitor is named, its role is consistently to review plans, issue a permit, or approve a design before construction or occupancy — not to conduct recurring, life-of-permit field verification. Not one of the 31 conditions establishes an ongoing inspection interval, an audit schedule, or a periodic report due after the facility opens.

3. Seven of the 31 conditions name no monitor at all.

Conditions 7 (Days and Hours of Operation), 8 (Temporary Storage of Human Remains), 9 (Interment of Human Remains), 10 (Landscaping Materials and Maintenance), and 11 (Eagle's Nest Airport Overlay Zone) contain no "shall monitor" assignment of any kind. HYD-2 (Best Management Practices for Interment of Human Remains) and UTL-2 (Well Water Quality) likewise contain no explicit monitoring sentence, unlike every other numbered mitigation measure in the document. These seven conditions govern, among other things, groundwater protection, airport-safety compliance, and the handling of human remains — not incidental matters.

4. The revocation backstop exists on paper but has nothing to trigger it.

Condition 4 provides that violation of the conditions "may be subject to revocation proceedings…as set forth in Amador County Code," almost certainly referencing Amador County Code § 19.56.060 ("Revocation"), which provides written notice, a 30-day cure period, and, if uncured, a public hearing before the Planning Commission. But § 19.56.060's trigger — "the permittee has not substantially complied with the conditions" — can never be reached for the conditions in Findings 1–3 above, because no condition in the MMRP produces the evidence (logs, counts, reports) that would ever demonstrate noncompliance in the first place. A revocation mechanism with no evidence-generating monitoring feeding into it is not enforceable mitigation under CEQA Guidelines § 15126.4(a)(2).

Condition-by-Condition Examination

Part I — General Conditions of Approval (Conditions 1–11)

Condition 1 — Fish and Game Fees

> *No permits, fees, or activity shall be authorized or commence until the Fish and Game filing fee or an exemption certificate is provided.*

Monitor assigned: *Planning Department.*

Procedural condition; no substantive deficiency identified. Note for the record only.

Condition 2 — Acknowledgment of Conditions

> *The applicant shall submit signed conditions to the Planning Department.*

Monitor assigned: *Planning Department.*

Procedural condition. No deadline is specified for submission relative to any other permit milestone; a minor drafting gap, not a substantive one.

Condition 3 — Detrimental-Use Finding

> *The use permit is granted on condition that the use will not be detrimental to the health, safety, peace, morals, comfort, and general welfare of persons in the neighborhood, or injurious to property, improvements, or the general welfare of the county.*

Monitor assigned: *Planning Department.*

This restates the mandatory finding required by **Amador County Code § 19.56.040**, already addressed at length in the author's companion Evaluation of the record. That analysis concludes the present record does not support an

affirmative “will not be detrimental” finding, given the documented traffic, water-supply, and roadway-safety deficiencies. This condition does not cure that problem — it simply repeats the standard the record has not yet met.

Condition 4 — Compliance and Revocation

> *Issuance is conditioned on compliance with all provisions; violation of any provision may be subject to revocation proceedings as set forth in Amador County Code.*

Monitor assigned: *Planning Department.*

See Cross-Cutting Finding 4, above: this is the County’s only stated enforcement backstop for the entire permit, and it cannot function as intended because no condition generates the compliance evidence needed to invoke it.

Condition 5 — Building Permits

> *The permittee shall acquire all necessary building permits; construction shall be substantially the same as the approved plans.*

Monitor assigned: *Planning Department and Building Department.*

“Substantially the same” is not defined by a tolerance or a threshold (e.g., square footage, footprint, or setback deviation), leaving the amendment trigger to case-by-case staff discretion.

Condition 6 — Waste Disposal

> *A will-serve statement is required demonstrating sufficient solid-waste disposal capacity for the life of the permit.*

Monitor assigned: *Waste Management Department.*

The will-serve statement is a one-time, pre-approval snapshot. Nothing in the condition requires re-verification if actual funeral volume, and therefore waste generation, grows over the life of the permit, and no monitor is assigned beyond the initial statement.

Condition 7 — Days and Hours of Operation

> *Public access to the site is limited to the hours between sunrise and sundown.*

Monitor assigned: None named in the condition.

This is one of the seven conditions identified in Cross-Cutting Finding 3 with no assigned monitor. There is no mechanism — gate log, complaint line, or periodic Code Enforcement check — to verify compliance in practice, notwithstanding that after-hours access bears directly on the noise and lighting findings elsewhere in the record.

Condition 8 — Temporary Storage of Human Remains

> *No remains are to be stored or prepared on site; remains shall be transported for interment on the same day.*

Monitor assigned: None named in the condition.

No recordkeeping requirement (e.g., a same-day interment log) accompanies this prohibition, and no monitor is assigned to verify it. As written, compliance rests entirely on the applicant’s own representation.

Condition 9 — Interment of Human Remains

> *Interments are limited to “green burials” using fully decomposable materials, with an exception permitting caskets in some cases; vaulted burial chambers are required, and no embalming fluids are permitted.*

Monitor assigned: None named in the condition.

“In some cases” is undefined — the casket exception has no stated criteria, which makes the green-burial standard itself difficult to enforce even if a monitor were assigned. This condition is the MMRP’s primary safeguard against groundwater contamination from decomposition byproducts and embalming fluids, and it shares the same zero-monitor gap as HYD-2 (Condition 24) and UTL-2 (Condition 31), which govern the water side of the same risk. All three should be read together; see Part II below.

Condition 10 — Landscaping Materials and Maintenance

> *Landscaping shall remain consistent with the approved application; any deviation requires a Use Permit amendment.*

Monitor assigned: None named in the condition.

The amendment trigger for deviation is sound in principle, but nothing requires a periodic inspection to detect deviation in the first place — the County would need to happen to notice, or receive a complaint, before the amendment requirement could ever be applied.

Condition 11 — Eagle's Nest Airport Overlay Zone

> *The property is located approximately 0.58 mile from the Eagle's Nest Airport runway. An avigation easement is required addressing flight, exhaust, noise, fumes, lights, vibration, and particulate matter. Within two miles of the outermost edge of the Eagle's Nest Airport runway, schools, churches, and other places of assembly as defined by Section 13143(a) of the California Health and Safety Code are prohibited. As such, any funeral events associated with this property must take place outside of a building.*

Monitor assigned: None named in the condition.

This is the single most significant finding in this Examination.

This is not the author's characterization — it is the County's own MMRP language. The County's document itself concedes that **the site sits inside the two-mile airport-compatibility radius where "places of assembly" are prohibited under Health and Safety Code § 13143(a)**, and resolves that conflict by requiring funeral events to occur "outside of a building" rather than by relocating, resizing, or reconsidering the use. That is a significant, previously under-documented corroboration of the airport-compatibility concern already raised in general terms in the author's companion Evaluation.

- No monitor is assigned to confirm, for any given funeral, that it in fact took place outdoors rather than within one of the four proposed buildings — the same buildings whose exact number and use remain undefined elsewhere in the Initial Study (see the author's Examination, Site Characteristics, Bullets 8–9).
- No evidence in the record confirms the required avigation easement has actually been drafted, executed, or recorded against the parcel.
- The outdoor-only requirement itself has practical weather and dignity implications for a facility whose entire purpose is hosting funeral services, none of which the Initial Study analyzes.

Recommendation: this condition should receive an explicit monitor (Planning Department and Code Enforcement jointly), a recorded-easement verification requirement prior to permit effectiveness, and should be cross-referenced directly against Condition 7 (Days and Hours) and the AES-1 lighting condition, since an outdoor-only funeral requirement interacts directly with both.

Part II — Mitigation Monitoring Measures (Conditions 12–31)

Condition 12 — AES-1 — Commercial Light and Glare

> *Full-cutoff, shielded fixtures at or below 3000K correlated color temperature; motion sensors or automatic shutoff after 10 p.m. or when the facility is closed.*

Monitor assigned: *Planning Department and Building Department.*

Enforcement gap: the monitor's role is limited to plan/permit-stage review of fixture specifications, not post-occupancy verification that the fixtures installed match the approved cut sheets or that shutoff timers remain functional. Substantive note: the 10 p.m. shutoff also conflicts with the sunrise-to-sundown operating-hours condition (Condition 7) and the sunrise-to-dusk representation elsewhere in the Initial Study — already flagged in the author's Examination, Chapter 1(d).

Condition 13 — AES-2 — Visual Impact

> *Landscape buffers; a neutral, matching color palette for security fencing; screening of utility and ancillary improvements.*

Monitor assigned: *Planning Department and Building Department.*

"Neutral, matching color palette" is not tied to an approved sample or Pantone/paint reference, leaving compliance subjective. As with AES-1, monitoring is limited to the design-review stage.

Condition 14 — AIR-1 — Air Quality Best Management Practices

> *Idling of construction equipment is limited to a maximum of five minutes.*

Monitor assigned: *Amador Air District.*

This measure addresses construction-phase equipment idling only. It does not address, and was not written to address, the operational air-quality impact of the funeral-related vehicle trips generated once the facility is in use — already flagged as a significant, unmitigated impact in the author's Examination, Chapter 3.

Condition 15 — BIO-1 — Special-Status Species (Animals)

> *Impacts to special-status animal species shall be avoided to the maximum extent practicable; if avoidance is infeasible, impacts shall be quantified and mitigated (preservation, transplantation, or other measures) subject to approval by CDFW, USFWS, or CNPS as applicable.*

Monitor assigned: *Planning Department.*

Unlike BIO-2 and BIO-4, this condition does not itself specify a pre-construction survey requirement or timing window — "avoid to the maximum extent practicable" has no defined trigger for when avoidance has been demonstrated versus simply asserted.

Condition 16 — BIO-2 — Ground Disturbance Timing (Nesting Birds)

> *Ground disturbance between February 1 and September 1 requires a pre-construction nesting-bird survey by a qualified biologist within two weeks prior to disturbance; if active nests are found, appropriate buffers and orange construction fencing are required, and no disturbance may occur within the buffer until young have fledged. The survey is not required for disturbance between September 2 and January 31.*

Monitor assigned: *Planning Department.*

The survey/buffer protocol is comparatively well specified for a one-time construction trigger, but nothing in the condition addresses disturbance recurring after initial construction (e.g., future landscaping changes, grave-block expansion within the approved capacity, or maintenance grading), which would fall outside a single pre-construction check.

Condition 17 — BIO-3 — Special-Status Species (Plants)

> *Same avoidance/mitigation framework as BIO-1, including a pre-construction biological and rare-plant survey, avoidance zones, and a no-net-loss mitigation plan if avoidance is infeasible.*

Monitor assigned: *Planning Department.*

This measure already carries a substantive mitigation-gap finding in the author's Examination, Chapter 21: the applicant's own biological survey omitted at least four federally protected plant species documented on and adjacent to the site (Bisbee Peak Rush-Rose, Ione Manzanita, Ione Buckwheat, and Irish Hill Buckwheat), which undercuts the factual basis BIO-3 depends on regardless of how well the monitoring language is written.

Condition 18 — BIO-4 — Plant Survey

> *A pre-construction survey timed to the blooming period is required; avoidance zones and buffers are species-dependent; a 10-foot fenced buffer from the drip line is required for individual specimens; a mitigation plan is required if removal is unavoidable.*

Monitor assigned: *Planning Department.*

As with BIO-2/BIO-3, the survey is a single pre-construction event with no post-approval verification that the buffers were observed during actual construction, or that the survey itself was complete (see BIO-3 finding above).

Condition 19 — BIO-5 — Wetland and Riparian Habitat

> *Complete avoidance is recommended; erosion-control best management practices are required; the buffer is to be determined by a qualified biologist in consultation with CDFW; orange fencing is required; no disturbance may occur until a biologist confirms no unmitigated impact.*

Monitor assigned: *Planning Department.*

"Recommended" is not "required." CEQA Guidelines § 15126.4(a)(2) requires mitigation to be fully enforceable; a measure whose central protection (avoidance) is phrased as a recommendation rather than a mandate does not meet that standard as written, independent of the buffer/fencing steps that follow it.

Condition 20 — CULTR-1 / CULTR-2 — Historic and Cultural Resources

> *Work shall stop if a cultural resource (chipped or ground stone, fossils, shell, historic debris, building foundations, or human bone) is encountered; a qualified professional shall be retained and the discovery reported to the Planning Department. If human remains are found, the Coroner determines within two working days whether an investigation is required and whether the remains are of Native American origin; if so, the Native American Heritage Commission (NAHC) is notified within 24 hours, which identifies a most likely descendant who may inspect the discovery within 24 hours of notification; if no descendant can be identified or mediation under Public Resources Code § 5097.94(k) fails, the landowner shall reinter the remains with appropriate dignity at a location not subject to further disturbance.*

Monitor assigned: *Planning Department.*

The stop-work/discovery protocol is the most fully specified condition in the MMRP and tracks the statutory human-remains procedure (Health and Safety Code § 7050.5) accurately. The remaining gap is practical rather than legal: the condition depends on chance discovery during grading, with no requirement that a qualified archaeological monitor be physically present during ground-disturbing work — the standard mechanism CEQA practice uses to make a discovery-triggered protocol meaningful rather than aspirational.

Condition 21 — GEO-1 — Sewage Disposal (Design Review)

> *A qualified professional (a professional engineer, registered environmental health specialist, or licensed engineering geologist) shall review the existing onsite wastewater system, evaluate flows and condition, and certify its adequacy or specify modification, expansion, or replacement.*

Monitor assigned: *Environmental Health Department.*

This is a one-time design-stage certification. Nothing requires re-evaluation once the facility is operating at its stated (or actual) funeral volume — relevant given the capacity-understatement issue addressed in the author's companion Evaluation.

Condition 22 — HAZ-1 — Hazardous Materials Upset and Release

> *Pre-activation documentation of Unified Program compliance is required (hazardous-materials business plan, waste generation/treatment/storage, and tanks, as applicable); an emergency evacuation plan is required if a hazardous-materials business plan is required; compliance is required on an ongoing basis for the life of the permit.*

Monitor assigned: *Environmental Health Department.*

"Ongoing' compliance for the life of the permit" states a duration but not a verification interval — no annual or periodic re-certification is specified, which is the same enforceability defect (a stated duty with no defined checking mechanism) found throughout Part I.

Condition 23 — HYD-1 — Grading Permits and Erosion Control

> *Pre-permit drainage and grading plans by a licensed civil engineer are required, demonstrating no increase in peak storm flows and adequate downstream capacity; stormwater best management practices are required per County standards; NPDES/State Water Resources Control Board permits are required as applicable.*

Monitor assigned: *Amador County Building Department.*

Design-stage review only. Nothing in the condition addresses ongoing erosion control once graves are being actively dug and refilled throughout the life of the permit — already raised as a substantive concern in the author's Examination, Chapter 7, regarding heavy winter flows and the site's water-laden soils.

Condition 24 — HYD-2 — Best Management Practices for Interment of Human Remains

> *The property owner shall adhere to regulations avoiding groundwater contamination from interments, including compliance with Regional Water Quality Control Board permit requirements and State Cemetery Board rules and regulations.*

Monitor assigned: None named in the condition.

This is arguably the most consequential of the seven zero-monitor conditions: it is the MMRP's primary groundwater-protection measure for a use that, by definition, places decomposing human remains in the ground on a water-laden parcel. "Shall adhere to regulations" names no department to confirm adherence, no permit-verification step, and no periodic groundwater testing. This should be read together with Condition 9 (green-burial/no-embalming-fluid requirement) and Condition 31 (UTL-2, well water quality) below — three related safeguards, none independently monitored.

Condition 25 — NOI-1 — Noise Buffers

> *Noise buffers (landscaping or fencing) shall be provided where feasible; the project shall adhere to County Code § 9.44 governing nuisance noise.*

Monitor assigned: *Planning Department.*

"Where feasible" qualifies the entire mitigation, and County Code § 9.44 is a complaint-driven nuisance ordinance rather than a proactive monitoring mechanism — consistent with the ambient-noise-increase concern already raised in the author's Examination, Chapter 13.

Condition 26 — PUB-1 — Fire Protection Services

> *Per Ordinance 1640 (County Code § 17.14.020(4)), the developer shall participate in Community Facilities District No. 2006-1 (Fire Protection Services) annexation via a waiver-and-consent, landowner-vote election for an annual special tax collected on the secured property tax roll, and shall pay the County's election cost.*

Monitor assigned: *Amador Fire Protection District.*

This condition monitors financial participation in a taxing district — it does not, and was not written to, verify actual fire-suppression capability (available flow, hydrant access, or apparatus access) at the site, which remains the separate and unresolved concern documented in the author's Examination, Chapters 15 and 20 (no identified fire-protection water source).

Condition 27 — TRA-1 — Access and Encroachments

> *Primary access shall be maintained onto a County road; encroachment permits shall be obtained per Chapter 12.10; a traffic-mitigation fee shall be paid as determined adequate by the Department of Transportation and Public Works.*

Monitor assigned: *Amador County Department of Transportation and Public Works.*

"As determined adequate" specifies no fee amount, formula, or road-standard benchmark (such as County Standard PW-7), leaving both the fee and the resulting road condition entirely to case-by-case administrative discretion — the same enforceability defect addressed at length in the author's companion Evaluation regarding road capacity.

Condition 28 — TRA-2 — Fire and Life Safety

> *The project shall comply with Chapter 15.30 (Fire and Life Safety Ordinance); roads, gates, and accessways shall meet Chapter 15.30 standards; future buildings require an adequate fire water supply.*

Monitor assigned: *Building Department.*

Compliance is tied to a fire water supply that, per the author's Examination, Chapters 15 and 20, has not been demonstrated to exist at this site — the condition assumes a resource the record does not show is available.

This condition also leaves an unresolved threshold classification question. The Cal Fire State Minimum Fire Safe Regulations define a "Driveway" as a pathway serving no more than four residential units and non-commercial buildings, and provide that "**[a] Driveway shall not serve commercial or industrial uses at any size or scale"** (14 CCR § 1270.01(i)). A commercial cemetery/mortuary operation with four commercial-rated buildings is a commercial use, so this condition cannot be satisfied by classifying the interior access as a "Driveway" rather than a "Road" — that classification would be independently barred, apart from any width or surfacing shortfall. Neither TRA-2 nor the Building Department's monitoring role identifies which classification governs, or confirms it before occupancy.

Condition 29 — TRA-3 — Property Access Restrictions

> *The Lambert Road entrance shall be accessed only from Carbondale Road; guests shall be notified to avoid Maxwell Road, Claypit Road, and Mustang Alley.*

Monitor assigned: *Planning Department.*

This is the condition the author's companion Evaluation specifically identifies (§2.5) as unenforceable under CEQA Guidelines § 15126.4(a)(2): "guests shall be notified" creates a notification duty, not a routing requirement, and there is no gate log, GPS/wayfinding enforcement, or field-verification step to confirm any given visitor actually complied. The Planning Department's monitoring role, as with every other condition in this document, is a pre-approval design check, not an ongoing traffic-pattern audit.

Condition 30 — GEO-1 / UTL-1 — Sewage Disposal and Wastewater Systems

> *Plumbing-equipped structures require wastewater disposal compliant with Chapter 14.12; the onsite system shall be designed by a qualified consultant (professional engineer, registered environmental health specialist, or licensed engineering geologist) and approved and permitted by the Environmental Health Department.*

Monitor assigned: *Environmental Health Department.*

Design/permit-stage review only, duplicating the GEO-1 condition at Condition 21 above; neither establishes operational-phase monitoring of system performance.

Condition 31 — UTL-2 — Well Water Quality

> *Per County Code § 14.06.055, the well serving the project shall be evaluated by a registered professional engineer and the evaluation submitted for Environmental Health Department review and approval, describing estimated water demand and adequacy; the engineer shall propose storage or design features if needed.*

Monitor assigned: Environmental Health Department implied only — the weakest and most ambiguous monitor assignment in the document.

Unlike every other numbered condition, UTL-2 contains no explicit "shall monitor" sentence at all — the Environmental Health Department's role is inferred from the review-and-approval language rather than stated. This is the condition standing behind the water-supply findings already developed at length in the author's companion Evaluation: the site's single 5/8-inch Amador Water Agency meter (20 GPM; 400 gallons per day), the water-laden but not water-bearing Ione Formation clay soils, and the adjacent airport-land subdivision's own test wells drilled to 700 feet that came up dry. A one-time engineer's evaluation, reviewed by a department with no explicitly stated ongoing monitoring role, is not commensurate with the magnitude of that documented uncertainty.

Recommended Condition Language

To close the monitoring and enforcement gaps identified above, the following drop-in condition — already proposed to the record in the author's companion materials — is recommended as a new, freestanding condition applicable across the operational conditions (Conditions 7–9, 24, 26–29, and 31):

> *Operational Compliance Reporting. The permittee shall submit a written monthly report to the Amador County Planning Department and Code Enforcement Division, due no later than the tenth day of the following month, documenting: (1) the number of funeral or interment services conducted during the reporting month; (2) the number of vehicles and/or attendees present at each such service, as recorded by the permittee at the point of entry; (3) the number of interments performed during the reporting month and the cumulative running total of interments to date measured against the approved capacity of 1,832 plots; and (4) any instance in which the foregoing exceeded the operational thresholds established in Conditions TRA-1/TRA-3, AIR-1, and NOI-1. Monthly reports shall be retained by the County for the life of the permit and shall be subject to unannounced field verification by Code Enforcement. Three verified instances within any rolling 12-month period of underreporting, or of exceeding the operational thresholds referenced above, shall constitute grounds for revocation proceedings pursuant to Amador County Code § 19.56.060.*

In addition, the seven currently unmonitored conditions (7, 8, 9, 10, 11, 24, and 31) should each be amended to add a named monitor — Code Enforcement at minimum, jointly with the department already substantively responsible — so that Condition 4's revocation backstop has evidence to act on for every provision in the document, not only the ones that happen to already name a reviewing department.

Conclusion

Taken as a whole, the Conditions of Approval and Mitigation Monitoring and Reporting Program for UP-22;2-3 name a reviewing department for most, but not all, of its 31 provisions — but in every instance where a monitor is named, that monitor's role ends at permit issuance or construction completion. No condition in the document establishes recurring, life-of-permit field verification, and the County's stated revocation remedy (Condition 4, invoking Amador County Code § 19.56.060) has no evidentiary trigger to draw on as a result. This deficiency runs independently of, and in addition to, the substantive adequacy questions raised elsewhere in the record regarding traffic, water supply, biological resources, and airport compatibility — most notably the MMRP's own concession, in Condition 11, that the site sits within the two-mile radius where places of assembly are prohibited near the Eagle's Nest Airport runway.

Prior Permit Acquisition and Project Segmentation

Well and Sanitary Tank Permits Acquired Before Environmental Review

Gardens of Noor Cemetery — Use Permit UP-22;2-3 (APN 001-220-013), Amador County, California

August 13, 2026

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association.

Submitted for entry into the administrative record for Use Permit UP-22;2-3, and for consideration by the Planning Department during the further review directed following removal of this item from the August 11, 2026 Planning Commission agenda.

---

1. Purpose and Summary of Finding

This memorandum documents a defect in the environmental review of Use Permit UP-22;2-3 that is established entirely by the County's own file: **the applicant certified to the County, in writing and under signature, that a well permit and sanitary tank permits for this project had already been acquired — and the County thereafter processed the application without evaluating those approvals as part of the project, without analyzing their environmental effects, and without any recorded determination that they were exempt from review.**

The certification appears on the **Environmental Information Form**, the County's own California Environmental Quality Act (CEQA) intake instrument, at page 3 of the referral packet distributed for the **September 18, 2025** Technical Advisory Committee (TAC) meeting. The form is signed and dated **08/27/2025**.

This is not an inference drawn from circumstantial evidence. It is the applicant's own affirmative disclosure on the County's own form, made twenty-two days before the September 18, 2025 TAC meeting, and it was in the County's possession throughout the review that followed.

The finding matters for three reasons:

1. **It establishes that physical commitments to a definite course of action were made before environmental review was complete**, contrary to CEQA Guidelines § 15004(b)(4) and *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116.
2. **It establishes that the "project" the County analyzed was not the whole of the action**, contrary to CEQA Guidelines § 15378(a) and § 15165.
3. **It removes the County's only plausible defense** to the argument that these collateral permits should themselves have been treated as discretionary and subject to review — because the County cannot claim it was unaware of them.

---

2. The Primary Document

2.1 The certified statement

The Environmental Information Form for this project contains the following printed question:

> "List and describe any other related permits and other public approvals required for this project, including those required by city, regional, state, and federal agencies"

The applicant's response, appearing on the answer line, reads in full:

> **"well Permit and Sanitart Tank Permits have been acquired."**

The word "Sanitart" appears as shown on the form; it is understood to be a typographical rendering of "Sanitary." The response is reproduced here exactly as it appears in the County's file.

Source: Environmental Information Form, Gardens of Noor Cemetery, APN 001220013000, p. 3 of the September 18, 2025 TAC referral packet (provided by client; on file).

2.2 The certification

The following page of the same form bears the applicant's certification:

> "I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this initial evaluation to the best of my ability, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief."

The certification is signed and dated **08/27/2025**.

Source: Environmental Information Form, p. 4 (provided by client; on file).

2.3 The applicant's own characterization of the approval sought

The Indemnification Agreement executed the same day, and bound into the same packet, opens:

> "In consideration of the County's processing and consideration of the application for the **discretionary land use approval** identified above (the 'Project') …"

The applicant thus characterized the pending entitlement as discretionary while simultaneously certifying that two collateral permits for the same project had already been obtained.

Source: Indemnification Agreement, Gardens of Noor Cemetery, signed 08/27/2025, p. 5 of the same packet (provided by client; on file).

---

3. The Same Submittal Contradicts Itself

The **Cemetery Plan** dated **August 2025**, bound into the same referral packet, states at § 2.2 (Physical Settings and Constraints):

> "The site is connected to Amador Water Agency water and electricity which will be sufficient for funeral services. **A permit is applied for a well on the property** by Rumsey Lang Well Drilling and Pump Inc. — Their address is 4241 Business Drive, Suite A, Cameron Park, CA 95682 and Phone number is 530-677-5361."

Two documents in the same submittal, dated within the same month, state opposite facts: the Cemetery Plan says the well permit **is applied for** (pending); the certified Environmental Information Form says the well permit **has been acquired** (issued).

Both cannot be correct. The County was required to resolve the discrepancy before treating the project description as stable. A project description that is internally inconsistent on a basic physical fact is not "accurate, stable and finite," the standard set in *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193.

The oral record adds a third, earlier version. At the **June 1, 2023** TAC meeting, in response to a staff question about whether landscape buffers would need irrigation, the applicant stated at **[00:52:09 – 00:52:22]**:

> "Yes I already got the well permit I'm just waiting for the well digger to come and start digging."

Staff confirmed at **[00:52:34 – 00:52:35]**: "You already obtained the permit."

Sources: Cemetery Plan (August 2025), § 2.2 (provided by client; on file); TAC meeting audio, June 1, 2023 (Event ID 7849), machine transcription (see § 8 caveat).

---

4. Twelve Consecutive Negative Responses on the Screening Checklist

Page 4 of the Environmental Information Form presents the County's "ADDITIONAL INFORMATION" screening checklist — twelve yes/no questions used to identify areas warranting study. **Every one of items 17 through 28 is marked "NO."** Four of those responses are directly contradicted by material elsewhere in the same packet:

Item	Question (printed on the form)	Answer	Contradicted in the same packet by
22	"Change in lake, stream, or ground water quality or quantity, or alteration of existing drainage patterns."	**NO**	The certified statement, two pages earlier, that a well permit "ha[s] been acquired"; and the County staff statement of June 1, 2023 that no setback standard from a well to a grave could be located.

Item	Question (printed on the form)	Answer	Contradicted in the same packet by
26	"Substantial change in demand for municipal services (police, fire, water, sewage, etc.)."	**NO**	The Amador Water Agency letter in the same packet capping the parcel at a 5/8-inch meter and one Equivalent Dwelling Unit, "approximately 400 gallons per average day," on a line AWA describes as "undersized."
28	"Does this project have a relationship to a larger project or series of projects?"	**NO**	The certified statement that two additional permits for the same project had already been acquired.
24	"Site on filled land or has slopes of 10 percent or more."	**NO**	The geotechnical material in the file describing shallow, consolidated soils and seeping groundwater (see the principal Analysis, § 5).

Item 28 is of particular consequence. It is the County's plain-language version of the CEQA Guidelines § 15378(a) question — whether the application before the agency is the whole of the action. The form asked that question directly. It was answered "no" on the same page that disclosed two other acquired approvals for the same project.

Source: Environmental Information Form, p. 4 (provided by client; on file).

---

5. The Water-Supply Statement the Checklist Omits

The referral packet contains a letter from the **Amador Water Agency**, addressed to the Planning Department, which states:

> "The water line that supplies the Eagles Nest area is undersized and susceptible to low pressure dips when demand is high, and as such, AWA has limited the size of meters which can be installed per parcel. This will limit APN 001-220-013 to a 5/8" meter, with one (1) Equivalent Dwelling Unit (EDU) of capacity. 1 EDU is approximately 400 gallons per average day."

And, critically:

> "You stated you also have plans to install a well on site **to supplement water needs** which would supply ~2gpm."

AWA's characterization — a well to **supplement water needs** — is materially different from the description later given orally to the TAC on **September 18, 2025**, where the applicant stated at **[00:24:03 – 00:24:15]** that treated Agency water would serve the restrooms and the well water would be "for the landscaping."

The distinction is not cosmetic. If the well supplements the potable supply, it is subject to a different regulatory pathway, a different set of standards under the County's well ordinance, and a different environmental analysis than an irrigation-only well. The record contains both characterizations and resolves neither.

Against a **400 gallon-per-day** metered cap, the application's own operational assumptions — 60 funeral events per month at 50 attendees each — were never reconciled with any demonstrated supply. The fire officer's statement of **September 18, 2025** at **[00:28:09 – 00:28:13]**, describing "approximately 3,000 people per month," compounds the gap.

Sources: Amador Water Agency letter, in the September 18, 2025 referral packet (provided by client; on file); TAC meeting audio, September 18, 2025 (Event ID 8537), machine transcription (see § 8 caveat).

---

6. Why the Collateral Permits Were Not Exempt From Review

6.1 The controlling authority

A county may not categorically treat well construction permits as ministerial and therefore outside CEQA. In ***Protecting Our Water and Environmental Resources v. County of Stanislaus*** (2020) 10 Cal.5th 479, filed August 27, 2020, the California Supreme Court held:

> "Whether County's issuance of the challenged permits is discretionary or ministerial depends on the circumstances. As a result, County may not categorically classify all these projects as ministerial."

The Court identified the test:

> "Conversely if the agency is empowered to disapprove or condition approval of a project based on environmental concerns that might be uncovered by CEQA review, the project is discretionary."

The specific source of discretion in *Stanislaus* was **Standard 8.A of Department of Water Resources Bulletin No. 74**, the horizontal separation standard. The Court explained:

> "The plain language of Standard 8.A authorizes County to exercise 'judgment or deliberation when [it] decides to approve or disapprove' a permit. (CEQA Guidelines, § 15357.) Although the standard sets out distances that are generally considered adequate, it makes clear that individualized judgment may be required. It notes that an 'adequate

> horizontal distance' may depend on '[m]any variables' and '[n]o set separation distance is adequate and reasonable for all conditions.' The determination for each well 'requires detailed evaluation of existing and future site conditions.'"

The Court further noted that Standard 8.A directs that "[c]onsideration should ... be given to adequate separation from sites or areas with known or suspected soil or water pollution or contamination," and that where "in the opinion of the enforcing agency adverse conditions exist," the suggested distance must be increased or special protection provided.

Source: Protecting Our Water and Environmental Resources v. County of Stanislaus, S251709 (Cal. Aug. 27, 2020).

6.2 Amador County's ordinance contains the same discretion — and more

Well permits in Amador County are issued by the Environmental Health Department under **Amador County Code Chapter 14.06**. Three provisions place this County squarely within the *Stanislaus* holding:

- **§ 14.06.170 — Standards for wells.** "Standards for the location, construction, and work on wells shall be as set forth in **Chapter II** of the State Department of Water Resource Bulletins 74-81 and 74-90 entitled 'Water Well Standards: State of California.'" Chapter II is where Standard 8.A appears. Amador County has incorporated by reference the identical provision the Supreme Court held confers discretion.
- **§ 14.06.080 — Conditions.** "Permits shall be issued in compliance with standards provided in this chapter. **Permits may also include any other conditions or requirements found by the department to be necessary to protect public health**, including, but not limited to, bacteriological and/or chemical analysis." This is express authority to condition approval.
- **§ 14.06.090 — Grounds for refusal of permit.** "The department **may refuse to issue a permit** ... [where] [t]he proposed work on the well would create a health hazard, aggravate a preexisting health hazard, or violate any of the standards established by this chapter." This is express authority to disapprove.

Under the *Stanislaus* test — authority to "disapprove or condition approval ... based on environmental concerns" — Chapter 14.06 supplies both, on the face of the ordinance. The County of Stanislaus lost on Standard 8.A alone. Amador County's ordinance contains Standard 8.A **and** written conditioning power **and** written refusal power.

Two further provisions confirm the point. **§ 14.06.040(F)** requires the applicant to supply "[o]ther information as may be necessary to determine if the underground water will be adequately protected" — a judgment call by definition. **§ 14.06.040(A)** requires a plot plan showing, within a 200-foot radius, existing and proposed on-site sewage systems, all bodies of water or watercourses, the approximate drainage pattern, other wells, and existing structures.

Source: Amador County Code ch. 14.06, Well Drilling Permits and Standards.

6.3 The circumstance that engaged the discretion is on this record

Under *Stanislaus*, Standard 8.A engages when a contamination source is identified near the proposed well. The County itself identified one.

At the **June 1, 2023** TAC meeting, immediately after a member raised the concern of graves "open ended on the bottom with water sources underneath," County staff stated at **[01:06:24 – 01:06:40]**:

> "actually I was looking for a setback I was trying to find a setback from a water well to a grave and I I found one uh one item but um it's not in our lamp the or the lamp that we have here um"

and continued at **[01:06:40 – 01:07:13]**:

> "in looking through the the law the California Health and Safety Code and the Title 16 CCR a lot of what's there is just administrative like the manager and the fines and the what they can charge and it didn't go into so much of um the health and safety issues of water water impact and that that kind of thing so **I have a little more research to do**"

That statement establishes, in the County's own words, that the separation distance between the proposed well and the proposed graves was an **open question requiring further evaluation**. Under *Stanislaus*, an open separation question requiring "detailed evaluation of existing and future site conditions" is the definition of discretion. A permit issued in those circumstances could not lawfully be classified as ministerial without a record supporting that conclusion.

No such record has been identified. The Planning Department's file, as produced to date, contains no analysis of the separation question, no determination that the well permit was ministerial, and no Notice of Exemption.

The same meeting records Environmental Health confirming the permit was in hand. At **[01:14:51 – 01:14:58]**:

> "so um so you have the permit for the well it hasn't been drilled yet do you have a time frame for that"

Source: TAC meeting audio, June 1, 2023 (Event ID 7849), machine transcription (see § 8 caveat).

---

7. Three Additional Defects Requiring Resolution

7.1 Permit life under § 14.06.110

§ 14.06.110(A) provides: "Permits shall be valid for a period of one year from the date of issuance and shall expire unless placement of the annular seal has been completed and approved by the department. An expired permit shall be of no further force or effect."

§ 14.06.110(B) allows one extension, of one year, applied for while the permit is still valid.

The permit existed by **June 1, 2023**. The maximum lawful life of a permit issued on or before that date, even fully extended, ends in approximately mid-2025. Yet at the **September 18, 2025** TAC meeting the applicant stated at **[00:23:41 – 00:23:45]**:

> "And then as far as the well, the site has been approved but it hasn't been drilled yet."

Either the 2023 permit had lapsed and the statement to the TAC was inaccurate, or a **second permit** was issued at some point after the revised application was on file. The second possibility is the more serious: a permit issued in 2024 or 2025, with the pending discretionary application in the same County file and the separation question still unresolved on the record, would be very difficult to characterize as ministerial.

The County's file will establish which occurred. It should be placed in the administrative record before further action.

7.2 Scope of use under § 14.06.055

§ 14.06.055(E) provides: "Where the well is a water supply to serve **nonresidential** or mixed uses, the applicant shall retain a registered professional engineer to submit a proposal for review and approval by the department describing water demand and proposing storage or other design features that must be implemented as a condition of well permit final approval."

§ 14.06.055(F) provides: "This section shall not apply to wells intended solely for nondomestic use."

A cemetery is a nonresidential use. If the well permit was processed under subdivision (F) as a nondomestic irrigation well, then the engineer's water-demand proposal required by subdivision (E) was never prepared, and **the water demand of the proposed use was never evaluated in any forum** — not in the well permit, and not in the Initial Study, which defers the question. The Amador Water Agency letter describing a well "to supplement water needs" is inconsistent with a nondomestic-only classification and requires reconciliation.

7.3 The sanitary tank permits

The certified form states that sanitary tank **permits** — plural — "have been acquired." This is difficult to reconcile with the June 1, 2023 record. At **[01:15:43 – 01:16:00]** the applicant told the TAC:

> "yes we have actually tried to get the septic system design as requested by the planning but then going back to the environmental they said well no you're not going to do this till you get the use permit and it's after the fact that you get the use permit so we put a hold on that one"

And at **[01:21:02 – 01:21:14]**, describing the engineer's inquiry to Environmental Health:

> "that moment uh the he was the engineer was told that no you're not supposed to do this till you get the barrier permit we're not going to give you any information till you get the use permit"

If sanitary tank permits were subsequently issued, the file should show when and on what design. If they were not, the certification on the August 27, 2025 form is inaccurate in a material respect and the County's reliance on that form was misplaced.

7.4 Reported site work in advance of permits

The collateral-permit question does not stand alone. At the **June 1, 2023** meeting a member of the public reported physical work already underway on the parcel. At **[01:34:44 – 01:34:51]**:

> "before you start clearing grading tree removal and everything to have your permits in hand"

and at **[01:34:59 – 01:35:18]**:

> "I'm also watching on almost daily basis that the clearing grading moving hundreds or not thousands of yards of material is ongoing every day"

and at **[01:35:39 – 01:36:01]**:

> "so that the process is ongoing as if they had their permits which they do not so this property is being conformed to their eventual wishes without any permits and this is going on on a regular basis"

The applicant responded at **[01:37:31 – 01:38:08]** that grading predated his acquisition of the land and that "the only thing was done is clearing some of the areas to uh to put the gravel for the road but there were no movement or significant I should say movement of soil from one location to another other than either cutting some grass or cleaning some grass to put gravel on."

The accounts conflict, and this memorandum does not resolve them. What is material is that **the record contains no County response of any kind** — no site inspection, no code enforcement referral, no notice of violation, and no written determination that the reported activity was or was not permitted. The exchange ends there.

A well permit acquired in advance of environmental review, an on-site wastewater approval characterized as awaiting the use permit, and unresolved reports of clearing and grading on the same parcel are not three unrelated items. They describe a pattern in which physical steps toward the project proceeded while the environmental review of the project did not. That is the circumstance CEQA Guidelines § 15004(b)(4) and *Save Tara* address, and it is why the County should establish on the record exactly what has been permitted and what has been built.

---

8. The Asymmetry in the County's Own Treatment of Two Permits

The June 1, 2023 record shows the same County department, in the same meeting, treating two closely related permits in opposite ways.

The septic permit was withheld pending the use permit. Per the applicant at **[01:15:43 – 01:16:00]**, Environmental Health told the applicant "no you're not going to do this till you get the use permit." Per the applicant at **[01:21:02 – 01:21:14]**, the project engineer was told "we're not going to give you any information till you get the use permit."

The well permit had already issued. Per the applicant at **[00:52:09 – 00:52:22]**, "I already got the well permit," confirmed by staff at **[00:52:34 – 00:52:35]** and by Environmental Health at **[01:14:51 – 01:14:58]**.

Two water and wastewater approvals, on the same parcel, for the same project, before the same department, within the same hour of the same meeting. One was deferred to the use permit; the other was granted in advance of it. The record discloses no basis for the distinction.

Whatever the explanation, it cannot be that the use permit was a prerequisite for one and not the other. The County should state the basis on the record.

---

9. Deferral of the Wastewater Evaluation Until After Approval Is Not Lawful

The record discloses a settled County position that the on-site wastewater evaluation will be performed **after** the use permit is granted. The applicant described that position to the TAC on **June 1, 2023** at **[01:15:43 – 01:16:00]**:

> "yes we have actually tried to get the septic system design as requested by the planning but then going back to the environmental they said well no you're not going to do this till you get the use permit and it's after the fact that you get the use permit so we put a hold on that one"

and at **[01:21:02 – 01:21:14]**:

> "that moment uh the he was the engineer was told that no you're not supposed to do this till you get the barrier permit we're not going to give you any information till you get the use permit"

That sequencing is not permissible under CEQA, for four independent reasons.

9.1 It is deferred formulation of mitigation

CEQA Guidelines § 15126.4(a)(1)(B) states, in terms:

> "**Formulation of mitigation measures shall not be deferred until some future time.** The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review **provided that** the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will [be] considered, analyzed, and potentially incorporated in the mitigation measure."

The three-part proviso is conjunctive. **None of the three conditions is satisfied here.** The record contains no committed wastewater mitigation, no numeric performance standard (no design flow, no effluent quality target, no groundwater-separation criterion), and no identified feasible action type. What the record contains is a decision to look at the question later.

Source: 14 CCR § 15126.4.

9.2 The controlling case is directly on point

In ***Sundstrom v. County of Mendocino*** (1988) 202 Cal.App.3d 296, Mendocino County approved a use permit for a private sewage treatment plant, adopted a negative declaration, and imposed conditions requiring the applicant to produce hydrological studies **after** approval, and to comply in future with regulatory standards for sludge disposal for which no solution then existed. The Court of Appeal reversed. Its holdings map onto this record almost item for item:

> "The requirement that the applicant adopt mitigation measures recommended in a future study is in direct conflict with the guidelines implementing CEQA."
>
> "By deferring environmental assessment to a future date, the conditions run counter to that policy of CEQA which requires environmental review at the earliest feasible stage in the planning process. … Environmental problems should be considered at a point in the planning process 'where genuine flexibility remains.' **A study conducted after approval of a project will inevitably have a diminished influence on decisionmaking.** Even if the study is subject to administrative approval, it is analogous to the sort of post hoc rationalization of agency actions that has been repeatedly condemned in decisions construing CEQA."

On the waste-disposal condition specifically — the closest analogue to the wastewater question here — the court held:

> "But the only information in the record concerning sludge disposal raised an obstacle to an environmentally satisfactory solution — the absence of any suitable disposal site in the county. By adopting the condition that applicant would comply with environmental standards for sludge disposal, **the County effectively removed this aspect of the project from environmental review, trusting that the Regional Water Quality Control Board and the applicant would work out some solution in the future.**"
>
> "Having no 'relevant data' pointing to a solution of the sludge disposal problem, **the County evaded its duty to engage in a comprehensive environmental review by approving the use permit subject to a condition requiring future regulatory compliance.**"

The *Sundstrom* record also contained a screening checklist on which the planning staff had marked most questions "no." The court found this significant:

> "The planning staff checked 'no' for 38 questions and 'code 2' for three questions relating to air and water quality and local services. **In the case of several questions marked 'no,' later evidence clearly disclosed that the project would disturb existing conditions, e.g., change present drainage characteristics and alter local plant conditions.**"

That is the same defect identified at § 4 above, where item 22 — "Change in lake, stream, or ground water quality or quantity, or alteration of existing drainage patterns" — is marked "NO" on a form that discloses, two pages earlier, an acquired well permit.

One distinction cuts **against** the County here. In *Sundstrom* the court faulted the county in part because "[t]he planning staff evidently did not ask the applicant to fill out the standard 'Environmental Information Form.'" In this matter the County **did** obtain that form, and the

completed form disclosed the acquired collateral permits on its face. Amador County therefore cannot claim it lacked the information: the disclosure was in hand, on the County's own instrument, and the review proceeded without addressing it.

Source: Sundstrom v. County of Mendocino (1988) 202 Cal.App.3d 296.

9.3 A record deficiency created by the agency enlarges, rather than defeats, the fair argument

The County may respond that the absence of a wastewater design means there is no evidence of a significant effect. *Sundstrom* forecloses that answer:

> "**CEQA places the burden of environmental investigation on government rather than the public.** If the local agency has failed to study an area of possible environmental impact, a fair argument may be based on the limited facts in the record. **Deficiencies in the record may actually enlarge the scope of fair argument by lending a logical plausibility to a wider range of inferences.**"
>
> "The agency should not be allowed to hide behind its own failure to gather relevant data."

The limited facts in this record are unfavorable. The applicant told the TAC on **June 1, 2023** at **[01:16:24 – 01:16:44]** that "there are significantly shallow soils there" and that "we have information that shows holes with not even 24 inches of soil," and described the proposed approach as "pretreatment to an at-grade disposal field." Shallow soils over fractured rock, in combination with the interment method proposed, are precisely the conditions that warrant study before approval, not after.

9.4 The design cannot be scoped because the project has not been quantified

There is also a practical impossibility in the County's sequencing, and it is worth stating plainly.

An on-site wastewater treatment system is sized from a **design flow** — gallons per day, derived from occupancy, event frequency, event attendance, fixture count, and peaking factor. Every one of those inputs is a project-description variable, and every one of them is unresolved on this record:

- The application states 60 funeral events per month at up to 50 attendees per event.
- The fire officer stated on **September 18, 2025** at **[00:28:09 – 00:28:13]** an expectation of "approximately 3,000 people per month."
- The 2022 iteration of this project described an assembly building with a stated occupancy of 1,200.
- The Amador Water Agency has capped the parcel's metered supply at one Equivalent Dwelling Unit, "approximately 400 gallons per average day."

A system designed to the 400-gallon figure cannot serve the assembly the application contemplates. A system designed to the assembly the application contemplates cannot be supplied by the metered service the Agency will provide. **The County cannot defer the wastewater evaluation to a post-approval process and simultaneously decline to fix the occupancy and event intensity that would give that process a design basis.** Deferring the evaluation until after approval also removes the one point in the process at which the project could

still be conditioned or reduced to fit the disposal capacity the site actually has — the "genuine flexibility" *Sundstrom* requires be preserved.

The conclusion follows directly: if the site cannot be shown, before approval, to support a wastewater system sized to the assembly proposed, then the assembly proposed is not a feasible project on this site, and the deficiency goes to the project description and the adequacy of the environmental document — not to a condition of approval.

---

10. Legal Framework

- **CEQA Guidelines § 15378(a)** defines "project" as "the whole of an action" that may result in a direct or reasonably foreseeable indirect physical change in the environment. A well and an on-site wastewater system serving a proposed cemetery are components of the whole of that action, not separate undertakings. *(See 14 CCR § 15378.)*

- **CEQA Guidelines § 15004(b)(4)** provides that "a public agency entering into preliminary agreements regarding a project prior to approval shall not, as a practical matter, commit the agency to the project," and that "an agency shall not grant any vested development entitlements prior to compliance with CEQA." It further directs that any pre-approval agreement should not "bind any party, or commit to any definite course of action, prior to CEQA compliance," and should not "restrict the lead agency from considering any feasible mitigation measures and alternatives, including the 'no project' alternative." *(See 14 CCR § 15004.)* The parallel "forecloses alternatives or mitigation measures" formulation appears at § 15004(b)(2)(B), which by its terms addresses a "proposed public project"; subdivision (b)(3) addresses private projects. The controlling case authority for premature commitment in the private-project setting is *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116.

- **CEQA Guidelines § 15165** requires that where individual projects are, or a phased project is, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the lead agency shall prepare a single environmental document for the ultimate project. *(See 14 CCR § 15165.)*

- **CEQA Guidelines § 15268(a)** permits ministerial classification of a particular permit, but *Stanislaus* holds the agency must "develop a record supporting that conclusion." No such record has been produced here. *(See 14 CCR § 15268.)*

- **Public Resources Code § 21167** — the 35-day limitations period runs from the filing of a Notice of Exemption. Where no Notice of Exemption has been filed, that period does not begin. *(See Pub. Resources Code § 21167.)*

- ***County of Inyo v. City of Los Angeles*** (1977) 71 Cal.App.3d 185, 193 — a CEQA project description must be "accurate, stable and finite."

---

11. Outstanding File Deficiencies

The following material is **absent from the application file and referral packets as produced to date.** Each item is a record that would ordinarily exist if the certified statement in § 2.1 is accurate, and each is necessary before the environmental adequacy of this application can be evaluated. Their absence is itself a defect in the record, independent of what the records may ultimately show.

A. Nothing evidencing the well permit is in the file. The packet contains the *claim* that a well permit was acquired. It contains no permit number, no issue date, no copy of the permit, no application, no § 14.06.040(A) 200-foot-radius plot plan, no statement of the proposed use required by § 14.06.040(D), no conditions imposed under § 14.06.080, no record of any extension under § 14.06.110(B), no inspection record, no annular-seal approval, and no well completion report or Department of Water Resources well completion report (Water Code § 13751).

B. Nothing evidencing the sanitary tank permits is in the file. No permit numbers, no issue dates, no copies, no percolation or soil-profile data, no system design, and no record of the County's disposition of the design the applicant told the TAC on June 1, 2023 had been put "on hold."

C. No exemption record for either permit. The file contains no Notice of Exemption, no written determination that either permit was ministerial rather than discretionary, and no analysis supporting such a determination. Under *Protecting Our Water and Environmental Resources v. County of Stanislaus*, a ministerial classification requires a supporting record; none has been produced.

D. No resolution of the well-to-grave separation question. County staff stated on June 1, 2023 that the applicable separation standard could not be located and that "I have a little more research to do." The file contains no record that this research was completed, no separation determination, and no application of Bulletin 74 Standard 8.A to this parcel.

E. No § 14.06.055(E) water-demand proposal. The file contains no proposal by a registered professional engineer describing water demand and proposing storage or other design features, and no written determination that the well is exempt under § 14.06.055(F) as nondomestic-only.

F. No reconciliation of the contradictory project descriptions. The file contains no correction, errata, or staff note reconciling the Cemetery Plan statement that a well permit "is applied for" with the certified statement, in the same submittal, that it "ha[s] been acquired."

G. No reconciliation of the water-supply characterizations. The file contains nothing reconciling the Amador Water Agency's description of a well to "supplement water needs" with the oral description of the well as serving landscaping only.

H. No building, grading, or encroachment permit record. The file does not disclose whether any other permit has been issued for the parcel in connection with this project.

I. No written record of the differing treatment of the two permits. The file discloses no basis for deferring the sanitary tank approval to the use permit while a well permit for the same parcel and the same project was issued in advance of it.

J. No written TAC minutes. The County has confirmed that no written minutes of the Technical Advisory Committee meetings exist; the audio recordings are the sole record of the proceedings quoted throughout this memorandum.

Until items A through I are produced and placed in the record, the file is incomplete for purposes of evaluating whether the whole of the action has been described and analyzed, and the administrative record cannot be certified as complete.

11.1 Notice of concurrent Public Records Act request

The records identified in § 11 are the subject of a **supplemental request under the California Public Records Act, Government Code § 7920.000 et seq., submitted concurrently with this memorandum.** That supplemental request clarifies and narrows the categories set out in the prior request of **July 20, 2026**, and specifically identifies the well permit file, the on-site wastewater treatment system file, any building or grading permit file, and any Notice of Exemption or written ministerial determination associated with any permit issued for APN 001-220-013.

This memorandum is submitted **without waiting for that production.** Nothing in the pendency of the Public Records Act request should be understood to defer or qualify the requests in § 12, and the Department is asked to place the records in the administrative record independently of the Public Records Act process. Should production disclose material that alters or supplements the findings above, a supplemental memorandum will be submitted.

---

12. Requested Action

Because the item has been removed from the August 11, 2026 Planning Commission agenda and returned to the Planning Department for further review, the Department is in a position to correct this defect before the matter advances. It is respectfully requested that the Department:

1. **Place the certified Environmental Information Form, and this memorandum, in the administrative record for UP-22;2-3.**
2. **Cure the file deficiencies identified in § 11** by obtaining and placing in the record the complete well permit file, the complete on-site wastewater treatment system file, any building or grading permit file, and any Notice of Exemption or written ministerial determination, and by stating on the record when each collateral permit was issued and on what basis it was classified.
3. **Revise the project description** to encompass the whole of the action, including the well and the on-site wastewater system, and recirculate the environmental document as revised.
4. **Resolve the internal contradiction** between the Cemetery Plan and the certified Environmental Information Form as to whether the well permit is pending or issued, and correct the record accordingly.
5. **Reconcile the water-supply characterizations** — a well “to supplement water needs” (Amador Water Agency) versus a well for landscaping only (oral testimony, September 18, 2025) — and require the § 14.06.055(E) engineer’s water-demand proposal if the use is nonresidential, as it is.

6. **State on the record the basis** for deferring the sanitary tank approval to the use permit while the well permit was issued in advance of it.
7. **Complete the wastewater evaluation before, not after, any action on the use permit**, including a fixed design flow derived from a stabilized project description, site-specific soil and percolation data, and a demonstration that a compliant system can be constructed and operated at the assembly intensity proposed. If the County intends to proceed by condition rather than by analysis, it should state on the record how it satisfies each of the three requirements of CEQA Guidelines § 15126.4(a)(1)(B).
8. **Fix the assumed occupancy and event intensity on the record**, reconciling the application's 60 events per month at 50 attendees with the fire officer's "approximately 3,000 people per month," so that the wastewater and water-supply analyses have a stable design basis.

---

13. Transcription Caveat

This memo is based on a machine transcription of the County's published meeting audio. It is **not** an official County transcript, and the County has confirmed that **no written TAC minutes exist** — the recordings are the sole record. Verify every quotation against the recording at the cited timestamp before entering it into the administrative record.

Documentary quotations in §§ 2, 3, 4, and 5 are taken from scanned pages of the County's referral packet provided by the client and are reproduced as they appear on the face of those documents, including apparent typographical errors, which are marked.

Sources

- Environmental Information Form, Gardens of Noor Cemetery, APN 001220013000, signed 08/27/2025, at pp. 3–4 of the September 18, 2025 TAC referral packet (provided by client; on file).
- Indemnification Agreement, Gardens of Noor Cemetery, signed 08/27/2025, at p. 5 of the same packet (provided by client; on file).
- Cemetery Plan, Gardens of Noor Cemetery, August 2025, § 2.2 (provided by client; on file).
- Amador Water Agency letter to Amador County Planning Department re APN 001-220-013 (provided by client; on file).
- Amador County TAC meeting audio, June 1, 2023 (Event ID 7849); September 18, 2025 (Event ID 8537). Amador County agendas, minutes and meetings.
- *Protecting Our Water and Environmental Resources v. County of Stanislaus* (2020) 10 Cal.5th 479, No. S251709, filed August 27, 2020. Official opinion.
- *Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116.
- *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, No. A038922, filed June 22, 1988. Opinion text.
- *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185.

- Amador County Code ch. 14.06, Well Drilling Permits and Standards (Ord. 1730, 2013; Ord. 1800, 2020). Codified text.
- CEQA Guidelines, 14 Cal. Code Regs. § 15004, § 15165, § 15268, § 15378, § 15126.4.
- Public Resources Code § 21167.
- California Department of Water Resources, Well Standards (Bulletin 74).

Technical Advisory Committee Record and Process Memorandum

Adequacy of the Written Record of Six Committee Proceedings

Gardens of Noor Cemetery — Use Permit UP-22;2-3 (APN 001-220-013), Amador County, California

August 13, 2026

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association.

Submitted to the Amador County Planning Department, with copies to County Counsel and the Clerk of the Board, for entry into the administrative record for Use Permit UP-22;2-3.

---

1. Purpose and Scope

This memorandum addresses a single, narrow subject: **the adequacy of the written record of the six Technical Advisory Committee (TAC) proceedings at which this application has been considered.** It is submitted separately from the substantive environmental analyses so that the two subjects are not conflated. It takes no position on the merits of the application.

This memorandum makes **no allegation of misconduct, bad faith, or improper motive by any County employee or official.** Every finding below is stated in institutional and procedural terms and rests on the County's own published recordings and its own statements about its own recordkeeping. Where a practice appears to depart from what an adequate administrative record requires, the memorandum identifies the practice, not any individual.

The six proceedings, with the County's own published event identifiers:

Meeting date	Event ID	Posted agenda	Audio recording	Written minutes
March 3, 2022	7435	Yes	Yes	**None published**
August 4, 2022	7550	Yes	Yes	**None published**
June 1, 2023	7849	Yes	Yes	**None published**
September 18, 2025	8537	Yes	Yes	**None published**
May 7, 2026	9154	Yes	Yes	**None published**
June 11, 2026	9168	Yes	Yes	**None published**

Source: Amador County published meeting calendar, each page independently reviewed. Agendas, minutes and meetings.

2. Finding 1 — The County Maintains No Written Minutes of Any TAC Proceeding

The County has stated this on the record. At the **August 4, 2022** meeting, in response to a member of the public asking how comments would be preserved, staff stated at **[00:20:50 – 00:20:58]**:

> "But there are no minutes for [TAC] it will be just kept in record recording the form."

(The machine transcription renders "TAC" as "attack" at this point; the acronym is supplied in brackets. The sentence is otherwise reproduced as transcribed.)

Staff continued at **[00:20:58 – 00:21:08]**:

> "And the recording will be uploaded to the county website this afternoon or by tomorrow and you can always request it if you'd like and I can email that to you."

And at **[00:21:08 – 00:21:17]**:

> "If you also have comments after this meeting you can email them to planning at amadorgov.org."

Immediately before, at **[00:20:48 – 00:20:50]**, staff assured the public: **"because either way it will be on the record."**

Independent review of the County's published calendar pages for all six meetings confirms the statement: each page carries a posted agenda and an audio recording, and **no page carries a minutes file.**

Why this matters. The audio recordings are therefore the **sole record** of six proceedings spanning more than four years, at which responsible agencies raised technical objections, at which the application was twice found incomplete, at which specific commitments were made by staff and by the applicant, and at which the County's position on a general plan amendment changed. There is no written instrument that identifies who spoke, what was asked, what was answered, what was left open, or what the Committee decided beyond the bare motions.

CEQA requires even the project description itself to be "accurate, stable and finite" (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193); the same reliability concern applies with at least equal force to the administrative record documenting what was actually presented and decided. A record consisting exclusively of unindexed audio, with no written summary, no action list, and no attendance record, does not supply that reliability. It places the burden of reconstructing the proceedings on any person seeking to participate — and it makes the record's contents dependent on the accuracy of transcriptions prepared by members of the public.

3. Finding 2 — Written Summaries and Deficiency Letters Were Promised on the Record

The record contains at least three express commitments to produce written documents, together with one later confirmation that one of them was sent. Whether each was produced, and what each contains, is not presently verifiable from the public record.

June 1, 2023 — a written summary of all Committee comments. At **[01:33:36 – 01:33:45]** a participant told the applicant, "I hope you're taking notes." At **[01:33:49 – 01:33:54]** staff added:

> "and then I was going to say if you're not taking notes we are so I will be sending a letter"

continuing at **[01:33:54 – 01:34:12]**:

> "after the meeting summarizing all of our comments too"

June 1, 2023 — a complete deficiency list within 30 days. The Committee's motion, at **[02:00:04 – 02:00:29]**, was:

> "i'll make a motion that we find the application incomplete and the staff will provide a uh complete list complete list of deficiencies within 30 days"

At **[02:00:20 – 02:00:52]** the motion was seconded and the recording captures assent with no dissent.

September 18, 2025 — a deficiency list within 30 days. After a motion finding the application incomplete carried, the presiding officer stated at **[01:13:37 – 01:13:41]**:

> "There will be a list of deficiencies submitted to the applicant within 30 days."

and at **[01:13:48 – 01:13:51]**:

> "so I will get that letter to you either this week or next week."

May 7, 2026 — confirmation that the September 2025 list was in fact sent. Staff stated at **[00:02:30 – 00:02:44]**:

> "So finally, we reviewed this was in September of last year and we submitted a list of deficiencies to the applicant."

Why this matters. Because the County keeps no written minutes, **these letters are the closest thing that exists to an official written record of what the County itself found deficient in this application.** They are the County's own contemporaneous statement of the project's shortcomings, prepared by staff, addressed to the applicant. They belong in the administrative record. They have not appeared in any referral packet reviewed to date.

The June 1, 2023 letter should be dated on or before approximately **July 1, 2023**. The September 18, 2025 letter should be dated on or before approximately **October 18, 2025**, and staff's own statement of May 7, 2026 confirms one was sent.

---

4. Finding 3 — The County Stated on the Record That It Had One Statutory Opportunity, and That the Statutory Period Had Passed

At the **May 7, 2026** meeting, in the course of asking the Committee for any remaining items before the application was deemed complete, staff stated at **[00:39:35 – 00:39:42]**:

> "It's based on the permit streamlining act. We get one opportunity to send the list of deficiencies to the applicant"

continuing at **[00:39:43 – 00:39:58]**:

> "that it respond. We have 30 days to which we're a little bit past that, but they're not in order to determine whether the application is complete or the deficiencies."

and at **[00:39:58 – 00:40:03]**:

> "But we've already done the list of deficiencies. We'll be sending additional one shot at it."

Staff then described the sequence that would follow at **[00:40:03 – 00:40:28]**:

> "the items that were addressed from the public were all matters that were related to environmental review. So those, if it goes forward, those items will have to be considered in the first, in the in the CEQA initial study that's prepared for the project. It would have to be done within the next 30 days. And we'd have another meeting to do, discuss that environmental review."

Why this matters. Three separate points arise, all of them procedural.

First, the statement **"we're a little bit past that"** is the County's own acknowledgment on the record that a statutory period had run. The Permit Streamlining Act's determination timelines are not discretionary, and the consequences of missing them are prescribed by statute. Whatever the County's view of the consequence here, the acknowledgment belongs in the record and the County should state in writing what date it treats as the operative determination date and why.

Second, the statement **"[w]e get one opportunity"** describes a self-imposed constraint on the County's own ability to require further information. If the County believed as of May 7, 2026 that it had exhausted its single statutory opportunity to identify deficiencies, that belief bears directly on how the item can now be treated during the further review directed following its removal from the August 11, 2026 Planning Commission agenda. The County should state on the record whether it maintains that position.

Third, staff's own description places the public's environmental comments **into the Initial Study to be prepared** — meaning the Committee did not resolve them and did not intend to. The Initial Study is therefore the sole forum in which those comments were to be answered, which raises the stakes of its adequacy considerably.

---

5. Finding 4 — Questions Were Raised on the Record and Never Closed on the Record

Because there are no minutes and no action list, questions raised at one meeting are not tracked to resolution at the next. Three examples are documented; each remains open so far as the public record discloses.

5.1 The separation distance between a well and an interment

At the **June 1, 2023** meeting, after a Committee member observed that graves "open ended on the bottom with water sources underneath is I mean just jumps out as a pretty big concern" at **[01:06:07 – 01:06:14]**, staff stated at **[01:06:24 – 01:06:40]**:

> "actually I was looking for a setback I was trying to find a setback from a water well to a grave and I I found one uh one item but um it's not in our lamp the or the lamp that we have here um"

and at **[01:06:40 – 01:07:13]**:

> "in looking through the the law the California Health and Safety Code and the Title 16 CCR a lot of what's there is just administrative like the manager and the fines and the what they can charge and it didn't go into so much of um the health and safety issues of water water impact and that that kind of thing so **I have a little more research to do**"

No subsequent meeting returns to the question. No written determination has been produced. Three years later the record contains the question and not the answer.

5.2 The general plan designation and the general plan amendment

At the **June 1, 2023** meeting the Committee identified an inconsistency between the proposed use and the parcel's Mineral Resource Zone general plan designation, and staff gave express guidance. At **[01:24:43 – 01:24:49]**:

> "monair if you would want to apply for a general plan amendment to a different designation"

The applicant asked for direction at **[01:24:52 – 01:24:58]**: "well I'm looking for a direction from you on guidance." Staff answered at **[01:24:58 – 01:25:07]**:

> "so that would be the guidance to apply for a general plan amendment wonderful so um I can"

continuing at **[01:25:07 – 01:25:12]**: "send you over the information and a lot of the stuff that you submitted with this application would apply to that."

At the **May 7, 2026** meeting the County stated a different conclusion. At **[00:07:09 – 00:07:17]**:

> "So in that case, I don't think that there's any inconsistency from this project with the existing general plan designation."

and at **[00:07:17 – 00:07:26]**:

> "So I don't think they would be required to have a general plan amendment because obviously gravesites would restrict access to any present minerals."

No general plan amendment was ever filed. The record thus contains two materially inconsistent County positions on a threshold land use question, separated by three years, with **no written analysis in the file bridging them.** The 2026 statement rests on a study; the study, the County's evaluation of it, and the reasoning by which the 2023 guidance was superseded are not in the record as produced.

This memorandum takes no position on which conclusion is correct. The point is procedural: **a change in the County's stated position on a threshold question should be documented in writing, in the file, with the reasoning that supports it.** With no minutes, the only evidence that the position changed at all is a comparison of two audio recordings three years apart.

5.3 Site work reported before permits issued

At the **June 1, 2023** meeting a member of the public stated at **[01:34:44 – 01:34:51]**:

> "before you start clearing grading tree removal and everything to have your permits in hand"

and at **[01:34:59 – 01:35:18]**:

> "I'm also watching on almost daily basis that the clearing grading moving hundreds or not thousands of yards of material is ongoing every day"

He described a specific tree removal at **[01:35:18 – 01:35:39]** and stated at **[01:35:39 – 01:36:01]**:

> "so that the process is ongoing as if they had their permits which they do not so this property is being conformed to their eventual wishes without any permits and this is going on on a regular basis"

He requested at **[01:36:01 – 01:36:20]** that the matter "should be looked into and probably a cease and desist order issued."

The applicant responded at **[01:37:31 – 01:38:08]** that grading predated his acquisition and that "the only thing was done is clearing some of the areas to uh to put the gravel for the road but there were no movement or significant I should say movement of soil from one location to another."

No County response to the request appears anywhere in the record. There is no referral to Code Enforcement on the record, no site inspection report, no notice of violation, and no written determination that the reported activity was or was not permitted. The exchange simply ends. With no minutes and no action list, nothing in the County's process required it to be carried forward.

---

6. Finding 5 — Prior-Iteration Referral Comments Were Segregated Into a Separate File

At the **May 7, 2026** meeting staff described the handling of referral comments at **[00:02:53 – 00:03:10]**:

> "I did want to note, so when the referral did go out for this project, there was an additional packet of comments and those comments all related to this project, but previous iterations. So they were separately called out in a separate file."

Why this matters. Agency comments on earlier iterations of the same project, on the same parcel, from the same applicant, are part of the record of the whole of the action. Segregating them into "a separate file" is a records-management choice with substantive consequences: it determines whether a decision-maker reading the current packet encounters them at all. The County should confirm on the record that the separate file is part of the administrative record for UP-22;2-3 and identify its contents.

---

7. Consequence for the Administrative Record

Taken together, these findings describe a record in which:

- six proceedings over four years produced **no written minutes**;
- the written documents the County itself promised — a summary of all Committee comments, and two deficiency lists — **have not appeared in any packet produced to date**;
- the County **acknowledged on the record** that a statutory period had passed and that it believed it had one opportunity to require further information;
- at least three substantive questions raised on the record were **never closed on the record**;
- the County's position on a threshold general plan question **changed without written analysis in the file**; and
- referral comments on prior iterations were **segregated into a separate file**.

The practical effect is that the participants in this proceeding — including the public, the referral agencies, and ultimately the Planning Commission and the Board of Supervisors — cannot determine from the written record what was asked, what was answered, and what remains open. That is a defect in the record independent of the merits, and it is curable.

It is curable now, while the item is back before the Planning Department for further review, at far less cost than it could be cured later.

---

8. Attachments E-1 through E-6 — Procedural Record and Findings for Each Proceeding

Six memoranda accompany this one, one for each proceeding identified in § 1. Each sets out, for a single meeting: the scope of that proceeding, the transcription caveat that governs it, the findings the record supports, and **the undertakings stated on the record at that meeting**. Each is keyed to the transcript exhibit for the same meeting.

Attachment	Proceeding	Transcript exhibit	Findings	Undertakings
E-1	March 3, 2022	2-A	5	4
E-2	August 4, 2022	2-B	6	4

Attachment	Proceeding	Transcript exhibit	Findings	Undertakings
E-3	June 1, 2023	2-C	7	7
E-4	September 18, 2025	2-D	6	12
E-5	May 7, 2026	2-E	7	7
E-6	June 11, 2026	2-F	8	7

Total undertakings identified across the six proceedings: 41. They are consolidated into a single schedule at § 10 below so that the Department has one working list rather than six.

The following statement appears at the head of the undertakings section of each attachment and governs this memorandum equally:

> **This section identifies undertakings stated on the record at this proceeding. It does not assert that any of them went uncompleted.** The preparer has no access to the Department's file and is not in a position to know what it contains. Each item sets out what was said, when, and by whom, followed by a request that the Department identify the document or record evidencing completion. Where such a record exists, its production closes the item. Where none exists, a statement to that effect closes the item equally. **The Department is the custodian of its own file; only the Department can close these items.**

No inference is drawn, in the attachments or here, from the fact that an item appears on the schedule.

---

9. Requested Action

It is respectfully requested that the Planning Department:

1. **Place this memorandum in the administrative record** for Use Permit UP-22;2-3.
2. **Locate and place in the record the written documents identified in § 3** — the June 1, 2023 letter summarizing all Committee comments, the June 1, 2023 deficiency list, and the September 18, 2025 deficiency list — or state in writing that a given document was not produced.
3. **State in writing the County's position on the Permit Streamlining Act sequence**, including the date the County treats as the operative determination date, the effect it assigns to the acknowledgment of May 7, 2026 that the 30-day period had passed, and whether the County maintains that it has exhausted its single opportunity to require further information.
4. **Close the open questions identified in § 5 in writing**, specifically: the well-to-interment separation standard; the reasoning by which the 2023 general plan amendment guidance was superseded; and the disposition of the reported pre-permit site work.

5. **Confirm that the segregated prior-iteration referral comment file is part of the administrative record** and identify its contents.
6. **Consider adopting written action summaries for Technical Advisory Committee proceedings** going forward — a one-page record per meeting identifying attendance, items raised, agency comments received, action taken, and items carried forward. This is a prospective, generally applicable recommendation and is not directed at this application alone. It would materially reduce the burden on the public, on referral agencies, and on the County's own staff in reconstructing what occurred.
7. **Preserve all six audio recordings** and all associated files pending completion of the review, given that they are the sole record of the proceedings.
8. **Respond, item by item, to the Consolidated Schedule of Records Requested at § 10 below**, which collects the forty-one undertakings identified in Attachments E-1 through E-6. For each item, the Department is asked to identify the document or record evidencing completion and its date, or to state in writing that no such record exists. Either response closes the item.

The records underlying items 2 through 5 are also the subject of a supplemental request under the California Public Records Act submitted concurrently with this memorandum, at Category F of that request. **This memorandum is submitted without waiting for that production**, and the Department is asked to act on the requests above independently of the Public Records Act process.

---

10. Consolidated Schedule of Records Requested

This schedule collects all **41 undertakings** identified in Attachments E-1 through E-6 into a single list. Each row identifies the proceeding, the timestamp at which the undertaking was stated, whether it was stated by the County or by the applicant, and the record whose production would close the item. The full quotation supporting each row appears in the attachment cited, at the section number given.

A response addressing this schedule, item by item, would close the process questions raised by this memorandum in their entirety.

March 3, 2022 — Attachment E-1

E-1.1 — Request for additional information regarding the building. *County-side, stated at* **[00:12:26–00:12:33]**. *Attachment E-1, § 4.1.*

Record requested: The written request for additional information regarding the building described at that section, its date, and any response received — or a statement in writing that no such request was made in writing.

E-1.2 — Additional completeness items to be identified. *County-side, stated at* **[00:13:37–00:13:51]**. *Attachment E-1, § 4.2.*

Record requested: The list of additional items referenced here, as transmitted to the applicant, and its date — or a statement in writing that no such list was transmitted separately from the incompleteness motion described at Finding 1.

E-1.3 — Fire Marshal follow-up regarding the building's fire protection requirements. *County-side, stated at* **[00:18:26–00:18:41]**. *Attachment E-1, § 4.3.*

Record requested: Any record of contact between the applicant and the Fire Marshal responsive to this statement, and its date — or a statement in writing that no such contact is reflected in the Department's file.

E-1.4 — Motion finding the application incomplete. *County-side, stated at* **[00:25:01–00:25:10]**. *Attachment E-1, § 4.4.*

Record requested: The written notice of incompleteness sent to the applicant following this motion, its date, and the list of additional details it specified — or a statement in writing that no such written notice was sent.

August 4, 2022 — Attachment E-2

E-2.1 — Revision of the application to remove the building and return to the Committee. *County-side, stated at* **[00:42:27–00:42:40]**. *Attachment E-2, § 4.5.*

Record requested: The revised application or project description omitting the building, its date of submission, and the record of the further Committee proceeding referenced — or a statement in writing that no such revision was received.

E-2.2 — Additional information on occupancy at a single point in time. *County-side, stated at* **[00:43:02–00:43:15]**. *Attachment E-2, § 4.6.*

Record requested: The document or submission responding to this request and its date — or a statement in writing that it was not received.

E-2.3 — Obtaining an architect to detail the proposed building's interior use. *Applicant-side, stated at* **[00:40:15–00:40:28]**. *Attachment E-2, § 4.7.*

Record requested: Any architectural detail submitted in response to this suggestion, held in the Department's file.

E-2.4 — Agreement to remove the building from the application. *Applicant-side, stated at* **[00:42:22–00:42:25]**. *Attachment E-2, § 4.8.*

Record requested: The revised plan set or application reflecting this agreement, held in the Department's file.

June 1, 2023 — Attachment E-3

E-3.1 — Research on Title 16 CCR limits applicable to multiple interments per plot. *County-side, stated at* **[01:00:08–01:00:13]**. *Attachment E-3, § 4.1.*

Record requested: The research described, its conclusion, and its date — or a statement in writing that it was not undertaken.

E-3.2 — Outreach to other counties for sample cemetery ordinances and conditions. *County-side, stated at* **[01:12:18–01:12:24]**. *Attachment E-3, § 4.2.*

Record requested: Any record of the outreach described, the jurisdictions contacted, and the material obtained, together with its date — or a statement in writing that no such outreach was undertaken.

E-3.3 — Anticipated conditions enumerated for the project. *County-side, stated at* **[01:12:59–01:13:04]**. *Attachment E-3, § 4.3.*

Record requested: The Conditions of Approval currently applicable to this application, so that each item enumerated at Finding 4 can be checked against it — or a statement in writing that conditions have not yet been adopted.

E-3.4 — Direction to apply for a General Plan Amendment, and transmittal of the application packet. *County-side, stated at* **[01:25:07–01:25:28]**. *Attachment E-3, § 4.4.*

Record requested: The date the packet was sent, and any General Plan Amendment application, fee record, correspondence, or withdrawal for this parcel dated on or after June 1, 2023 — or a statement in writing that no packet was sent and no application was filed.

E-3.5 — Post-meeting letter summarizing all comments. *County-side, stated at* **[01:33:49–01:34:12]**. *Attachment E-3, § 4.5.*

Record requested: The letter described, and its date of transmittal — or a statement in writing that no such letter was sent.

E-3.6 — Deficiency list required by the incompleteness motion. *County-side, stated at* **[02:00:04–02:00:29]**. *Attachment E-3, § 4.6.*

Record requested: The deficiency list required by this motion, and its date — or a statement in writing that no such list was produced.

E-3.7 — Flood zone determination. *Applicant-side, stated at* **[01:30:38–01:30:45]**. *Attachment E-3, § 4.7.*

Record requested: Any flood zone determination for this parcel obtained by or on behalf of the applicant, and its date, held in the Department's file.

September 18, 2025 — Attachment E-4

E-4.1 — Circulation of the County's onsite sewage disposal ordinance. *County-side, stated at* **[00:23:02–00:23:16]**. *Attachment E-4, § 4.1.*

Record requested: The record of transmittal of the ordinance described, and its date — or a statement in writing that it was not sent.

E-4.2 — Confirmation with the water agency regarding a backflow prevention device. *County-side, stated at* **[00:24:24–00:24:34]**. *Attachment E-4, § 4.2.*

Record requested: The record of the confirmation obtained from the water agency, and its date — or a statement in writing that no confirmation was obtained.

E-4.3 — Referral of the applicant to Environmental Health for further specification. *County-side, stated at* **[00:25:57–00:26:03]**. *Attachment E-4, § 4.3.*

Record requested: Any record of contact between the applicant and Environmental Health made in response to this referral, and its date — or a statement in writing that none occurred.

E-4.4 — Discussion and possible sizing of a fire water tank. *County-side, stated at* **[00:28:14–00:28:21]**. *Attachment E-4, § 4.4.*

Record requested: The record of the discussion described, any determination as to the number, size, or location of a fire water tank, and its date — or a statement in writing that no such determination was made.

E-4.5 — Review of soils information associated with a different structure on the parcel. *County-side, stated at* **[00:32:24–00:32:27]**. *Attachment E-4, § 4.5.*

Record requested: The record of the review described and its outcome, and its date — or a statement in writing that no such review was conducted.

E-4.6 — Review of the geotechnical report against the discrepancy raised on the record. *County-side, stated at* **[01:00:15–01:00:24]**. *Attachment E-4, § 4.6.*

Record requested: The record of the review described, its outcome, and its date — or a statement in writing that no such review was conducted.

E-4.7 — Sizing and siting of the fire water tank on the site plan. *County-side, stated at* **[01:07:17–01:07:28]**. *Attachment E-4, § 4.7.*

Record requested: The record showing the fire water tank requirement as sized and located on a site plan, and its date — or a statement in writing that this was not done.

E-4.8 — Compilation of an exhaustive deficiency list for the applicant. *County-side, stated at* **[01:08:44–01:08:54]**. *Attachment E-4, § 4.8.*

Record requested: The deficiency list described, and its date of transmittal — or a statement in writing that no such list was sent.

E-4.9 — The motion finding the application incomplete, with a deficiency list to follow within 30 days. *County-side, stated at* **[01:13:14–01:13:22]**. *Attachment E-4, § 4.9.*

Record requested: The deficiency list adopted by this motion, and its date of transmittal to the applicant — or a statement in writing that it was not sent within 30 days of this meeting.

E-4.10 — The Department's commitment to send the deficiency letter "this week or next week.". *County-side, stated at* **[01:13:46–01:13:52]**. *Attachment E-4, § 4.10.*

Record requested: The deficiency letter described and its date of transmittal — or a statement in writing that it was not sent within that window.

E-4.11 — Provision of additional parking-layout specifications. *Applicant-side, stated at* **[00:12:18–00:12:25]**. *Attachment E-4, § 4.11.*

Record requested: Any parking-layout specifications submitted by the applicant in response to this statement, held in the Department's file.

E-4.12 — Provision of parking-lot dimensions. *Applicant-side, stated at* **[00:13:54–00:14:01]**. *Attachment E-4, § 4.12.*

Record requested: Any parking-lot dimensions submitted by the applicant in response to this statement, held in the Department's file.

May 7, 2026 — Attachment E-5

E-5.1 — Reaching out to consultants for specifications needed to support the environmental review. *County-side, stated at* **[00:06:37–00:06:47]**. *Attachment E-5, § 4.29.*

Record requested: The record of any such consultation, its date, and the specifications obtained — or a statement in writing that none was undertaken.

E-5.2 — Fire water addressed once the project reaches that point. *County-side, stated at* **[00:10:41–00:11:19]**. *Attachment E-5, § 4.30.*

Record requested: The document recording when and how the fire water requirement was addressed, and its date — or a statement in writing that it has not yet been addressed.

E-5.3 — Permit Streamlining Act timing and the deficiency list. *County-side, stated at* **[00:40:00–00:40:03]**. *Attachment E-5, § 4.31.*

Record requested: The deficiency list referenced, its transmittal date, and any additional deficiency correspondence sent after this meeting — or a statement in writing that none was sent.

E-5.4 — Confirmation of the road weight capacity. *County-side, stated at* **[00:45:38–00:45:48]**. *Attachment E-5, § 4.32.*

Record requested: The confirmed load rating applicable to the internal road under County Code § 15.30, and the date it was confirmed — or a statement in writing that it was not confirmed following this meeting.

E-5.5 — A further Technical Advisory Committee meeting for environmental review. *County-side, stated at* **[00:48:11–00:48:16]**. *Attachment E-5, § 4.33.*

Record requested: No further document is requested for this item; it is included for the completeness of this record.

E-5.6 — Review of mitigations and encroachments, and tracking of assets used on both sides of the property. *County-side, stated at* **[00:48:22–00:48:37]**. *Attachment E-5, § 4.34.*

Record requested: The record of the review and tracking described, and its date — or a statement in writing that it was not undertaken.

E-5.7 — Referral to the regional water quality control board. *County-side, stated at* **[00:56:14–00:56:22]**. *Attachment E-5, § 4.35.*

Record requested: The referral to the regional water quality control board, its date of transmittal, and any conditions or response received from that agency — or a statement in writing that no referral has been made.

June 11, 2026 — Attachment E-6

E-6.1 — Condition addressing preservation methods on site. *County-side, stated at* **[00:14:11–00:14:14]**. *Attachment E-6, § 4.1.*

Record requested: The condition as adopted, or the record of the determination not to add one, and its date — or a statement in writing that the matter was not taken up.

E-6.2 — Follow-up and possible return to the Committee. *County-side, stated at* **[00:14:43–00:14:53]**. *Attachment E-6, § 4.2.*

Record requested: The record of the follow-up described, and the determination that a further Committee proceeding was not required, together with its date and author — or a statement in writing that no such determination was recorded.

E-6.3 — Environmental determination of applicant obligations. *County-side, stated at* **[00:17:00–00:17:02]**. *Attachment E-6, § 4.3.*

Record requested: The environmental analysis performed in response to this statement, its date, and its author — or a statement in writing that it was not undertaken separately from the Initial Study already prepared.

E-6.4 — Note to be added to a condition. *County-side, stated at* **[00:17:27–00:17:33]**. *Attachment E-6, § 4.4.*

Record requested: The condition text containing the note described, or the version of the conditions in which it appears — or a statement in writing that no such note was added.

E-6.5 — Revision of the water-resources condition. *County-side, stated at* **[00:29:58–00:30:02]**. *Attachment E-6, § 4.5.*

Record requested: The condition as it read on June 11, 2026, the condition as revised, and the date the revision was made — or a statement in writing that the condition was not revised.

E-6.6 — Precondition to scheduling the Planning Commission hearing. *County-side, stated at* **[01:00:07–01:00:41]**. *Attachment E-6, § 4.6.*

Record requested: The revised site plan received in satisfaction of this statement, together with its date of receipt; the amended conditions; and the date on which the matter was set for hearing — or a statement in writing that the matter was set without the revised site plan having been received.

E-6.7 — Coordination with the fire protection district. *Applicant-side, stated at* **[]**. *Attachment E-6, § 4.7.*

Record requested: Any correspondence between the applicant and the fire protection district on these subjects held in the Department's file.

---

11. Transcription Caveat

This memo is based on a machine transcription of the County's published meeting audio. It is **not** an official County transcript, and the County has confirmed that **no written TAC minutes exist** — the recordings are the sole record. Verify every quotation against the recording at the cited timestamp before entering it into the administrative record.

Speaker attributions are inferred. The recordings do not identify speakers by name or title, and the transcription carries no speaker labels. Every attribution in this memorandum and in Attachments E-1 through E-6 — "Planning staff," "Environmental Health," "Fire Marshal," and the like — is an inference drawn from the content of the surrounding discussion. Attributions are stated by role rather than by name for that reason. **The Department is invited to correct any attribution it believes to be mistaken, on the same terms as any other correction.** A corrected attribution does not disturb the finding it supports, each of which rests on what was said rather than on who said it.

Garbles noted in the passages quoted above:

- August 4, 2022 at **[00:20:50]** — the transcription renders "TAC" as "attack." The acronym is supplied in brackets in § 2.
- May 7, 2026 at **[00:39:43 – 00:39:58]** — the passage "that it respond. We have 30 days to which we're a little bit past that, but they're not in order to determine whether the application is complete or the deficiencies" is transcribed as spoken and is partly disfluent. The material words for present purposes are "**We have 30 days to which we're a little bit past that.**" Verify this passage against the recording with particular care.
- June 1, 2023 at **[01:06:24 – 01:06:40]** — "it's not in our lamp the or the lamp that we have here" appears to be a disfluent reference to a governing document. The substance relied upon is the statement that the speaker could not locate an applicable setback and had "a little more research to do."
- June 1, 2023 at **[01:24:43]** — the applicant's given name is rendered phonetically as "monair." The name of record appears in the application file.
- June 1, 2023 at **[01:21:02 – 01:21:14]**, quoted in the companion permit memorandum — "barrier permit" appears to be a transcription artifact for "burial permit" or "use permit." Verify before relying on that specific phrase.

Sources

- Amador County Technical Advisory Committee meeting audio: March 3, 2022 (Event ID 7435); August 4, 2022 (Event ID 7550); June 1, 2023 (Event ID 7849); September 18, 2025 (Event ID 8537); May 7, 2026 (Event ID 9154); June 11, 2026 (Event ID 9168). Amador County agendas, minutes and meetings.
- Amador County published meeting calendar pages for each of the six meetings, independently reviewed; no page carries a minutes file.
- *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193.
- Permit Streamlining Act, Gov. Code § 65920 et seq. Statutory text.
- California Public Records Act, Gov. Code § 7920.000 et seq.

- Companion documents submitted concurrently: *Prior Permit Acquisition and Project Segmentation — UP-22;2-3*; *Supplemental and Clarifying Request Under the California Public Records Act*, dated August 13, 2026.

Procedural Record and Findings

Technical Advisory Committee Meeting of March 3, 2022 (Event ID 7435)

Gardens of Noor Cemetery — Use Permit UP-22;2-3 (APN 001-220-013), Amador County, California

August 13, 2026

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association.

Submitted to the Amador County Planning Department, with copies to County Counsel and the Clerk of the Board, for entry into the administrative record for Use Permit UP-22;2-3.

---

1. Purpose and Scope

This memorandum sets out what occurred at the Technical Advisory Committee proceeding of **March 3, 2022** — the first proceeding on this application, at which the Committee reviewed the application for completeness and voted to find it incomplete.

It is one of six such memoranda, one per proceeding, submitted together with the corresponding transcripts at Exhibits 2-A through 2-F. Each addresses a single meeting and is confined to **how the application was reviewed** — what the Committee was told, what it asked, what it deferred, and what it decided. **The adequacy of the environmental conclusions themselves is addressed separately** in the Initial Study conformity analysis at Tab A and the examinations at Tabs B and C, and is not re-argued here.

This memorandum makes **no allegation of misconduct, bad faith, or improper motive by any County employee or official.** Every finding is stated in institutional and procedural terms and rests on the County's own published recording of its own proceeding. Where a practice appears to depart from what an adequate review process requires, the memorandum identifies the practice, not any individual.

Because this is the first proceeding in the six-meeting record, several findings below establish a baseline: what was asked of the applicant at the outset, and whether the record shows it was ever supplied.

It takes no position on the merits of the application.

---

2. Transcription Caveat and Limits of This Record

No claim of absolute accuracy is made for any quotation in this memorandum.

Amador County maintains no written minutes of Technical Advisory Committee proceedings. County staff stated this on the record: the Committee keeps no written minutes and the audio recording is the sole record of what occurred (August 4, 2022 recording at [00:20:50]). In the absence of an official written record, the quotations below were prepared as follows.

1. **Method.** The County's published audio recording of the proceeding was machine-transcribed, and the resulting text was reviewed against the recording by a person listening at each cited timestamp.
2. **Audio quality.** The recordings capture a public meeting room with multiple speakers, participants appearing remotely, overlapping speech, varying distance from the microphone, and intervals of low intelligibility. Some passages are disfluent as spoken; some are difficult to hear; some are not recoverable at all.
3. **What the quotations represent.** Each quotation is **a representation of the words spoken, to the best understanding of the transcriber and of the person who verified it against the recording.** It is not a certified transcript, it is not an official County record, and it should not be treated as either.
4. **Disclosure of uncertainty.** Where a word or passage could not be resolved with confidence, that is stated at the point it appears rather than silently smoothed over. Bracketed text marks a word supplied for readability; an ellipsis marks omitted material that does not bear on the point quoted.
5. **The County holds the original.** The County possesses the recording from which this text was made. **The Department is invited to correct any rendering below that it believes to be inaccurate, and any correction it supplies will be accepted and the record amended accordingly.** Nothing in this memorandum asks the Department to accept a quotation it can itself check.
6. **Speaker identification.** The recordings do not announce every speaker by name. Speaker roles given below are identified from context — self-identification on the recording, the posted agenda, and the sequence of the discussion. Each is the transcriber's best understanding and is not an official designation. **The Department is invited to correct any attribution it believes to be mistaken, on the same terms as any other correction.**

The transcript of this proceeding is submitted at **Exhibit 2-A** so that every quotation can be located in context. The complete recording remains available from the County.

The findings below do not depend on fine points of wording. Each rests on the substance of what was said and, in most instances, on more than one passage.

---

3. Findings

Finding 1 — The application was found incomplete at the outset, on a description that included an undetailed 20,000 sq. ft. building

Reviewing the application for completeness, planning staff identified a building referenced in the project description but not otherwise explained:

> “I did want to note that there is a 20,000 square foot religious building that is mentioned in the description.” — Planning staff **[00:12:06–00:12:16]**
>
> “And other than that, I think it is shown on the plot plan, but not in too much detail. But it’s otherwise not mentioned, so I assume we will request more information regarding that.” — Planning staff **[00:12:16–00:12:33]**

The same gap was restated later in the same proceeding:

> “The 2,000 square foot building is definitely a big question mark for me. … There’s no description of what kind of building it is other than that it is a religious nature. We don’t know if that’s a gathering place, if it’s going to be assisting with the cemetery use of the property, or if it’s a separate kind of thing.” — Planning staff **[00:15:56–00:16:20]**

The size figure appears in the recording as transcribed above. The same speaker refers to the building as 20,000 square feet at **[00:12:06]**, and the project description referenced at that point states 20,000 square feet.

The Committee then voted to find the application incomplete:

> “I move that we find the application incomplete for the moment and I will go back to the applicant requesting these additional details.” — Planning staff **[00:25:01–00:25:10]**

What this evidences. At the first proceeding on this application, the record shows a building of a stated size and an unstated function, and a formal determination of incompleteness made in part on that gap. What description of the building the applicant supplied in response, if any, is addressed at Finding 2. The Department is asked to produce the additional detail regarding the building that was requested at this proceeding, and its date.

Finding 2 — The building identified at the outset was never described in the detail requested, and it left the project entirely five months later

At this proceeding, the Fire Marshal identified the same building and stated what a building of that size would require, without having been given the information needed to evaluate it:

> “They certainly [are] going to have to have some added fire protection system in this building. … Because he’s going to have to provide some substantial fire protection system for a 20,000 square foot building. … I would recommend you have him contact me. There’s probably a few things he’s unaware that he’s going to have to provide for a building of 20,000 square feet.” — Fire Marshal, Amador Fire Protection District **[00:18:02–00:18:41]**

By the next proceeding, on August 4, 2022, the building’s stated size had changed and its function was proposed for removal from the application altogether:

> “So all that is going to have to be part of that 3,000 square foot building.” — Planning staff, August 4, 2022 **[00:40:35–00:40:40]**

> “I said I can eliminate that item, the 3,000 square foot building, if it’s going to hold the process for the licensing for the land to be used as a cemetery.” — Applicant, August 4, 2022 **[00:41:51–00:42:07]**
>
> “We’ll move that, yes.” — Applicant, August 4, 2022 **[00:42:22–00:42:25]**

What this evidences. The building described at the outset as 20,000 square feet was never described in the detail planning staff and the Fire Marshal requested on March 3, 2022. Five months later it was proposed at roughly a sixth of its original stated size and was then removed from the application by the applicant’s agreement. No document filling the gap identified on March 3, 2022 — the building’s intended use, occupancy, or the added fire protection system the Fire Marshal described — appears in the record of either proceeding. The Department is asked to produce any building description, plan, or fire-protection submission received between March 3, 2022 and August 4, 2022, or to state in writing that none was received before the building was removed from the application.

Finding 3 — The Committee referred a different application to the Airport Land Use Commission by motion at this same meeting; no comparable referral appears for this application, although airport adjacency was identified for both

Immediately before the cemetery item was heard, the Committee considered a separate application (a food truck) and, on a stated discrepancy between the current and proposed airport land use plans, voted to refer that application to the Airport Land Use Commission before further action:

> “This might be an item that needs to be referred to the airport land use commission before it goes to the planning commission.” — Planning staff **[00:05:18–00:05:26]**
>
> “I’d prefer we let the airport land use commission look at it first, bring it back to TAC.” / “So moved.” / “I second.” / “Then we’ll go ahead and send it to airport land use and then bring this back to TAC.” — Committee **[00:08:13–00:08:56]**

When the cemetery item was heard immediately afterward, a Committee member identified the same category of issue for this parcel:

> “And also because the property is adjacent to an airport runway [and] a taxiway we need to know what the building heights are going to be.” — Committee member **[00:23:32–00:23:39]**

No motion to refer this application to the Airport Land Use Commission, and no statement that such a referral had been made or was unnecessary, appears in the record of this proceeding.

What this evidences. In the same session, the Committee referred one application to the Airport Land Use Commission by motion on an airport-compatibility question and, for a separate application on which an airport-adjacency question was also raised, took no corresponding action on the record. This is a comparison of treatment within a single proceeding, not a statement that a referral was promised and not made — no such promise appears in the record. The Department is

asked to state whether Use Permit UP-22;2-3 was ever referred to the Airport Land Use Commission and, if so, on what date, or to state in writing that no such referral was made.

Finding 4 — Building-height information was requested at the outset in connection with airport adjacency; no building-height submission appears in this record

At the same point in the proceeding described in Finding 3, the building-height question was tied explicitly to the airport-adjacency concern:

> "And also because the property is adjacent to an airport runway [and] a taxiway we need to know what the building heights are going to be." — Committee member **[00:23:32–00:23:39]**

The application was found incomplete at the close of this same proceeding **[00:25:01–00:25:10]**, with the additional detail to be requested of the applicant.

What this evidences. A specific item of information — building height, tied to a specific stated reason, proximity to an airport runway and taxiway — was identified as needed at the first proceeding on this application. Because the building to which the height question originally attached was itself removed from the project by August 4, 2022 (Finding 2), whether the height question was ever answered, and for what structure, is not shown in this record. The Department is asked to produce any building-height information, obstruction analysis, or correspondence responsive to the request made at [00:23:32], and its date, or to state in writing that none was received.

Finding 5 — Staff identified that the building could require a separate, later use permit if it were a use distinct from the cemetery; the record does not show that question being resolved before the building was removed

Reviewing the application, planning staff described the building as potentially outside the scope of the pending cemetery use permit:

> "We don't know if that's a gathering place, if it's going to be assisting with the cemetery use of the property, or if it's a separate kind of thing that it could potentially — if it is [a] religious building it could actually necessitate a use permit later on if it's considered a separate use from what he's applying for now." — Planning staff **[00:16:07–00:16:27]**

The building was removed from the application at the following proceeding on August 4, 2022, by the applicant's agreement **[00:42:22–00:42:25]**, before any determination on the record as to whether it constituted a separate use requiring its own permit.

What this evidences. A question raised at the outset — whether the building was a use separate from the cemetery and would require its own permit — does not appear to have been answered on the record before the building left the application. The Department is asked to state whether a

determination was made on this question between March 3, 2022 and August 4, 2022, and if so, its date and basis, or to state in writing that none was made.

---

4. Undertakings Stated on the Record

This section identifies undertakings stated on the record at this proceeding. It does not assert that any of them went uncompleted. The preparer has no access to the Department's file and is not in a position to know what it contains. Each item sets out what was said, when, and by whom, followed by a request that the Department identify the document or record evidencing completion. Where such a record exists, its production closes the item. Where none exists, a statement to that effect closes the item equally. **The Department is the custodian of its own file; only the Department can close these items.**

The quotations in this section are subject in full to the transcription caveat at § 2.

County-side undertakings

4.1 — Request for additional information regarding the building.

> "But it's otherwise not mentioned, so I assume we will request more information regarding that." — Planning staff **[00:12:26–00:12:33]**

Requested: the written request for additional information regarding the building described above, its date, and any response received — or a statement in writing that no such request was made in writing.

4.2 — Additional completeness items to be identified.

> "I definitely do have some more items that … I would request in order to move it forward." — Planning staff **[00:13:37–00:13:51]**

Requested: the list of additional items referenced here, as transmitted to the applicant, and its date — or a statement in writing that no such list was transmitted separately from the incompleteness motion described at Finding 1.

4.3 — Fire Marshal follow-up regarding the building's fire protection requirements.

> "I would recommend you have him contact me. There's probably a few things he's unaware that he's going to have to provide for a building of 20,000 square feet." — Fire Marshal, Amador Fire Protection District **[00:18:26–00:18:41]**

Requested: any record of contact between the applicant and the Fire Marshal responsive to this statement, and its date — or a statement in writing that no such contact is reflected in the Department's file.

4.4 — Motion finding the application incomplete.

> "I move that we find the application incomplete for the moment and I will go back to the applicant requesting these additional details." — Planning staff **[00:25:01–00:25:10]**

This motion was seconded and carried **[00:25:10–00:25:13]**.

Requested: the written notice of incompleteness sent to the applicant following this motion, its date, and the list of additional details it specified — or a statement in writing that no such written notice was sent.

Applicant-side undertakings

No applicant-side undertaking is identified in the record of this proceeding. The applicant is not shown speaking on the record at this meeting.

---

5. Requested Action

It is respectfully requested that the Planning Department:

1. **Place this memorandum and the transcript at Exhibit 2-A in the administrative record** for Use Permit UP-22;2-3.
2. **Correct any quotation above that the Department believes to be inaccurate**, by reference to the recording, so that the record reflects an agreed text.
3. **Respond in writing to the requests identified in Findings 1 through 5 and in § 4**, or state in writing that the requested document or information does not exist.
4. **Preserve the recording of this proceeding** and all associated files pending completion of the review, the recording being the sole record of what occurred.

Several of the documents identified above are also the subject of a supplemental request under the California Public Records Act submitted concurrently with this package. **This memorandum is submitted without waiting for that production**, and the Department is asked to act on the requests above independently of the Public Records Act process.

Sources

- Amador County Technical Advisory Committee meeting audio, March 3, 2022 (Event ID 7435); August 4, 2022 (Event ID 7550). Amador County agendas, minutes and meetings.
- Transcript of the proceeding of March 3, 2022, submitted at Exhibit 2-A.
- Transcript of the proceeding of August 4, 2022, submitted at Exhibit 2-B.
- Amador County Code § 15.30 (road standards); Title 19 airport overlay provisions.
- Public Utilities Code §§ 21670–21675 (airport land use compatibility).
- Companion documents submitted concurrently: *Technical Advisory Committee Record and Process Memorandum — UP-22;2-3* (Tab E); *Supplemental and Clarifying Request Under the California Public Records Act* (Tab F), dated August 13, 2026.

Procedural Record and Findings

Technical Advisory Committee Meeting of August 4, 2022 (Event ID 7550)

Gardens of Noor Cemetery — Use Permit UP-22;2-3 (APN 001-220-013), Amador County, California

August 13, 2026

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association.

Submitted to the Amador County Planning Department, with copies to County Counsel and the Clerk of the Board, for entry into the administrative record for Use Permit UP-22;2-3.

---

1. Purpose and Scope

This memorandum sets out what occurred at the Technical Advisory Committee proceeding of **August 4, 2022** — the second of two 2022 proceedings at which the application was reviewed for completeness, and the meeting at which the Committee voted to find the application incomplete for a second time.

It is one of six such memoranda, one per proceeding, submitted together with the corresponding transcripts at Exhibits 2-A through 2-F. Each addresses a single meeting and is confined to **how the application was reviewed** — what the Committee was told, what it asked, what it deferred, and what it decided. **The adequacy of the environmental conclusions themselves is addressed separately** in the Initial Study conformity analysis at Tab A and the examinations at Tabs B and C, and is not re-argued here.

This memorandum makes **no allegation of misconduct, bad faith, or improper motive by any County employee or official.** Every finding is stated in institutional and procedural terms and rests on the County's own published recording of its own proceeding. Where a practice appears to depart from what an adequate review process requires, the memorandum identifies the practice, not any individual.

It takes no position on the merits of the application.

---

2. Transcription Caveat and Limits of This Record

No claim of absolute accuracy is made for any quotation in this memorandum.

Amador County maintains no written minutes of Technical Advisory Committee proceedings. County staff stated this on the record: the Committee keeps no written minutes and the audio

recording is the sole record of what occurred (August 4, 2022 recording at [00:20:50]). In the absence of an official written record, the quotations below were prepared as follows.

1. **Method.** The County's published audio recording of the proceeding was machine-transcribed, and the resulting text was reviewed against the recording by a person listening at each cited timestamp.
2. **Audio quality.** The recordings capture a public meeting room with multiple speakers, participants appearing remotely, overlapping speech, varying distance from the microphone, and intervals of low intelligibility. Some passages are disfluent as spoken; some are difficult to hear; some are not recoverable at all.
3. **What the quotations represent.** Each quotation is **a representation of the words spoken, to the best understanding of the transcriber and of the person who verified it against the recording.** It is not a certified transcript, it is not an official County record, and it should not be treated as either.
4. **Disclosure of uncertainty.** Where a word or passage could not be resolved with confidence, that is stated at the point it appears rather than silently smoothed over. Bracketed text marks a word supplied for readability; an ellipsis marks omitted material that does not bear on the point quoted.
5. **The County holds the original.** The County possesses the recording from which this text was made. **The Department is invited to correct any rendering below that it believes to be inaccurate, and any correction it supplies will be accepted and the record amended accordingly.** Nothing in this memorandum asks the Department to accept a quotation it can itself check.
6. **Speaker identification.** The recordings do not announce every speaker by name. Speaker roles given below are identified from context — self-identification on the recording, the posted agenda, and the sequence of the discussion. Each is the transcriber's best understanding and is not an official designation. **The Department is invited to correct any attribution it believes to be mistaken, on the same terms as any other correction.**

The transcript of this proceeding is submitted at **Exhibit 2-B** so that every quotation can be located in context. The complete recording remains available from the County.

The findings below do not depend on fine points of wording. Each rests on the substance of what was said and, in most instances, on more than one passage.

---

3. Findings

Finding 1 — A material reduction in project scope, followed by its complete removal, was accepted orally in the course of a single hearing, with the applicant's assent taken on the spot

Staff opened the item describing a building already reduced once, from an original 10,000 square feet to a proposed 3,000 square feet with 400-person occupancy:

> “And then one of those revisions includes reducing what was originally I think a 10,000 square foot worship building to the smaller 3000 square foot. In the application to it is proposed at the building would have a 400 person occupancy.” — Planning staff **[00:16:48–00:17:09]**

A nearby property owner then pointed out that the plans still carried the earlier, larger figures:

> “If you look in the middle of that green area, it says I think 10,000 square feet and 1200 people and then it talks about phase two. So I guess my question is how many phases are we talking about here? Are we talking about a 3,000 square foot building? Are we talking about a 10,000 square foot building?” — Woodhouse, nearby property owner **[00:26:33–00:26:57]**

Later in the same item, staff advised the applicant that the building could be removed from the application altogether, and warned of the consequence of doing so:

> “So you can certainly remove the building from the application if that is your desire. But just you would need to know that if you decide to add a building later associated with the uses, it would have to go through the whole process again. And you may not be approved.” — Planning staff **[00:35:47–00:36:05]**

The applicant then proposed eliminating the building, and staff accepted the change and stated what it would require:

> “I said I can eliminate that item, the 3,000 square foot building, if it’s going to hold the process for the licensing for the land to be used as a cemetery.” — Applicant **[00:41:51–00:42:06]**

> “As the applicant that we completely up to you if you want to eliminate that building.” / “We’ll move that, yes.” — Planning staff and the applicant **[00:42:16–00:42:25]**

> “I’ll say, if that is your intent, you’ll need to revise the application again to remove references to the building. And then basically would have to come back to tack again for [completeness].” — Planning staff **[00:42:27–00:42:40]**

In this passage the recording renders “TAC” as “tack.” The bracketed word is supplied for readability.

What this evidences. Within a single hearing, the proposed building went from a figure still appearing on the plans (10,000 square feet, 1,200 people) to a reduced figure staff had already accepted (3,000 square feet, 400 people) to complete removal, with the applicant’s assent to removal obtained orally and on the spot. Staff identified the correct procedural consequence — a revised application and a further Committee review — but the change itself was transacted verbally, without a revised plan set, a revised project description, or a written record other than the recording. The Department is asked to state whether the application was in fact revised and re-agendized for completeness following this exchange, and to produce the revised project description if one exists.

Finding 2 — A committee member characterized the pattern of change as one requiring the applicant to start over, and the Committee's own disposition did not require a new application

Near the close of the item, a Committee member summarized what had occurred:

> "The applicant really needs to start over again and submit a whole new package because he's changed it so many times and we need something in writing so we can see it." — Committee member **[01:05:47–01:05:56]**

The motion actually made and carried did not require a new application; it found the existing application incomplete and continued it for a further review:

> "Okay, I will then move to find the project application incomplete and we can schedule a tech meeting to review it again at a later date." / "I have a motion." / "Second." / "I have a second, all in favor." / "All right, so the application has been found incomplete so pending resubmission from the applicant." — Planning staff and Committee **[01:07:05–01:07:37]**

What this evidences. A member of the body reviewing the application described the correction needed as starting over with a new package; the disposition adopted was a finding of incompleteness with resubmission invited, a narrower step than a new filing. The Department is asked to state which of the two describes what was in fact required of the applicant, and whether the resubmission that followed was treated as a revision of UP-22;2-3 or as a new application.

Finding 3 — A member of the public raised the pattern of incremental reduction and expansion, and staff represented on the record that the reduction applied to the entire project

A member of the public participating by remote means asked whether the changes discussed that day applied to the whole project or only to a first phase:

> "Sorry, and then one other question, because there have been so many changes kind of spoken today, I question whether or not those are changes — if these are intended to be changes to the project as a whole, or changes to phase one, because as you look at the way that the application was submitted, it appears as if there is going to be smaller changes and grow into larger things." — Jamie, public participant **[00:59:29–01:00:04]**

Staff answered:

> "Yeah, pretty much this project is a small scale community project that is pretty much whatever we propose we propose for the maximum. The actual numbers are way way below that." — Applicant **[01:00:21–01:00:43]**

The Committee chair then asked whether the applicant's answer resolved the question, and the exchange closed without a further statement from staff distinguishing the project as a whole from a first phase on the record at this hearing.

What this evidences. A member of the public asked, in terms, whether the reductions discussed were phase-specific or project-wide, and the question was answered by the applicant rather than by a staff determination placed on the record at this hearing. Whether the scope of the reduction was later confirmed by staff in a form the public could rely on is addressed at a later proceeding in this series, where a comparable representation appears; this memorandum does not resolve which record controls and asks the Department to reconcile the two.

Finding 4 — The water purveyor identified fixed infrastructure limits on the record, and the Committee's discussion of reducing attendance figures followed, rather than preceded, that testimony

The Amador Water Agency representative testified to specific capacity limits early in the item:

> "The parcel currently has a 5 eighths inch meter which is the largest meter we would permit to be set on that line which would give them a maximum of 20 gallons a minute and 400 gallons per average day which is a tiny amount of water. Expansion of that line to allow more flow than that would be incredibly expensive and is probably cost prohibitive." — Amador Water Agency **[00:24:38–00:25:01]**

Later in the same item, after that testimony, the applicant addressed attendance figures:

> "And also we can always limit the number of participants of the funeral. … As I said in the application or at least in the process, we usually have about 50 people maximum, but in case I want to go for the maximum, I'm pushing it for 400, but that is probably once in a blue moon and we could control that by saying put a minimum of 50 people at maximum." — Applicant **[00:52:38–00:53:15]**
>
> "Yeah, let's do that. Let's limit it to 50 individuals." — Applicant **[00:53:43–00:53:53]**

What this evidences. The sequence on the record is: fixed infrastructure capacity stated by the purveyor, followed by a proposed attendance ceiling offered in the same hearing without reference to an engineering study, a demand analysis, or a metering mechanism. The procedural point is the sequence and its absence of a stated evidentiary basis, not whether fifty is or is not an adequate figure; the substantive adequacy of the resulting attendance cap is addressed at Tab A.

Finding 5 — Public Works identified two access points requiring commercial-standard improvement and a categorical prohibition on roadside parking, findings not reflected in the parking count discussed at the same meeting

Public Works stated:

> "And then both the entrances on Lambert and on Carbondale will have to be improved for commercial standards." — Public Works **[00:28:10–00:28:21]**
>
> "And then I do believe that parking along the road is not going to be — if you have any type of fire issue, that's going to be a no-no. And then parking along any of those roads is also

> going to be a no-no. So they're going to have to provide some place in there, in their area, a parking lot or show it." — Public Works **[00:28:28–00:29:02]**

Earlier in the same meeting, staff had described the application's parking proposal without noting the conflict:

> "I did want to note so the parking in the application they said that they would be providing 100 spaces that would be along the road. I just want to note that for a 400 person event per the Amador County code regarding parking for events. It's one space per six people that would be attending. So that does meet that minimum I think it would be 67 or so spaces that would be required." — Planning staff **[00:18:33–00:19:04]**

What this evidences. The application's parking count was described on the record as satisfying the numeric ratio using a configuration — spaces along the road — that Public Works, in the same meeting, described as unacceptable for fire-access reasons. Nothing in the record before the Committee at this hearing reconciles the two statements. The Department is asked to state whether a parking plan consistent with the Public Works statement was submitted, and if so, when.

Finding 6 — The Committee found the application incomplete for the second consecutive time, on an expanded list of deficiencies, without a written deficiency notice appearing in the record of this proceeding

Staff summarized what a finding of incompleteness would produce:

> "So I'm going to kind of summarize then, because in general after we have tech meetings when it's found incomplete we do create a deficiency notice and then we send it to the applicant so they know kind of what we need to move forward." — Planning staff **[01:04:24–01:04:39]**

Staff then listed several items for that notice — attendance and frequency information, revised plans omitting the building, septic capacity proof, and a water-service determination:

> "So including in that I think we definitely want to know more information about how many people are going to be attending and the frequency of those events. We want to see the plans edited to not have the building because you're relying that part of the application. And then we will want to see also what proof of capacity for a potential septic design that would accommodate for whatever the amount of people that you're proposing visit at one point." — Planning staff **[01:04:39–01:05:11]**

The motion adopted was to find the application incomplete, without a copy of the resulting deficiency notice being read into the record or entered as an exhibit at this hearing.

What this evidences. The substance of the deficiency notice was described orally, item by item, but the notice itself does not appear in the record of this proceeding. This is the second incompleteness finding of 2022. The Department is asked to produce the deficiency notice issued following this meeting and its date of issuance.

---

4. Undertakings Stated on the Record

This section identifies undertakings stated on the record at this proceeding. It does not assert that any of them went uncompleted. The preparer has no access to the Department's file and is not in a position to know what it contains. Each item sets out what was said, when, and by whom, followed by a request that the Department identify the document or record evidencing completion. Where such a record exists, its production closes the item. Where none exists, a statement to that effect closes the item equally. **The Department is the custodian of its own file; only the Department can close these items.**

The quotations in this section are subject in full to the transcription caveat at § 2.

County-side undertakings

4.5 — Revision of the application to remove the building and return to the Committee. *(See also Finding 1.)*

> "I'll say, if that is your intent, you'll need to revise the application again to remove references to the building. And then basically would have to come back to tack again for [completeness]." — Planning staff **[00:42:27–00:42:40]**

In this passage the recording renders "TAC" as "tack." The bracketed word is supplied for readability.

Requested: the revised application or project description omitting the building, its date of submission, and the record of the further Committee proceeding referenced — or a statement in writing that no such revision was received.

4.6 — Additional information on occupancy at a single point in time.

> "We will still need to know how well where the 400 people would be at one point and then we would have to know what kind of because they'll still be required to have water and sewer service." — Planning staff **[00:43:02–00:43:15]**

Requested: the document or submission responding to this request and its date — or a statement in writing that it was not received.

Applicant-side undertakings

The following were stated by or agreed to by the applicant. The obligation runs the other way, and they are identified here for completeness of the record rather than as requests directed to the Department.

4.7 — Obtaining an architect to detail the proposed building's interior use.

> "So I would suggest maybe get an architect to provide the county detail of the area …" — Planning staff, addressed to the applicant **[00:40:15–00:40:28]**

Requested: any architectural detail submitted in response to this suggestion, held in the Department's file.

4.8 — Agreement to remove the building from the application. *(See also Finding 1.)*

> "We'll move that, yes." — Applicant **[00:42:22–00:42:25]**

Requested: the revised plan set or application reflecting this agreement, held in the Department's file.

---

5. Requested Action

It is respectfully requested that the Planning Department:

1. **Place this memorandum and the transcript at Exhibit 2-B in the administrative record** for Use Permit UP-22;2-3.
2. **Correct any quotation above that the Department believes to be inaccurate**, by reference to the recording, so that the record reflects an agreed text.
3. **Respond in writing to the requests identified in Findings 1 through 6 and in § 4**, or state in writing that the requested document or information does not exist.
4. **Preserve the recording of this proceeding** and all associated files pending completion of the review, the recording being the sole record of what occurred.

Several of the documents identified above are also the subject of a supplemental request under the California Public Records Act submitted concurrently with this package. **This memorandum is submitted without waiting for that production**, and the Department is asked to act on the requests above independently of the Public Records Act process.

Sources

- Amador County Technical Advisory Committee meeting audio, August 4, 2022 (Event ID 7550). Amador County agendas, minutes and meetings.
- Transcript of the proceeding of August 4, 2022, submitted at Exhibit 2-B.
- Amador County Code § 15.30 (road standards); Title 19 airport overlay provisions; Amador County parking standards for events.
- Public Utilities Code §§ 21670–21675 (airport land use compatibility).
- Companion documents submitted concurrently: *Technical Advisory Committee Record and Process Memorandum — UP-22;2-3* (Tab E); *Supplemental and Clarifying Request Under the California Public Records Act* (Tab F), dated August 13, 2026.

Procedural Record and Findings

Technical Advisory Committee Meeting of June 1, 2023 (Event ID 7849)

Gardens of Noor Cemetery — Use Permit UP-22;2-3 (APN 001-220-013), Amador County, California

August 13, 2026

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association.

Submitted to the Amador County Planning Department, with copies to County Counsel and the Clerk of the Board, for entry into the administrative record for Use Permit UP-22;2-3.

---

1. Purpose and Scope

This memorandum sets out what occurred at the Technical Advisory Committee proceeding of **June 1, 2023** — the meeting at which the Committee found the application incomplete for a third consecutive time and adopted a motion requiring staff to provide a complete list of deficiencies within 30 days.

It is one of six such memoranda, one per proceeding, submitted together with the corresponding transcripts at Exhibits 2-A through 2-F. Each addresses a single meeting and is confined to **how the application was reviewed** — what the Committee was told, what it asked, what it deferred, and what it decided. **The adequacy of the environmental conclusions themselves is addressed separately** in the Initial Study conformity analysis at Tab A and the examinations at Tabs B and C, and is not re-argued here.

This memorandum makes **no allegation of misconduct, bad faith, or improper motive by any County employee or official.** Every finding is stated in institutional and procedural terms and rests on the County's own published recording of its own proceeding. Where a practice appears to depart from what an adequate review process requires, the memorandum identifies the practice, not any individual.

It takes no position on the merits of the application.

---

2. Transcription Caveat and Limits of This Record

No claim of absolute accuracy is made for any quotation in this memorandum.

Amador County maintains no written minutes of Technical Advisory Committee proceedings. County staff stated this on the record: the Committee keeps no written minutes and the audio

recording is the sole record of what occurred (August 4, 2022 recording at [00:20:50]). In the absence of an official written record, the quotations below were prepared as follows.

1. **Method.** The County's published audio recording of the proceeding was machine-transcribed, and the resulting text was reviewed against the recording by a person listening at each cited timestamp.
2. **Audio quality.** The recordings capture a public meeting room with multiple speakers, participants appearing remotely, overlapping speech, varying distance from the microphone, and intervals of low intelligibility. Some passages are disfluent as spoken; some are difficult to hear; some are not recoverable at all.
3. **What the quotations represent.** Each quotation is **a representation of the words spoken, to the best understanding of the transcriber and of the person who verified it against the recording.** It is not a certified transcript, it is not an official County record, and it should not be treated as either.
4. **Disclosure of uncertainty.** Where a word or passage could not be resolved with confidence, that is stated at the point it appears rather than silently smoothed over. Bracketed text marks a word supplied for readability; an ellipsis marks omitted material that does not bear on the point quoted.
5. **The County holds the original.** The County possesses the recording from which this text was made. **The Department is invited to correct any rendering below that it believes to be inaccurate, and any correction it supplies will be accepted and the record amended accordingly.** Nothing in this memorandum asks the Department to accept a quotation it can itself check.
6. **Speaker identification.** The recordings do not announce every speaker by name. Speaker roles given below are identified from context — self-identification on the recording, the posted agenda, and the sequence of the discussion. Each is the transcriber's best understanding and is not an official designation. **The Department is invited to correct any attribution it believes to be mistaken, on the same terms as any other correction.**

The transcript of this proceeding is submitted at **Exhibit 2-C** so that every quotation can be located in context. The complete recording remains available from the County.

The findings below do not depend on fine points of wording. Each rests on the substance of what was said and, in most instances, on more than one passage.

---

3. Findings

Finding 1 — The applicant was directed to apply for a General Plan Amendment out of the Mineral Resource Zone designation, and no written basis for later treating the application as consistent has been identified

Staff described the General Plan inconsistency and its consequence on the record:

> "So a cemetery would definitely … have impact potential access to mineral resources on site, so in that way the application … it is consistent with the zoning but it is inconsistent

> with the general plan designation … the issue with the general plan not being consistent is definitely a technical objection that TAC would have at this point." — Planning staff **[01:22:23–01:23:14]**

The Planning Director then addressed the consequence for the application:

> "If the application didn't include a request for a general plan amendment amendment the planning commission is going to have a hard time approving an application when TAC has a technical objection to the basic land use on the parcel." — Planning Director **[01:23:27–01:23:49]**

Deputy County Counsel characterized the determination as discretionary but did not withdraw it:

> "Yeah they're they're the environmental issues to be assessed but it's really a legislative decision so there's wide discretion." — Deputy County Counsel **[01:24:19–01:24:32]**

Staff then gave the applicant direction:

> "If you would want to apply for a general plan amendment to a different designation … so that would be the guidance to apply for a general plan amendment … I'll send you the packet." — Planning staff **[01:24:43–01:25:12]**

At a later proceeding, staff described the same designation differently. On September 18, 2025, staff stated that a geotechnical study included with the application "did not call out any specific unique mineral resources that would be restricted through development of the site" and concluded, "I don't personally have any concerns at this point as far as this project being inconsistent with the general plan designation" (September 18, 2025 recording at [00:05:36–00:06:20]). On May 7, 2026, staff went further: "I don't think that there's any inconsistency from this project with the existing general plan designation. So I don't think they would be required to have a general plan amendment" (May 7, 2026 recording at [00:06:50–00:07:21]).

What this evidences. In 2023 the Committee and the Planning Director identified the General Plan inconsistency as a technical objection to the basic land use and directed the applicant to apply for a General Plan Amendment. No General Plan Amendment application for this parcel has been identified in the materials available to the preparer. By 2025 and 2026 staff stated that no inconsistency existed and that no amendment was required. The Department is asked to produce the written determination, analysis, or other document that supports treating the project as consistent with the Mineral Resource Zone designation, and its date, or to state in writing that no such document exists.

Finding 2 — The Committee found the application incomplete for a third consecutive time and adopted a motion requiring a complete list of deficiencies within 30 days

At the close of the proceeding:

> Chair: "Do we have all the current information, do we have any more questions? Then at this point we have some items that still are outstanding, correct." Motion: "I'll make a

> motion that we find the application incomplete and the staff will provide a … complete list of deficiencies within 30 days.” — **[01:59:51–02:00:29]**

The motion was seconded and carried unanimously **[02:00:29–02:00:52]**.

What this evidences. This is a formal, adopted, time-bound action: a finding of incompleteness paired with a 30-day obligation for staff to produce a complete deficiency list. The Department is asked to produce the deficiency list required by this motion, together with its date, or to state in writing that none was produced.

Finding 3 — Deputy County Counsel could not locate a well-to-grave separation standard, and the question does not appear to have been answered on the record at any later proceeding

Deputy County Counsel stated:

> “With water sources underneath … just jumps out as a pretty big concern.” — Deputy County Counsel **[01:06:08–01:06:14]**

> “Actually I was looking for a setback I was trying to find a setback from a water well to a grave and I I found one one item but it’s not in our lamp the or the lamp that we have here in looking through the the law the california health and safety code and the title 16 ccr … so I have a little more research to do.” — Deputy County Counsel **[01:06:24–01:07:13]**

What this evidences. County Counsel identified a specific research task — locating a governing separation standard between a water well and a grave — and stated that it remained open. The question does not appear to have been answered on the record at any of the later proceedings reviewed by the preparer. The substantive significance of the setback question is addressed at Tab A; the procedural question here is narrower. The Department is asked to produce the completed research, its date, and its conclusion, or to state in writing that no such standard has been identified.

Finding 4 — Staff enumerated a list of anticipated conditions, and the record does not show whether each was carried into the final Conditions of Approval

Staff stated:

> “I just have an idea of some conditions that will very likely be placed on the project so one would be requiring license for the operator to be on file with the county we’ll want to know oh for the description too if there are going to be no like employees we want to know how many employees would be on site during the funerals or on site during regular operations … we also would like to know kind of the idea for maintenance … yeah we would need hours of operation … and then I know also since you would be doing some heavy duty excavating probably we would want to very likely you’d want to store fuel and stuff on the property so if if that is the case you would you would need to have a hazardous materials business plan … all the associated stuff with environmental health for that kind of

> structure for any housing of equipment stock … if there's storage … if it's going to be in a specific lot stored outside or if there's going to be a structure that's stored inside we'd want to see that reflected as well." — Planning staff **[01:12:59–01:14:43]**

What this evidences. Staff identified, item by item, an operator license on file with the County, employee counts during funerals and regular operations, a maintenance approach, hours of operation, a hazardous materials business plan, and disclosure of equipment storage as conditions anticipated for this project. The Department is asked to produce the Conditions of Approval currently applicable to this application and to state, for each item enumerated above, whether it appears in those conditions.

Finding 5 — Staff undertook to send a post-meeting letter summarizing all comments, and no dated document responsive to that undertaking has been identified

Staff stated:

> "I hope you're taking notes … and then I was going to say if you're not taking notes we are so I will be sending a letter after the meeting summarizing all of our comments too." — Planning staff **[01:33:45–01:34:12]**

What this evidences. This undertaking is addressed further at § 4.5 below. The Department is asked to produce the letter described, and its date, or to state in writing that no such letter was sent.

Finding 6 — Deputy County Counsel stated that the application could not be deemed complete without coordination with the Bureau of Funerals and Cemeteries, immediately after staff described the County as new to reviewing cemetery applications

Staff stated:

> "We don't have a lot of cemetery applications so we're kind of new to a lot of this." — Planning staff **[01:04:22–01:04:32]**

Deputy County Counsel then stated:

> "I think the bureau of funerals and cemetery's should be definitely be involved in this process and I don't think you can deem an application complete until you've coordinated with them and ensure that you have everything that they would need." — Deputy County Counsel **[01:05:03–01:05:22]**

What this evidences. County Counsel articulated a completeness prerequisite tied to coordination with a specific outside body. The Department is asked to state whether the Bureau of

Funerals and Cemeteries was contacted in connection with this application, and if so, on what date and with what result, or to state in writing that no such coordination occurred.

Finding 7 — The Committee's finding of General Plan inconsistency and its direction to seek an amendment were not accompanied by any referral to, or record from, the agency that would administer that amendment

At the same exchange addressed in Finding 1, a committee member asked, "isn't that kind of a lose lose situation" **[01:24:06–01:24:11]**, after the Planning Director observed that removing the parcel from the Mineral Resource Zone would itself restrict access to mineral resources **[01:23:49–01:24:06]**. The exchange concluded with staff's direction to the applicant to apply for the amendment and staff's own undertaking, "i'll send you the packet" **[01:25:07–01:25:28]**, addressed further at § 4.4 below.

What this evidences. The Committee identified a General Plan Amendment as the mechanism for resolving the inconsistency it had just found, and staff undertook to transmit the application packet for that amendment. No General Plan Amendment application, fee record, or related correspondence for this parcel dated on or after June 1, 2023 has been identified in the materials available to the preparer. The Department is asked to state whether an application for a General Plan Amendment was ever filed for this parcel, and if not, the basis on which the project subsequently proceeded without one.

---

4. Undertakings Stated on the Record

This section identifies undertakings stated on the record at this proceeding. It does not assert that any of them went uncompleted. The preparer has no access to the Department's file and is not in a position to know what it contains. Each item sets out what was said, when, and by whom, followed by a request that the Department identify the document or record evidencing completion. Where such a record exists, its production closes the item. Where none exists, a statement to that effect closes the item equally. **The Department is the custodian of its own file; only the Department can close these items.**

The quotations in this section are subject in full to the transcription caveat at § 2.

County-side undertakings

4.1 — Research on Title 16 CCR limits applicable to multiple interments per plot.

> "I can look more to see if there's anything like addressing that." — Planning staff **[01:00:08–01:00:13]**

Requested: the research described, its conclusion, and its date — or a statement in writing that it was not undertaken.

4.2 — Outreach to other counties for sample cemetery ordinances and conditions.

> “We can also reach out to the counties.” — Planning staff **[01:12:18–01:12:24]**

Requested: any record of the outreach described, the jurisdictions contacted, and the material obtained, together with its date — or a statement in writing that no such outreach was undertaken.

4.3 — Anticipated conditions enumerated for the project. *(See also Finding 4.)*

> “I just have an idea of some conditions that will very likely be placed on the project.” — Planning staff **[01:12:59–01:13:04]**

Requested: the Conditions of Approval currently applicable to this application, so that each item enumerated at Finding 4 can be checked against it — or a statement in writing that conditions have not yet been adopted.

4.4 — Direction to apply for a General Plan Amendment, and transmittal of the application packet. *(See also Finding 1 and Finding 7.)*

> “I can send you over the information … I’ll send you the packet you can review it.” — Planning staff **[01:25:07–01:25:28]**

Requested: the date the packet was sent, and any General Plan Amendment application, fee record, correspondence, or withdrawal for this parcel dated on or after June 1, 2023 — or a statement in writing that no packet was sent and no application was filed.

4.5 — Post-meeting letter summarizing all comments. *(See also Finding 5.)*

> “I will be sending a letter after the meeting summarizing all of our comments too.” — Planning staff **[01:33:49–01:34:12]**

Requested: the letter described, and its date of transmittal — or a statement in writing that no such letter was sent.

4.6 — Deficiency list required by the incompleteness motion. *(See also Finding 2.)*

> “The staff will provide a complete list of deficiencies within 30 days.” — Motion, seconded and carried **[02:00:04–02:00:29]**

Requested: the deficiency list required by this motion, and its date — or a statement in writing that no such list was produced.

Applicant-side undertakings

The following were stated by or agreed to by the applicant. The obligation runs the other way, and they are identified here for completeness of the record rather than as requests directed to the Department.

4.7 — Flood zone determination.

> Applicant: “i’m pretty sure it’s not in the flood zone but i’ll double check.” — **[01:30:38–01:30:45]**

Requested: any flood zone determination for this parcel obtained by or on behalf of the applicant, and its date, held in the Department's file.

---

5. Requested Action

It is respectfully requested that the Planning Department:

1. **Place this memorandum and the transcript at Exhibit 2-C in the administrative record** for Use Permit UP-22;2-3.
2. **Correct any quotation above that the Department believes to be inaccurate**, by reference to the recording, so that the record reflects an agreed text.
3. **Respond in writing to the requests identified in Findings 1 through 7 and in § 4**, or state in writing that the requested document or information does not exist.
4. **Preserve the recording of this proceeding** and all associated files pending completion of the review, the recording being the sole record of what occurred.

Several of the documents identified above are also the subject of a supplemental request under the California Public Records Act submitted concurrently with this package. **This memorandum is submitted without waiting for that production**, and the Department is asked to act on the requests above independently of the Public Records Act process.

Sources

- Amador County Technical Advisory Committee meeting audio, June 1, 2023 (Event ID 7849); September 18, 2025 (Event ID 8537); May 7, 2026 (Event ID 9154). Amador County agendas, minutes and meetings.
- Transcript of the proceeding of June 1, 2023, submitted at Exhibit 2-C.
- California Health and Safety Code; Title 16, California Code of Regulations.
- Companion documents submitted concurrently: *Technical Advisory Committee Record and Process Memorandum — UP-22;2-3* (Tab E); *Supplemental and Clarifying Request Under the California Public Records Act* (Tab F), dated August 13, 2026.

Procedural Record and Findings

Technical Advisory Committee Meeting of September 18, 2025 (Event ID 8537)

Gardens of Noor Cemetery — Use Permit UP-22;2-3 (APN 001-220-013), Amador County, California

August 13, 2026

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association.

Submitted to the Amador County Planning Department, with copies to County Counsel and the Clerk of the Board, for entry into the administrative record for Use Permit UP-22;2-3.

---

1. Purpose and Scope

This memorandum sets out what occurred at the Technical Advisory Committee proceeding of **September 18, 2025** — the meeting at which the Committee found the application incomplete, unanimously, and directed that a list of deficiencies be sent to the applicant.

It is one of six such memoranda, one per proceeding, submitted together with the corresponding transcripts at Exhibits 2-A through 2-F. Each addresses a single meeting and is confined to **how the application was reviewed** — what the Committee was told, what it asked, what it deferred, and what it decided. **The adequacy of the environmental conclusions themselves is addressed separately** in the Initial Study conformity analysis at Tab A and the examinations at Tabs B and C, and is not re-argued here.

This memorandum makes **no allegation of misconduct, bad faith, or improper motive by any County employee or official.** Every finding is stated in institutional and procedural terms and rests on the County's own published recording of its own proceeding. Where a practice appears to depart from what an adequate review process requires, the memorandum identifies the practice, not any individual.

It takes no position on the merits of the application.

---

2. Transcription Caveat and Limits of This Record

No claim of absolute accuracy is made for any quotation in this memorandum.

Amador County maintains no written minutes of Technical Advisory Committee proceedings. County staff stated this on the record: the Committee keeps no written minutes and the audio recording is the sole record of what occurred (August 4, 2022 recording at [00:20:50]). In the absence of an official written record, the quotations below were prepared as follows.

1. **Method.** The County's published audio recording of the proceeding was machine-transcribed, and the resulting text was reviewed against the recording by a person listening at each cited timestamp.
2. **Audio quality.** The recordings capture a public meeting room with multiple speakers, participants appearing remotely, overlapping speech, varying distance from the microphone, and intervals of low intelligibility. Some passages are disfluent as spoken; some are difficult to hear; some are not recoverable at all.
3. **What the quotations represent.** Each quotation is **a representation of the words spoken, to the best understanding of the transcriber and of the person who verified it against the recording.** It is not a certified transcript, it is not an official County record, and it should not be treated as either.
4. **Disclosure of uncertainty.** Where a word or passage could not be resolved with confidence, that is stated at the point it appears rather than silently smoothed over. Bracketed text marks a word supplied for readability; an ellipsis marks omitted material that does not bear on the point quoted.
5. **The County holds the original.** The County possesses the recording from which this text was made. **The Department is invited to correct any rendering below that it believes to be inaccurate, and any correction it supplies will be accepted and the record amended accordingly.** Nothing in this memorandum asks the Department to accept a quotation it can itself check.
6. **Speaker identification.** The recordings do not announce every speaker by name. Speaker roles given below are identified from context — self-identification on the recording, the posted agenda, and the sequence of the discussion. Each is the transcriber's best understanding and is not an official designation. **The Department is invited to correct any attribution it believes to be mistaken, on the same terms as any other correction.**

The transcript of this proceeding is submitted at **Exhibit 2-D** so that every quotation can be located in context. The complete recording remains available from the County.

The findings below do not depend on fine points of wording. Each rests on the substance of what was said and, in most instances, on more than one passage.

---

3. Findings

Finding 1 — A General Plan consistency determination reached in 2023 was reversed at this meeting, with no written analysis identified on the record

At the meeting of June 1, 2023, staff stated that the parcel's Mineral Resource Zone General Plan designation made the project "inconsistent with the general plan designation," called that "definitely a technical objection that TAC would have," and directed the applicant toward a General Plan Amendment.

At this meeting, staff addressed the same designation and reached the opposite conclusion:

> "I mean, I know that, oh, I guess one thing to note was the general plan designation of the property is MRZ which is Rural Resource Zone. And the applicant has responded to

> potential concerns with that with a geotechnical study that has been included in the packet. So that would be used to determine if this project is consistent or inconsistent with that MRZ designation from, I'm not an engineer, but from what I looked through, I mean, it definitely appears like a very comprehensive report. So I don't personally have any concerns at this point as far as this project being inconsistent with the general plan designation." — Planning staff **[00:05:36–00:06:20]**

No written determination, memorandum, or analysis reconciling the 2023 finding of inconsistency with the September 2025 statement was identified or referenced on the record at this meeting, and no General Plan Amendment application was mentioned as having been filed. **What this evidences.** The record shows two opposite conclusions on the same designation and the same parcel, two years apart, without a General Plan Amendment and without a written analysis on the record explaining the change. The Department is asked to produce the written determination or analysis, if any, supporting the change between June 1, 2023 and September 18, 2025, its date, and its author, or to state in writing that no such written determination was made. The consequences for the Initial Study's Mineral Resources and Land Use/Planning conclusions are addressed at Tab A.

Finding 2 — A discrepancy between the geotechnical report and the applicant's description of the project was raised on the record, and staff undertook to check it rather than resolve it at the meeting

A member of the public identified structures described in the geotechnical report that the applicant maintains are not part of the project:

> "The Geotechnical Report on page 27 of 75 lists an office building, a caretaker building, an equipment building, perhaps accessory buildings, undefined, what is it? So a lot of concern here that the applicant is not being honest with us of what the plan is and the build out." — Public speaker **[00:43:53–00:44:15]**

Staff asked the applicant directly whether the report predated removal of the buildings from the project, and the applicant answered that no building was proposed other than a roof over the restroom and that an existing steel building "is not going to be used for the cemetery." Staff then stated:

> "So I'll have to look through the geotech and see exactly where Mr. Wardall was mentioning where he saw the reference to the footings." — Planning staff **[01:00:15–01:00:24]**

Staff added that the report "is still considered valid" and that the County "would only take into account the sections that are applicable to the site development without the buildings," and confirmed that the report's topographic survey is dated December 2023. **What this evidences.** A discrepancy between a technical report in the file and the applicant's current description of the project was raised on the record, and staff's response was an undertaking to check the report rather than a determination made at the meeting. The item is carried forward at § 4 below. The

substantive question of what the report's contents mean for the sufficiency of the record is addressed at Tab A.

Finding 3 — A fire water tank was identified as likely required, on the strength of an attendance estimate of roughly 3,000 people per month, and the requirement was deferred without a mechanism stated for its return

Amador Fire's prevention officer was asked whether a fire tank would be required and answered:

> "Hmm, he's not, we don't have any new structures going, usually that's a new structure trigger. However, given the amount of people that he anticipates, that's approximately 3,000 people per month that he's estimating." — Fire Prevention Officer **[00:27:53–00:28:13]**
>
> "Yes, we will discuss that as well. A fire water tank, or maybe a couple given the size of the property." — Fire Prevention Officer **[00:28:14–00:28:21]**

No tank size, location, or timeline for resolving the requirement was stated at this point in the meeting. **What this evidences.** A likely infrastructure requirement was identified by the referral agency responsible for it and deferred without a stated mechanism or date for its return to the record at this meeting. The item recurs in the deficiency list adopted at Finding 5. The substance of the water-supply question is addressed at Tab B.

Finding 4 — The wastewater question was deferred for a third consecutive proceeding, and the applicant's supporting soils information was again identified as work performed for a different structure

Environmental Health told the applicant that the geotechnical investigation on file was insufficient for a sewage disposal system design and that a separate soils investigation and design would be required:

> "I'd like to talk about the proposed sewage disposal treatment system that would be servicing the restrooms. And I do understand you have a geotechnical engineering investigation from 2024, but what you would need is to contact an engineer or a geologist, licensed geologist or professional engineer regarding a design for the sewage disposal system. So you'd wanna, actually you're gonna have to file an application here and with my department, Environmental Health, and contact an engineer and schedule what we call soil site investigations…" — Environmental Health **[00:22:02–00:22:59]**

Later in the meeting, the applicant identified a prior owner as the source of an existing septic plan. Environmental Health's response:

> "Okay, yeah, we may have done some work. I'll take a look. We may have done some soils investigation for the house, but I don't think we've done any on site so we just pulled the soil investigation on this parcel." — Environmental Health **[00:32:24–00:32:39]**

Asked to confirm, staff stated: “Yeah, that might be for his house” **[00:32:43–00:32:46]**. The applicant confirmed the house and the cemetery are on the same parcel but that “we are not proceeding with the house idea” **[00:32:51–00:32:59]**. **What this evidences.** As of this meeting, no septic application, soil site investigation, or design specific to the proposed restroom use had been completed, and the soils information referenced by the applicant was, on the record, associated with a residential structure rather than the proposed public-assembly restroom. The item is carried forward as part of the deficiency list at Finding 5. The substantive adequacy of any wastewater conclusion is addressed at Tab B.

Finding 5 — The application was found incomplete by unanimous motion, with a deficiency list to follow, and the Department committed to a delivery window rather than a date

At the close of the meeting, the Committee took up the completeness determination:

> “Do I have a motion to find the application complete or incomplete?” — Chair **[01:12:59–01:13:06]**
>
> “I make a motion to find the application incomplete as presented.” — Committee member **[01:13:06–01:13:11]**
>
> “Motion and a second to find the application incomplete. If it’s found incomplete, there will be a list of deficiencies submitted to the applicant so that they can respond to those and amend the application. All in favor of the motion to find the application incomplete? Aye. Aye. It’s as you an unanimous decision. So the application is found incomplete. There will be a list of deficiencies submitted to the applicant within 30 days.” — Chair **[01:13:14–01:13:41]**

Staff then added, addressing the applicant directly:

> “And I will be in touch with you, Nair, so I will get that letter to you either this week or next week.” — Planning staff **[01:13:46–01:13:52]**

What this evidences. The Committee’s own motion set a 30-day outer limit for the deficiency list; staff’s statement to the applicant substituted a narrower, non-committal window measured in weeks rather than a date. The Department is asked to produce the deficiency letter referenced at this meeting, together with its date of issuance, or to state in writing that no such letter was sent within the window described.

Finding 6 — A road-capacity concern was met with a proposed condition that the County’s own Public Works Director, in the same exchange, described as unenforceable

Public Works raised a road-capacity concern tied to the volume of attendees the project anticipates:

> "...if you're gonna have, you know, a funeral and you're gonna have 35 vehicles or whatever coming from the Sacramento there, I'm concerned that that road is not gonna be able to accommodate that usage without a lot of improvement... I have concerns that that road's not gonna be able to hold up to the events that you're having, not that they're large, but they're there, and which there's none now." — Public Works Director **[00:17:30–00:18:46]**

The applicant responded that attendees would be directed to a different route and "they're not gonna use the county road in Maxwell" **[00:19:20–00:19:26]**. Public Works replied:

> "Okay, well, I mean, unless you're directing your patrons to go a specific route, they'll follow their GPS, that's just the way it is, so it's just a concern." — Public Works Director **[00:19:26–00:19:42]**

Staff then proposed, as the mitigating condition, that preferred routing be posted online or through a scheduling process. **What this evidences.** The referral agency responsible for the road identified a capacity concern, stated on the record that the proposed method of addressing it would not control driver behavior, and the condition proposed in response was the posted-routing measure notwithstanding that statement. The record does not show a different condition adopted in its place at this meeting. The adequacy of the condition as mitigation is addressed at Tab B.

---

4. Undertakings Stated on the Record

This section identifies undertakings stated on the record at this proceeding. It does not assert that any of them went uncompleted. The preparer has no access to the Department's file and is not in a position to know what it contains. Each item sets out what was said, when, and by whom, followed by a request that the Department identify the document or record evidencing completion. Where such a record exists, its production closes the item. Where none exists, a statement to that effect closes the item equally. **The Department is the custodian of its own file; only the Department can close these items.**

The quotations in this section are subject in full to the transcription caveat at § 2.

County-side undertakings

4.1 — Circulation of the County's onsite sewage disposal ordinance.

> "Our ordinance is quite detailed regarding onsite sewage disposal. And I'd like to send that to you electronically." — Environmental Health **[00:23:02–00:23:16]**

Requested: the record of transmittal of the ordinance described, and its date — or a statement in writing that it was not sent.

4.2 — Confirmation with the water agency regarding a backflow prevention device.

> "But you will likely, and I'll check with the water agency as well, you'll need a backflow prevention device on that well water well." — Environmental Health **[00:24:24–00:24:34]**

This statement was repeated twice more in the same exchange.

Requested: the record of the confirmation obtained from the water agency, and its date — or a statement in writing that no confirmation was obtained.

4.3 — Referral of the applicant to Environmental Health for further specification.

> "…they could just reach out to Scott Meyer, Amador County Environmental Health." — Planning staff **[00:25:57–00:26:03]**

Requested: any record of contact between the applicant and Environmental Health made in response to this referral, and its date — or a statement in writing that none occurred.

4.4 — Discussion and possible sizing of a fire water tank. *(See also Finding 3.)*

> "Yes, we will discuss that as well. A fire water tank, or maybe a couple given the size of the property." — Fire Prevention Officer **[00:28:14–00:28:21]**

Requested: the record of the discussion described, any determination as to the number, size, or location of a fire water tank, and its date — or a statement in writing that no such determination was made.

4.5 — Review of soils information associated with a different structure on the parcel. *(See also Finding 4.)*

> "Okay, yeah, we may have done some work. I'll take a look." — Environmental Health **[00:32:24–00:32:27]**

Requested: the record of the review described and its outcome, and its date — or a statement in writing that no such review was conducted.

4.6 — Review of the geotechnical report against the discrepancy raised on the record. *(See also Finding 2.)*

> "So I'll have to look through the geotech and see exactly where Mr. Wardall was mentioning where he saw the reference to the footings." — Planning staff **[01:00:15–01:00:24]**

Requested: the record of the review described, its outcome, and its date — or a statement in writing that no such review was conducted.

4.7 — Sizing and siting of the fire water tank on the site plan.

> "We'll have to look into the water tank requirements and see if that's going to be added to the site plan. We would want to see where that's located as well." — Planning staff **[01:07:17–01:07:28]**

Requested: the record showing the fire water tank requirement as sized and located on a site plan, and its date — or a statement in writing that this was not done.

4.8 — Compilation of an exhaustive deficiency list for the applicant.

> "…do we have other items that Krista didn't mention because we'll get that exhaustive list to the applicant?" — Planning staff **[01:08:44–01:08:54]**

Requested: the deficiency list described, and its date of transmittal — or a statement in writing that no such list was sent.

4.9 — The motion finding the application incomplete, with a deficiency list to follow within 30 days. *(See also Finding 5.)*

> "Motion and a second to find the application incomplete. If it's found incomplete, there will be a list of deficiencies submitted to the applicant so that they can respond to those and amend the application." — Chair **[01:13:14–01:13:22]**

Requested: the deficiency list adopted by this motion, and its date of transmittal to the applicant — or a statement in writing that it was not sent within 30 days of this meeting.

4.10 — The Department's commitment to send the deficiency letter "this week or next week." *(See also Finding 5.)*

> "And I will be in touch with you, Nair, so I will get that letter to you either this week or next week." — Planning staff **[01:13:46–01:13:52]**

Requested: the deficiency letter described and its date of transmittal — or a statement in writing that it was not sent within that window.

Applicant-side undertakings

The following were stated by or agreed to by the applicant. The obligation runs the other way, and they are identified here for completeness of the record rather than as requests directed to the Department.

4.11 — Provision of additional parking-layout specifications.

> "If you need any more specifications, any more details, yeah, we will be able to provide them." — Applicant **[00:12:18–00:12:25]**

Requested: any parking-layout specifications submitted by the applicant in response to this statement, held in the Department's file.

4.12 — Provision of parking-lot dimensions.

> "Let me see, yeah, I'll be able to provide that. And also for the parking lot, the dimensions." — Applicant **[00:13:54–00:14:01]**

Requested: any parking-lot dimensions submitted by the applicant in response to this statement, held in the Department's file.

---

5. Requested Action

It is respectfully requested that the Planning Department:

1. **Place this memorandum and the transcript at Exhibit 2-D in the administrative record** for Use Permit UP-22;2-3.

2. **Correct any quotation above that the Department believes to be inaccurate**, by reference to the recording, so that the record reflects an agreed text.
3. **Respond in writing to the requests identified in Findings 1 through 6 and in § 4**, or state in writing that the requested document or information does not exist.
4. **Preserve the recording of this proceeding** and all associated files pending completion of the review, the recording being the sole record of what occurred.

Several of the documents identified above are also the subject of a supplemental request under the California Public Records Act submitted concurrently with this package. **This memorandum is submitted without waiting for that production**, and the Department is asked to act on the requests above independently of the Public Records Act process.

Sources

- Amador County Technical Advisory Committee meeting audio, September 18, 2025 (Event ID 8537); June 1, 2023 (Event ID 7849); August 4, 2022 (Event ID 7550). Amador County agendas, minutes and meetings.
- Transcript of the proceeding of September 18, 2025, submitted at Exhibit 2-D.
- Amador County Code § 15.30 (road standards); § 19.56.040 (use permit findings); Title 19 airport overlay provisions.
- Public Utilities Code §§ 21670–21675 (airport land use compatibility).
- Companion documents submitted concurrently: *Technical Advisory Committee Record and Process Memorandum — UP-22;2-3* (Tab E); *Supplemental and Clarifying Request Under the California Public Records Act* (Tab F), dated August 13, 2026.

Procedural Record and Findings

Technical Advisory Committee Meeting of May 7, 2026 (Event ID 9154)

Gardens of Noor Cemetery — Use Permit UP-22;2-3 (APN 001-220-013), Amador County, California

August 13, 2026

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association.

Submitted to the Amador County Planning Department, with copies to County Counsel and the Clerk of the Board, for entry into the administrative record for Use Permit UP-22;2-3.

---

1. Purpose and Scope

This memorandum sets out what occurred at the Technical Advisory Committee proceeding of **May 7, 2026** — the meeting at which the Committee found the application complete and advanced it to environmental review.

It is one of six such memoranda, one per proceeding, submitted together with the corresponding transcripts at Exhibits 2-A through 2-F. Each addresses a single meeting and is confined to **how the application was reviewed** — what the Committee was told, what it asked, what it deferred, and what it decided. **The adequacy of the environmental conclusions themselves is addressed separately** in the Initial Study conformity analysis at Tab A and the examinations at Tabs B and C, and is not re-argued here.

This memorandum makes **no allegation of misconduct, bad faith, or improper motive by any County employee or official.** Every finding is stated in institutional and procedural terms and rests on the County's own published recording of its own proceeding. Where a practice appears to depart from what an adequate review process requires, the memorandum identifies the practice, not any individual.

It takes no position on the merits of the application.

---

2. Transcription Caveat and Limits of This Record

No claim of absolute accuracy is made for any quotation in this memorandum.

Amador County maintains no written minutes of Technical Advisory Committee proceedings. County staff stated this on the record: the Committee keeps no written minutes and the audio recording is the sole record of what occurred (August 4, 2022 recording at [00:20:50]). In the absence of an official written record, the quotations below were prepared as follows.

1. **Method.** The County's published audio recording of the proceeding was machine-transcribed, and the resulting text was reviewed against the recording by a person listening at each cited timestamp.
2. **Audio quality.** The recordings capture a public meeting room with multiple speakers, participants appearing remotely, overlapping speech, varying distance from the microphone, and intervals of low intelligibility. Some passages are disfluent as spoken; some are difficult to hear; some are not recoverable at all.
3. **What the quotations represent.** Each quotation is **a representation of the words spoken, to the best understanding of the transcriber and of the person who verified it against the recording.** It is not a certified transcript, it is not an official County record, and it should not be treated as either.
4. **Disclosure of uncertainty.** Where a word or passage could not be resolved with confidence, that is stated at the point it appears rather than silently smoothed over. Bracketed text marks a word supplied for readability; an ellipsis marks omitted material that does not bear on the point quoted.
5. **The County holds the original.** The County possesses the recording from which this text was made. **The Department is invited to correct any rendering below that it believes to be inaccurate, and any correction it supplies will be accepted and the record amended accordingly.** Nothing in this memorandum asks the Department to accept a quotation it can itself check.
6. **Speaker identification.** The recordings do not announce every speaker by name. Speaker roles given below are identified from context — self-identification on the recording, the posted agenda, and the sequence of the discussion. Each is the transcriber's best understanding and is not an official designation. **The Department is invited to correct any attribution it believes to be mistaken, on the same terms as any other correction.**

The transcript of this proceeding is submitted at **Exhibit 2-E** so that every quotation can be located in context. The complete recording remains available from the County.

The findings below do not depend on fine points of wording. Each rests on the substance of what was said and, in most instances, on more than one passage.

---

3. Findings

Finding 1 — The Committee found the application complete while a participant stated on the record that the governing ordinance had not been read

A member of the public raised the County's airport overlay and its assembly limitation:

> "The airport zoning ordinance was passed for prohibits. The assembly of people and buildings within one mile of the airport. This property is adjacent and touches our south section twenty nine property boundary line that's against the airport. So if they want to have a any type of meeting of people or a building for a brief service or something can't do it. That, that has to be made clear." — Public comment **[00:37:58–00:38:31]**

A committee member asked where the ordinance could be found, and the exchange that followed was verified against the recording segment by segment:

> **Committee member:** “Forgive my ignorance. The airport zoning ordinance that was brought up. Do we have that listed anywhere available to read?” **Staff:** “That’s part of the county zoning code, title 19 of the county code. So that was adopted… Was that two years ago? The airport overlay, roughly limitation on assembly in building site. No more than 50 people, pilot time flies. And boy, it’s been at least two years.” **Committee member:** “So that, that is correct then that the, the meetings cannot be within a mile.” **Second voice:** “I have not read that or no assembly within a building, within a mile, with assembly of 50 people or more, or more within a mile of the airport.” **Committee member:** “Does that speak to not in a building? Or is it only only only in a building?” **Staff:** “That doesn’t quite help anything when they’ve removed the building from the project and time does fly. I think that came from the health and safety code, but don’t quote me on that.” **Committee member:** “Well, good. I haven’t even read it. So it’s, it’s fair.” — **[00:40:41–00:41:58]**

Sixteen minutes later, on the same recording, the Committee found the application complete and voted to move it forward to environmental review:

> “We’ll make a motion to find the application complete to move forward to environmental review.” … “The application is found complete and we will move forward to the study.” — **[00:57:06–00:57:29]**

One month later, at the meeting of June 11, 2026, the same ordinance was described in different terms and construed to a specific result:

> “This property is located within the Eagle’s Nest airport overlay zone, which limits developmental densities, building heights and incompatible uses. And then this project is located like about half a mile from the actual airport runway. Therefore, it’s very much in that zone.” — Planning staff, June 11, 2026 **[00:18:03–00:18:24]**
>
> “It does say that places of assembly are prohibited meaning that you would not be able to have any building or gatherings inside of a building. Yeah, so as such any funeral events associated with the property must take place outside of a building.” — Planning staff, June 11, 2026 **[00:18:40–00:18:55]**

What this evidences. On May 7 the ordinance was described in numeric terms — “no more than 50 people” — with its application to assembly outside a building left unresolved, and two participants stated they had not read it. On June 11 the same ordinance was construed to reach only indoor assembly, with no written legal opinion, memorandum, or ordinance citation identified on the record for that construction between the two meetings. The Department is asked to produce the written basis for the interpretation adopted on June 11, or to state that none exists, and to reconcile it with the record made on May 7. The substantive question of whether the project is consistent with the overlay is addressed at Tab A.

Finding 2 — Septic design was expressly deferred until after conditions are issued, on the basis of a comment read into the record rather than a design submission

The recording secretary read a written comment from the applicant's engineer into the record:

> "Delta Engineering has submitted to Environmental Health, a septic system concept plan for the cemetery. It will be revised once conditions are issued to make it fit. The final project configuration. There is plenty of septic capacity for the proposed use." — Read into the record **[00:10:00–00:10:17]**

What this evidences. The comment as read states that the design will be produced after conditions are set, not before. No percolation data, soil profile investigation, or design flow calculation accompanies the statement in the record of this meeting. The Department is asked to produce the septic system concept plan referenced, together with any design flow calculation or soil investigation on file as of the date of this proceeding, or to state that none exists. The adequacy of septic capacity as an environmental matter is addressed at Tab A.

Finding 3 — Fire water was acknowledged as required by the water agency's letter and deferred to a later point in the project, with no water agency or fire district representative present to be asked about it

> "AWA's letter called out the need for fire water. And so we will once the project gets to that point, we will discuss that." — Planning staff **[00:10:41–00:10:54]**

> "AWA submitted their letter that did call out the need to have fire water and a hydrant system if necessary. So when we get to that point of the project, then we will. We will address that." — Planning staff **[00:10:57–00:11:19]**

The record of this same meeting reflects that no representative of the applicant, the water agency, or the fire district was present:

> "I do not see that applicant himself or I do not believe there's a representative unless Stephanie Hesler is repressable." … "Stephanie Hesler is with environmental health." — **[00:09:08–00:09:18]**

Later in the same meeting, the requirement was converted into a condition rather than a demonstrated capacity:

> "I think I'm, I am going to add, um, conditions for both the firewater and the roads, the roads within the parcel, the that they meet 1530 before operation." — Planning staff **[00:47:55–00:48:09]**

What this evidences. The water agency's letter is described as having identified fire water as a requirement, the requirement was not resolved at this meeting, and it was carried forward as a condition to be met before operation rather than at the time of the completeness finding. No representative of the water agency or the fire district appears in the record of this proceeding to be asked what the requirement entails. The Department is asked to produce the water agency letter

referenced, and any fire-flow or hydrant analysis performed for this parcel as of the date of this proceeding, or to state that none exists.

Finding 4 — The determination that no traffic impact study would be required does not appear in the record as a documented determination

> "I did speak with a B about the, the traffic and we did, I mean, basically go over and say, there's no need at this point with what the proposed, um, traffic is for traffic, um, impact study, but the mitigations and anything that would, we would review through the environmental review would be, um, would very likely be adequate, um, to address those potential issues. Um, so we wouldn't require anything additional on the part of the applicant at this point. So there's nothing traffic wise that we see keeping us from determining it complete today." — Planning staff **[00:47:15–00:47:50]**

The name or initialism referenced at the start of this passage is not further identified in the transcript, and no written determination on the question is read into the record at this meeting.

What this evidences. The decision not to require a traffic impact study is described at this meeting as the product of a conversation rather than a written analysis, and no memorandum, worksheet, or other document recording that determination was identified on the County's own recording of the proceeding. The Department is asked to produce the record of the determination described at this passage, including its date and the person or persons who made it, or to state in writing that no such record exists. The substance of whether a traffic study was warranted is addressed at Tab A.

Finding 5 — The Committee found the application complete without resolving the road setback and load rating that its own staff identified as unverified

> "15 30 does call out, um, setbacks. I want to say it's no for residential 10 feet. I'd have to double check for commercial." — Planning staff **[00:44:56–00:45:03]**

> "And there is a weight capacity. I want to say it's 40,000, but I'd have to double check on that number." — Planning staff **[00:45:38–00:45:48]**

These figures were offered against a description, earlier in the same meeting, of the excavations the road would run beside:

> "So from what I understand the depth of those holes, I mean, it's probably wrong to have a say 12 feet." — Planning staff **[00:44:27–00:44:33]**

What this evidences. Two figures bearing on road adequacy — the commercial setback and the load rating — were identified by staff as uncertain and requiring confirmation against the code text, and the application was found complete without the confirmation appearing on the record. The Department is asked to state the commercial setback and load rating applicable under County Code § 15.30 as of the date of this proceeding, and whether either was confirmed before the completeness finding was made. The adequacy of the road design is addressed at Tab A.

Finding 6 — The application was found complete on the same record in which staff described the Permit Streamlining Act's timing requirement as a factor favoring a completeness finding

> "It's based on the Permit Streamlining Act. We get one opportunity to send the list of deficiencies to the applicant that it respond. We have 30 days to which we're a little bit past that, but they're not in order to determine whether the application is complete or the deficiencies. But we've already done the list of deficiencies. We'll be sending additional one shot at it." — Planning staff **[00:39:37–00:40:03]**

What this evidences. Staff described the applicable statutory deadline as one the County had already passed, and described the single-deficiency-list mechanism as bearing on whether to proceed. The passage is set out above exactly as it was verified against the recording. The Department is asked to state the date the application was received, the date the prior deficiency list was transmitted, and whether the 30-day period referenced above had run as of May 7, 2026.

Finding 7 — The application was found complete and forwarded for referral to the regional water quality control board without a referral date or record of transmittal appearing at this meeting

> "I guess one more thing I did want to note. So the application would be forwarded as well and they would be under whatever regulation from the regional water quality control board regarding groundwater quality." — Planning staff **[00:56:14–00:56:22]**

> "Cause I'll, yeah, as a, all projects as a responsible state agency, they would have an opportunity to work place conditions on it as well." — Planning staff **[00:56:23–00:56:32]**

What this evidences. A referral to the regional water quality control board was described as forthcoming, and no date of transmittal, correspondence, or confirmation of referral was read into the record at this or a later meeting reviewed in this series. The Department is asked to produce the referral to the regional water quality control board for this application, together with its date, and any response received, or to state that no referral has been made.

---

4. Undertakings Stated on the Record

This section identifies undertakings stated on the record at this proceeding. It does not assert that any of them went uncompleted. The preparer has no access to the Department's file and is not in a position to know what it contains. Each item sets out what was said, when, and by whom, followed by a request that the Department identify the document or record evidencing completion. Where such a record exists, its production closes the item. Where none exists, a statement to that effect closes the item equally. **The Department is the custodian of its own file; only the Department can close these items.**

The quotations in this section are subject in full to the transcription caveat at § 2.

County-side undertakings

4.29 — Reaching out to consultants for specifications needed to support the environmental review.

> "So if we need specification, we can reach out to those consultants up to prepare those studies and obtain specification as needed." — Planning staff **[00:06:37–00:06:47]**

Requested: the record of any such consultation, its date, and the specifications obtained — or a statement in writing that none was undertaken.

4.30 — Fire water addressed once the project reaches that point. *(See also Finding 3.)*

> "AWA's letter called out the need for fire water. And so we will once the project gets to that point, we will discuss that. … So when we get to that point of the project, then we will. We will address that." — Planning staff **[00:10:41–00:11:19]**

No representative of the water agency or the fire protection district appears in the record of this proceeding. By the meeting of June 11, 2026, the fire water requirement as separately conditioned at [00:47:55–00:48:09] of this same meeting does not appear in the water-resources condition read into that later record.

Requested: the document recording when and how the fire water requirement was addressed, and its date — or a statement in writing that it has not yet been addressed.

4.31 — Permit Streamlining Act timing and the deficiency list. *(See also Finding 6.)*

> "We've already done the list of deficiencies. We'll be sending additional one shot at it." — Planning staff **[00:40:00–00:40:03]**

Requested: the deficiency list referenced, its transmittal date, and any additional deficiency correspondence sent after this meeting — or a statement in writing that none was sent.

4.32 — Confirmation of the road weight capacity. *(See also Finding 5.)*

> "I want to say it's 40,000, but I'd have to double check on that number." — Planning staff **[00:45:38–00:45:48]**

Requested: the confirmed load rating applicable to the internal road under County Code § 15.30, and the date it was confirmed — or a statement in writing that it was not confirmed following this meeting.

4.33 — A further Technical Advisory Committee meeting for environmental review.

> "Yeah. And we'll have another technical advisory committee meeting for this item for the environmental review." — Planning staff **[00:48:11–00:48:16]**

This undertaking was fulfilled: the Technical Advisory Committee met on June 11, 2026, to review the Initial Study and proposed Mitigated Negative Declaration for this application, as set out in the memorandum for that proceeding.

Requested: no further document is requested for this item; it is included for the completeness of this record.

4.34 — Review of mitigations and encroachments, and tracking of assets used on both sides of the property.

> "We'll review the mitigations and the encroachments for all the assets. We have to also track the assets that they will be using both sides of the property." — Planning staff **[00:48:22–00:48:37]**

Requested: the record of the review and tracking described, and its date — or a statement in writing that it was not undertaken.

4.35 — Referral to the regional water quality control board. *(See also Finding 7.)*

> "The application would be forwarded as well and they would be under whatever regulation from the regional water quality control board regarding groundwater quality." — Planning staff **[00:56:14–00:56:22]**

Requested: the referral to the regional water quality control board, its date of transmittal, and any conditions or response received from that agency — or a statement in writing that no referral has been made.

---

5. Requested Action

It is respectfully requested that the Planning Department:

1. **Place this memorandum and the transcript at Exhibit 2-E in the administrative record** for Use Permit UP-22;2-3.
2. **Correct any quotation above that the Department believes to be inaccurate**, by reference to the recording, so that the record reflects an agreed text.
3. **Respond in writing to the requests identified in Findings 1 through 7 and in § 4**, or state in writing that the requested document or information does not exist.
4. **Preserve the recording of this proceeding** and all associated files pending completion of the review, the recording being the sole record of what occurred.

Several of the documents identified above are also the subject of a supplemental request under the California Public Records Act submitted concurrently with this package. **This memorandum is submitted without waiting for that production**, and the Department is asked to act on the requests above independently of the Public Records Act process.

Sources

- Amador County Technical Advisory Committee meeting audio, May 7, 2026 (Event ID 9154); June 11, 2026 (Event ID 9168). Amador County agendas, minutes and meetings.
- Transcript of the proceeding of May 7, 2026, submitted at Exhibit 2-E.

- Amador County Code § 15.30 (road standards); § 19.56.040 (use permit findings); Title 19 airport overlay provisions.
- Public Utilities Code §§ 21670–21675 (airport land use compatibility).
- Companion documents submitted concurrently: *Technical Advisory Committee Record and Process Memorandum — UP-22;2-3* (Tab E); *Supplemental and Clarifying Request Under the California Public Records Act* (Tab F), dated August 13, 2026.

Procedural Record and Findings

Technical Advisory Committee Meeting of June 11, 2026 (Event ID 9168)

Gardens of Noor Cemetery — Use Permit UP-22;2-3 (APN 001-220-013), Amador County, California

August 13, 2026

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association.

Submitted to the Amador County Planning Department, with copies to County Counsel and the Clerk of the Board, for entry into the administrative record for Use Permit UP-22;2-3.

---

1. Purpose and Scope

This memorandum sets out what occurred at the Technical Advisory Committee proceeding of **June 11, 2026** — the meeting at which the Committee recommended that the application, the Initial Study, and a proposed Mitigated Negative Declaration be advanced to the Planning Commission.

It is one of six such memoranda, one per proceeding, submitted together with the corresponding transcripts at Exhibits 2-A through 2-F. Each addresses a single meeting and is confined to **how the application was reviewed** — what the Committee was told, what it asked, what it deferred, and what it decided. **The adequacy of the environmental conclusions themselves is addressed separately** in the Initial Study conformity analysis at Tab A and the examinations at Tabs B and C, and is not re-argued here.

This memorandum makes **no allegation of misconduct, bad faith, or improper motive by any County employee or official.** Every finding is stated in institutional and procedural terms and rests on the County's own published recording of its own proceeding. Where a practice appears to depart from what an adequate review process requires, the memorandum identifies the practice, not any individual.

It takes no position on the merits of the application.

---

2. Transcription Caveat and Limits of This Record

No claim of absolute accuracy is made for any quotation in this memorandum.

Amador County maintains no written minutes of Technical Advisory Committee proceedings. County staff stated this on the record: the Committee keeps no written minutes and the audio

recording is the sole record of what occurred (August 4, 2022 recording at [00:20:50]). In the absence of an official written record, the quotations below were prepared as follows.

1. **Method.** The County's published audio recording of the proceeding was machine-transcribed, and the resulting text was reviewed against the recording by a person listening at each cited timestamp.
2. **Audio quality.** The recordings capture a public meeting room with multiple speakers, participants appearing remotely, overlapping speech, varying distance from the microphone, and intervals of low intelligibility. Some passages are disfluent as spoken; some are difficult to hear; some are not recoverable at all.
3. **What the quotations represent.** Each quotation is **a representation of the words spoken, to the best understanding of the transcriber and of the person who verified it against the recording.** It is not a certified transcript, it is not an official County record, and it should not be treated as either.
4. **Disclosure of uncertainty.** Where a word or passage could not be resolved with confidence, that is stated at the point it appears rather than silently smoothed over. Bracketed text marks a word supplied for readability; an ellipsis marks omitted material that does not bear on the point quoted.
5. **The County holds the original.** The County possesses the recording from which this text was made. **The Department is invited to correct any rendering below that it believes to be inaccurate, and any correction it supplies will be accepted and the record amended accordingly.** Nothing in this memorandum asks the Department to accept a quotation it can itself check.
6. **Speaker identification.** The recordings do not announce every speaker by name. Speaker roles given below are identified from context — self-identification on the recording, the posted agenda, and the sequence of the discussion. Each is the transcriber's best understanding and is not an official designation. **The Department is invited to correct any attribution it believes to be mistaken, on the same terms as any other correction.**

The transcript of this proceeding is submitted at **Exhibit 2-F** so that every quotation can be located in context. The complete recording remains available from the County.

The findings below do not depend on fine points of wording. Each rests on the substance of what was said and, in most instances, on more than one passage.

---

3. Findings

Finding 1 — The Committee recommended the environmental document forward while stating that the site plan could not be approved as drawn and would have to be redrawn

Discussing the fire and life safety condition, staff told the applicant that the plan as submitted could not meet County Code § 15.30:

> “So I did notice in the site plan that you proposed, [applicant], there’s not sufficient, I guess room on the northern end of the property as it’s shown for that road to meet 15.30 and then also for it to accommodate any road parking. … So I think you’ll probably want to review and revise that site plan because it would be required to be changed anyways to accommodate for 15.30 standards.” — Planning staff **[00:26:20–00:26:51]**
>
> “…because the way that is shown, it looks like everything just needs to be shifted south to accommodate for that. … But we would want to see that before we move forward just to make sure that everything’s consistent as far as you having an application that is adequately addressing the mitigations that are proposed.” — Planning staff **[00:27:14–00:27:46]**

The Committee then voted to recommend the application, the Initial Study, and a proposed Mitigated Negative Declaration to the Planning Commission **[00:58:56–00:59:52]**. After that vote, staff added:

> “So I will wait to schedule it definitively for that planning commission meeting until we have a revised site plan that shows the adequate space for any roadside parking you’re proposing as well as the meeting the 15.30 requirements for that internal road. … But once we receive that and amend those conditions, we’ll schedule it.” — Planning staff **[01:00:07–01:00:41]**

What this evidences. The Committee completed its review and made its recommendation on a site plan that staff had, in the same session, described as non-compliant and in need of redrawing, with the conditions themselves to be amended once the replacement arrived. The sequence — plan rejected, plan to be redrawn, conditions to be amended, recommendation nonetheless made — is a procedural sequence, and it is set out here for that reason. The consequences for the sufficiency of the environmental document are addressed at Tab A.

Finding 2 — The Committee stated the correct standard for scope changes once, and deferred every other unresolved item

Six times in approximately one hour, the Committee answered questions about future expansion by identifying the permit-amendment process as the control:

Subject	Statement	Timestamp
Additional buildings	“Any additional buildings that are proposed through this project would require an amendment to the use permit.”	[00:08:58–00:09:07]
Expanded burial methods	“if at some point the applicant wanted to expand those uses, they would need an amendment to the use permit.”	[00:11:33–00:11:45]

Subject	Statement	Timestamp
Embalmed remains	“it would require an amendment to the use permit conditions if that were the case.”	[00:16:06–00:16:18]
Embalmed remains, restated	“if this future needs changed, it would require an amendment from the use permit.”	[00:17:29–00:17:33]
Landscaping	“if you were going to be changing landscaping, then you would just need to amend the use permit to allow for that.”	[00:17:59–00:18:03]
Preservation method	“if there’s embalming fluid or embalmed bodies proposed that would require an amendment.”	[00:30:05–00:30:30]

On one of those subjects, however, staff declined to defer, and stated why:

> “It would delay moving the application forward to the planning commission because we’ll have to evaluate that with, that ought to be part of the environmental review and then hasn’t been. … And there’s no way we couldn’t defer that.” — Planning staff **[00:16:18–00:16:35]**

What this evidences. Staff articulated the standard — a change in project scope must be evaluated before advancement and cannot be deferred — and applied it to one item. In the same proceeding the Committee deferred the septic design, the fire water supply, the road geometry, and the site plan. The Department is asked to state in writing why the standard staff identified at [00:16:18] governed that item and not the others.

Finding 3 — An interpretation of the airport overlay ordinance was adopted orally, with no written basis identified, one month after the Committee stated on the record that it had not read the ordinance

At this meeting staff described the overlay and construed it:

> “This property is located within the Eagle’s Nest airport overlay zone, which limits developmental densities, building heights and incompatible uses. And then this project is located like about half a mile from the actual airport runway. Therefore, it’s very much in that zone.” — Planning staff **[00:18:03–00:18:24]**

> “It does say that places of assembly are prohibited meaning that you would not be able to have any building or gatherings inside of a building. Yeah, so as such any funeral events

associated with the property must take place outside of a building." — Planning staff **[00:18:40–00:18:55]**

One month earlier, at the meeting of May 7, 2026, the same ordinance was described differently and its contents were expressly unknown to those present:

- The overlay was described as a numeric occupancy limitation — "roughly limitation on assembly in building site. No more than 50 people" **[00:41:11–00:41:14]**.
- Asked whether the restriction reached assembly outside a building, staff answered, "That doesn't quite help anything when they've removed the building from the project" **[00:41:47–00:41:51]**.
- "I haven't even read it" **[00:41:56–00:41:57]**.
- "I have not read that or no assembly within a building, within a mile" **[00:41:28–00:41:32]**.

What this evidences. Between May 7 and June 11 the Committee moved from stating that it had not read the overlay ordinance to construing it authoritatively, and the construction adopted — that the prohibition reaches indoor assembly only — narrows the ordinance materially. No written legal opinion, memorandum, staff analysis, or ordinance citation supporting that construction was identified on the record. The Department is asked to produce the written basis for the interpretation, or to state that none exists. The substantive consequences of the interpretation, including its relationship to the occupancy limits the Committee set at this same meeting, are addressed at Tab A.

Finding 4 — A condition imposed at the previous meeting was not carried forward, and the agency that would have been asked about it was not present

At the meeting of May 7, 2026, the chair stated that conditions would be added "for both the firewater and the roads… that they meet 15.30 before operation" **[00:47:55–00:48:09]**.

The fire water requirement as stated on May 7 does not appear in the condition as read at this meeting.

The fire district did not appear at this proceeding and submitted no comment that was read into the record.

What this evidences. A requirement announced on the record at one proceeding was not carried into the conditions at the next, and the referral agency whose requirement it was had no representative present to be asked about the change. The Department is asked to identify who authorized the change, when, and on what basis, and to state whether the fire district was consulted.

Finding 5 — Interment standards were deferred to agencies that the County's own earlier record shows had identified no applicable standard

Questions concerning interment standards, including separation from water sources, were addressed at this meeting by deferral to other agencies.

The County's own record of the June 1, 2023 proceeding shows the opposite of a standard being available. Asked about separation between a water well and a grave, the speaker stated that a search had been made and that further work was needed, having found only one item of uncertain application, and had "a little more research to do" **[01:06:24–01:06:40]** (the passage is partly disfluent; see § 2 and Exhibit 2-C).

What this evidences. An unresolved question was closed by referring it to a body that, on the County's own earlier record, had not identified a governing standard. The question raised in 2023 does not appear to have been answered on the record at any of the six proceedings. The Department is asked to identify the applicable separation standard and its source, or to state in writing that none has been located.

Finding 6 — Biological review was described on the record as consultation of a website

The biological resources review discussed at this proceeding was described in terms of consulting an online database rather than field survey or agency consultation.

What this evidences. The Department is asked to state what biological review was performed for this application, by whom, on what date, and with what qualifications; whether any field survey was conducted and, if so, in what season; and whether any referral was made to the California Department of Fish and Wildlife with respect to this application. The adequacy of the resulting conclusions is addressed at Tab A.

Finding 7 — A referral agency's "no comment" response was given on a project description that has since changed

The Cemetery Board's response of record is a "no comment" returned earlier in the review.

The project description has changed materially since that response, including the removal of the building from the project and the changes to the site plan discussed at Finding 1.

What this evidences. A no-comment response reflects the project as described to the responding agency at the time of referral. Where the description subsequently changes, the response no longer speaks to the project under consideration. The Department is asked to state the date of the Cemetery Board referral, the project description transmitted with it, and whether any re-referral was made after the project description changed.

Finding 8 — The water-resources condition was found to be incorrect, was edited orally during the proceeding, and the environmental document was recommended before the corrected text existed

The water-resources condition as written was identified during the meeting as incorrect:

> "And then the well water quality. This may need to be changed because if I want to understand there's AWA water service I don't think this is actually accurate. It might need to be rephrased today in the case that AWA services not." — Planning staff **[00:29:06–00:29:21]**

The revision was then described orally rather than drafted:

> "So I'll note that and I will revise that subject to environmental standard language." — Planning staff **[00:29:58–00:30:05]**

The Committee recommended the Initial Study and the proposed Mitigated Negative Declaration forward **[00:58:56–00:59:52]**. At the close of the proceeding the recommendation was confirmed as carrying the unwritten revision:

> "The EDITS on the water resource." / "With the EDITS, yeah, as discussed, correct." — **[01:00:00–01:00:05]**

The corrected text of the condition was not read in full, was not circulated, and did not exist in written form at the time of the recommendation.

What this evidences. A condition on which the environmental recommendation rested was amended orally and was not reduced to writing before the recommendation was made. Neither the Committee nor any member of the public could read the condition being recommended. The Department is asked to produce the water-resources condition as it read on June 11, 2026, and the condition as amended, together with the date the amended text was written.

---

4. Undertakings Stated on the Record

This section identifies undertakings stated on the record at this proceeding. It does not assert that any of them went uncompleted. The preparer has no access to the Department's file and is not in a position to know what it contains. Each item sets out what was said, when, and by whom, followed by a request that the Department identify the document or record evidencing completion. Where such a record exists, its production closes the item. Where none exists, a statement to that effect closes the item equally. **The Department is the custodian of its own file; only the Department can close these items.**

The quotations in this section are subject in full to the transcription caveat at § 2.

County-side undertakings

4.1 — Condition addressing preservation methods on site.

> "We can definitely look into adding that as a condition, that if … that is to take place on site." — Planning staff **[00:14:11–00:14:14]**

Requested: the condition as adopted, or the record of the determination not to add one, and its date — or a statement in writing that the matter was not taken up.

4.2 — Follow-up and possible return to the Committee.

> "…that we will follow up, which means that this may come back to tack. I would assume it would for environmental to address specifically that aspect." — Planning staff **[00:14:43–00:14:53]**

In this passage the recording renders "TAC" as "tack."

The application was recommended forward to the Planning Commission at this same proceeding **[00:58:56–00:59:52]** and, so far as the preparer is aware, has not returned to the Committee.

Requested: the record of the follow-up described, and the determination that a further Committee proceeding was not required, together with its date and author — or a statement in writing that no such determination was recorded.

4.3 — Environmental determination of applicant obligations.

> "We will do our environmental to determine what you would need to do…" — Planning staff **[00:17:00–00:17:02]**

Requested: the environmental analysis performed in response to this statement, its date, and its author — or a statement in writing that it was not undertaken separately from the Initial Study already prepared.

4.4 — Note to be added to a condition. *(See also Finding 2.)*

> "And I can put a note too in the condition that if this future needs changed, it would require an amendment from the use permit." — Planning staff **[00:17:27–00:17:33]**

Requested: the condition text containing the note described, or the version of the conditions in which it appears — or a statement in writing that no such note was added.

4.5 — Revision of the water-resources condition. *(See also Finding 8.)*

> "So I'll note that and I will revise that subject to environmental standard language." — Planning staff **[00:29:58–00:30:02]**

The condition had been identified during the proceeding as inaccurate with respect to the source of water service.

Requested: the condition as it read on June 11, 2026, the condition as revised, and the date the revision was made — or a statement in writing that the condition was not revised.

4.6 — Precondition to scheduling the Planning Commission hearing. *(See also Finding 1.)*

> "So I will wait to schedule it definitively for that planning commission meeting until we have a revised site plan that shows the adequate space for any roadside parking you're

> proposing as well as the meeting the 15.30 requirements for that internal road. … But once we receive that and amend those conditions, we'll schedule it." — Planning staff **[01:00:07–01:00:41]**

This undertaking is of a different character from the others in this section. It states a condition precedent to setting the matter for hearing, announced by the Department on its own initiative and after the vote.

Requested: the revised site plan received in satisfaction of this statement, together with its date of receipt; the amended conditions; and the date on which the matter was set for hearing — or a statement in writing that the matter was set without the revised site plan having been received.

Applicant-side undertakings

The following were stated by or agreed to by the applicant. The obligation runs the other way, and they are identified here for completeness of the record rather than as requests directed to the Department.

4.7 — Coordination with the fire protection district regarding the fire tax district and access distances to be depicted on the plans **[00:25:00–00:25:04; 00:26:59–00:27:01]**.

Requested: any correspondence between the applicant and the fire protection district on these subjects held in the Department's file.

---

5. Requested Action

It is respectfully requested that the Planning Department:

1. **Place this memorandum and the transcript at Exhibit 2-F in the administrative record** for Use Permit UP-22;2-3.
2. **Correct any quotation above that the Department believes to be inaccurate**, by reference to the recording, so that the record reflects an agreed text.
3. **Respond in writing to the requests identified in Findings 2 through 8 and in § 4**, or state in writing that the requested document or information does not exist.
4. **Preserve the recording of this proceeding** and all associated files pending completion of the review, the recording being the sole record of what occurred.

Several of the documents identified above are also the subject of a supplemental request under the California Public Records Act submitted concurrently with this package. **This memorandum is submitted without waiting for that production**, and the Department is asked to act on the requests above independently of the Public Records Act process.

Sources

- Amador County Technical Advisory Committee meeting audio, June 11, 2026 (Event ID 9168); May 7, 2026 (Event ID 9154); June 1, 2023 (Event ID 7849); August 4, 2022 (Event ID 7550). Amador County agendas, minutes and meetings.
- Transcript of the proceeding of June 11, 2026, submitted at Exhibit 2-F.
- Amador County Code § 15.30 (road standards); § 19.56.040 (use permit findings); Title 19 airport overlay provisions.
- Public Utilities Code §§ 21670–21675 (airport land use compatibility).
- Companion documents submitted concurrently: *Technical Advisory Committee Record and Process Memorandum — UP-22;2-3* (Tab E); *Supplemental and Clarifying Request Under the California Public Records Act* (Tab F), dated August 13, 2026.

Peggy Flynn
PO Box 35
Rail Road Flat, CA 95248
pjpatrickflynnbooks@gmail.com
(530) 368-6434

August 13, 2026

Via Email and U.S. Mail

Amador County Planning Department
810 Court Street
Jackson, CA 95642
planning@amadorgov.org

cc: Amador County Counsel
cc: Amador County Clerk-Recorder
cc: Amador County Environmental Health Department

RE: SUPPLEMENTAL AND CLARIFYING REQUEST UNDER THE CALIFORNIA PUBLIC RECORDS ACT — Proposed Cemetery Project: Application No. UP-22; 2-3, Gardens of Noor Cemetery, Applicant: Mounir Kaddoura, 857 Carbondale Road and 16630 Lambert Road, Ione, CA, APN 001-220-013 / Collateral Permits, Notices of Exemption, and Ministerial Determinations

This letter supplements and clarifies the request submitted July 20, 2026. It is not a withdrawal or replacement of that request.

Dear Records Custodian:

On **July 20, 2026** I submitted a request under the California Public Records Act, Government Code § 7920.000 et seq., for records relating to Application No. UP-22; 2-3. That request remains pending as to all categories stated in it, and nothing in this letter narrows, waives, or withdraws any part of it.

The purpose of this letter is to **clarify and narrow** the July 20, 2026 request by naming specific records that fall within the categories already stated but that the earlier letter did not identify by name. Government Code § 7922.600(a) directs that when a member of the public requests information, the agency shall assist the requester in making a focused and effective request by, among other things, "assist[ing] the member of the public to identify records and information that are responsive to the request or to the purpose of the request, if stated," and "describ[ing] the information technology and physical location in which the records exist." This letter is offered in that spirit: it identifies the records with precision so that the search may be efficient and the production complete.

To the extent the County takes the position that any category below falls outside the scope of the July 20, 2026 request, this letter should be treated in the alternative as an independent

request under Government Code § 7920.000 et seq. as to that category only. The County is asked not to treat the categories already encompassed by the July 20, 2026 request as though they were newly requested for purposes of any response deadline. Government Code § 7922.535(a) requires a determination within 10 days of receipt of a request as to whether the request seeks disclosable public records, together with the reasons for the determination and an estimated date on which records will be available. Government Code § 7922.530(a) requires that records be made promptly available. The determination deadline for the July 20, 2026 request has already run as to the categories stated there.

Reason This Clarification Is Necessary

The referral packet distributed for the **September 18, 2025** Technical Advisory Committee meeting contains an **Environmental Information Form** for this project, signed and dated **08/27/2025**. In response to the printed question "List and describe any other related permits and other public approvals required for this project, including those required by city, regional, state, and federal agencies," the form states:

> "well Permit and Sanitart Tank Permits have been acquired."

The word "Sanitart" appears as written on the form.

The same packet contains no permit number, no issue date, no copy of either permit, no well plot plan, no well completion report, and no wastewater system design. The **Cemetery Plan** bound into the same packet states at § 2.2 that "[a] permit **is applied for** a well on the property by Rumsey Lang Well Drilling and Pump Inc." The two documents in the same submittal state opposite facts.

Because these collateral approvals bear directly on the scope of the project and the adequacy of its environmental review, and because the application has now been removed from the August 11, 2026 Planning Commission agenda and returned to the Planning Department for further review, the records below are requested with specificity.

Records Requested

Each item below requests **all** records in the County's possession, custody, or control, in any department, regardless of medium, and regardless of whether the record is held by the Planning Department, the Environmental Health Department, the Building Department, the Department of Transportation and Public Works, County Counsel, the Clerk-Recorder, or any other County office. The construction terms, definitions, and instructions set out in the July 20, 2026 letter — including the broad construction of "relating to," the inclusion of electronically stored information wherever located, the requirement of an exemption log, and the request for native format — apply to each item below and are incorporated here by reference.

A. Well construction permit records — Amador County Code Chapter 14.06

1. The complete permit file for **every** water well permit, application, or authorization ever applied for, issued, denied, extended, modified, suspended, or revoked for APN 001-220-

013, including any predecessor or successor assessor's parcel number for the same land, from January 1, 2016 to the present. If more than one permit exists, produce each file separately and identify each by permit number and issue date.

2. For each such permit: the application, all attachments, the **permit number**, the **date of issuance**, the **date of expiration**, and any renewal or extension granted under Amador County Code § 14.06.110(B).
3. The **plot plan** required by § 14.06.040(A), showing the items enumerated there within a 200-foot radius, including property lines, sewer piping, existing and proposed on-site sewage disposal systems, bodies of water and watercourses, approximate drainage pattern, other wells, existing structures, and utility easements.
4. The statement of "the proposed use of the well" required by § 14.06.040(D), and any subsequent amendment to that stated use.
5. Any information supplied under § 14.06.040(F) — "[o]ther information as may be necessary to determine if the underground water will be adequately protected" — and all records reflecting the department's evaluation of that information.
6. All **conditions or requirements** imposed under § 14.06.080, including any requirement of bacteriological or chemical analysis, and all analytical results submitted in response.
7. All records reflecting any consideration of **refusal** under § 14.06.090, including any evaluation of whether the proposed work "would create a health hazard, aggravate a preexisting health hazard, or violate any of the standards established by this chapter."
8. All records reflecting the department's application to this parcel of the standards adopted by reference at §§ 14.06.010 and 14.06.170 — Department of Water Resources Bulletins 74-81 and 74-90, Chapter II — including any evaluation under **Standard 8.A** of horizontal separation between the proposed well and any actual or potential source of contamination.
9. All records reflecting the separation distance between the proposed well location and any proposed interment area, including any determination of the setback question described in item G.1 below.
10. All **inspection records**, field notes, photographs, and correspondence relating to the well, including any record of placement and approval of the **annular seal** under § 14.06.110(A).
11. Any **well completion report** or well driller's report submitted for this parcel, including any report submitted under § 14.06.110(C) or Water Code § 13751, and any Department of Water Resources well completion report form.
12. Any proposal prepared by a registered professional engineer under **§ 14.06.055(E)** describing water demand and proposing storage or other design features, together with the department's review and approval of it; **or**, if no such proposal was required, all records reflecting the determination that § 14.06.055 did not apply, including any determination under § 14.06.055(F) that the well is "intended solely for nondomestic use."
13. All records of **fees** assessed, paid, refunded, or waived in connection with any well permit for this parcel.
14. All communications, in any medium, between any County employee or official and the applicant, any representative of the applicant, or **Rumsey Lang Well Drilling and Pump Inc.** (4241 Business Drive, Suite A, Cameron Park, CA 95682), relating to any well on this parcel.

B. On-site wastewater treatment system and “sanitary tank” permit records

15. The complete file for **every** on-site wastewater treatment system permit, septic permit, sanitary tank permit, application, or authorization ever applied for, issued, denied, extended, modified, suspended, or revoked for APN 001-220-013, from January 1, 2016 to the present, including each permit number and issue date.
16. All **system designs**, plans, calculations, and engineering submittals, including any **design flow** calculation and the occupancy, event frequency, event attendance, or fixture-count assumptions on which it was based.
17. All **soil profile, boring, percolation, and groundwater** data for this parcel in the County’s possession, including all field logs and test results, whoever prepared them.
18. All records reflecting the County’s application of the Amador County Local Agency Management Program or any successor on-site wastewater program to this parcel.
19. All records reflecting the County’s position, communicated to the applicant or the applicant’s engineer, that the wastewater evaluation or system design would be deferred until after issuance of the use permit, and all records reflecting the basis for that position.
20. All communications between any County employee or official and the applicant, any representative of the applicant, or **Delta Engineering Inc.** (41 Main Street, Jackson, CA) relating to wastewater disposal on this parcel.

C. Building, grading, and encroachment permit records

21. The complete file for every **building permit**, grading permit, encroachment permit, or other construction or site-work permit applied for, issued, denied, or expired for APN 001-220-013 from January 1, 2016 to the present, including each permit number, issue date, and expiration date.
22. All records of any site work, drilling, grading, excavation, vegetation removal, or construction actually performed on the parcel, including inspection records, complaints, code enforcement records, and photographs.

D. Notices of Exemption, Notices of Determination, and ministerial determinations

23. Every **Notice of Exemption** filed with the County Clerk or the State Clearinghouse relating to APN 001-220-013 or to any permit issued for it, together with proof of posting and the dates of posting and removal.
24. Every **Notice of Determination** filed relating to APN 001-220-013.
25. Every **written determination**, memorandum, checklist, email, note, or other record reflecting a conclusion that any permit issued for this parcel was **ministerial** rather than discretionary, or was otherwise exempt from review under the California Environmental Quality Act, together with all analysis supporting that conclusion.
26. All records reflecting the County’s practice, policy, guidance, training material, or written procedure for classifying well permits and on-site wastewater permits as ministerial or discretionary, including any material reflecting consideration of ***Protecting Our Water and Environmental Resources v. County of Stanislaus*** (2020) 10 Cal.5th 479.
27. The **CEQA log** or equivalent index maintained by the County Clerk of all Notices of Exemption and Notices of Determination filed for the period January 1, 2016 to the present, sufficient to identify any filing relating to this parcel.

E. Project description, scope, and reconciliation records

28. All records reflecting the County's evaluation of the response on the **Environmental Information Form** stating that a "well Permit and Sanitart Tank Permits have been acquired," including any staff note, comment, correction, request for clarification, or follow-up.
29. All records reconciling that statement with the Cemetery Plan statement that a well permit "is applied for," or reflecting any awareness of the discrepancy.
30. All records reflecting the County's evaluation of the responses to items 17 through 28 of the "Additional Information" checklist on the Environmental Information Form, including the response "NO" to item 28, "Does this project have a relationship to a larger project or series of projects?"
31. All records reflecting the water supply intended to serve this project, including all communications with the **Amador Water Agency**, and all records reflecting whether the well is intended to supplement the potable supply or to serve landscape irrigation only.
32. All records reflecting the assumed **occupancy, event frequency, and event attendance** used by any County department for any analysis of this project, including any figure other than 60 events per month at 50 attendees, and including the basis for the statement made at the September 18, 2025 Technical Advisory Committee meeting of an expectation of approximately 3,000 people per month.

F. Technical Advisory Committee records

33. For each Technical Advisory Committee meeting at which this application appeared — including the meetings of **March 3, 2022; August 4, 2022; June 1, 2023; September 18, 2025; May 7, 2026; and June 11, 2026** — the agenda, the complete referral packet distributed to members, the audio or video recording, and **any written minutes, notes, action summaries, sign-in sheets, or member comment forms**, whether or not adopted, and whether or not designated as minutes.
34. If no written minutes exist for any such meeting, a **written statement identifying each meeting for which no written minutes exist**, and identifying the record retention schedule or policy under which the County maintains Technical Advisory Committee records.
35. All written responses, comments, referral response forms, and correspondence submitted by any referral agency or County department in response to any referral of this application, for each referral cycle, together with all records reflecting the County's disposition of each comment.

G. Open items reflected in the County's own record

36. All records reflecting completion, abandonment, or disposition of the research described by County staff at the June 1, 2023 Technical Advisory Committee meeting concerning the applicable setback between a water well and an interment, including any determination ultimately reached, any source consulted, and any communication with the California Department of Public Health, the State Water Resources Control Board, the Cemetery and Funeral Bureau, or any other agency on that question.
37. All records relating to the guidance given at the June 1, 2023 Technical Advisory Committee meeting that the applicant apply for a **general plan amendment**, including the packet

referenced by staff as being sent to the applicant, any application received, and all records reflecting the County's determination that the project may proceed without a general plan amendment notwithstanding the parcel's Mineral Resource Zone general plan designation.

38. All records reflecting the removal of this item from the **August 11, 2026** Planning Commission agenda and its return to the Planning Department, including the direction given, the scope of the further review contemplated, and the anticipated schedule.

Response Requested

1. Please provide the **determination required by Government Code § 7922.535(a)** — whether the request seeks disclosable public records, the reasons for that determination, and the estimated date on which records will be available — within 10 days of receipt, as to any category the County treats as newly requested.
2. Please make disclosable records **promptly available** as required by Government Code § 7922.530(a), on a **rolling basis** as located, rather than withholding all production until the search is complete. Given that the application is under active review, rolling production is requested specifically so that the records may be considered while the review is pending.
3. If the County invokes the extension permitted by Government Code § 7922.535(b), please state in writing the specific "unusual circumstances" relied upon and the specific records affected. That extension is limited to no more than 14 additional days.
4. If any record is withheld in whole or in part, please provide an **exemption log** identifying the record, the specific statutory or other legal basis for withholding, and the **name and title of the person asserting the exemption**, as requested in the July 20, 2026 letter.
5. If any requested record **does not exist**, please state that in writing rather than remaining silent, identifying which item is affected. A written statement that a record does not exist is itself material to the pending review.
6. Consistent with Government Code § 7922.600(a), if any item above is unclear or would be more efficiently searched if reframed, please contact me and I will narrow it. If a practical basis exists for denying access to any item, please provide suggestions for overcoming it.
7. Please produce electronic records in their **native format** with metadata intact, as requested in the July 20, 2026 letter.

I am available at the telephone number and email address above to discuss scope, format, or sequencing at any time. I would welcome a call before the determination deadline if that would make the search more efficient.

Thank you for your assistance.

Sincerely,

Peggy Flynn
Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association

Statutory references: Gov. Code § 7920.000 et seq. (California Public Records Act); § 7922.530(a) (prompt availability); § 7922.535(a)–(b) (10-day determination; extension of no more than 14 additional days for unusual circumstances); § 7922.600(a) (agency duty to assist). See Gov. Code § 7922.535 and Gov. Code § 7922.600.

TAB G

Exhibits

Use Permit UP-22;2-3

August 13, 2026

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association

---

This tab contains the exhibit set supporting Tabs A through F.

The exhibits are indexed at Part 2 of the Table of Contents and Exhibit Index, which is filed as the second document in the front matter of this package. That index is controlling. It lists **seventy-three exhibits in nine categories**, and assigns each exhibit a number, a title, a source, and a status designation.

Exhibits are tabbed and numbered to match that index exactly. Where an exhibit is a County record that has been requested but not yet produced, the index states so and the exhibit position is held open.

Nothing in this divider is substantive. It exists only to mark the tab position and to direct the reader to the controlling index.

Exhibit 2-A

Submitted in connection with Use Permit UP-22-2-3, County of Amador

Transcript — Amador County Technical Advisory Committee

Meeting of March 3, 2022

Source: Machine transcription of Amador County's published meeting audio. **Not an official County transcript.** Amador County produces no written TAC minutes; the audio recording is the sole official record. Verify every quotation against the recording at the cited timestamp before entering it into the administrative record.

Timestamps are shown as [HH:MM:SS - HH:MM:SS] and refer to elapsed time in the audio file.

[00:00:05 - 00:00:09] I'd like to bring this meeting to order.
[00:00:09 - 00:00:18] Today is March 3rd for the Ambedore County Technical Advisory Committee.
[00:00:18 - 00:00:25] Do we have any correspondence not related to anything on the agenda?
[00:00:25 - 00:00:34] We're two items of correspondence for item five that were submitted previously,
[00:00:34 - 00:00:40] one from Catherine Ebbett concerning fire response times from the various responsible fire departments
[00:00:40 - 00:00:48] in that area and one from John Munn from December of last year concerning the access route.
[00:00:48 - 00:00:51] They're not in the packet, but just wanted to verify that they are in the record for
[00:00:51 - 00:00:53] the project.
[00:00:53 - 00:00:54] Okay.
[00:00:54 - 00:00:55] Alrighty.
[00:00:55 - 00:01:02] Any...so at this time, if anyone has any comments or would like to address the commission
[00:01:02 - 00:01:09] for anything that is not on the agenda that we could at least listen to, we won't be able
[00:01:09 - 00:01:14] to take any action or anything like that.

[00:01:14 - 00:01:16] Alrighty.
[00:01:16 - 00:01:18] Then on to the agenda.
[00:01:18 - 00:01:22] So item number one is the request for a use permit.
[00:01:22 - 00:01:25] I'll send it off to you guys.
[00:01:25 - 00:01:28] Okay.
[00:01:28 - 00:01:30] So this is a request for a use permit.
[00:01:30 - 00:01:31] 22-2-2.
[00:01:31 - 00:01:43] It's for a food truck that would be located at APN 044-010-012 in the Martel Amador Shopping
[00:01:43 - 00:01:47] Center Martel Shopping Plaza.
[00:01:47 - 00:01:53] So the owner is Martel Investments LLC.
[00:01:53 - 00:01:54] So they're the property owner.
[00:01:54 - 00:02:01] The proponent is the Manuel Duarte representing the Wingit Food Truck.
[00:02:01 - 00:02:07] So it would be for having a food truck located at that shopping center.
[00:02:07 - 00:02:12] It would occupy some of the parking spaces and it would be for takeout food only.
[00:02:12 - 00:02:17] I know that he does have a commissary kitchen that is in progress of getting permitted
[00:02:17 - 00:02:22] that's located in the same shopping center just across the parking lot.
[00:02:22 - 00:02:27] So he would be preparing food there and then it would be moved to his food truck
[00:02:27 - 00:02:29] as necessary.
[00:02:29 - 00:02:36] And then the food truck also would be considered a temporary, a temporary structure that would
[00:02:36 - 00:02:42] be able to be moved to other locations if he did have catering elsewhere.
[00:02:42 - 00:02:50] So as far as determining this project, let's see, we have the site plan and everything
[00:02:50 - 00:02:52] showing the location of the trailer.
[00:02:52 - 00:02:57] And I know we had some correspondence with Dave Shepherd from the ALUC who had
[00:02:57 - 00:03:00] some concerns regarding dining and eating.
[00:03:00 - 00:03:04] But after speaking with the project applicant, he did clarify that it would be for takeout
[00:03:04 - 00:03:08] only so there would be no consumption of the food on the premises.
[00:03:08 - 00:03:15] So that wouldn't be in violation of the current airport land use plan.
[00:03:15 - 00:03:17] So moving on.
[00:03:17 - 00:03:19] Sorry.
[00:03:19 - 00:03:33] So yeah, he did include a land use agreement with the property owner showing that they
[00:03:33 - 00:03:36] had consented to the application.

[00:03:36 - 00:03:44] But other than that, I mean, I don't know what other information we would need for discussion,
[00:03:44 - 00:03:45] I guess.
[00:03:45 - 00:03:46] All right.
[00:03:46 - 00:03:48] Any questions, comments at this point?
[00:03:48 - 00:03:52] This is Michelle with Environmental Health.
[00:03:52 - 00:03:56] Yet, no, we don't have any objection to the information provided.
[00:03:56 - 00:03:57] It seems adequate.
[00:03:57 - 00:04:02] We do have some outstanding issues that we're asking them to resolve with Amateur
[00:04:02 - 00:04:04] Water Agency regarding the wastewater.
[00:04:04 - 00:04:06] And so they're actively working on that.
[00:04:06 - 00:04:10] So in terms of information provided, they are on track with us, Environmental Health.
[00:04:10 - 00:04:13] This is Chuck with planning.
[00:04:13 - 00:04:23] The current 1990 airport land use plan identifies the site in Safety Zone 2,
[00:04:23 - 00:04:31] which just considers retail food, even takeouts, I would think would apply with that,
[00:04:31 - 00:04:35] or eating and drinking establishments as being non-compatible with that Safety Zone.
[00:04:36 - 00:04:43] But the proposed update from 2018 to the airport land use plan puts that site in a different Safety Zone,
[00:04:43 - 00:04:50] puts it in proposed Safety Zone 4, which both of those types of uses are compatible with.
[00:04:50 - 00:04:56] And those Safety Zones are based on national crash statistics for airports with similar size,
[00:04:56 - 00:05:00] similar operating characteristics.
[00:05:01 - 00:05:07] But with the 1990 plan being the official document that's in effect at the time,
[00:05:07 - 00:05:18] this might be an item, and the 2018 one being showing that the updated data puts that location outside of the same Safety Zone.
[00:05:18 - 00:05:26] This might be an item that needs to be referred to the airport land use commission before it goes to the planning commission.
[00:05:27 - 00:05:32] Is that to have it resolved so we have a definitive answer?
[00:05:32 - 00:05:36] So we have a definitive answer as to whether which Safety Zone applies.
[00:05:36 - 00:05:48] If we kept it at the current zone, that could potentially kill the project, correct?
[00:05:48 - 00:05:50] If we use the 1990.
[00:05:50 - 00:05:58] Yeah, the 1990 one defines it as Safety Zone 2, and those uses being not compatible with Safety Zone 2.
[00:05:59 - 00:06:06] Well, the uses under the Zone 2, wouldn't that just be the eating and

drinking?
[00:06:06 - 00:06:07] Or retail food.
[00:06:07 - 00:06:09] Oh, okay.
[00:06:09 - 00:06:27] So this could be one of those situations that, yes, adding one more step might be more prudent for the applicant to get this through once we get a definitive.
[00:06:27 - 00:06:36] Because then we could also start moving forward with whatever new plan is in place.
[00:06:36 - 00:06:46] Because would they potentially start looking at using the 2018 plan or for adoption?
[00:06:46 - 00:06:54] I don't have a hope that that plan is going to be adopted before this application needs to be.
[00:06:54 - 00:06:58] But it would be one of those things that it could be help force it along.
[00:06:58 - 00:07:12] But because there is a discrepancy between the two and you have current data showing that it's not a concern, I think that committee needs to take a look at it prior to planning commission action.
[00:07:12 - 00:07:13] Okay.
[00:07:13 - 00:07:17] Anything else?
[00:07:17 - 00:07:25] I know from Public Works, by the way, I'm Mark Hopkins with Representing Public Works.
[00:07:25 - 00:07:31] The driveway and all that is adequate because it's already commercial business.
[00:07:31 - 00:07:34] It's already established, things like that.
[00:07:34 - 00:07:54] Then the action potentially could be to move this forward to the airport land use or traffic or airport commission and get that resolved before taking it to the planning commission.
[00:07:54 - 00:08:01] That was what you were suggesting.
[00:08:01 - 00:08:06] So are you asking whether we do that first before TAC makes a determination on completeness?
[00:08:06 - 00:08:07] No, no.
[00:08:08 - 00:08:09] Okay.
[00:08:09 - 00:08:13] But if we were going to entertain something to have that as part of the action?
[00:08:13 - 00:08:19] I'd prefer we let the airport land use commission look at it first, bring it back to TAC.
[00:08:19 - 00:08:20] Okay.
[00:08:20 - 00:08:24] And we know the application is complete because that part of the question has been resolved.
[00:08:24 - 00:08:25] Okay.
[00:08:25 - 00:08:27] And then we'll do our SQL analysis.
[00:08:27 - 00:08:34] I have something, Chuck, though, that we as the TAC send to the commission or does the applicant responsible to go to the commission?
[00:08:34 - 00:08:39] Planning Department staff for the airport land use commission so

we can agendize that forward.
[00:08:39 - 00:08:40] Wonderful.
[00:08:40 - 00:08:41] Okay.
[00:08:41 - 00:08:45] Then I will take a motion for that if we'd like.
[00:08:47 - 00:08:48] So moved.
[00:08:48 - 00:08:49] I second.
[00:08:49 - 00:08:50] Alrighty.
[00:08:50 - 00:08:56] Then we'll go ahead and send it to airport land use and then bring this back to TAC.
[00:08:56 - 00:09:00] No questions, no concerns.
[00:09:00 - 00:09:01] Moving forward.
[00:09:01 - 00:09:02] Yes.
[00:09:02 - 00:09:03] I just wanted to confirm.
[00:09:03 - 00:09:09] So are we finding the application incomplete then?
[00:09:09 - 00:09:15] Or are we finding it complete upon obtaining the findings from the ALEC?
[00:09:15 - 00:09:27] We're putting it, we're leaving this open and setting this aside so it can go to TAC or go to the land use and then bring it back for completion.
[00:09:28 - 00:09:29] Okay.
[00:09:29 - 00:09:31] It's still up in the air.
[00:09:31 - 00:09:39] Can we, can we combine completion and environmental review at the next one if land use or the airport folks say it's okay?
[00:09:39 - 00:09:42] Because we don't drag it along too long or that would be my only suggestion.
[00:09:42 - 00:09:43] We could.
[00:09:43 - 00:09:44] Okay.
[00:09:44 - 00:09:45] Okay.
[00:09:45 - 00:09:49] So we could actually move this along if we get concurrence.
[00:09:49 - 00:09:56] That way if there's no hiccups on that, we can move forward with that.
[00:09:56 - 00:09:59] Okay.
[00:09:59 - 00:10:00] Are you happy with that?
[00:10:00 - 00:10:04] If I must be.
[00:10:04 - 00:10:07] Well said.
[00:10:07 - 00:10:15] Then item number two, another request for land use permit or use permit.
[00:10:15 - 00:10:18] Take it away.
[00:10:18 - 00:10:19] Okay.
[00:10:19 - 00:10:23] So this is use permit 22-3 for gardens of newer cemetery.
[00:10:23 - 00:10:24] I did one in the state.
[00:10:24 - 00:10:31] I had talked with the applicant and we had it named as Kadura Cemetery, but we have since resolved the name to be gardens of newer cemeteries.
[00:10:32 - 00:10:34] For the project name.

[00:10:34 - 00:10:42] It is located at 857 Carbondale Road in Ion, California 95640 and the request is for a cemetery.
[00:10:42 - 00:10:48] So per county code, cemeteries are allowed in any zoning district with a approved use permit.
[00:10:48 - 00:10:51] So that is why it is before us today.
[00:10:51 - 00:10:55] And then yeah, we are reviewing it for completeness.
[00:10:55 - 00:11:01] So the, even though they're allowed in any zoning district, I will provide the zoning information.
[00:11:01 - 00:11:07] It is zone R1A and it's approximately 46 acres off of Carbondale.
[00:11:07 - 00:11:09] And then the general plan is MRZ.
[00:11:09 - 00:11:12] So that's mineral resource zone.
[00:11:12 - 00:11:27] So within the application, we received a preliminary kind of project description plot map, the environmental information form, and all the other, I guess, items.
[00:11:27 - 00:11:32] The applicant is Munir Kadura and he is not the property owner.
[00:11:32 - 00:11:41] So we do have a consent letter from the property owner Brett L. Carlson, giving him permission to submit the project on his behalf.
[00:11:41 - 00:11:58] So within the cemetery description, cemetery plan, he did give us some kind of preliminary information about the background of this and the physical setting and the surrounding areas.
[00:11:59 - 00:12:06] As well as some more detailed information about the burial options and things that are to be included.
[00:12:06 - 00:12:16] I did want to note that there is a 20,000 square foot religious building that is mentioned in the description.
[00:12:16 - 00:12:25] And other than that, I think it is shown on the plot plan, but not in too much detail.
[00:12:26 - 00:12:33] But it's otherwise not mentioned, so I assume we will request more information regarding that.
[00:12:33 - 00:12:39] And then, yeah, he has some information about the site characteristics and some of the proposed improvements to the site.
[00:12:39 - 00:12:46] Again, I wasn't sure about some of the language with which it was presented.
[00:12:47 - 00:12:57] Like, for example, he did mention some turf, but I wasn't sure if that was because he was proposing turf as a landscape auction or if it was just something being evaluated as a potential option.
[00:12:57 - 00:13:08] So I think that some of the items within the report are not necessarily definitive for the project.
[00:13:08 - 00:13:17] And I don't know if that is something that we would wish to have more clearly delineated for the project description to go forward.
[00:13:17 - 00:13:26] I wanted to state also we did receive an Oak Woodlands study, a biological study by Diane Moore.
[00:13:26 - 00:13:32] So that does satisfy the requirement of having an Oak Woodlands study for the project.

[00:13:32 - 00:13:36] And then we also did receive a cultural resources study for the project as well.
[00:13:36 - 00:13:51] I guess I will let you guys discuss it, but I mean, I definitely do have some more items that I mean, I can rattle off that I would request in order to move it forward.
[00:13:51 - 00:13:57] Just as seen as we would be the ones performing the initial study for the project.
[00:13:57 - 00:14:00] But I guess if you guys have.
[00:14:00 - 00:14:04] Actually, that would be good to know because some of it might be some of the things that we would like to do.
[00:14:04 - 00:14:08] Okay, so yeah, first off parking.
[00:14:08 - 00:14:16] He did mention that there was 800 100 100 spots potentially but he said it was on the road or not.
[00:14:16 - 00:14:27] I wasn't sure exactly what where or how that would be located and the specifications as to how much of the property would be allocated to parking.
[00:14:27 - 00:14:37] He did mention that there would be I think 50,000 graves sites obviously that's a large number and it's intended to be phased throughout.
[00:14:37 - 00:14:44] It looks like multiple decades for development of the site just due to the nature of cemetery is in development.
[00:14:44 - 00:14:54] I would probably want to see more information as to where those specific areas would be and in what order they would be developed.
[00:14:54 - 00:15:12] So we kind of have some idea of how much space that would be taking up and then which spaces would be being developed first and that kind of thing as far as access and for emergency services and all that kind of thing if there were something that would cause people to need to evacuate the site that kind of thing.
[00:15:12 - 00:15:22] So as far as the parking and roadways, there wasn't that much information. I don't know what he has planned. Obviously, you would have to comply with 15 30.
[00:15:22 - 00:15:32] But again, I'm not sure exactly what the requirements are for cemetery specifically and if this would be considered like what kind of use we're looking at as far as how many people would be there at once.
[00:15:32 - 00:15:42] He gave us approximate numbers of people per week. But again, we don't know if that's all at once or if it's gathered throughout the week that kind of thing.
[00:15:42 - 00:15:56] So in order for us to phrase conditions going forward, we would need to know more information about how many people he's expected to frequent the site and what number that kind of thing.
[00:15:56 - 00:16:07] The 2000 square foot building is definitely a big question mark for me. I don't. There's no description of what kind of building it is other than that it is a religious nature.
[00:16:07 - 00:16:20] We don't know if that's a gathering place. If it's going to be assisting with the cemetery use of the property or if it's a separate kind of thing that it could potentially if it is religious building it could
[00:16:20 - 00:16:27] could actually necessitate a use permit later on if it's considered a

separate use from what he's applying for now.
[00:16:28 - 00:16:37] If it is going to be used for people, I would assume we would need to know if they're going to be bathrooms or water service that kind of thing to it.
[00:16:37 - 00:16:42] What kind of occupancy is he expecting of that.
[00:16:42 - 00:16:58] And then yeah hours of operation. That's kind of for us know just because he doesn't say if it's going to if they're going to be employees presence or anything if it's going to be an unmanned facility how what time it's going to be open.
[00:16:58 - 00:17:02] He did mention that it would be gated have security cameras.
[00:17:02 - 00:17:10] Yeah, I mean in the application it did state that they have city water and electricity so I assume we would need proof of that.
[00:17:10 - 00:17:13] Going forward.
[00:17:13 - 00:17:16] And I guess that's it.
[00:17:16 - 00:17:22] Go for it.
[00:17:22 - 00:17:26] Patrick you on the farm are sure for amateur fire protection district.
[00:17:26 - 00:17:36] Chris and some seeming just based on your information that are lack of your going to recommend that this is needs to go back for incomplete.
[00:17:36 - 00:17:38] That would be my okay.
[00:17:38 - 00:17:40] But I'm not the voting member.
[00:17:40 - 00:17:42] I know right right right.
[00:17:42 - 00:17:46] But usually when you have a cemetery you're building a building.
[00:17:46 - 00:17:48] Good matter difference.
[00:17:48 - 00:17:50] We all been to funerals.
[00:17:50 - 00:17:53] That's probably going to be used for viewing.
[00:17:53 - 00:17:57] Room for viewing so it's going to have people in there.
[00:17:57 - 00:18:00] Assuming it's going to have people in there plus restrooms and so forth.
[00:18:00 - 00:18:02] Lease from the fire side.
[00:18:02 - 00:18:07] They certainly going to have to have some added fire protection system in this building.
[00:18:07 - 00:18:11] So being he's not the owner of the of the land.
[00:18:11 - 00:18:17] You know this is a I'm assuming he's going to have a pretty lengthy lease.
[00:18:17 - 00:18:26] Because he's going to have to provide some substantial fire protection system for a 20,000 square foot building.
[00:18:26 - 00:18:33] Really that's all I have in terms of I would recommend you have him contact me.
[00:18:33 - 00:18:40] There's probably a few things he's unaware that he's going to have to provide for a building of 20,000 square feet.
[00:18:40 - 00:18:44] It's probably going to have several viewing rooms I suspect.
[00:18:44 - 00:18:48] Unfortunately, I've you know we all been to funerals I've been to many.
[00:18:48 - 00:19:02] So there are probably going to be multiple rooms and it's going to hold enough people depending on how many viewing where it's going to fall into a

higher category of hazards in terms of number of people.
[00:19:02 - 00:19:14] This is Michelle with environmental health and I can put this into an email also to planning into the applicant.
[00:19:14 - 00:19:17] Yeah, so Krista touched on my a little bit.
[00:19:17 - 00:19:25] My main thought was I needed we need an acknowledgement that potable water is required and as our onsite sewage disposal system.
[00:19:25 - 00:19:43] So I would agree that we need a more detailed plan for the property so we can see where everything is including the buildings roads driveways, the phasing in of the of the burial areas and then conceptual at least a conceptual septic and you said they were going to be on public water out there.
[00:19:43 - 00:19:47] That's what the application said it said city water and electricity.
[00:19:47 - 00:19:49] Yeah, OK, I'm not sure.
[00:19:49 - 00:19:50] I wasn't sure.
[00:19:50 - 00:19:52] Not sure that it goes.
[00:19:52 - 00:20:03] But anyways, that would be something we need acknowledged on what the sources and if they are going to end up on a well they need to be aware of that location as well and be aware that could be a public water system depending on when we get more information on population served.
[00:20:03 - 00:20:11] That's kind of environmental and then they'll likely require potentially want to require a hazmat business plan just depending if they're going to have any fuel out there.
[00:20:11 - 00:20:16] I know the sense of you cemetery for example has one for fuel for their tractors and things like that.
[00:20:16 - 00:20:20] So just putting that out there.
[00:20:20 - 00:20:21] Thank you.
[00:20:21 - 00:20:25] This is Mark Hopkins with public works.
[00:20:25 - 00:20:31] Since they're potentially proposing to ingress and egress.
[00:20:31 - 00:20:33] Both of them on County roads.
[00:20:33 - 00:20:40] Both of them are going to need to be commercial.
[00:20:40 - 00:20:44] Entrances.
[00:20:44 - 00:20:47] The one thing that I also don't see.
[00:20:47 - 00:20:54] I just because this is conceptual but it would be.
[00:20:54 - 00:21:00] Nice to have an idea of what the conceptual of the layout of the.
[00:21:00 - 00:21:05] Lots are going to be because you're going to have your religious center.
[00:21:05 - 00:21:26] Could be of any denomination could be used at multiple times depending on what denomination and or direction somebody could actually be there for several days depending on the practice.
[00:21:26 - 00:21:36] So that is one of those things that needs to be potentially taken into consideration and then also yes the way it's going to be phased on how things are going to be used.
[00:21:36 - 00:21:39] How things are going to be built out.
[00:21:39 - 00:21:44] And where is going to be the first section.

[00:21:44 - 00:21:50] Is it going to be close to the buildings or is it going to be far away from the buildings.
[00:21:50 - 00:21:57] So that would be something to be considered and then to add on top of that.
[00:21:57 - 00:22:03] Is it going to be landscape to a point that it's going to be requiring water.
[00:22:03 - 00:22:08] Is that also going to tap into their palatable water.
[00:22:08 - 00:22:18] But the biggest one is yes commercial driveways encroachments all the way around.
[00:22:18 - 00:22:21] And can I add one more thing I forgot.
[00:22:21 - 00:22:27] It's unrelated to environmental health but I do there is some state oversight for private cemeteries.
[00:22:27 - 00:22:31] Cemetery and funeral bureau so I'm not sure this is my first cemetery.
[00:22:31 - 00:22:38] So I'm not sure where we where we fit into making sure that they achieve their certificate of authority.
[00:22:38 - 00:22:43] There's various steps they have to go through to make sure they're related by the state as well.
[00:22:43 - 00:22:46] And again I don't know how that works yet but we may want to be aware.
[00:22:46 - 00:22:51] There's another agency that might need to know.
[00:22:51 - 00:23:00] All righty then it sounds like we have quite a few.
[00:23:00 - 00:23:04] Is anyone any questions any comments or anything like that.
[00:23:04 - 00:23:10] I got one I concur that we need a detailed site plan and I think it needs to be the scale.
[00:23:10 - 00:23:23] Show exactly where the building parking driveways are going to go and even the layout of the grave sites as well because all of those are going to have could have a significant impact on oak woodland and other vegetation and we need to know what that is.
[00:23:23 - 00:23:28] That also might end up scaling down from the 50,000.
[00:23:28 - 00:23:32] It might go down less.
[00:23:32 - 00:23:39] And also because the property is adjacent to an airport runway in a taxiway we need to know what the building heights are going to be.
[00:23:39 - 00:23:40] Yes.
[00:23:40 - 00:23:55] I had a question so I mean would we consider adding a landscape plan as a requirement to find it complete just to pass along to the applicant.
[00:23:56 - 00:24:04] I would end up not necessarily a needing one but what are they going to what are they achieving.
[00:24:04 - 00:24:08] That's going to be what my thought would be first.
[00:24:08 - 00:24:11] So like a more detailed description of the landscape.
[00:24:11 - 00:24:26] Are they going to leave it natural similar to let's say in I own the two seven you have the Catholic Church and then you have the open church or the cemeteries across both of them are non maintained.

[00:24:26 - 00:24:32] But yeah you go over to up country you have the one up there that's manicured.
[00:24:32 - 00:24:36] You know you have the one over here at Sunview.
[00:24:36 - 00:24:38] That's manicured.
[00:24:38 - 00:24:45] You know what are they looking for what are they playing what is their vision if you will.
[00:24:45 - 00:25:01] And that's something that's going to probably tie into the environmental party then I will accept the motion.
[00:25:01 - 00:25:10] I move that we find the application incomplete for the moment and I will go back to the applicant requesting these additional details.
[00:25:10 - 00:25:13] Second person second all in favor.
[00:25:13 - 00:25:15] All right.
[00:25:15 - 00:25:17] Item three.
[00:25:17 - 00:25:23] This is a zone change.
[00:25:23 - 00:25:28] So take it away.
[00:25:28 - 00:25:31] So.
[00:25:31 - 00:25:40] So yeah the property it is located at 9 9 4 9 State Highway 88 and APN 011 14 0 0 3 6.
[00:25:40 - 00:25:49] So it is a zone change along with the application for the property to be entered into a new Williamson Act contract.
[00:25:49 - 00:26:09] This was seen before the agriculture advisory committee yesterday which was March 2nd 2022 and they recommended that it does qualify under the principles of compatibility and everything that's required as far as establishing a new contract and recommend approval of that.
[00:26:10 - 00:26:21] To be forwarded to the planning commission and the board. So as far as looking at the application for completeness today it's fairly standard.
[00:26:21 - 00:26:32] The application is of course a zone change to from the X district which is our special use district to the AG exclusive agriculture zoning district.
[00:26:33 - 00:26:48] So the for the establishment of new contracts the land use limitations of the exclusive agriculture district become the limitations of the contract which means that we are looking at an expansion of certain uses that would come with the zone change.
[00:26:48 - 00:26:55] The property is currently it has vineyards I think it's around 15 acres or 10 to 15 acres.
[00:26:56 - 00:27:08] And then there's I believe an existing house and other accessory buildings and then there's some storage buildings that are currently used for storage and also I think events for family and friends.
[00:27:08 - 00:27:25] So I mean other than that I guess we have the application before us and we would be looking at completion to forward to the no to attack again because we have to decide on the environmental document.
[00:27:25 - 00:27:36] So because of the nature of the zone change from X to AG we are looking at an expansion of uses so we are going to be doing an initial study for the project.

[00:27:36 - 00:27:44] That's just evaluating the potential environmental impacts of the change from the X special use district to the exclusive agriculture district.
[00:27:45 - 00:27:54] The uses under X are pretty much just limited to residential and inherently agricultural uses.
[00:27:54 - 00:27:58] So there are uses under the exclusive agriculture district that would expand that.
[00:27:58 - 00:28:03] So that's what we would would be evaluating at the next meeting if this is found complete.
[00:28:03 - 00:28:09] Questions comments.
[00:28:09 - 00:28:13] Patrick you here again with the amateur fire protection district.
[00:28:13 - 00:28:18] Christian you mentioned agriculture use and other use and then you mentioned events.
[00:28:18 - 00:28:20] Did you say that.
[00:28:20 - 00:28:23] Well those would be yes those are okay.
[00:28:23 - 00:28:25] Possible expanded uses under the age.
[00:28:25 - 00:28:26] Okay.
[00:28:26 - 00:28:29] Okay well I'm in a fire protecting district.
[00:28:29 - 00:28:32] We're okay with this zone change.
[00:28:32 - 00:28:40] As long as certain appropriate signs are in there and then we're totally fine with that.
[00:28:40 - 00:28:47] I just want to clarify you said events.
[00:28:47 - 00:28:50] You think Michelle.
[00:28:50 - 00:28:55] No I have no objection to the application as submitted either.
[00:28:55 - 00:29:12] If you guys when you guys move on and try to take advantage of the new zone change will work with you and you guys already have the septic final things like that that would be would be here to help you navigate those additional resources you might need but as for this I have no objection either.
[00:29:12 - 00:29:18] I think being on a state highway has Caltrans come back with anything at all at this point.
[00:29:18 - 00:29:26] I believe they sent a comment that was no comment.
[00:29:26 - 00:29:34] Oh and we also see that there is a Caltrans person here via zoom if they have a response.
[00:29:34 - 00:29:36] Alrighty.
[00:29:36 - 00:29:41] Paul I'm going to go ahead and unmute you and see if you have any comment.
[00:29:41 - 00:29:49] Yeah there's any comments from the also from the public itself.
[00:29:49 - 00:30:07] This is Paul from Caltrans and I agree with what Chris.
[00:30:07 - 00:30:08] Thank you Paul.
[00:30:08 - 00:30:10] Anyone else.
[00:30:10 - 00:30:13] Any other zoomers have comments.
[00:30:13 - 00:30:17] I mean I had another comment too that we did receive.
[00:30:17 - 00:30:23] Well I spoke with Christine who's the project applicant and she did want to designate Jason because I was another applicant too.

[00:30:23 - 00:30:29] So that was one of the comments I guess that was added to the application.
[00:30:29 - 00:30:44] Chris I forgot to mention the second item here and this one here the one we're talking about right now there's an application fee that wasn't paid for that.
[00:30:44 - 00:30:53] It's not much but it's just like all the other processing fees you have to pay if you just want to go to count it's 176 but just want to just make note of that.
[00:30:53 - 00:30:57] It's painful I know.
[00:30:57 - 00:31:02] Then if any other comments.
[00:31:02 - 00:31:05] If not then I'll would you like to speak.
[00:31:05 - 00:31:06] Yes.
[00:31:06 - 00:31:14] Come up to the mic and go ahead.
[00:31:14 - 00:31:17] We won't be able to hear you need to come to the mic.
[00:31:17 - 00:31:19] Sorry.
[00:31:19 - 00:31:31] Oh is it possible for the application to be considered complete.
[00:31:31 - 00:31:36] And then if it's assuming if it meets all the requirements it can move forward.
[00:31:36 - 00:31:42] So because we're not going to be doing anything really different than we are right now as a vineyard.
[00:31:42 - 00:31:47] It has a home of barn slash studio and a wine cave.
[00:31:47 - 00:32:01] And so the only thing different is that we've applied for a winery permit but we that will have to go in the wine cave because we that's all the space we have very small very minimal.
[00:32:01 - 00:32:05] There's not going to be any sales or tasting room or anything like that.
[00:32:05 - 00:32:08] So just wondering if that's a possibility.
[00:32:08 - 00:32:16] What we would end up doing is moving this forward so the environmental documentation can be done just to make sure that they're satisfied.
[00:32:16 - 00:32:19] It allows the public comments.
[00:32:19 - 00:32:23] It's a 30 day practice.
[00:32:23 - 00:32:38] That way whatever the outcome of the environmental documentation you're legally you are you have a legal representation of that is past sequel or you have conditions that need to be met or anything like that.
[00:32:38 - 00:32:40] Moving forward.
[00:32:40 - 00:32:41] Okay.
[00:32:41 - 00:32:45] So but we will see what we can do today.
[00:32:45 - 00:32:46] Thank you very much.
[00:32:46 - 00:32:48] Appreciate that.
[00:32:48 - 00:32:50] Yep.
[00:32:50 - 00:32:56] I think that we find this project application complete and that we schedule the environmental review.
[00:32:56 - 00:32:57] Move it forward.
[00:32:57 - 00:32:58] Second.
[00:32:58 - 00:32:59] All right.

[00:32:59 - 00:33:00] All in favor.
[00:33:00 - 00:33:01] I.
[00:33:01 - 00:33:04] Okay.
[00:33:04 - 00:33:06] Item number four.
[00:33:06 - 00:33:10] Another zone change.
[00:33:10 - 00:33:11] Yes.
[00:33:11 - 00:33:15] Item number four was submitted by the 2003 Kevin W.
[00:33:15 - 00:33:17] Boho Trust.
[00:33:17 - 00:33:24] It's also a request to zone change into the AG exclusive agriculture district.
[00:33:24 - 00:33:25] A.
[00:33:25 - 00:33:28] A entering into a Williamson Act contract.
[00:33:28 - 00:33:40] The difference between this project and the project mentioned previously is this is existing zoned a for agricultural and the uses are between the a zone and the AG zone.
[00:33:40 - 00:33:44] Are essentially I mean they're almost the same.
[00:33:44 - 00:34:07] They're they're very minor differences if that which is why we scheduled this item for both completeness and environmental review because we are anticipating that a notice of exemption will be adopted for this project per the categorical exemption 15 3 1 7 open open space contracts for easements.
[00:34:08 - 00:34:16] And I think I got ahead of myself but the proposed use of this project would be for grazing land for the 120 acres.
[00:34:16 - 00:34:35] Oh and I do want to add yesterday also the project went before the agricultural advisory committee who did recommend that the two parcels the 80 acre parcel and the 40 acre parcel be merged into one.
[00:34:35 - 00:34:40] That was a recommendation that they're passing on to the board of supervisors.
[00:34:40 - 00:34:46] Okay.
[00:34:46 - 00:35:01] Looking at the application that currently just has a barn residents stockpond and they're not looking to add or change or anything like that.
[00:35:01 - 00:35:03] Okay.
[00:35:03 - 00:35:11] Any comments questions comments questions.
[00:35:11 - 00:35:17] Doomers.
[00:35:17 - 00:35:19] No zoomer comments at this time.
[00:35:19 - 00:35:22] All right.
[00:35:22 - 00:35:28] Then with that.
[00:35:28 - 00:35:41] Did I understand you to say Ruslan or I understood me when we talked yesterday that you've made a determined on determination to seek whether it's sequel exempt.
[00:35:41 - 00:35:44] Or do we need to go through the environmental document.
[00:35:44 - 00:35:50] So, I think that's kind of what we're here to do with two motions I'm assuming.
[00:35:50 - 00:35:59] The first motion to find whether or not the application is complete

and the second motion will be discussing whether or not it.
[00:35:59 - 00:36:01] It's categorically exempt.
[00:36:01 - 00:36:10] All right.
[00:36:10 - 00:36:12] We can do the motion all at once.
[00:36:12 - 00:36:15] We need to discuss the separate correct.
[00:36:15 - 00:36:17] Or no.
[00:36:17 - 00:36:21] In this case well maybe I'll explain it if I make a motion.
[00:36:21 - 00:36:25] So I'll make a motion that we find the application complete.
[00:36:25 - 00:36:38] And that the application be processed as categorically exempt from sequel because there are they're not significant increases in the proposed potential uses of the property.
[00:36:38 - 00:36:45] Going from the agricultural zone to the exclusive agricultural zone which are essentially identical.
[00:36:45 - 00:36:55] And I will just ask would there be anything that needs to be evaluated when they if they were to do the merger correct it would also be exempt.
[00:36:55 - 00:36:57] The merger would be exempt from sequel.
[00:36:57 - 00:36:58] Okay.
[00:36:58 - 00:37:07] That decisions ultimately the board supervisors when the application when the zone change and the contracts get before the before the board.
[00:37:07 - 00:37:08] Okay.
[00:37:08 - 00:37:09] I'll second it.
[00:37:09 - 00:37:12] I have a person a second all in favor.
[00:37:12 - 00:37:13] I.
[00:37:13 - 00:37:14] All right.
[00:37:14 - 00:37:16] Item number five.
[00:37:16 - 00:37:20] Another zone change.
[00:37:20 - 00:37:23] Alrighty Chuck.
[00:37:23 - 00:37:30] This application is for a zone change from the R1 a single family residential and agricultural district to the plan development district.
[00:37:30 - 00:37:35] In conjunction with a request for a use permit for an event venue and vacation rental.
[00:37:35 - 00:37:42] Property owners are Thomas and Barbara Hoover properties located in Supervisorial District D3.
[00:37:42 - 00:37:46] And the location is 43 300 highway 88 in Kirkwood.
[00:37:46 - 00:37:51] So the last time the application was before attack.
[00:37:51 - 00:38:07] We requested biological report cultural resources study and details on the access road in relation to access for emergency services.
[00:38:07 - 00:38:18] So we've we've received a biological report and cultural resources study neither of those identified had any concerns for additional mitigation.
[00:38:18 - 00:38:21] At least as far as finding the application complete.
[00:38:21 - 00:38:25] So I'll defer to a FPD on road access.
[00:38:25 - 00:38:28] This is again Patrick Chew with the Amador fire protection district.
[00:38:28 - 00:38:30] I am the fire marshal.

[00:38:30 - 00:38:34] As I mentioned a few times here that this was brought up.
[00:38:34 - 00:38:36] We had some great discussion.
[00:38:36 - 00:38:39] I went there twice looked at the place.
[00:38:39 - 00:38:46] The applicant has some great ideas on what they want to do and how they want to mitigate some of the access road.
[00:38:46 - 00:38:51] And I thought there was some great ideas that they had to propose to us.
[00:38:51 - 00:38:55] Unfortunately, I don't think correct them.
[00:38:55 - 00:38:56] I'm wrong.
[00:38:56 - 00:39:03] But I haven't received anything yet in writing on what your proposal are going to be and how you're going to mitigate it.
[00:39:03 - 00:39:07] Everything that we had was generally my site visit there.
[00:39:07 - 00:39:09] This is what we like to do.
[00:39:09 - 00:39:20] This is how we like to mitigate the road, putting cameras in having a more identifiable area where we can have driveways and pullouts.
[00:39:20 - 00:39:25] But I don't think we received anything on paper on how that's going to happen.
[00:39:25 - 00:39:26] Correct me if I'm wrong.
[00:39:26 - 00:39:29] But have I have you said anything to us.
[00:39:29 - 00:39:36] Any proposal any of your ideas that you guys had and they were all great ideas.
[00:39:36 - 00:39:47] But I don't think I received anything yet.
[00:39:47 - 00:40:00] Good afternoon Tom Hoover with the hideout.
[00:40:00 - 00:40:04] I think the only thing that you've received and maybe I'm not sure.
[00:40:04 - 00:40:13] I know it's gone through check a number of the departments was the map of the road, the wists and the turnouts and all that information.
[00:40:13 - 00:40:16] I think that was really on.
[00:40:16 - 00:40:19] I don't know if you ever actually received that.
[00:40:19 - 00:40:27] Yeah, I you mentioned a couple of times and I don't recall receiving anything.
[00:40:27 - 00:40:30] But we did have some great guys have some great ideas.
[00:40:30 - 00:40:33] How are you going to the blind spot going up the hill?
[00:40:33 - 00:40:35] How are you planning on doing that?
[00:40:35 - 00:40:42] And those seem like great ideas, but I don't have it written down anywhere on paper and there was no proposal.
[00:40:42 - 00:40:55] I assume Chuck that without that information, I mean, Patrick's not ready to consider it complete until we return some of those comments back to him.
[00:40:55 - 00:41:00] I think they had a little bit to do with.
[00:41:00 - 00:41:03] You know, we're a little bit remote.
[00:41:03 - 00:41:12] If there's a fire there, we really don't expect to get much service before everything is completely engulfed.
[00:41:12 - 00:41:21] So I think we've what we've discussed so the rest of the committee can understand is we'd like to see a somewhat of a fire.

[00:41:21 - 00:41:27] We have a large lake, millions of gallons sitting right on the property next to the buildings.
[00:41:27 - 00:41:37] We want to utilize that and put in a fire pump and some hydrants and so that the first responders is going to be us.
[00:41:37 - 00:41:39] So we want to make it easy.
[00:41:39 - 00:41:42] You flip a switch, you hook up a hose and you run for it.
[00:41:42 - 00:41:50] By now we have hoses and bibs at every building, but they're not obviously fire flow.
[00:41:50 - 00:42:00] So I think from our standpoint, we would like to see something that's easy for us to operate because we think we will be the first ones to deal with it.
[00:42:00 - 00:42:05] And Patrick has given us some advice on how to deal with those things.
[00:42:05 - 00:42:07] So I think that was one item.
[00:42:07 - 00:42:09] The other was that we have a large hill to climb over.
[00:42:09 - 00:42:13] It's paved, it's concreted.
[00:42:13 - 00:42:16] Everyone goes over it.
[00:42:16 - 00:42:22] RVs, forest service, fire trucks, dump trucks, you know, but it is tight.
[00:42:22 - 00:42:24] It doesn't have turnouts on one side of it.
[00:42:24 - 00:42:26] The other side will.
[00:42:26 - 00:42:39] So we had talked about doing some kind of a signal like a traffic flight, a Pardee signal where one can move and one can be assured that they're not going to get stuck on the hill.
[00:42:39 - 00:42:42] Pretty much the hills within sight.
[00:42:42 - 00:42:47] You're looking at 300 feet, 400 feet up the hill on the one side.
[00:42:47 - 00:42:52] Yeah, probably as you can see what's coming up from the other side.
[00:42:52 - 00:42:53] Yeah.
[00:42:53 - 00:42:58] When we have some turnouts at the top of the hill for that reason, but you're right.
[00:42:58 - 00:43:08] Again, as most of you are aware, we've been operating for 10 years with these same situations.
[00:43:08 - 00:43:11] We have yet to have a problem there.
[00:43:11 - 00:43:19] So we're really talking extreme if there's enough fire trucks coming in and there's an evacuation going out.
[00:43:19 - 00:43:22] I mean, I think that's what we're trying to envision.
[00:43:22 - 00:43:28] And normal operation, I think we've figured out what works and what doesn't work.
[00:43:28 - 00:43:38] So I assume that I need to put some of that in writing so the fire department can consider it as part of the conditions.
[00:43:38 - 00:43:41] I noticed a letter in the packet is from 2020.
[00:43:41 - 00:43:46] So we probably both need to update our discussions for this committee.
[00:43:46 - 00:43:53] I would ask, Chuck, is that the only remaining thing that you're aware of that we need to be complete?

[00:43:53 - 00:43:55] Unless other departments have comments.
[00:43:55 - 00:44:02] That's those were the only those were the things outstanding the last time we met, which I think was 2020.
[00:44:02 - 00:44:03] Right.
[00:44:03 - 00:44:09] Well, I think the application was deemed complete and then we went to the environmental review, which then.
[00:44:09 - 00:44:11] Now, we didn't get to completeness.
[00:44:11 - 00:44:17] We needed these three things resolved before we could find the application complete and then we'll do environmental review.
[00:44:17 - 00:44:22] We did have a meeting once and it was like Mike was still here and it was deemed complete.
[00:44:22 - 00:44:25] And then we moved on to what I thought was in but I'm not sure of your process.
[00:44:25 - 00:44:27] So I'm trying to understand it.
[00:44:27 - 00:44:35] And then we went on to attack environmental review and that's when we were requested to do a number of studies that took us a while to get.
[00:44:35 - 00:44:48] But either way, from my perspective, what Patrick needs is the one outstanding thing that we need to see before that is complete environmental review.
[00:44:48 - 00:44:49] Right.
[00:44:49 - 00:44:50] Okay.
[00:44:50 - 00:44:52] How that's going to work for emergency.
[00:44:52 - 00:44:57] And I can look for I'm not sure who ended up with the we gave you a couple of maps of the road.
[00:44:57 - 00:45:03] I thought we gave you one large one and a number of small ones that identified the widths and the turnouts.
[00:45:03 - 00:45:07] I see it's in the packet, but it's very, very small.
[00:45:07 - 00:45:13] If it's in the packet than the APD has seen that they haven't seen anything supplemental to that.
[00:45:13 - 00:45:14] Yeah.
[00:45:14 - 00:45:15] Okay.
[00:45:15 - 00:45:18] I think that's all I had him say about that sounds like what he's asking for.
[00:45:18 - 00:45:19] Yeah, Tom.
[00:45:19 - 00:45:25] And everything you mentioned are like great ideas with the climbing of the road and so forth.
[00:45:25 - 00:45:33] And in addition to see it on paper, there need to be some effort in terms of this is how much is going to cost.
[00:45:33 - 00:45:38] We have three estimates and this is what it's going to take to do that.
[00:45:38 - 00:45:43] And then obviously a date on when you think this could get accomplished.
[00:45:43 - 00:45:54] So you kind of follow through with all the conversation we had and now get something in writing and say, you know, we got a couple of bids out and these these are.

[00:45:55 - 00:46:03] What we're proposing what seem like great ideas and I support that, but we need to take the next step now.
[00:46:03 - 00:46:10] So you and I need to be I need to be clear on what exactly Chuck says one thing I'm thinking you're thinking more than one.
[00:46:10 - 00:46:19] No, I think I think Chuck is just waiting for me to say the application is complete from my perspective.
[00:46:19 - 00:46:22] Okay, but from your perspective you need more than.
[00:46:22 - 00:46:24] Yeah, everything that you talked about.
[00:46:24 - 00:46:25] Okay.
[00:46:25 - 00:46:32] What you talked about needs to be other than just talking and needs to be written down and this is this is a rock solid plan.
[00:46:32 - 00:46:34] This is what we're going to do.
[00:46:34 - 00:46:36] Well, this is what we're going to propose.
[00:46:36 - 00:46:40] Obviously, there may be comments from you that change it.
[00:46:40 - 00:46:41] My comments.
[00:46:41 - 00:46:45] No, I'm saying once we submit it, I'm assuming you'll review it and there may be.
[00:46:45 - 00:46:46] Yeah, that's absolutely true.
[00:46:46 - 00:46:53] But if it is what you guys talked about how you're planning on doing this, I shouldn't have any problem with that.
[00:46:53 - 00:46:56] Because I already told you verbally that just seems like a great idea.
[00:46:56 - 00:46:57] Okay.
[00:46:57 - 00:47:01] Well, then I may ask for a few minutes of your time here in the next week.
[00:47:01 - 00:47:02] Okay.
[00:47:02 - 00:47:03] So that we can knock something out.
[00:47:03 - 00:47:04] Sure.
[00:47:04 - 00:47:05] Okay.
[00:47:05 - 00:47:08] Tom Sweatt on Zoom has his hand up and would like to comment.
[00:47:08 - 00:47:09] Alrighty.
[00:47:09 - 00:47:11] One moment, Tom.
[00:47:11 - 00:47:15] Go ahead.
[00:47:15 - 00:47:16] Hear me.
[00:47:16 - 00:47:17] Yes, we can.
[00:47:17 - 00:47:18] Okay.
[00:47:18 - 00:47:21] I just I understand this point well taken.
[00:47:21 - 00:47:29] I just want to make sure that that we don't cross the line between finishing the application and getting the conditions of approval.
[00:47:29 - 00:47:37] We're talking about having bids and dates for completion and so forth that seem to be a little premature at the current time.
[00:47:37 - 00:47:46] But Mr. Hoover, I think it's a good idea to work directly with fire so they can get a better schematic to help them evaluate the project in more detail.
[00:47:46 - 00:47:50] But I just want to make that comment.

[00:47:50 - 00:47:52] All right.
[00:47:52 - 00:47:53] Thank you, Tom.
[00:47:53 - 00:47:55] Anyone else have any comments?
[00:47:55 - 00:47:59] Any other Zoomer comments?
[00:47:59 - 00:48:03] There are none.
[00:48:03 - 00:48:04] Okay.
[00:48:04 - 00:48:07] Then I will.
[00:48:07 - 00:48:08] Let me chime in real quick.
[00:48:08 - 00:48:10] This is environmental health.
[00:48:10 - 00:48:11] No, we don't have any.
[00:48:11 - 00:48:15] I think we we have what we need to write conditions.
[00:48:15 - 00:48:20] But there are still they will all be related to septic water food, the spa.
[00:48:20 - 00:48:22] Those will all be conditions.
[00:48:22 - 00:48:27] Not saying it's all complete, but in terms of application, I don't have anything further.
[00:48:27 - 00:48:32] I don't believe in order to write my conditions.
[00:48:32 - 00:48:35] All right.
[00:48:35 - 00:48:39] I'll take a motion.
[00:48:39 - 00:48:40] I'll make a motion.
[00:48:40 - 00:48:50] We find the application and complete pending.
[00:48:50 - 00:48:54] The one item that we know that is outstanding, correct?
[00:48:54 - 00:48:55] Which is fire.
[00:48:55 - 00:48:57] Right.
[00:48:57 - 00:49:05] So if you can get with him and get that done, then we can slam this out.
[00:49:05 - 00:49:06] Alrighty.
[00:49:06 - 00:49:08] Oh, do we want all second?
[00:49:08 - 00:49:09] I'm sorry.
[00:49:09 - 00:49:15] Do I have a question?
[00:49:15 - 00:49:16] More for Jack.
[00:49:16 - 00:49:18] What the next step?
[00:49:18 - 00:49:22] Assuming TAC finds this application complete.
[00:49:22 - 00:49:24] What is our next steps?
[00:49:24 - 00:49:29] Next sounds like the next step is get with the FPD, make sure that they have what they need.
[00:49:29 - 00:49:35] Come back to TAC, find the application complete, then we do the environmental review,
[00:49:35 - 00:49:43] and we'll have another TAC meeting to consider those mitigations and conditions of approval before it goes to the Planning Commission.
[00:49:43 - 00:49:49] So what are the mitigations that are to still be drafted by departments?
[00:49:49 - 00:49:51] Hopefully determine based on completeness of the application.

[00:49:51 - 00:49:54] I don't think the application itself is going to, it's not going to change any,
[00:49:54 - 00:49:59] but the road issues are the last outstanding thing that's going to happen.
[00:49:59 - 00:50:01] The next outstanding thing that needs to be addressed.
[00:50:01 - 00:50:06] But once TAC finds it complete, then the next step is?
[00:50:06 - 00:50:07] Environmental review.
[00:50:07 - 00:50:08] By TAC.
[00:50:08 - 00:50:09] By TAC.
[00:50:09 - 00:50:10] Okay.
[00:50:10 - 00:50:12] Have you heard that?
[00:50:12 - 00:50:18] Once those are done, then off to the Planning Commission and then onto the board.
[00:50:18 - 00:50:19] Okay.
[00:50:19 - 00:50:20] All right.
[00:50:20 - 00:50:22] Because you have a two-part application, one is the use permit and then the zone change.
[00:50:22 - 00:50:25] The Planning Commission will make a decision on the use permit,
[00:50:25 - 00:50:28] but they'll make a recommendation on the zone change to the board.
[00:50:28 - 00:50:30] All right.
[00:50:30 - 00:50:31] Thank you.
[00:50:31 - 00:50:32] All right.
[00:50:32 - 00:50:35] With that, we have the first and the second.
[00:50:35 - 00:50:38] All in favor for non-complete?
[00:50:38 - 00:50:39] Aye.
[00:50:39 - 00:50:40] Aye.
[00:50:40 - 00:50:41] Aye.
[00:50:41 - 00:50:42] All right.
[00:50:42 - 00:50:45] We'll get this done, get that done and move that forward.
[00:50:45 - 00:50:52] Do we have anything else that we know of at the moment?
[00:50:52 - 00:50:53] All right.
[00:50:53 - 00:50:55] With that, I close the meeting.
[00:50:55 - 00:50:56] Thank you.

Exhibit 2-B

Submitted in connection with Use Permit UP-22-2-3, County of Amador

Transcript — Amador County Technical Advisory Committee

Meeting of August 4, 2022

Source: Machine transcription of Amador County's published meeting audio. **Not an official County transcript.** Amador County produces no written TAC minutes; the audio recording is the sole official record. Verify every quotation against the recording at the cited timestamp before entering it into the administrative record.

Timestamps are shown as [HH:MM:SS - HH:MM:SS] and refer to elapsed time in the audio file.

[00:00:00 - 00:00:02] All right.
[00:00:02 - 00:00:06] I'd like to go ahead and bring this meeting to order.
[00:00:06 - 00:00:07] Hello, everyone.
[00:00:07 - 00:00:16] Today is August 4th, 2022.
[00:00:16 - 00:00:22] We are here at the Amador County Tactical Advisory,
[00:00:22 - 00:00:24] our Technical Advisory Committee.
[00:00:24 - 00:00:29] Currently, we have at least two items on the agenda.
[00:00:29 - 00:00:31] So to get things started,
[00:00:31 - 00:00:36] is there any correspondence that has not made it into the packets?
[00:00:36 - 00:00:43] I don't believe so, no.
[00:00:43 - 00:00:45] All right.
[00:00:45 - 00:00:59] Any matters or persons who wish to address the committee regarding non-agenda items may do so.
[00:00:59 - 00:01:04] Let's go ahead and start with item number one.
[00:01:04 - 00:01:10] It is a request for a use permit for a cell tower.
[00:01:10 - 00:01:12] All right.
[00:01:12 - 00:01:17] So this is the applicant is Epic Wireless Jeff Leiner,
[00:01:17 - 00:01:21] is the representative on the Zoom call, I believe.
[00:01:21 - 00:01:26] Project is located at 25119, State Highway 88 in Pioneer.
[00:01:26 - 00:01:30] And this is a request for a use permit to install a 100 foot tall,
[00:01:30 - 00:01:35] faux monopine design wireless communication tower with 12 panel

antenna,
[00:01:35 - 00:01:38] 9 remote radio units, 1 microwave antenna,
[00:01:38 - 00:01:42] and associated tower and ground equipment.
[00:01:42 - 00:01:47] I have copies of the draft conditions of approval
[00:01:47 - 00:01:53] and the draft initial study in the back, if anyone wants to follow along.
[00:01:53 - 00:02:01] But in doing the initial study, this is proposed to be a mitigated negative declaration.
[00:02:01 - 00:02:07] So I'll just quickly go through the chapters that actually had mitigations.
[00:02:07 - 00:02:14] So all else, all other chapters would be things that were either less than significant or no impact.
[00:02:14 - 00:02:23] So with chapter one aesthetics, there is a mitigation for the aesthetics
[00:02:24 - 00:02:29] so that the proposed wireless tower shall be constructed as a monopine tower
[00:02:29 - 00:02:32] to match the surrounding character of the area.
[00:02:32 - 00:02:35] And just real quick, for anyone looking through the packet,
[00:02:35 - 00:02:39] the sequel initial study is not in the packet.
[00:02:39 - 00:02:46] But yeah, so mitigation of one AES is for the monopine design.
[00:02:46 - 00:02:51] Chapter two was primarily no impact, same with chapter three.
[00:02:51 - 00:02:59] Chapter four, there is a mitigation for, I believe it was ground nesting birds.
[00:02:59 - 00:03:06] So there was a mitigation there for avoiding impacts to nesting bird species
[00:03:06 - 00:03:10] or birds protected under the migratory bird 2D act.
[00:03:10 - 00:03:14] So all ground disturbing activities conducted between February 1 and September 1
[00:03:14 - 00:03:18] must be preceded by a pre-construction survey for active nests
[00:03:18 - 00:03:20] conducted by a qualified biologist.
[00:03:20 - 00:03:23] So that'll make it its way into the draft conditions.
[00:03:23 - 00:03:30] Chapter five, cultural resources, there were mitigations for ground disturbing activity
[00:03:30 - 00:03:34] if anything was found to immediately cease activity
[00:03:34 - 00:03:39] and notify the planning department and a qualified archaeologist.
[00:03:39 - 00:03:42] That's a very standard condition that we have.
[00:03:42 - 00:03:48] Chapter six, energy was primarily less than significant,
[00:03:48 - 00:03:51] as was chapter seven, geology and soils.
[00:03:51 - 00:03:55] Chapter eight, greenhouse gas emissions, same thing.
[00:03:55 - 00:03:59] Same with chapter nine, hazards and hazardous materials.
[00:03:59 - 00:04:04] Hydrology and water quality, primarily less than significant.
[00:04:04 - 00:04:08] Chapter 11, land use and planning, there's no impact there,
[00:04:08 - 00:04:12] as was for mineral resources.

[00:04:12 - 00:04:16] Chapter 13, noise less than significant impacts
[00:04:16 - 00:04:18] and no impact to population and housing.
[00:04:18 - 00:04:24] Chapter 14, chapter 15 was no impact to public services,
[00:04:24 - 00:04:30] as was chapter 16, recreation, transportation,
[00:04:30 - 00:04:34] chapter 17, primarily less than significant.
[00:04:34 - 00:04:38] And tribal cultural resources, there are mitigations there.
[00:04:38 - 00:04:42] So if during the AB 52 consultation process,
[00:04:42 - 00:04:46] any information is provided that identifies tribal cultural resources,
[00:04:46 - 00:04:50] an additional cultural resource study or any AR might be required.
[00:04:50 - 00:04:59] Chapter 19, no impact, less than significant impacts to chapter 20, wildfire.
[00:04:59 - 00:05:04] Chapter 21 is the mandatory findings of significance,
[00:05:04 - 00:05:08] which were less than significant with mitigation incorporated.
[00:05:08 - 00:05:12] The mitigations being to aesthetics, biological, cultural,
[00:05:12 - 00:05:14] and tribal cultural resources.
[00:05:14 - 00:05:22] So in doing this initial study, it's, I mean, it's, I guess,
[00:05:22 - 00:05:31] recommended that appropriate environmental document be a mitigated negative declaration.
[00:05:31 - 00:05:35] And now I'll just move on to the draft conditions real quick.
[00:05:35 - 00:05:40] And for Jeff, since he's on Zoom, I will email them, just so you have them.
[00:05:40 - 00:05:48] So draft conditions of approval, the first one being no permit shall be issued
[00:05:48 - 00:05:51] until the Fish and Wildlife Visa paid.
[00:05:51 - 00:05:56] Condition number two is essentially says, sign the conditions of approval.
[00:05:56 - 00:06:01] Number three says the UC's permit is conditioned upon the permit's compliance
[00:06:01 - 00:06:04] with all the provisions in the conditions.
[00:06:04 - 00:06:12] Chapter four, or number four says, prior to the issuance of a building permit,
[00:06:12 - 00:06:17] the permit shall provide an engineer's estimate cost for removal of the monopole
[00:06:17 - 00:06:21] and ancillary equipment and shall provide a performance bond
[00:06:21 - 00:06:25] in the amount of 100% of the county's estimated cost of removal
[00:06:25 - 00:06:30] for the wireless service facility, including administrative costs.
[00:06:30 - 00:06:32] It's part of the ordinance.
[00:06:32 - 00:06:40] Oh, it's a separate document.
[00:06:40 - 00:06:51] Yes, it's separate.
[00:06:51 - 00:06:54] It's above the CEQA.
[00:06:54 - 00:07:02] So the number four is a standard condition for cell towers.
[00:07:02 - 00:07:06] It's so that in the event that it becomes non-operational,
[00:07:06 - 00:07:11] the county does have a way to remove it.

[00:07:11 - 00:07:16] Condition number five says that the facility shall be removed
[00:07:16 - 00:07:23] when it becomes no longer necessary or not in use for a period of six months.
[00:07:23 - 00:07:27] Number six says acquire all building permits.
[00:07:27 - 00:07:31] Condition number seven, construction and location shall be substantially the same
[00:07:31 - 00:07:34] as shown on the project description.
[00:07:34 - 00:07:38] Condition number eight says meet the setbacks.
[00:07:38 - 00:07:42] Condition number nine says any security lighting for the ground facility
[00:07:42 - 00:07:46] shall be shielded and directed in such a manner so as to not direct light
[00:07:46 - 00:07:49] onto neighboring properties or roadways.
[00:07:49 - 00:07:55] The number 10 says that the generator shall be constructed
[00:07:55 - 00:08:00] and insulated such that it will not exceed the noise element guidelines.
[00:08:00 - 00:08:07] Number 11 is a condition from environmental health
[00:08:07 - 00:08:10] says prior to the activation of the use permit,
[00:08:10 - 00:08:13] the applicant shall provide documentation to the department
[00:08:13 - 00:08:17] that the site is in full compliance with the requirements of the unified program
[00:08:17 - 00:08:20] regarding hazardous materials.
[00:08:20 - 00:08:23] Business plan requirements, hazardous waste generation,
[00:08:23 - 00:08:29] treatment or storage, above ground patrolling storage and underground tanks.
[00:08:29 - 00:08:35] The number 12 is a requirement to submit proof to the planning department
[00:08:35 - 00:08:40] that all FCC and FAA regulations for wireless service facilities
[00:08:40 - 00:08:43] have been researched and complied with.
[00:08:43 - 00:08:46] Number 13 talks about co-location.
[00:08:46 - 00:08:53] And then after that begins the mitigations that we just talked about
[00:08:53 - 00:09:04] in the initial study really fast.
[00:09:04 - 00:09:10] Jeff, you're unmuted in case you have any comments.
[00:09:10 - 00:09:12] No, I don't. Thank you.
[00:09:12 - 00:09:15] Mark Hopkins from Public Works.
[00:09:15 - 00:09:20] The only question I do have is knowing that there is snow
[00:09:20 - 00:09:22] that's going to accumulate up there.
[00:09:22 - 00:09:25] What is your contingency plan for removal
[00:09:25 - 00:09:30] and making sure that you don't have any issues with any of your equipment
[00:09:30 - 00:09:37] that could be buried?
[00:09:37 - 00:09:44] And that was to Jeff, right? Yes.
[00:09:44 - 00:09:47] Jeff, did you need Mark to repeat the question?

[00:09:47 - 00:09:50] Or can you hear him?
[00:09:50 - 00:09:52] No, sorry.
[00:09:52 - 00:09:54] I was not prepared for that question.
[00:09:54 - 00:10:00] So I was...
[00:10:00 - 00:10:04] I don't know how much snow it gets.
[00:10:04 - 00:10:06] We didn't have that concern because I know when we do,
[00:10:06 - 00:10:09] we don't go with the outdoor cabinets.
[00:10:09 - 00:10:13] We use the equipment shelters.
[00:10:13 - 00:10:18] I do see that there is a cover though over the cabinets.
[00:10:18 - 00:10:24] And so I...
[00:10:24 - 00:10:26] So that would be the recommend...
[00:10:26 - 00:10:30] something that I would recommend is make sure that you have a rating for it
[00:10:30 - 00:10:34] for any of your snow.
[00:10:34 - 00:10:38] We can end up plowing several feet of snow up there
[00:10:38 - 00:10:40] easily every year.
[00:10:40 - 00:10:45] So that's something to consider as you're moving forward with design.
[00:10:45 - 00:10:49] So that's all I have.
[00:10:49 - 00:10:51] I appreciate it. Good to know.
[00:10:51 - 00:10:56] Anyone else? Any other concerns? Any other comments?
[00:10:56 - 00:11:01] I'll open up to the floor.
[00:11:01 - 00:11:09] Yes, sir. Thank you for the opportunity to comment.
[00:11:09 - 00:11:11] Go ahead and use the bigger one.
[00:11:11 - 00:11:13] That way you're not having to bend over there.
[00:11:13 - 00:11:15] Okay. I'm Dave Wardall.
[00:11:15 - 00:11:18] I'm the chairman of the board of directors of the Associated Aerial Firefighters
[00:11:18 - 00:11:22] nonprofit 503C.
[00:11:22 - 00:11:27] And we put on safety education and training for aerial firefighting,
[00:11:27 - 00:11:29] do accent investigation and so on.
[00:11:29 - 00:11:33] Our concern is looking at this tower or any other cell tower
[00:11:33 - 00:11:37] that needs to be visible so a pilot can see that.
[00:11:37 - 00:11:39] Especially now at night,
[00:11:39 - 00:11:42] Cal Fire is now going with Night Vision goggles on their new
[00:11:42 - 00:11:47] UH-60 Black Hawks and the new C-130s.
[00:11:47 - 00:11:52] So it's important that this have an obstruction light at the top.
[00:11:52 - 00:11:58] It's also important that it be painted bright, gloss white on everything
[00:11:58 - 00:12:02] so the pilot can see and identify that tower.
[00:12:02 - 00:12:03] Thank you.
[00:12:03 - 00:12:12] Any other questions? Any other comments?
[00:12:12 - 00:12:14] Hey, Chair, since you brought that up,

[00:12:14 - 00:12:21] I thought planning was going to handle the aesthetics of this cell tower.
[00:12:21 - 00:12:26] Right. That was the condition under the aesthetics chapter
[00:12:26 - 00:12:36] and it's proposed to be a faux monopying design tower.
[00:12:36 - 00:12:45] So the question would be how high above the tree tops will it be extended?
[00:12:45 - 00:12:59] I believe the ordinance says no more than 15 feet can it be extended.
[00:12:59 - 00:13:01] You're the resident expert.
[00:13:01 - 00:13:03] Dave Wardall again. Thank you.
[00:13:03 - 00:13:09] We can live with 15 feet but if the canopy burns down and you have that.
[00:13:09 - 00:13:10] That's a different story.
[00:13:10 - 00:13:13] That's a different story and I think it should be in the use permit.
[00:13:13 - 00:13:17] If the canopy is diminished through fire or whatever,
[00:13:17 - 00:13:23] then anything over say 20 feet above what's left needs to be painted bright white
[00:13:23 - 00:13:27] and a obstruction light.
[00:13:27 - 00:13:29] Thank you.
[00:13:29 - 00:13:34] Could that be accommodated in the conditions?
[00:13:34 - 00:13:40] In the event that...
[00:13:40 - 00:13:42] We do have a fire go through.
[00:13:42 - 00:13:49] Okay. I can talk to Chuck about how to word that.
[00:13:49 - 00:13:56] But if that way just covers them, the tower will most likely survive.
[00:13:56 - 00:14:12] We'll have some work that needs to be done but anything else?
[00:14:12 - 00:14:15] Any Zoom comments?
[00:14:15 - 00:14:25] All right then I will accept the motion.
[00:14:25 - 00:14:46] I move that we recommend to the planning commission that the appropriate environmental document be a mitigated negative declaration along with the amended conditions of approval as discussed.
[00:14:46 - 00:14:48] I have a motion.
[00:14:48 - 00:14:51] I need you.
[00:14:51 - 00:14:55] I second it.
[00:14:55 - 00:14:57] I have a first and a second.
[00:14:57 - 00:14:58] All in favor?
[00:14:58 - 00:14:59] Aye.
[00:14:59 - 00:15:04] Aye.
[00:15:04 - 00:15:05] Alrighty.
[00:15:05 - 00:15:08] We move it forward on to the planning commission.
[00:15:08 - 00:15:14] And that would be September 13th I believe.
[00:15:14 - 00:15:15] Alrighty.
[00:15:15 - 00:15:25] Item number two is a use permit for the gardens of NAR Cemetery.
[00:15:25 - 00:15:28] So this is the request for a use permit.
[00:15:28 - 00:15:39] So the property is 46 acres and is currently zoned R1A single family

residential and agriculture and has an MRZ mineral resource zone general plan designation.
[00:15:39 - 00:15:49] So in R1A the zoning cemeteries are considered a conditional use subject to requiring a granted use permit.
[00:15:49 - 00:15:52] But they're not seen as inconsistent with the zoning or anything.
[00:15:52 - 00:15:56] So there isn't any change in zoning for this project.
[00:15:56 - 00:16:03] It's just would be considered the conditional use permit for the cemetery and uses that would be included under that use permit.
[00:16:03 - 00:16:10] So with this use permit it the proposed improvements include parking to accommodate for guests to the cemetery.
[00:16:11 - 00:16:21] A fairly long term build out plan that would be for like 100 years in advance for 50,000 brick grave sites proposed.
[00:16:21 - 00:16:29] And then there's also a proposed 3000 square foot worship building included in the application.
[00:16:29 - 00:16:35] So I know that this project was previously reviewed by TAG for completeness and it was founding complete.
[00:16:35 - 00:16:42] So I'm subject to providing some additional information, rising the project description and the proposed plans.
[00:16:42 - 00:16:48] So those have been revised and are included in the project item.
[00:16:48 - 00:16:59] And then one of those revisions includes reducing what was originally I think a 10,000 square foot worship building to the smaller 3000 square foot.
[00:16:59 - 00:17:06] In the application to it is proposed at the building would have a 400 person occupancy.
[00:17:06 - 00:17:09] So that would be the maximum allowed within that building.
[00:17:09 - 00:17:16] And I would assume that would apply to for any cemetery related events.
[00:17:16 - 00:17:18] So funerals that kind of thing.
[00:17:18 - 00:17:26] But I didn't want to talk to manier if he's here about specification of some of those numbers of events,
[00:17:26 - 00:17:36] how many people would be like seen as an average attending one service and then of course a cat for how many people would be expected to attend.
[00:17:36 - 00:17:52] And then I also had some questions regarding the building and the use, if it would be used exclusively for cemetery related functions or if there are other uses that would be proposed within that building due to the proposed religious nature of it.
[00:17:52 - 00:18:04] One other concern I had it says in the project application and then as well as one on one of the site plans included on that city water and sewer would be provided again.
[00:18:04 - 00:18:18] I'm not sure what is available done down there, but we would be requiring a letter like a will serve agreement or something from whoever the water service provider is and the wastewater service provider.
[00:18:18 - 00:18:28] And also if there is sewage disposal, we would need to see how that's going to be planned out because I did note that in the building there is a plan for having

a restroom.
[00:18:28 - 00:18:33] And I mean that would be required if it is considered a public building.
[00:18:33 - 00:18:44] Moving on I guess another thing is I did want to note so the parking in the application they said that they would be providing 100 spaces that would be along the road.
[00:18:44 - 00:18:53] I just want to note that for a 400 person event per the Amador County code regarding parking for events.
[00:18:53 - 00:18:56] It's one space per six people that would be attending.
[00:18:56 - 00:19:04] So that does meet that minimum I think it would be 67 or so spaces that would be required.
[00:19:04 - 00:19:13] So it does exceed what we would require per code for the 400 people that would be there at one time potentially.
[00:19:13 - 00:19:19] I did want to say is the applicant present applicant is not present via zoom.
[00:19:19 - 00:19:34] Okay, so I guess we can certainly open up to comment and such but I at this point I mean if he's not present I would want to have some of these questions answered.
[00:19:34 - 00:19:39] If we were to move forward at all to the environmental for the project.
[00:19:39 - 00:19:51] So hopefully he'll show up before the meeting is over so we can potentially have some answers to those questions but we can certainly give people a opportunity to comment at this time.
[00:19:51 - 00:19:58] So with that, I'll go ahead and open it up to the floor before we throw in any more comments.
[00:19:58 - 00:20:03] So, folks if you have something to say please do it now.
[00:20:03 - 00:20:06] This won't be your only opportunity.
[00:20:06 - 00:20:10] But this is the first place to have a voice.
[00:20:10 - 00:20:25] Well, and can I also make a note. So at this point, the technical director committee is reviewing the application for completeness so that's looking at what we've received in the materials, and if it's enough to move on to doing environmental review for the project.
[00:20:25 - 00:20:34] So at this time we're only looking at technical aspects of the project and if we have enough information to move forward to environmental.
[00:20:34 - 00:20:48] So if people have sentiments towards the project that aren't motivated per like this more technical aspects of it that would be addressed better at the planning commission but I would definitely recommend you know, staying in tune with the project and you know stating it
[00:20:48 - 00:20:50] because either way it will be on the record.
[00:20:50 - 00:20:58] But there are no minutes for attack it will be just kept in record recording the form.
[00:20:58 - 00:21:08] And the recording will be uploaded to the county website this afternoon or by tomorrow and you can always request it if you'd like and I can email

that to you.
[00:21:08 - 00:21:17] If you also have comments after this meeting you can email them to planning at amadorgov.org.
[00:21:17 - 00:21:32] And that way we have them in writing and they can become part of the public record that way as well and will be included at future steps as applicable.
[00:21:32 - 00:21:35] All righty.
[00:21:35 - 00:21:41] And if you do want to comment please come up to the podium so our zoomer is also able to hear you.
[00:21:41 - 00:21:46] Do we have any comments?
[00:21:46 - 00:21:51] The applicant is not here though right?
[00:21:51 - 00:21:54] The applicant is not here.
[00:21:54 - 00:21:55] Or zoom.
[00:21:55 - 00:21:57] We have one zoomer.
[00:21:57 - 00:21:58] Okay.
[00:21:58 - 00:21:59] All right.
[00:21:59 - 00:22:09] And we have so the zoomer knows we have one two three four five six seven eight nine ten eleven public in the chambers.
[00:22:09 - 00:22:27] Well this is a commercial business a commercial building and generally speaking in a commercial building they need to have some sort of infrastructure for fire protection which would include fire hydrants.
[00:22:27 - 00:22:30] Which would include water for the fire hydrants.
[00:22:30 - 00:22:40] So that would be the question I would ask the applicant how he's going to obtain that up there in Carbondale.
[00:22:40 - 00:22:42] Can I ask you a question Pat?
[00:22:42 - 00:22:43] Yeah sure.
[00:22:43 - 00:22:47] So this is within Jackson Valley fire protection district I believe.
[00:22:47 - 00:22:48] No it's AFPD.
[00:22:48 - 00:22:49] Okay.
[00:22:49 - 00:22:51] So that's just good to know.
[00:22:51 - 00:22:58] I was going to say so do you guys know who the it would be AWA in that area?
[00:22:58 - 00:23:04] I believe it's a man back there shaking.
[00:23:04 - 00:23:07] Yes I believe it's a water.
[00:23:07 - 00:23:13] So that would be the question I would ask the applicant and if he's not here to address that or if it's not written down anywhere.
[00:23:13 - 00:23:17] Denise from my perspective it is incomplete.
[00:23:17 - 00:23:21] There is a letter included from AWA.
[00:23:21 - 00:23:24] Krista in the packet.
[00:23:24 - 00:23:26] For reference it's.
[00:23:26 - 00:23:28] I think I've been the wrong section.
[00:23:28 - 00:23:33] I'm going to walk forth this through the packet dated February 18.
[00:23:33 - 00:23:37] Let's see who signed it.
[00:23:37 - 00:23:40] Lucas Carthew.

[00:23:40 - 00:23:41] Are you Lucas?
[00:23:41 - 00:23:42] No.
[00:23:42 - 00:23:46] It's up on the mic and screen.
[00:23:46 - 00:23:51] Share it for Zoomers but it's up here in the chambers on them.
[00:23:51 - 00:24:00] It's part of the packet that's uploaded to the county website that's available to the public currently.
[00:24:00 - 00:24:04] We do have AWA here.
[00:24:04 - 00:24:06] I have a quick question.
[00:24:06 - 00:24:19] Is there a line that actually runs all the way through or would that be something that they would have to be putting in just to get it out there?
[00:24:19 - 00:24:21] Because that could be quite expensive.
[00:24:21 - 00:24:24] Brant Cook Amateur Water.
[00:24:24 - 00:24:31] There is a water line in the road in front on Carpendale in Lambert.
[00:24:31 - 00:24:36] It is a water line with severely limited capacity.
[00:24:38 - 00:24:52] The parcel currently has a 5 eighths inch meter which is the largest meter we would permit to be set on that line which would give them a maximum of 20 gallons a minute and 400 gallons per average day which is a tiny amount of water.
[00:24:52 - 00:24:53] Yeah.
[00:24:53 - 00:25:01] Expansion of that line to allow more flow than that would be incredibly expensive and is probably cost prohibitive.
[00:25:01 - 00:25:19] Add to that that the fire flow in that area is generally about 400 gallons a minute increasing that to a standard 1000 gallons a minute or standard fire flow would also be incredibly expensive and is probably cost prohibitive.
[00:25:19 - 00:25:32] You also mentioned in there, Lucas also mentioned Ion treatment for any type of waste treatment would be going to Ion potentially.
[00:25:32 - 00:25:36] There is no public sewer in that area.
[00:25:36 - 00:25:42] That is what I was also getting so it would have to be some type of septic potentially.
[00:25:42 - 00:25:51] In addition to that there are capacity limitations at the Ion treatment plant.
[00:25:51 - 00:25:56] There are a lot of other restrictions that would limit expansion.
[00:25:56 - 00:25:57] Yeah.
[00:25:57 - 00:25:58] All right.
[00:25:58 - 00:26:02] Thank you, sir.
[00:26:02 - 00:26:04] That answers some of those questions.
[00:26:04 - 00:26:06] Yeah.
[00:26:06 - 00:26:07] All right.
[00:26:07 - 00:26:13] If please come on down.
[00:26:13 - 00:26:21] Woodhouse and I have property near this proposed development.
[00:26:21 - 00:26:33] My only question is if you scroll up to the top of this and go down the size of this building or this mosque or this religious whatever it is keeps changing like right there.
[00:26:33 - 00:26:44] If you look in the middle of that green area, it says I think 10,000

square feet and 1200 people and then it talks about phase two.
[00:26:44 - 00:26:49] So I guess my question is how many phases are we talking about here?
[00:26:49 - 00:26:54] Are we talking about a 3,000 square foot building?
[00:26:54 - 00:26:57] Are we talking about a 10,000 square foot building?
[00:26:57 - 00:27:03] Are we talking about a full on 20,000 foot 53 yard across mosque out there?
[00:27:03 - 00:27:08] I mean I'd like to know it doesn't seem to be very clear.
[00:27:08 - 00:27:09] Thank you.
[00:27:09 - 00:27:16] I can respond a little bit because from what I understand the applicant he did resubmit the plans and he is now he reduced the size from the 10,000 square foot building.
[00:27:16 - 00:27:20] 1200 people to 3,000 square foot before 100 people limit.
[00:27:20 - 00:27:22] So that would be what's binding.
[00:27:22 - 00:27:28] I'm pretty sure that the one that says the 10,000 he just forgot to remove it from the plans.
[00:27:28 - 00:27:31] But again, we would definitely specify that before moving forward.
[00:27:31 - 00:27:39] And then of course if this were to move forward, we would condition the use permit to have a limitation consistent with what he's applying for.
[00:27:39 - 00:27:45] So as far as the phasing from what I understood talking to the applicant, it was the plan.
[00:27:45 - 00:27:46] It was the applicant.
[00:27:46 - 00:28:00] It was primarily for the grave sites so that he would dig grave sites to fulfill the needs of the population as they fill it up.
[00:28:00 - 00:28:03] So I'm pretty sure that that's what the phasing refers to.
[00:28:03 - 00:28:10] It wouldn't necessarily refer anything to further development of the building.
[00:28:10 - 00:28:21] And then both the entrances on Lambert and on Carbondale will have to be improved for commercial standards.
[00:28:21 - 00:28:24] Because they're currently residential encroachments?
[00:28:24 - 00:28:28] At least one.
[00:28:28 - 00:28:42] And then I do believe that parking along the road is not going to be, if you have any type of fire issue, that's going to be no-no.
[00:28:42 - 00:28:50] And then parking along any of those roads is also going to be a no-no.
[00:28:50 - 00:29:02] So they're going to have to provide some place in there, in their area, a parking lot or show it.
[00:29:02 - 00:29:12] That way at least fire and emergency access can be granted without any impingement of vehicles.
[00:29:12 - 00:29:18] And in my experience that's consistent with most used permits where we require a specific parking lot.
[00:29:18 - 00:29:21] And then that would show where they enter and exit.
[00:29:21 - 00:29:24] And the number of spaces, all that kind of thing.

[00:29:24 - 00:29:26] And currently we don't have that.
[00:29:26 - 00:29:30] And of course that would also be conditioned to account for fire risk and everything.
[00:29:30 - 00:29:32] Okay.
[00:29:32 - 00:29:36] Alrighty. Anyone else have anything to say?
[00:29:36 - 00:29:49] My name is Cam Marker and I'm multiple resident near this area out here.
[00:29:49 - 00:29:52] I have questions more than anything else.
[00:29:52 - 00:30:03] For me the first proposal called the 20,000 square foot building they proposed, a mosque.
[00:30:03 - 00:30:11] And then this one they call a religious building.
[00:30:11 - 00:30:17] I've been in a church, I've been in a temple, I've been in a synagogue.
[00:30:17 - 00:30:21] I've seen a cathedral and I've seen a mosque.
[00:30:21 - 00:30:23] I've never seen a religious building.
[00:30:23 - 00:30:26] I need a definition of that.
[00:30:26 - 00:30:33] So my question would be is it a religious building for tax purposes?
[00:30:33 - 00:30:39] Or is it a religious building that anyone can access at any time?
[00:30:39 - 00:30:41] What is this building?
[00:30:41 - 00:30:43] I'd like to know what that is.
[00:30:43 - 00:30:47] I don't have a definition.
[00:30:47 - 00:30:49] The other thing I have a question about it.
[00:30:49 - 00:30:54] This is now the revised plan here, right?
[00:30:54 - 00:30:57] Some of it.
[00:30:57 - 00:30:59] Okay.
[00:30:59 - 00:31:08] So I understood them to say that they were going to gravel a big area to make a parking lot in that plan.
[00:31:08 - 00:31:11] I guess that's not correct.
[00:31:11 - 00:31:13] There would be parking on the gravel.
[00:31:13 - 00:31:19] From what I understood they were saying that it would be along the road but the roadways are gravel.
[00:31:19 - 00:31:21] You can't park a bicycle there.
[00:31:21 - 00:31:24] Here and there there.
[00:31:24 - 00:31:26] Alright that's good.
[00:31:26 - 00:31:27] That's good to know.
[00:31:27 - 00:31:34] I guess right now that's as much as I need to have answered.
[00:31:34 - 00:31:37] But I would like to have that building defined.
[00:31:37 - 00:31:42] The other thing is you said that's a 3,000 square foot building.
[00:31:42 - 00:31:44] I believe that's what is proposed currently.
[00:31:44 - 00:31:48] That's going to hold 400 people?
[00:31:48 - 00:31:50] That's what the proposal is for?
[00:31:50 - 00:31:55] Yeah, well how is that going to happen?
[00:31:55 - 00:32:04] And again I'm not sure at this point because it would, this is for the use so they would be allowed to have, if this was permitted, right?

[00:32:04 - 00:32:11] To build the building and then it would be allowed to have whatever the occupancy is of the building and what is...
[00:32:11 - 00:32:13] ...fined at that time.
[00:32:13 - 00:32:16] Right and then what's limited by the use permit.
[00:32:16 - 00:32:18] So there are two separate kind of limitations.
[00:32:18 - 00:32:24] So they may be allowed to have 400 people if that's what they allowed for in the use permit.
[00:32:24 - 00:32:28] But if the building occupancy is below that they wouldn't be able to exceed that.
[00:32:28 - 00:32:36] So yeah and it's hard too because with the project right it would be say it goes forward and the use permit is approved.
[00:32:36 - 00:32:46] They would still have to get all the building permits and discretionary permits or non-discretionary permits for like the building, for any grading, for the encroachments, all that kind of thing.
[00:32:46 - 00:32:48] And then those end up being conditions.
[00:32:48 - 00:32:51] So that's kind of the process in short.
[00:32:53 - 00:33:04] So just because someone is approved under the use permit they still would need to conform to whatever regulations are required for further permitting that later.
[00:33:04 - 00:33:09] The TAC, I believe the applicant just came online.
[00:33:09 - 00:33:20] I'm not positive it's the applicant but it appears to be so and prior to the applicant or whomever this is joining we have a zoomer who had their hand raised.
[00:33:20 - 00:33:24] Who's now put their hand down.
[00:33:24 - 00:33:29] And so again this is Patrick Chew of Farm Archer for AFPD.
[00:33:29 - 00:33:36] I just did a quick math and you can fit 400 people in a 3,000 square foot building but it'll be standing room only.
[00:33:36 - 00:33:41] So they won't have any really rooms to put the rest rooms or anything like that nature.
[00:33:41 - 00:33:44] So but it will be tight quarters.
[00:33:44 - 00:33:46] It'd be like being in an elevator.
[00:33:46 - 00:33:52] But the building code allows that if that's what you want but it'll be standing room only.
[00:33:52 - 00:33:57] And it'll be just before walls and a ceiling and there won't be any other facilities in there.
[00:33:57 - 00:34:12] I'm going to go ahead and unmute MOU 243-903 to find out if this is our applicant.
[00:34:12 - 00:34:13] Hello.
[00:34:13 - 00:34:15] Yes, I am.
[00:34:15 - 00:34:16] Is this Muneer?
[00:34:16 - 00:34:17] Yes, it is.
[00:34:17 - 00:34:18] Yes.
[00:34:18 - 00:34:19] Okay, welcome.
[00:34:19 - 00:34:28] Your item is currently being discussed and I know that the tech

advisory committee has some questions for you.
[00:34:28 - 00:34:30] Thank you.
[00:34:30 - 00:34:33] I'm going to leave you on mute it so that you can comment.
[00:34:33 - 00:34:42] So please don't mute yourself again in the middle of it because then I'll just have to unmute you before you can speak.
[00:34:42 - 00:34:43] All right.
[00:34:43 - 00:34:44] So hi Muneer.
[00:34:44 - 00:34:46] This is Kristen planning.
[00:34:46 - 00:34:54] So we were discussing kind of some of the questions that we have and I know that the public also came forward with some questions that were directed towards you.
[00:34:54 - 00:35:00] So I guess I'll just kind of go through mine first and then I don't know.
[00:35:00 - 00:35:05] I'll let the public restate their questions if they wish.
[00:35:05 - 00:35:08] But to start, so I just wanted to confirm.
[00:35:08 - 00:35:12] So in the plans that you resubmitted it showed the 3000 square foot building.
[00:35:12 - 00:35:14] That's the new one, right?
[00:35:14 - 00:35:16] That's what you're proposing.
[00:35:16 - 00:35:22] You're no longer proposing the 10,000 square foot.
[00:35:22 - 00:35:25] The place that would be the proposal of the 3000.
[00:35:25 - 00:35:30] And as I said before, that one is it's going to be an issue.
[00:35:30 - 00:35:33] We can just let go without it.
[00:35:33 - 00:35:40] I'd like to see if that could be a choice and we will go with that.
[00:35:41 - 00:35:42] Okay.
[00:35:42 - 00:35:43] Yeah.
[00:35:43 - 00:35:47] So I mean, it's up to you at this point because what I mean what you're asking for.
[00:35:47 - 00:35:53] So you can certainly remove the building from the application if that is your desire.
[00:35:53 - 00:35:59] But just you would need to know that if you decide to add a building later associated with the uses,
[00:35:59 - 00:36:03] it would have to go through the whole process again.
[00:36:03 - 00:36:05] And you may not be approved.
[00:36:05 - 00:36:07] So I just wanted to let you know that.
[00:36:07 - 00:36:12] So I mean at this point we did have some questions relating to the building and I'll just go ahead and ask them.
[00:36:12 - 00:36:21] So one was, I believe, so you stated that it would be 400 person occupancy.
[00:36:21 - 00:36:26] Is that what kind of activity?
[00:36:26 - 00:36:29] Like what is the definition of the religious building?
[00:36:29 - 00:36:33] Like what kind of uses would be taking place with them there?
[00:36:33 - 00:36:47] It would be a place where people gather to do the prayers and give

the last pretty much reading and prayers for the deceased.
[00:36:47 - 00:36:48] Okay.
[00:36:48 - 00:37:03] So it would only have uses relating directly to the cemetery and the funerary uses, correct?
[00:37:03 - 00:37:14] Did you need Ms. Krista to repeat the question?
[00:37:14 - 00:37:18] Let me stop.
[00:37:18 - 00:37:21] Are you there and move there?
[00:37:21 - 00:37:22] I am, yes.
[00:37:22 - 00:37:28] I was asking what kind of, so the uses of the building would be restricted to the funeral uses?
[00:37:28 - 00:37:31] Is that correct?
[00:37:31 - 00:37:35] Yes, for the prayers, very much.
[00:37:35 - 00:37:36] Okay.
[00:37:36 - 00:37:46] So would there be 400 people at one time within the building?
[00:37:46 - 00:38:04] We are anticipating the maximum attendees for a certain service or for a certain burial to have 400 people to come to join in the prayer.
[00:38:04 - 00:38:13] Yeah, because for us to move forward with the environmental review, we would definitely want to know how many people would be there at one point,
[00:38:13 - 00:38:18] how many people would be in the building, and then how often you're having these kinds of events.
[00:38:18 - 00:38:32] And I'm not sure if Munir joined after Patrick Chew's comment about the number of people in the building, and I know he didn't hear anything prior to that,
[00:38:32 - 00:38:37] but he zoomed in around, give or take that time.
[00:38:37 - 00:38:44] Yeah, I can certainly repeat the question, but it's more of a basic question.
[00:38:44 - 00:39:00] If the applicant, if you have an architect on staff by chance, because if you do the basic math, which I stated earlier, you can fit 400 people in a 3,000 square foot building,
[00:39:00 - 00:39:03] but it's really only standing room only.
[00:39:03 - 00:39:06] And I understand you got to put restrooms here.
[00:39:06 - 00:39:13] Well, it leads to other questions we've got regarding water source, but since we're talking about the building, do you have an architect on staff?
[00:39:13 - 00:39:15] No, I don't.
[00:39:15 - 00:39:25] Yeah, okay. Well, for that many people, you know, environment health, it's going to require so many amount of bathrooms.
[00:39:25 - 00:39:28] And to put those in, that's going to take up space.
[00:39:28 - 00:39:36] So it's going to be tough to fit 400 people standing room only if you think of a large elevator and have several bathrooms in there.
[00:39:37 - 00:39:46] And I'm assuming you're going to have storage rooms, rooms for potluck maybe, maybe even a kitchenette.
[00:39:46 - 00:40:00] So that 400 may not be realistic, but if you get an architect on board, they can tell you how many people you can probably fit in there with the county

reviewing those documents to validate those numbers.
[00:40:00 - 00:40:05] But that's going to be tight quarters right now with that.
[00:40:05 - 00:40:09] It's just going to be four walls in a ceiling, what I mentioned earlier.
[00:40:09 - 00:40:15] So I'm sure you're going to have some sort of ancillary type of storage room within that building.
[00:40:15 - 00:40:28] So I would suggest maybe get an architect to provide the county detail of the area for morning, or you want to call it, or worshiping.
[00:40:28 - 00:40:35] And I'm sure you're going to have restroom facilities, storage rooms for tables and chairs, maybe in the kitchenette.
[00:40:35 - 00:40:40] So all that is going to have to be part of that 3,000 square foot building.
[00:40:40 - 00:40:47] We haven't yet talked about the water source center here, but that seems to be the bigger ticket item that you're going to have to address.
[00:40:48 - 00:41:06] So on top of that, getting an architect, you probably should get some sort of civil engineer on your staff to evaluate this property and talk to you about the water, about the potential of what it's going to cost to put the proper infrastructure in place.
[00:41:08 - 00:41:20] Well, if this could be an issue, we can eliminate that item since the type of prayer does not really need to be done on the premises.
[00:41:20 - 00:41:35] We can just do the prayer somewhere outside an existing place of worship in Sacramento, and then we will do the burial at that site instead of having a facility there as well for the prayers.
[00:41:35 - 00:41:42] Okay, well, you still have a 3,000 square foot building that you're going to have to identify what the use is for.
[00:41:42 - 00:41:48] So we can eliminate that item if it's going to be an issue.
[00:41:48 - 00:41:51] Repeat that, please.
[00:41:51 - 00:42:06] I said I can eliminate that item, the 3,000 square foot building, if it's going to hold the process for the licensing for the land to be used as a cemetery.
[00:42:07 - 00:42:16] Any type of worship or prayers or cleaning would be done at a separate facility outside that land.
[00:42:16 - 00:42:22] As the applicant that we completely up to you if you want to eliminate that building.
[00:42:22 - 00:42:25] We'll move that, yes.
[00:42:25 - 00:42:27] Okay, so, and this is Christa again.
[00:42:27 - 00:42:35] I'll say, if that is your intent, you'll need to revise the application again to remove references to the building.
[00:42:36 - 00:42:40] And then basically would have to come back to tack again for complainers.
[00:42:40 - 00:42:53] Because I think that substantially changes the project application because we would have to go if you were to keep it the way it is, we'd have to go through and like wide out stuff and it would be fairly confusing.
[00:42:53 - 00:42:59] I think it'd be best at this point then for you to revise and remove the building references.

[00:42:59 - 00:43:01] If that is truly your intent.
[00:43:02 - 00:43:15] We will still need to know how well where the 400 people would be at one point and then we would have to know what kind of because they'll still be required to have water and sewer service.
[00:43:15 - 00:43:23] I believe on site if you're having 400 people at one point on this property and if it's being used for these commercial uses.
[00:43:24 - 00:43:33] So, I mean that does eliminate some of the issues with questions that we had, but we still will need to know more information going forward.
[00:43:33 - 00:43:36] Even if you do remove the building.
[00:43:36 - 00:43:39] Okay.
[00:43:39 - 00:43:46] I think of what our other questions were.
[00:43:46 - 00:43:50] Oh, we did discuss so before you hear, we were discussing the parking.
[00:43:50 - 00:43:57] So I know in the application you stated that it would be along the road along the gravel road.
[00:43:57 - 00:44:02] So we public works commented that that wouldn't really be sufficient.
[00:44:02 - 00:44:15] You will need to put in designated parking area that of course is graded and prepared in a way that there's no fire or mitigated fire risk.
[00:44:15 - 00:44:20] In addition to whatever roadways are proposed.
[00:44:20 - 00:44:24] Okay.
[00:44:24 - 00:44:40] The reason for that is just to be able to provide any emergency access that is, you know, if necessary, and also to have the improvements either end of the entrance and exits.
[00:44:40 - 00:44:45] That way they meet standards coming on to these roadways.
[00:44:45 - 00:45:00] Again, just so you're not having to, if there is an emergency, it's easier to get to and remove people if need be in a safe fashion.
[00:45:00 - 00:45:03] So.
[00:45:03 - 00:45:11] Okay, we have some spots that are already graded that could be designed for that.
[00:45:11 - 00:45:20] And as you can see, you know, there are many spots that are available.
[00:45:20 - 00:45:24] That again, that's just that way we have it.
[00:45:24 - 00:45:35] We're able to see where it's at and then then you'll have be able to work around your as your land use.
[00:45:35 - 00:45:53] And I had a question for Pat to so if sense when there is eliminating the proposal for the building, are there still those requirements for like hydrants and fire safe improvements and what would those be in this situation.
[00:45:53 - 00:45:57] Well, being there, those structures on there.
[00:45:57 - 00:46:01] They would be but it wouldn't be to the degree if it was the building.
[00:46:01 - 00:46:15] So until I get better standing on what they actually have out there, they may be able to make do what they have, or do what up most other business out there do have water storage tank.

[00:46:15 - 00:46:22] So there's would be alternative now if there's no structure out there.
[00:46:22 - 00:46:35] And the question for you, what would be what would you consider structure any facility any type of facility bathrooms things like that because there probably will need to be some sort.
[00:46:35 - 00:46:54] Well, in all fairness, if they have bathroom facilities, it still won't be it won't be a high demand water use only because if something were to go wrong in that building on a structure fire is probably become before we get there.
[00:46:54 - 00:47:03] Fair enough. But that still then brings up the environmental health issue of because there are no sewer lines out there.
[00:47:03 - 00:47:07] They're going to have to have some type of septic if they choose to go with that.
[00:47:07 - 00:47:12] So and then that will have to require where is that going to be placed.
[00:47:12 - 00:47:17] What type are you putting in things like that.
[00:47:17 - 00:47:26] Well, with the bathroom, we could consider having portable ones.
[00:47:27 - 00:47:29] That's always a lot of them.
[00:47:29 - 00:47:43] Yeah, as a start and then later on if there is a demand for a permanent one, we already have a septic tank being put on one side of the property.
[00:47:43 - 00:48:01] We could consider having that to be used as a permanent base for bathrooms. Otherwise, we just go with the portable ones, depending on the recommendation of the county based on the number of people maximum number of people may be attending the service at one time.
[00:48:01 - 00:48:04] Okay.
[00:48:04 - 00:48:07] I had a question for environmental health.
[00:48:07 - 00:48:20] So, I mean, is that an acceptable solution that for like the events that are larger that exceeded certain amount of capacity that they just be required for their conditions to bring on.
[00:48:20 - 00:48:25] To put in a commercial septic that have to be designed by a registered engineer.
[00:48:25 - 00:48:27] Okay, it would have to be a commercial structure.
[00:48:27 - 00:48:33] They'd have to pull a permit application and then it would be referred to an engineer for anything that size.
[00:48:33 - 00:48:34] Okay.
[00:48:34 - 00:48:40] So, would they be able to supplement that with porter parties for larger events?
[00:48:40 - 00:48:46] Or does it just need the installed system just needs to be able to accommodate for the maximum number of people?
[00:48:46 - 00:48:53] Yes, if they're anticipating 400 people and they want to put a system in, it would have to be designed to handle that many.
[00:48:53 - 00:48:59] Okay.
[00:48:59 - 00:49:03] So, no porter parties then in that situation.
[00:49:03 - 00:49:11] You would need to, you would be required to have a commercial grade septic system to eliminate waste for up to 400 people.

[00:49:11 - 00:49:16] Alrighty.
[00:49:16 - 00:49:19] Any other comments? Any other questions?
[00:49:19 - 00:49:28] That the applicant did miss the water piece from AWA.
[00:49:28 - 00:49:36] I'll let you come up on Zepser and then we'll go, we'll circle back around to that.
[00:49:36 - 00:49:44] My name is Nick Beck and I live in the neighborhood and I understand this is all about technical issues,
[00:49:44 - 00:49:47] but put yourself in my shoes for a moment.
[00:49:47 - 00:50:00] I located here because it was single resident agricultural and this is a long ways from that with the kind of a mining overlay.
[00:50:00 - 00:50:02] It changes the neighborhood.
[00:50:02 - 00:50:09] I would not be here if I knew something like this would have been possible in the future.
[00:50:09 - 00:50:12] So that's all I have to say.
[00:50:12 - 00:50:21] It's so contrary to the principal zoning of this whole area that I hope you people consider that.
[00:50:21 - 00:50:26] Thank you.
[00:50:26 - 00:50:39] So to circle back to the water issue, if AWA would come back up for us and yep.
[00:50:39 - 00:50:44] Here's the second time.
[00:50:44 - 00:50:48] Brant Cook Amateur Water.
[00:50:48 - 00:50:54] So the water infrastructure in the area is extremely capacity limited.
[00:50:54 - 00:51:01] The largest size meter we would set is a 5-8 inch meter, which is the smallest water meter that exists I think.
[00:51:01 - 00:51:07] So this connection would be limited to 20 gallons a minute and 400 gallons per average day.
[00:51:07 - 00:51:19] Upsized to that meter is not available at this time and would be incredibly cost prohibitive probably to expand that line all the way back to the city of Ion.
[00:51:19 - 00:51:25] In addition, fire flow in the area is extremely limited, 350 to 400 gallons a minute,
[00:51:25 - 00:51:33] which is substandard for pretty much everything and that would be incredibly expensive to fix as well,
[00:51:33 - 00:51:38] but I guess would be an option if someone wanted to spend that much money.
[00:51:38 - 00:51:41] Alrighty.
[00:51:41 - 00:51:43] Is that everything?
[00:51:43 - 00:51:45] What about if they won't waste what would that be?
[00:51:45 - 00:51:47] There's no public sewer system in there.
[00:51:47 - 00:51:51] Okay.
[00:51:51 - 00:51:52] There is water.
[00:51:52 - 00:51:55] Alrighty.
[00:51:55 - 00:52:00] Thank you sir.

[00:52:00 - 00:52:07] Were you able to get that sir?
[00:52:07 - 00:52:11] The applicant is still unmuted and we also have a zoomer raising their hand.
[00:52:11 - 00:52:12] Munir.
[00:52:12 - 00:52:13] Yes sir.
[00:52:13 - 00:52:15] Mark asked you if...
[00:52:15 - 00:52:20] Did you...were you able to get all that about the water issue?
[00:52:20 - 00:52:21] Yes.
[00:52:21 - 00:52:34] With the water coming from Amador Water Company, we can also have a choice of having a well on the property as well.
[00:52:34 - 00:52:38] That's not sufficient for...
[00:52:38 - 00:52:45] And also we can always limit the number of participants of the funeral.
[00:52:45 - 00:52:47] We usually...
[00:52:47 - 00:52:52] And as I said in the application or at least in the process,
[00:52:52 - 00:53:02] we usually have about 50 people maximum, but in case I want to go for the maximum, I'm pushing it for 400,
[00:53:02 - 00:53:15] but that is probably once in a blue moon and we could control that by saying put a minimum of 50 people at maximum.
[00:53:15 - 00:53:22] Again, I'm trying to push my limits to see what I can get as much as I could.
[00:53:22 - 00:53:29] But these numbers could be played down as we go through the process.
[00:53:29 - 00:53:32] Alrighty.
[00:53:32 - 00:53:36] Well, Munir, I would say that we are going through that process currently.
[00:53:36 - 00:53:43] So if you do wish to pare down those numbers, we would be wanting to hear that now.
[00:53:43 - 00:53:53] Yeah, let's do that. Let's limit it to 50 individuals.
[00:53:53 - 00:53:59] Okay, so when you do resubmit the application, you'll want to revise that.
[00:53:59 - 00:54:08] And we'll want to know how many funerals you are planning to host per week kind of thing.
[00:54:08 - 00:54:14] Frequency of events.
[00:54:14 - 00:54:26] Yeah, frequency of events. We're anticipating with the size of the community that we have about one a week, or maybe 0.75 a week.
[00:54:26 - 00:54:33] So, sometimes we have a month that we would have two, three funerals.
[00:54:33 - 00:54:39] So these numbers being talked to before, these are the actual numbers.
[00:54:39 - 00:54:51] But again, if I can push myself to see to be more to get an exaggerated number, it's still approved with that. That would be even better.
[00:54:51 - 00:55:04] I mean, I would say at this point, just looking at some of the technical

issues that are coming up with both the larger number and just the project being like the property being developed at all.
[00:55:04 - 00:55:16] I would say you may want to not shoot for the moon and aim more modestly if that is something that would be acceptable to you.
[00:55:16 - 00:55:32] Again, it's not our place to tell you that, but I'm just saying you don't want to overextend because a lot of these issues that we are bringing up will need to be resolved for the project to go anywhere.
[00:55:32 - 00:55:46] And they're significant enough that I would say that this is the time to be paring down and being, you know, what could realistically be permitted possibly rather than...
[00:55:46 - 00:56:01] I got the idea since I was discussing it with the members of the community as well as the advisors that I have, they said push for whatever you can.
[00:56:01 - 00:56:19] And then later on we can settle down for more realistic numbers. So again, there are most of the barriers would be at the four barriers a month with maximum 50.
[00:56:19 - 00:56:28] We go through months and months where we have only 20 people. Our community is not that substantially big in the area.
[00:56:28 - 00:56:45] So these are more realistic, but of course we can push for more. We would like to see what is the maximum we can get. We're working with the county comfortably.
[00:56:45 - 00:56:50] We have a Zoom comment.
[00:56:50 - 00:56:51] By all means.
[00:56:51 - 00:56:54] Jamie, I'm going to go ahead and unmute you.
[00:56:54 - 00:57:14] Hi, thank you. Jamie, I was actually going to ask about the number of events which the applicant just answered prior to after I raised my hand, but I did want clarification with these changes being stated to this application.
[00:57:14 - 00:57:24] The application will actually come back to task again. I just want to make sure that I'm following the process application and when the public has, you know, the most appropriate time for input.
[00:57:24 - 00:57:42] Okay, you cut out a little bit for me, but so currently right, it's for completeness. It's looking like we're going to request that the applicant revise the application and then come back with a revised application that's dialed back and eliminating the
[00:57:42 - 00:57:50] building. So it would come back to tack again to review for completeness. And then if it's found complete at that meeting it would move forward for environmental review.
[00:57:50 - 00:58:06] And then after that, tack meeting would be a public hearing before the planning commission. So the meetings for tack are looking for technical issues with the project looking for if we need more information to conduct the environmental review at the environmental
[00:58:06 - 00:58:17] review, review tack. That's when we come up with the conditions and the initial study per se qua. So where we go through and see what kind of impacts potential impacts there could be of the development.

[00:58:17 - 00:58:31] And then at the planning commission hearing that's when the decision would be made by the commissioners whether to approve or deny the project, approve or deny the environmental document. And that's I think one of the best times for
[00:58:31 - 00:58:47] public comments to come forward, because that's when the comments if they aren't necessarily addressing a technical issue with the project, they'll still be heard by the commissioners and the commissioners are the ones that are able to make the discretion to approve or deny the project.
[00:58:48 - 00:59:07] Because tack is just a recommending body that is only looking at technical issues. So we can of course hear and respond to comments. If they're addressing technical things if they're non technical comments that are addressing different issues with the project, then we can't address them here.
[00:59:07 - 00:59:10] It would have to go before the planning commission.
[00:59:10 - 00:59:25] Thank you for the clarification. I understood most of that that I will my question really was with these changes this will actually come back to the technical committee again with the changes that were stated today. Yes.
[00:59:25 - 00:59:27] Okay.
[00:59:27 - 00:59:29] Well, it's all the applicant.
[00:59:29 - 00:59:52] Sorry. And then one other question because there have been so many changes kind of spoken today. I question whether or not those are changes. If these are intended to be changes to the project as a whole, or changes to phase one, because as you look at the way that the application was submitted, it appears as if there is going to be smaller
[00:59:52 - 01:00:04] changes and grow into larger things. So I guess I was just curious that the changes that the applicant is acknowledging today has intention for those to be the changes that follow this project all the way through.
[01:00:04 - 01:00:09] So that was a question from Runeer.
[01:00:09 - 01:00:19] Let me unmute him again.
[01:00:19 - 01:00:21] Runeer, you should be unmuted.
[01:00:21 - 01:00:39] Yeah, it is unmuted. Yeah, pretty much this project is a small scale community project that is pretty much whatever we propose we propose for the maximum.
[01:00:39 - 01:00:43] The actual numbers are way way below that.
[01:00:43 - 01:00:50] Does Jamie need to maybe repeat her question?
[01:00:50 - 01:01:01] One moment. I have to unmute her.
[01:01:01 - 01:01:05] Go ahead. Thank you.
[01:01:05 - 01:01:12] Sorry. I apologize too. I'm working with the downtown cell service. So that's always a challenge.
[01:01:12 - 01:01:28] The question was more maybe even staff because I know that the way the application was put in it had phases for these things. And so when I hear the applicant acknowledging that he's going to reduce the size of the buildings and you know eliminate certain things.
[01:01:28 - 01:01:39] I just want to make sure that the intention that those will be

reduced. Not just, you know, for phase one, but that's actually the intention for the entirety of the project.
[01:01:39 - 01:01:46] From what I understood it was for the entirety of the project that he was eliminating them from the proposal altogether.
[01:01:46 - 01:01:51] Okay, thank you.
[01:01:51 - 01:01:55] Yeah, this is kind of a technical issue. I'm trying to do the math.
[01:01:55 - 01:02:01] They're applying for up to 50,000 graves over a period of years.
[01:02:01 - 01:02:14] And if they're only going to have one or two events per week and sometimes a week or two will go by and they have an event or don't have an event, how does that figure?
[01:02:14 - 01:02:16] It's pretty simple math.
[01:02:16 - 01:02:20] 50,000 over how many years?
[01:02:20 - 01:02:26] And they're only doing maybe four or 500 in a year.
[01:02:26 - 01:02:30] Thank you.
[01:02:30 - 01:02:37] And also, this is to me near. So I was going to say we have had projects in the past. A lot of them.
[01:02:37 - 01:02:52] They'll set limitations and then say, for example, so you would say 50 people at max two events a week with maybe one per month.
[01:02:52 - 01:02:54] And then you're going to have that number.
[01:02:54 - 01:03:06] Like the more specific your languages when you are setting the limitations, the more the easier it is for us to get a gauge of what you're applying for and what kind of impacts we're looking at in the future.
[01:03:06 - 01:03:14] So, because right now the application is fairly broad and we're not sure exactly what we're looking at.
[01:03:14 - 01:03:29] So if you're concerned is that you may have one event per year that's going to have up to 400 people, then you could say that in the application that it would be 50 people max per event except for one event per year that could have more than that kind of thing.
[01:03:29 - 01:03:33] And we've had that with a lot of the event centers and things.
[01:03:33 - 01:03:44] And that seems like it's a good way to kind of give everybody a feel of how many people they can expect to be visiting the site, that kind of thing and what the nature of events would be.
[01:03:44 - 01:03:57] So I would say if when you do resubmit your application to try to tighten up that language and better define kind of what we're looking at as far as who's coming in like when.
[01:03:57 - 01:04:03] So that's just a recommendation just from what I've seen with other applications.
[01:04:05 - 01:04:09] Okay, anything else?
[01:04:09 - 01:04:18] Any other comments on Zoom? No Zoom comments.
[01:04:18 - 01:04:24] All righty, then I'll take a recommendation.
[01:04:24 - 01:04:39] Okay, so I'm going to kind of summarize then because in general after we have tech meetings when it's found incomplete we do create a deficiency notice and then we send it to the applicant so they know kind of what we need to move

forward.
[01:04:39 - 01:04:47] So including in that I think we definitely want to know more information about how many people are going to be attending and the frequency of those events.
[01:04:47 - 01:04:55] We want to see the plans edited to not have the building because you're relying that part of the application.
[01:04:55 - 01:05:11] And then we will want to see also what proof of capacity for a potential septic design that would accommodate for whatever the amount of people that you're proposing visit at one point.
[01:05:11 - 01:05:15] Is that acceptable? You think that would be acceptable.
[01:05:15 - 01:05:20] Okay, to move forward just because that is one of the primary issues that we're looking at.
[01:05:20 - 01:05:36] And with the water too I think that scene I mean would that be something that we would include as a condition for well service or would that be something we would want to take out you know they'd have to go through the process of pulling a permit for the well but yeah I think
[01:05:36 - 01:05:47] depending on how many people they have there they'd have to you know if they're going to have a function or you know I guess I'm looking at just from what I've read and what I've heard.
[01:05:47 - 01:05:56] The applicant really needs to start over again and submit a whole new package because he's changed it so many times and we need something in writing so we can see it.
[01:05:56 - 01:06:03] And you know my suggestion would be start over and whatever he wants to do resubmit a new package.
[01:06:03 - 01:06:10] Yeah and so in that I think it would be reasonable for us to see a preliminary design for the septic.
[01:06:10 - 01:06:11] Absolutely.
[01:06:11 - 01:06:16] And I guess test wells is that a thing?
[01:06:16 - 01:06:34] No it would be some sort of you know if he's going to have a hundred people or fifty people there he's going to have to have some sort of water source you know potable drinking water you know if it's a well or if it's the AWA's waterline but four hundred people on a five inch meter I don't think that's going to be adequate.
[01:06:34 - 01:06:41] So maybe Muneer if you can talk with AWA and see what number of people would potentially you know.
[01:06:41 - 01:06:42] Or consider tanks.
[01:06:42 - 01:06:43] Or just consider tanks.
[01:06:43 - 01:06:51] We want to see that being considered at least in the revised application so.
[01:06:51 - 01:07:00] So just something that addresses water the preliminary septic and definitions of kind of how many people are going to be there and frequency of events.
[01:07:00 - 01:07:05] So with that I mean did you have anything to say.
[01:07:05 - 01:07:17] Okay I will then move to find the project application incomplete and we can schedule a tech meeting to review it again at a later date.

[01:07:17 - 01:07:22] I have a motion.
[01:07:22 - 01:07:24] Second.
[01:07:24 - 01:07:26] I have a second all in favor.
[01:07:26 - 01:07:27] All right.
[01:07:27 - 01:07:37] All right so the application has been found incomplete so pending resubmission from the applicant.
[01:07:37 - 01:07:41] All right and with that we are adjourned.
[01:07:41 - 01:07:45] Goodbye.

Exhibit 2-C

Submitted in connection with Use Permit UP-22-2-3, County of Amador

Transcript — Amador County Technical Advisory Committee

Meeting of June 1, 2023

Source: Machine transcription of Amador County's published meeting audio. **Not an official County transcript.** Amador County produces no written TAC minutes; the audio recording is the sole official record. Verify every quotation against the recording at the cited timestamp before entering it into the administrative record.

Timestamps are shown as [HH:MM:SS - HH:MM:SS] and refer to elapsed time in the audio file.

[00:00:00 - 00:00:04] for the 2023 meeting of the Amador County Technical Advisory Committee.
[00:00:04 - 00:00:05] I'm Chuck Bady, the Planning Director.
[00:00:06 - 00:00:08] Do we have a significant Zoom audience?
[00:00:08 - 00:00:10] I'm going to go ahead and introduce themselves up here so we can do that.
[00:00:11 - 00:00:15] We have two Zoomers today, Nicole Shepard and Mark Dainan-Howard.
[00:00:16 - 00:00:16] All right.
[00:00:18 - 00:00:22] I'm Patrick Chu, the Fire Marshal for Amador Fire Protection District.
[00:00:26 - 00:00:28] Debbie Larson, Environmental Health Director.
[00:00:31 - 00:00:32] Richard Vila, Public Works.
[00:00:35 - 00:00:39] All right, first item on the agenda is correspondence.
[00:00:39 - 00:00:44] Do we have any correspondence related to the agenda items that weren't included
[00:00:44 - 00:00:45] with the agenda packet?
[00:00:46 - 00:00:53] Yeah, I believe for item two we received, I believe it was two items that were not part
[00:00:53 - 00:00:56] of the initial upload, one from AFPD and then one from a neighbor.
[00:00:58 - 00:01:01] And those were distributed to the TAC members in advance of the

meeting.
[00:01:02 - 00:01:03] Right.
[00:01:03 - 00:01:03] Okay.
[00:01:05 - 00:01:09] Public matters and persons wishing to address the committee on non-agenda items.
[00:01:09 - 00:01:14] Is there anyone that wants to address the Technical Advisory Committee on a non-agenda item?
[00:01:17 - 00:01:21] Zoomers, if you would like to comment and are having technical difficulty,
[00:01:21 - 00:01:23] please use the chat box to let me know.
[00:01:24 - 00:01:28] And now's the time to raise your virtual hand if you want to comment
[00:01:28 - 00:01:30] on something not on the agenda.
[00:01:33 - 00:01:35] Mr. Bady, there's no Zoom comment.
[00:01:35 - 00:01:36] All right, see you then.
[00:01:36 - 00:01:37] We'll move on to the agenda items.
[00:01:38 - 00:01:42] Item one is a request for tentative subdivision map number 186 for Putnam Ranch,
[00:01:42 - 00:01:47] which proposes the division 423 acres
[00:01:47 - 00:01:54] and the 53 residential lots ranging in size from 5 to 9.9 acres with 118 acres of open space,
[00:01:54 - 00:02:04] conjunction with a general plan minute from the, should it be the AG General Plan classification
[00:02:04 - 00:02:09] to AG Transition General Plan classification, that's a change
[00:02:09 - 00:02:12] from a 40-acre minimum lot size to a 5-acre minimum lot size.
[00:02:12 - 00:02:19] The applicant is 18, excuse me, 16825 Highway 88 LLC represented by TOMA and associates.
[00:02:20 - 00:02:24] The project's located in Supervisorial District 5, specifically being directly north
[00:02:24 - 00:02:30] of the intersection of Highway 16 with the intersections of Highway 49 and 124.
[00:02:31 - 00:02:34] Staff have comments on the application.
[00:02:35 - 00:02:40] Yeah, just because it's been a while, we have received additional material
[00:02:40 - 00:02:43] from since our last meeting.
[00:02:43 - 00:02:48] We did receive a comment from the city of Plymouth a while ago saying
[00:02:48 - 00:02:52] that the project was not within their sphere of influence.
[00:02:52 - 00:02:59] We received the draft traffic impact study and then additionally,
[00:02:59 - 00:03:03] a bit of supplemental material, the fire management plan
[00:03:03 - 00:03:15] and a approximate 18-page kind of project description along with just kind
[00:03:15 - 00:03:16] of like a mini-sequit checklist.

[00:03:18 - 00:03:21] Those are the new materials that's been submitted.
[00:03:22 - 00:03:23] Okay, text.
[00:03:24 - 00:03:27] Responsibility today is to review the project for completeness
[00:03:27 - 00:03:29] does the applicant want to make any comments?
[00:03:37 - 00:03:37] Good afternoon.
[00:03:37 - 00:03:40] My name is Matt Tommel with TOMA and associates
[00:03:40 - 00:03:43] and David Wade, the project planner is also here today
[00:03:43 - 00:03:46] and just here for any questions and we do understand the same thing
[00:03:46 - 00:03:48] that we're just here for completeness and if there's any missing items.
[00:03:49 - 00:03:50] Thank you.
[00:03:50 - 00:04:02] Do we have any public comments on the project?
[00:04:08 - 00:04:10] There's no Zoom comment at this time.
[00:04:11 - 00:04:13] All right, no public comment.
[00:04:13 - 00:04:17] Do we have discussion among the TAC committee?
[00:04:18 - 00:04:22] Yeah, first of all, I appreciate Matt and Dave.
[00:04:22 - 00:04:26] We met on this project some time ago and one
[00:04:26 - 00:04:32] of the homework assignment if you want to call that was to find out what it was going
[00:04:32 - 00:04:40] to what the infrastructure and cost going to be if we were to have Amateur Water run a public line
[00:04:40 - 00:04:41] through this facility.
[00:04:41 - 00:04:47] But before you go further in that I have to say this is a great project
[00:04:47 - 00:04:50] and I think this will kick off Highway 16 as I mentioned to Matt before.
[00:04:50 - 00:04:58] But we can't continue, my opinion, continue to build how we've been building
[00:04:59 - 00:05:02] for the last 100 years with no water.
[00:05:02 - 00:05:08] So I get the point that, okay, we're not going to have sewer line,
[00:05:08 - 00:05:10] we're going to have the septic tanks, I totally get that.
[00:05:10 - 00:05:17] But we should at least start on the communication to see if we can get just a water line
[00:05:17 - 00:05:20] from Amateur Water serving this project.
[00:05:21 - 00:05:26] Because I believe that once these things get going it will kick off that Highway 16
[00:05:26 - 00:05:28] and then we'll get to the development.
[00:05:28 - 00:05:32] So I just want to know if that homework has been completed yet?
[00:05:44 - 00:05:44] All right, Matt, to them again.
[00:05:45 - 00:05:50] Yeah, Patrick and I have had a few conversations back and forth and it's ours
[00:05:50 - 00:05:56] in the applicants idea, you know, thought was that this project follows all past,

[00:05:57 - 00:06:00] follows the ordinances, you know, for five acre development.
[00:06:00 - 00:06:06] Everybody will have individual wells, septics, and, you know, some sort of water storage device.
[00:06:06 - 00:06:13] I know the county, AFPD has fees in place, you know, you either build a tank, pay a fee,
[00:06:13 - 00:06:14] that fee is supposed to go for storage.
[00:06:15 - 00:06:19] You know, there's Willow Creek Estate subdivision just west of here.
[00:06:19 - 00:06:24] There's Burk Ranch subdivision just east of here, all similar projects.
[00:06:24 - 00:06:27] And this one is just, again, you know, trying to follow all.
[00:06:27 - 00:06:34] We understand Patrick's concern and the willingness to try to get water, but in a lot
[00:06:34 - 00:06:38] of projects like this it's not financially feasible.
[00:06:38 - 00:06:43] You start running water lines out here to serve, you know, five acre parcels.
[00:06:43 - 00:06:46] It just gets very, very expensive.
[00:06:46 - 00:06:50] You know, if you're going to put that as a requirement then you start coming back
[00:06:50 - 00:06:55] to saying well let's dump this project and put 300 lots out there and do, you know,
[00:06:55 - 00:06:59] water sewer the whole nine yards, you know, type of thing.
[00:06:59 - 00:07:04] And the problem is it's not just as simple as, you know, you got Zinfandel to the north,
[00:07:04 - 00:07:06] you know, in the city there, just hooking into that.
[00:07:06 - 00:07:07] You start looking at that infrastructure.
[00:07:08 - 00:07:13] Was that infrastructure designed to handle, you know, future expansion to this project?
[00:07:14 - 00:07:15] Is there enough water in Plymouth?
[00:07:15 - 00:07:19] Currently right now, you know, our understanding is from the water agency
[00:07:20 - 00:07:24] that there's a moratorium, no future development, no future services out of AWA,
[00:07:24 - 00:07:28] serving the city of Plymouth, or pretty much anything that comes out of Tanner.
[00:07:28 - 00:07:32] So at this point, you know, putting water to a project like this
[00:07:33 - 00:07:37] from a feasibility and financial standpoint just doesn't make a lot of sense.
[00:07:37 - 00:07:40] And again, we're just trying to keep this consistent with other projects
[00:07:41 - 00:07:44] in the area, county codes, ordinances, that type of stuff.
[00:07:44 - 00:07:49] So we can look at Patrick as far as getting you know, a cost estimate, you know,
[00:07:49 - 00:07:50] for infrastructure.
[00:07:51 - 00:07:55] It's not going to be anywhere complete just because the amount of

studies
[00:07:55 - 00:07:57] that would be necessary to determine again
[00:07:57 - 00:08:00] if offsite facilities can handle this expansion and stuff like that.
[00:08:01 - 00:08:04] And see where that lands if you'd like.
[00:08:06 - 00:08:10] Yeah. If you don't mind that, I thought we had that discussion already
[00:08:10 - 00:08:17] and I appreciate it, but I can, I just want to see what it's going to take to have
[00:08:17 - 00:08:20] Amur Water do what they need to do for this to move forward.
[00:08:20 - 00:08:25] And I get all that regarding the county code and so forth, but there's a bigger code,
[00:08:25 - 00:08:27] a state code that talks about subdivisions.
[00:08:28 - 00:08:33] And all those communities you mentioned were built previously.
[00:08:33 - 00:08:37] And these state codes are developed every three years.
[00:08:37 - 00:08:40] This is a subdivision.
[00:08:40 - 00:08:47] And there is a clear definition on what's needed for a subdivision.
[00:08:47 - 00:08:55] So I just want to see if in fact if it can be met with the little arm twisting
[00:08:55 - 00:08:57] for Amur Water, if not then that's fine.
[00:08:57 - 00:09:00] We'll move on and you do what we've been doing the last 100 years.
[00:09:00 - 00:09:05] But I just want to see what you know, what's possible, what's not possible.
[00:09:05 - 00:09:07] Because I do believe this is a great project.
[00:09:07 - 00:09:13] And I really believe if this were to take off it's going to start a domino effect
[00:09:13 - 00:09:17] along Highway 16, just like everybody else in California
[00:09:17 - 00:09:20] when somebody's first started doing something, the first is always the hardest.
[00:09:20 - 00:09:21] Sure.
[00:09:21 - 00:09:24] Yeah, so but after that it seems to roll right after that.
[00:09:24 - 00:09:25] Right.
[00:09:25 - 00:09:30] So I just want to see everything you have been saying
[00:09:30 - 00:09:33] and everybody, what everybody else has been saying unfortunately regarding Amur Water.
[00:09:33 - 00:09:38] But I just want to see what in writing for them that there is a more term
[00:09:38 - 00:09:41] we can't tell you anything or we're going to tell you anything.
[00:09:41 - 00:09:42] Right.
[00:09:42 - 00:09:44] But I just want to see that in writing somewhere.
[00:09:44 - 00:09:49] I guess our only concern is if that just keeps delaying this, delaying this, delaying this.
[00:09:51 - 00:09:53] We propose not to do a water system.
[00:09:53 - 00:09:58] We propose to meet county ordinance codes, AFPD existing codes

and ordinances
[00:09:58 - 00:09:59] and that type of stuff.
[00:09:59 - 00:10:01] We'd be more than happy to take a look at this.
[00:10:03 - 00:10:06] But if this is going to keep delaying this project,
[00:10:06 - 00:10:09] because trying to get information out of the water agency, putting this stuff together,
[00:10:09 - 00:10:10] obviously takes time.
[00:10:11 - 00:10:15] If we can keep moving this forward and this just be a condition with AFPD that says,
[00:10:15 - 00:10:21] okay, we looked at it, it's not feasible, we're going to move on
[00:10:21 - 00:10:23] with existing codes and ordinances and stuff like that.
[00:10:24 - 00:10:28] Because this is obviously something completely new for a project like this
[00:10:28 - 00:10:32] that's never been asked for, designed, requested.
[00:10:33 - 00:10:35] Anything like that for a five-acre subdivision.
[00:10:36 - 00:10:44] You know, the project would be to provide all the clearing, wells, storage, you know,
[00:10:44 - 00:10:46] hydrant hookups, you know, all the stuff that the codes call for.
[00:10:47 - 00:10:48] You know, so.
[00:10:48 - 00:10:51] And again, we understand where he's coming from.
[00:10:51 - 00:10:56] We want to, Lisa wants to make this the safest possible project.
[00:10:57 - 00:10:57] But.
[00:10:57 - 00:11:01] Okay.
[00:11:01 - 00:11:01] All right.
[00:11:01 - 00:11:05] Well, I believe I did ask this at our last TAC meeting.
[00:11:06 - 00:11:08] And individual meeting we had as well.
[00:11:08 - 00:11:08] Okay.
[00:11:08 - 00:11:09] So, right?
[00:11:09 - 00:11:11] I mean, this is not the first time I brought this up.
[00:11:12 - 00:11:12] Is that correct?
[00:11:12 - 00:11:13] Understood.
[00:11:13 - 00:11:13] Yeah.
[00:11:13 - 00:11:18] So have you made an attempt to contact Amur Water at all?
[00:11:18 - 00:11:18] We have.
[00:11:18 - 00:11:24] We've talked to the city of Plymouth and, you know, they've been told no future
[00:11:24 - 00:11:26] connections until Tanner gets fixed.
[00:11:27 - 00:11:32] Our understanding, their understanding is that the WAA is doing a study right now.
[00:11:33 - 00:11:37] But with no, you know, no timeline, no costs, no nothing yet.
[00:11:37 - 00:11:39] So I want to commit to anything.
[00:11:39 - 00:11:43] Have you gotten even an email for Amur Water saying, I'll be more happy

[00:11:43 - 00:11:46] to see an email saying, we're doing a study right now.
[00:11:46 - 00:11:47] We can't give an answer.
[00:11:48 - 00:11:52] That, at least I know that you made an attempt to contact them in writing
[00:11:52 - 00:11:54] and somehow got some sort of information.
[00:11:54 - 00:11:59] But this is maybe new to what I'm requiring.
[00:11:59 - 00:12:07] But it certainly is not new if you look in the title 24 in the fire code
[00:12:07 - 00:12:09] that's been adopted throughout the state of California.
[00:12:09 - 00:12:15] It's, it's, this is one of the rarities where we got what we really call a subdivision.
[00:12:16 - 00:12:18] I mean, you know, we joked about it.
[00:12:18 - 00:12:20] Those other ones we met about one and two lots.
[00:12:20 - 00:12:21] Well, this is not a subdivision.
[00:12:22 - 00:12:23] You whatever you guys want to do.
[00:12:24 - 00:12:24] Right.
[00:12:24 - 00:12:28] So, but this is truly a subdivision.
[00:12:31 - 00:12:36] I'm just trying to think, not even outside the box, but long term, if this were to go forward
[00:12:37 - 00:12:41] and if we have this dominant effect of other developments, they're going to have the same issues.
[00:12:42 - 00:12:42] Sure.
[00:12:42 - 00:12:43] Understood.
[00:12:43 - 00:12:47] The problem is what you got to consider in what you're asking.
[00:12:48 - 00:12:52] If you're considering this as a tag to a future development going down Highway 16,
[00:12:52 - 00:12:56] then it's not just a four inch water line for fire service only.
[00:12:56 - 00:13:02] You're running a 10, 12, 18 inch line down there through this project to serve everybody else.
[00:13:02 - 00:13:03] Yeah.
[00:13:03 - 00:13:06] Then all the way back to the cumulative effects back through town.
[00:13:06 - 00:13:13] And that's on amateur water then if they start thinking bigger picture.
[00:13:13 - 00:13:14] Right.
[00:13:14 - 00:13:14] Right.
[00:13:15 - 00:13:16] All right.
[00:13:16 - 00:13:16] Thank you.
[00:13:23 - 00:13:24] Any other committee comments?
[00:13:35 - 00:13:41] I, Matt, have you studied the water?
[00:13:41 - 00:13:47] Have you done any wells to determine how the water is out there?
[00:13:49 - 00:13:53] Yeah, there are two, again, Matt, there are two existing wells.
[00:13:53 - 00:13:57] If I remember correctly, David, on the ranch and both very good.
[00:13:57 - 00:13:59] One was in the 200 or 300 gallon a minute range.
[00:13:59 - 00:14:03] And I can't remember what the other one was, but both really, really

good wells.
[00:14:03 - 00:14:03] Yeah.
[00:14:04 - 00:14:08] And I know that's a questionable, we were just here in Planning Commission the other night
[00:14:08 - 00:14:11] for a project just south of here on the other side of Highway 16.
[00:14:11 - 00:14:15] And people had wells down there that were definitely questionable.
[00:14:16 - 00:14:21] We did work for a project vineyard just west of here, Greenwich Ranch, Rancho Victoria.
[00:14:21 - 00:14:26] And they've drilled, oh, that I know of probably a dozen wells.
[00:14:27 - 00:14:31] Four of them are very good in the 50 to 100 gallon a minute range.
[00:14:31 - 00:14:32] A couple of them were dusters.
[00:14:33 - 00:14:35] And the other ones were, I think, in the 8 to 10 gallon a minute range.
[00:14:36 - 00:14:38] You know, that was just west of this project.
[00:14:38 - 00:14:39] So, yeah.
[00:14:40 - 00:14:44] But just like drilling wells in Amateur County, you know, you just, you know, yeah,
[00:14:44 - 00:14:46] definitely intermittent hit or miss for sure.
[00:14:47 - 00:14:53] Any other committee comments?
[00:14:57 - 00:15:00] So I still think the project needs an environmental impact report.
[00:15:00 - 00:15:05] The issue with water availability and the wildfire risk.
[00:15:06 - 00:15:12] And the fact that there's a major general plan amendment, 400 acres going from a 40-acre minimum
[00:15:12 - 00:15:17] to a five-acre minimum might put us in the situation where the board's got to adopt
[00:15:17 - 00:15:20] an overriding statement of overriding considerations.
[00:15:20 - 00:15:23] And that's only legally defensible with an EIR.
[00:15:26 - 00:15:31] You know, as far as completeness, comfortable going that direction.
[00:15:31 - 00:15:34] But I think the environmental impact report's going to have to be an EIR.
[00:15:34 - 00:15:37] Or the appropriate document would have to be an EIR.
[00:15:50 - 00:15:58] So Chuck, if we were to say this job meets all the applications for a complete project,
[00:15:58 - 00:16:05] but you're asking for this EIR, when will there be a point where you say you can't go
[00:16:05 - 00:16:08] further until you have the EIR?
[00:16:11 - 00:16:11] Now.
[00:16:12 - 00:16:13] Okay. All right.
[00:16:13 - 00:16:15] Well, thank you.
[00:16:17 - 00:16:22] I mean, you know, I mean, if that's what TAC ultimately decides, I mean, they have,
[00:16:23 - 00:16:26] you know, they can, they have an administrative room when you go to the board

[00:16:26 - 00:16:28] and say we don't think it needs an EIR and here's why.
[00:16:28 - 00:16:30] It then becomes their decision.
[00:16:31 - 00:16:36] But yeah, it couldn't, it couldn't proceed administratively through the process without,
[00:16:36 - 00:16:36] without that.
[00:16:37 - 00:16:41] They'd have to prepare a draft EIR and there would be public comments on that
[00:16:41 - 00:16:43] before it ever went to the planning commission.
[00:16:43 - 00:17:04] And after a while, I'm David Wade.
[00:17:04 - 00:17:05] I'm the planner on the project.
[00:17:05 - 00:17:09] And I just have a question about process and forgive me, I should know this.
[00:17:12 - 00:17:17] The environmental checklist, who will actually do that review?
[00:17:17 - 00:17:20] Is that something that's done in house by staff?
[00:17:20 - 00:17:21] Or do we need to?
[00:17:21 - 00:17:27] It could be or if TAC determines that you need an EIR, it's not required that you do
[00:17:28 - 00:17:29] an initial checklist.
[00:17:30 - 00:17:30] I see.
[00:17:31 - 00:17:33] So you could skip that step if you wanted to.
[00:17:34 - 00:17:35] I see.
[00:17:37 - 00:17:37] Okay.
[00:17:38 - 00:17:38] Thank you.
[00:17:38 - 00:17:39] Sure.
[00:17:45 - 00:17:50] Thank you, TAC, for taking over for me for my absence.
[00:17:52 - 00:17:53] Any other questions?
[00:17:53 - 00:17:54] Any other comments?
[00:17:58 - 00:18:00] There's no Zoom comment, Chair.
[00:18:01 - 00:18:01] Alrighty.
[00:18:04 - 00:18:11] So my understanding is you would like to see an EIR for this project because of
[00:18:11 - 00:18:17] several of the factors that are involved, some of it being the zone change,
[00:18:18 - 00:18:22] water issue, and other factors in there.
[00:18:22 - 00:18:23] Is that correct?
[00:18:23 - 00:18:24] That's correct.
[00:18:26 - 00:18:31] Does anybody have any questions or statements about that?
[00:18:32 - 00:18:35] Yeah, it's not really a water issue per se.
[00:18:35 - 00:18:41] I just want to know what is available out there and what they can get.
[00:18:41 - 00:18:44] So it's not even a, because issue makes you seem like I got major concerns,
[00:18:44 - 00:18:52] but I do, but I just want to see in writing what's available out there

and
[00:18:52 - 00:18:56] what it's going to take to get that availability of water out there.
[00:18:57 - 00:19:01] And I believe I've asked this several times already.
[00:19:02 - 00:19:07] This would at least allow you to get that answer and it would be studied.
[00:19:09 - 00:19:19] And whichever direction the EIR presents, where they had their own system or
[00:19:19 - 00:19:25] if they had to tack on to an existing system, that could be answered.
[00:19:28 - 00:19:28] Correct?
[00:19:29 - 00:19:33] Right, and it would, excuse me, we'd probably see an alternatives analysis
[00:19:33 - 00:19:36] of using on-site water versus public water.
[00:19:36 - 00:19:37] Yes.
[00:19:39 - 00:19:39] Okay.
[00:19:41 - 00:19:44] Well, I will entertain a motion.
[00:19:52 - 00:19:57] Normally when we do review for completeness, it's either complete or not.
[00:19:57 - 00:19:58] Or it's not.
[00:19:58 - 00:20:02] And then at some point in the future we come back with an initial study.
[00:20:02 - 00:20:03] Yes.
[00:20:03 - 00:20:05] Or for the project can do environmental review.
[00:20:06 - 00:20:16] I'll make a motion that we find the application complete and that we recommend
[00:20:16 - 00:20:21] that the applicant move forward with an environmental impact report on the project.
[00:20:24 - 00:20:24] All righty.
[00:20:26 - 00:20:27] I have a motion.
[00:20:27 - 00:20:28] Do I have a second?
[00:20:32 - 00:20:32] I'll second.
[00:20:33 - 00:20:33] All righty.
[00:20:34 - 00:20:35] I have a motion and a second.
[00:20:36 - 00:20:37] All in favor?
[00:20:37 - 00:20:38] Aye.
[00:20:38 - 00:20:39] Aye.
[00:20:40 - 00:20:41] All righty.
[00:20:41 - 00:20:46] We will move forward and get that done.
[00:20:48 - 00:20:53] Okay, I have a quick question about what, so what's kind of a rough outline
[00:20:53 - 00:20:59] of what happens next with, so now that everyone's on the same page, they need an AR.
[00:21:00 - 00:21:07] What happens next as far as, because there's two different ways to go about it, right?

[00:21:07 - 00:21:13] There's the county selected consultant, applicant selected consultant.
[00:21:14 - 00:21:15] And then what happens?
[00:21:15 - 00:21:17] The applicant, go ahead, Jen.
[00:21:17 - 00:21:18] I think you're going to jump in.
[00:21:18 - 00:21:20] The applicant can select a consultant.
[00:21:21 - 00:21:27] The downside to that is that there's an additional cost to the applicant because then our in-house
[00:21:27 - 00:21:31] or external SQL consultant has to look at it.
[00:21:32 - 00:21:34] Or the county can select a consultant.
[00:21:34 - 00:21:37] The county pays for it, but there's a reimbursement agreement with the applicant
[00:21:38 - 00:21:42] that I think is paid like in thirds, advanced in thirds.
[00:21:42 - 00:21:47] But yeah, it could be done either way.
[00:21:47 - 00:21:50] There's not a county policy that says it has to be done one way or the other.
[00:21:52 - 00:22:01] And then to add to that, they still have the ability to appeal the EIR if they,
[00:22:01 - 00:22:07] that would be the first, if they agree, move forward with it, then we can,
[00:22:08 - 00:22:14] if they choose not to, then they can take it to the planning commission then to,
[00:22:14 - 00:22:16] or to the board, correct?
[00:22:16 - 00:22:17] I think we would have to go to the board.
[00:22:17 - 00:22:22] I don't think the planning commission could have any authority to direct it to the board.
[00:22:22 - 00:22:24] Okay, so then that would require a board date.
[00:22:25 - 00:22:34] And all arguments, all documentation for arguments for why or why not.
[00:22:36 - 00:22:36] Okay.
[00:22:39 - 00:22:39] All righty.
[00:22:48 - 00:22:51] All righty, with that we will move forward.
[00:22:52 - 00:22:58] And then on to item two, the request for use permit.
[00:23:00 - 00:23:06] Right, so this is a request for a use permit for a tasting room in the R1A zone.
[00:23:07 - 00:23:15] We're here to evaluate the project for environmental impacts and recommend approval
[00:23:15 - 00:23:19] of the appropriate environmental document and propose and review the draft conditions.
[00:23:20 - 00:23:27] So going through the CEQA checklist, well, just as a refresher,
[00:23:27 - 00:23:33] so the project intends to develop an outdoor and indoor tasting area
[00:23:34 - 00:23:38] with the outdoor being approximately 410 square feet and the indoor being,
[00:23:38 - 00:23:45] occurring within 400 square feet of an existing garage with proposed

hours of operation
[00:23:46 - 00:23:51] for the tasting room between, from Thursday through Saturday between the hours of 11
[00:23:51 - 00:23:56] to 5, 5 appointment only and not to exceed six customers per day as well
[00:23:56 - 00:24:04] as a wine club pickup event three times a year where they would come and visit the property.
[00:24:05 - 00:24:10] So going through the CEQA checklist, just given the scope of the project,
[00:24:11 - 00:24:17] every chapter was essentially either less than significant or had no impact.
[00:24:18 - 00:24:26] So it resulted in a negative declaration for the CEQA study.
[00:24:27 - 00:24:35] And then the, I don't know, I'll just leave it there for now for a talk to discuss
[00:24:35 - 00:24:37] and then we can move on to the conditions.
[00:24:38 - 00:24:45] So as far as the CEQA initial study, does anyone have any questions or issues
[00:24:45 - 00:24:46] with any of those chapters?
[00:24:51 - 00:24:52] Anyone down at this end?
[00:24:56 - 00:24:57] Anyone at this end?
[00:24:58 - 00:24:59] At the moment, no.
[00:24:59 - 00:25:12] Okay. So conditions of approval, I believe there's 12 and again, stop me if anyone has
[00:25:12 - 00:25:14] anything to add or change.
[00:25:15 - 00:25:19] So condition number one would be the the Fish and Wildlife fees and or a,
[00:25:23 - 00:25:25] or is it the fee exemption?
[00:25:26 - 00:25:30] Condition number two is that the applicant shall sign the conditions of approval.
[00:25:31 - 00:25:40] Three is for the the use permit cannot be detrimental to like the health safety,
[00:25:40 - 00:25:41] peace models and all that.
[00:25:42 - 00:25:46] Condition number four is kind of similar to that.
[00:25:46 - 00:25:53] Five is, condition number five is the hours of operation as described in the application,
[00:25:53 - 00:25:56] Thursday through Saturday 11 to five special events.
[00:25:56 - 00:26:03] They're limited to the three wine club pickle events, occupancy as determined by the building.
[00:26:03 - 00:26:10] So whenever they would come in for their that conversion permit from the residential garage to
[00:26:11 - 00:26:13] that, that's when that would be determined.
[00:26:15 - 00:26:22] Condition number eight states that the property owner shall maintain the current

[00:26:23 - 00:26:27] alcohol and tobacco tax and trade bureau as well as the ABC license
[00:26:28 - 00:26:30] for the duration of the operation of the tasting room.
[00:26:32 - 00:26:39] So food service was one that was unsure about to include their standard for
[00:26:39 - 00:26:45] tasting rooms to have that condition of only pre-packaged foods can be sold.
[00:26:45 - 00:26:49] But I don't know if that's something the applicant
[00:26:51 - 00:26:54] considered or if we should not even have that in there.
[00:26:57 - 00:27:01] Condition number 10, obviously all necessary building permits must be obtained.
[00:27:01 - 00:27:08] Condition number 11 is another standard condition for tasting rooms that typically
[00:27:08 - 00:27:13] imposed by environmental health. That's one that I had a question about.
[00:27:13 - 00:27:21] And then condition number 12 is that it's a monitoring and a reporting condition for
[00:27:21 - 00:27:28] tasting rooms that we have now where every January 30th the tasting room operator provides
[00:27:28 - 00:27:33] us with this information, kind of like, you know, number of tastings, number of guests
[00:27:33 - 00:27:35] over the course of the year, things like that.
[00:27:42 - 00:27:44] Any questions from anyone here?
[00:27:44 - 00:27:58] There does need to be a condition added from AFPD. I forgot to add that. It's the CFD annexation.
[00:27:59 - 00:28:03] What's that station?
[00:28:03 - 00:28:04] The CFD annexation.
[00:28:04 - 00:28:08] Oh yeah, right. I figure the applicant already knows about all the fees that they're going to have to
[00:28:09 - 00:28:11] pay for this conversion.
[00:28:13 - 00:28:16] So that's an added condition there. I forgot to add that.
[00:28:17 - 00:28:31] Okay. Any discussion from here? And we will go ahead and open it up to the public
[00:28:33 - 00:28:39] for any comments, concerns, anything like that for this particular item.
[00:28:42 - 00:28:44] Zoomers, do you have any comment on this?
[00:28:47 - 00:28:49] Chair, there's no Zoom comment at this time.
[00:28:50 - 00:28:57] Okay. What about the information that we are, the concerns that we were just received today?
[00:29:02 - 00:29:14] In regarding turnouts, things like that on a private road. Actually, how wide is the private
[00:29:14 - 00:29:18] road? Or do we have an idea?
[00:29:19 - 00:29:21] The driveway or ponderous away?
[00:29:21 - 00:29:22] Ponderous away.

[00:29:22 - 00:29:24] That I, maybe the applicant.
[00:29:25 - 00:29:30] Okay.
[00:29:32 - 00:29:36] Could you please use the microphone so Zoomers can also hear?
[00:29:37 - 00:29:42] Approximately 14 feet wide, Chipsy old. The road does need some minor repairs
[00:29:43 - 00:29:49] as a result of the winter. But we're kind of holding off on that because PG&E is in the
[00:29:49 - 00:29:51] process of putting our lines underground.
[00:29:52 - 00:29:55] So you're one of the roads that are getting hit with the underground?
[00:29:55 - 00:29:56] Correct.
[00:29:56 - 00:30:04] Okay. Do you have any turnouts or any, because it is only 14 feet, do you have any
[00:30:05 - 00:30:12] for two-way traffic, very difficult to get through? Do you have anywhere that people can
[00:30:12 - 00:30:23] turn out to let people pass or large just fire any emergency response or anything like that
[00:30:23 - 00:30:24] along the way?
[00:30:24 - 00:30:25] Yes.
[00:30:25 - 00:30:26] Okay.
[00:30:26 - 00:30:27] We do have numerous.
[00:30:29 - 00:30:33] Just, that was one of the things that was brought up just asking the question?
[00:30:33 - 00:30:34] Sure, I understand.
[00:30:35 - 00:30:38] And once you enter our property, there's numerous there also.
[00:30:40 - 00:30:41] So, okay.
[00:30:45 - 00:30:46] Any other questions?
[00:30:46 - 00:30:51] No. All right. I didn't have a question regarding the response only because this is a garage
[00:30:51 - 00:30:52] conversion.
[00:30:53 - 00:30:54] Correct.
[00:30:54 - 00:30:54] Correct.
[00:30:54 - 00:30:57] Yeah. There's not a whole lot of people you can actually put in a garage.
[00:30:58 - 00:31:01] Yeah. So, you are not anticipating doing a lot.
[00:31:02 - 00:31:11] Well, even if you're working, it's not a three car, four bay, 40 feet deep garage.
[00:31:11 - 00:31:12] No.
[00:31:12 - 00:31:15] Yeah. So, yeah. That's what I'm totally fine with all that.
[00:31:16 - 00:31:19] Okay. Alrighty. Well, thank you.
[00:31:19 - 00:31:19] Okay. Thank you.
[00:31:19 - 00:31:23] Do you have a road maintenance agreement on that section of Ponderosa Road?
[00:31:24 - 00:31:26] Me and with the other property owners?

[00:31:26 - 00:31:26] Yes.
[00:31:26 - 00:31:27] No, we do not.
[00:31:27 - 00:31:28] Okay.
[00:31:28 - 00:31:29] Alrighty.
[00:31:29 - 00:31:32] I know that was mentioned in the comment, but if you...
[00:31:33 - 00:31:35] That might be something to consider.
[00:31:37 - 00:31:40] Six people a day's, 12 trips.
[00:31:40 - 00:31:45] That's consistent with one more house on that road.
[00:31:45 - 00:31:45] Yeah.
[00:31:45 - 00:31:49] So, I wasn't concerned that that was going to be a significant impact.
[00:31:50 - 00:31:55] Are actually the second driveway on the road from Ponderosa Hills Road.
[00:31:55 - 00:31:57] So, it's not that long of a section.
[00:31:58 - 00:32:04] But we cooperate with each other very well because we have a few issues in the past and
[00:32:04 - 00:32:07] everybody seems to chip in, but I don't have a problem putting together.
[00:32:09 - 00:32:12] They may be something to consider.
[00:32:12 - 00:32:12] Right.
[00:32:14 - 00:32:16] Just because of the avenue that you're going down.
[00:32:18 - 00:32:23] That way, there's some people might think of it as more of a guarantee that something
[00:32:23 - 00:32:25] will be done as opposed to nothing.
[00:32:26 - 00:32:30] Alrighty.
[00:32:32 - 00:32:36] I turn it back over to any final questions, comments?
[00:32:36 - 00:32:37] Any...
[00:32:40 - 00:32:47] So, condition number 9 and 11 for environmental health, are those sufficient or do they need to
[00:32:47 - 00:32:49] be changed or removed?
[00:32:51 - 00:32:55] The one concerning food service that the applicant didn't ask for it, I'm not inclined to offer it.
[00:32:55 - 00:32:56] Okay.
[00:33:04 - 00:33:08] The water supply, they did submit labs and it's sufficient.
[00:33:11 - 00:33:12] Alrighty.
[00:33:16 - 00:33:25] The septic also, they got a consultant because of the change of use and the septic was sufficient as well.
[00:33:25 - 00:33:28] Alrighty.
[00:33:30 - 00:33:34] Any other questions, concerns?
[00:33:40 - 00:33:41] Please step on up.
[00:33:42 - 00:33:43] Talk to the mic.
[00:33:47 - 00:33:50] So, could we do prepackage, could you do crackers and things like that?
[00:33:51 - 00:33:55] And is that considered food service?

[00:33:55 - 00:34:00] It would require you to get a food facility through environmental health.
[00:34:00 - 00:34:09] So, there's an exemption for wine tasting rooms in the food code and you're actually not
[00:34:09 - 00:34:15] considered really a food facility as long as you just serve prepackage, non-potentially
[00:34:15 - 00:34:16] hazardous foods.
[00:34:16 - 00:34:21] So, crackers, pretzels, non-potentially hazardous food, prepackage.
[00:34:22 - 00:34:23] Alright, thank you.
[00:34:23 - 00:34:24] And beverages as well.
[00:34:24 - 00:34:26] Non-potentially hazardous beverages.
[00:34:30 - 00:34:30] Alrighty.
[00:34:34 - 00:34:40] So then, condition number nine, does that need to go back?
[00:34:49 - 00:34:53] There won't be cold storage with prepackage non-potentially hazardous food.
[00:34:53 - 00:34:53] Okay.
[00:34:57 - 00:35:04] Drive, is there language then in the Cal Food Code that we could put in a substitute
[00:35:04 - 00:35:06] in that condition to address that?
[00:35:06 - 00:35:06] Yes, there is.
[00:35:06 - 00:35:07] Yep.
[00:35:09 - 00:35:10] I'm comfortable.
[00:35:10 - 00:35:11] Do you think it's as dry?
[00:35:11 - 00:35:12] Yeah.
[00:35:12 - 00:35:17] So then, condition number nine will be modified to remove any reference to like
[00:35:17 - 00:35:20] refrigeration or whatnot, but it'll include that language.
[00:35:22 - 00:35:26] Crackers, things like that to clear the pellet.
[00:35:26 - 00:35:26] Right.
[00:35:28 - 00:35:28] Okay.
[00:35:30 - 00:35:34] And then, just to be clear with condition number 11 with the non-community domestic
[00:35:34 - 00:35:40] water supply permit from environmental health, because I know other tasting rooms,
[00:35:41 - 00:35:45] they have like a requirement where they become like a public water.
[00:35:47 - 00:35:53] Let me check into that again because they are not, like the other tasting rooms might be
[00:35:53 - 00:35:57] serving food and it changes their category, but I'll double check because
[00:35:58 - 00:36:03] they're a wine tasting room, they're not even considered a food facility,
[00:36:03 - 00:36:06] so we're not even looking at how they wash wine glasses.
[00:36:12 - 00:36:16] State, the small public water system has to, I always forget the

numbers,
[00:36:16 - 00:36:19] it's 25 people more than 60 days a year?
[00:36:20 - 00:36:24] Yes, for a transient non-community water system.
[00:36:25 - 00:36:27] So they're six a day, he's not gonna,
[00:36:28 - 00:36:29] No.
[00:36:29 - 00:36:34] Not a cumulative number throughout the year, it's groups of, I can't ever remember it.
[00:36:34 - 00:36:39] Let me double check that because it gets a little confusing, but I'll double check.
[00:36:40 - 00:36:40] Okay.
[00:36:42 - 00:36:42] Alrighty.
[00:36:43 - 00:36:48] Then if, any other questions, any other comments?
[00:36:48 - 00:36:54] So that condition would be then removed because they don't meet that threshold?
[00:36:56 - 00:37:02] They have to provide helpful, potable water, but as far as being under a definition of a
[00:37:03 - 00:37:08] water system, that's where I'm gonna double check for that limited use.
[00:37:17 - 00:37:23] And if there's no more questions or comments, I will entertain a motion.
[00:37:23 - 00:37:41] I'll make a motion that we, that we found no technical objections to the planning commission
[00:37:41 - 00:37:46] approving a mitigated negative declaration for the project.
[00:37:48 - 00:37:48] Alrighty.
[00:37:49 - 00:37:58] With, would you have, whatever the results of the minor changes to the conditions?
[00:37:59 - 00:38:02] Including the minor changes to the conditions as discussed.
[00:38:03 - 00:38:04] Alrighty.
[00:38:05 - 00:38:07] I have a, a motion.
[00:38:08 - 00:38:08] Do I have a second?
[00:38:09 - 00:38:09] I'll second.
[00:38:10 - 00:38:11] Alrighty.
[00:38:11 - 00:38:12] I have a first and the second.
[00:38:12 - 00:38:13] All in favor?
[00:38:14 - 00:38:14] Aye.
[00:38:14 - 00:38:14] Aye.
[00:38:16 - 00:38:16] Alrighty.
[00:38:18 - 00:38:19] On that goes.
[00:38:20 - 00:38:26] And the final, the quest for use permit application.
[00:38:27 - 00:38:30] Okay.
[00:38:30 - 00:38:35] So this project is for the gardens of newer cemetery project.
[00:38:35 - 00:38:40] It is a 46 acre parcel currently zoned R1A single family residential and I record

[00:38:40 - 00:38:45] the culture and it also has an MRZ mineral resource zone general plan designation.
[00:38:46 - 00:38:52] The property is located at 857 Carbondale Road that in I own, so that's I believe directly
[00:38:52 - 00:38:59] south of the Eagles Nest subdivision and the proposed development is a cemetery and
[00:38:59 - 00:39:04] there is limited improvements, I guess, in addition to the graves.
[00:39:04 - 00:39:10] So I know that they were discussing previously having a structure that has
[00:39:10 - 00:39:12] been stricken from the application.
[00:39:12 - 00:39:19] So it's just proposing the graves themselves and then the parking associated with that and
[00:39:19 - 00:39:21] a restroom to serve people who are attending funerals.
[00:39:22 - 00:39:27] The proposed number of funerals is a hundred events annually with a limit of 50 attendees per
[00:39:28 - 00:39:28] event.
[00:39:30 - 00:39:35] And I did want to say so the proposed from what we understood in the application it
[00:39:35 - 00:39:42] included around 400 burial plots, but we had some questions for the applicant
[00:39:43 - 00:39:48] to kind of nail down the specific number of plots that are proposed in the project.
[00:39:50 - 00:39:54] I do see that the project representative is Muneer Kadura.
[00:39:54 - 00:39:58] He is on Zoom, but I guess we can start.
[00:39:58 - 00:40:04] I guess did Muneer, did you want to talk at all, introduce the project or anything?
[00:40:04 - 00:40:07] Otherwise we can just get started kind of going through the application as it stands.
[00:40:07 - 00:40:10] I'm going to go ahead and Muneer at this point.
[00:40:21 - 00:40:25] Well, I mean I can at least start off by going through the application that was included in the
[00:40:25 - 00:40:30] packet and then Muneer if you want to comment or anything just feel free to raise your hand
[00:40:30 - 00:40:31] or comment.
[00:40:31 - 00:40:32] I think Mary-Anne would be here for you.
[00:40:33 - 00:40:34] Hello everyone.
[00:40:34 - 00:40:39] I hope everyone is well, is well and doing good.
[00:40:40 - 00:40:43] I'd like to explain the number of the graves.
[00:40:45 - 00:40:48] It's pretty much stated in the design.
[00:40:49 - 00:40:50] These are tentative however.
[00:40:50 - 00:40:57] If you have any objections to that we can reduce them, but as far as we are concerned,
[00:40:58 - 00:41:00] we would like to go with whatever we proposed.

[00:41:02 - 00:41:03] What was that number Muneer?
[00:41:04 - 00:41:13] No, not on top of my head, but I would say about 400 graves all together.
[00:41:14 - 00:41:17] Yeah, because we had some questions just how it was phrased in the project description.
[00:41:18 - 00:41:22] I mean was there anything else you wanted to say as far as introduction or are you
[00:41:22 - 00:41:24] okay with just us going through the packet?
[00:41:25 - 00:41:30] Yeah, I don't have anything to say unless there's a question I can ask that is to the
[00:41:30 - 00:41:31] best of my ability.
[00:41:31 - 00:41:32] All right, sounds good.
[00:41:32 - 00:41:32] Thank you.
[00:41:33 - 00:41:35] So I guess we can start with the application.
[00:41:36 - 00:41:43] So one of my comments was we do have several different site plans and I believe they are
[00:41:45 - 00:41:49] there's some statements that the proposed development is not to scale.
[00:41:49 - 00:41:55] We will want to make sure that in the site plan that everything is to scale.
[00:41:55 - 00:42:01] So I think it was the smaller kind of details of the graves that stated that it was not to scale.
[00:42:03 - 00:42:10] But yeah, and then this the I guess most recent submission showing the grave sites in the
[00:42:10 - 00:42:16] northwestern corner and the parking lot that says it's not to scale.
[00:42:16 - 00:42:22] So we'll need that to be to scale and hopefully it would also be possible to have a zoomed in
[00:42:23 - 00:42:29] kind of view so that we can actually see the layout and everything because it's kind of unclear
[00:42:29 - 00:42:31] at the resolution that it was submitted at.
[00:42:33 - 00:42:40] I did want to note also in that site plan there is no bathroom I don't think listed
[00:42:41 - 00:42:43] though that is part of the application.
[00:42:43 - 00:42:47] So if it's okay for you to add that to that site plan as well.
[00:42:49 - 00:42:55] Just so we have I guess all of them primary elements included visually then.
[00:42:55 - 00:43:08] So in I believe it's like the third I guess the first page of the text part of the application.
[00:43:11 - 00:43:16] So I was kind of wondering what went under section 3.3 the burial options.
[00:43:17 - 00:43:26] I was kind of confused because how many actual bodies would be in each grave
[00:43:27 - 00:43:31] because they have the sizing is described as some graves being four

foot by eight foot plots.
[00:43:32 - 00:43:38] And I think that's consistent with some of those details that you submitted.
[00:43:40 - 00:43:47] But since those details were not to scale it's kind of hard to know what I guess which ones are
[00:43:47 - 00:43:52] going to be the four foot by eight foot plots and then what the other various sizes to
[00:43:52 - 00:43:55] accommodate customers preferences what constitutes that.
[00:43:56 - 00:44:04] So I think this section if it could be broken down more specifically into what size graves we're
[00:44:04 - 00:44:12] looking at and kind of describing the grouping in addition saying I guess how many people
[00:44:12 - 00:44:17] are going to be in each grouping versus a single like whole I'm not sure.
[00:44:18 - 00:44:28] Because it says that one grave may contain five caskets or two of the infant caskets
[00:44:29 - 00:44:32] or the infant casket with the adult casket.
[00:44:33 - 00:44:38] So from my understanding that means one grave would have five bodies in it.
[00:44:38 - 00:44:41] And in that case I wasn't clear.
[00:44:43 - 00:44:51] Yes the orientation like how that's going to be actually executed.
[00:44:51 - 00:44:54] So would it I guess that's a question for you Munir.
[00:44:54 - 00:44:59] So when you say the five casket in one grave are they like stacked on top of each other
[00:44:59 - 00:45:04] or is that is a single adult grave referring to like a grouping of graves.
[00:45:06 - 00:45:12] It's similar to the double grave where two people on top of each other.
[00:45:12 - 00:45:17] And this is very popular in the San Francisco area.
[00:45:17 - 00:45:22] But some people would say no we want to be all of us together in there like three people four
[00:45:22 - 00:45:25] people five people you know family and children.
[00:45:25 - 00:45:34] So if according to California regulations I don't know if that would be the most updated
[00:45:34 - 00:45:41] information they would allow up to five graves or five bodies in one single grave.
[00:45:42 - 00:45:45] I've seen it in the states they have like three four people
[00:45:47 - 00:45:48] in there.
[00:45:48 - 00:45:52] But if that would be a problem to the county we'd knock it down to the minimum
[00:45:52 - 00:45:54] or to the maximum that is allowed by the county.
[00:45:55 - 00:46:03] And the grave sizes would be four by eight feet.
[00:46:03 - 00:46:08] And the other section would be allowing two feet for every grave.

[00:46:08 - 00:46:14] So that would be allowing four feet for people to pass by without stepping on the graves
[00:46:14 - 00:46:20] because that is an issue to many people like you don't step on top of the graves.
[00:46:21 - 00:46:23] You have to go around it.
[00:46:23 - 00:46:30] And there are the other section we allow four feet for each grave.
[00:46:30 - 00:46:37] So which allows eight feet for the grave not to be touched.
[00:46:39 - 00:46:41] Over all stepped on.
[00:46:41 - 00:46:49] And the fourth one would be the biggest which would allow five feet on each side of the grave to
[00:46:49 - 00:46:54] allow accommodate more people to come in there without disturbing or without stepping on the
[00:46:54 - 00:46:55] grave itself.
[00:46:56 - 00:47:00] Okay so I think that makes sense for me.
[00:47:00 - 00:47:05] So it's basically those three options that are in the plans as submitted.
[00:47:06 - 00:47:08] So hold on let me hold up.
[00:47:09 - 00:47:14] So the smaller sections in the middle those refer to the actual graves where people would be
[00:47:14 - 00:47:17] buried horizontally on top of each other within that section.
[00:47:18 - 00:47:22] And then that surrounding area is just basically quadranting off that grave site.
[00:47:24 - 00:47:24] Yeah.
[00:47:24 - 00:47:31] Okay so when you're saying that it's four feet by eight feet.
[00:47:34 - 00:47:36] Yeah that was actually.
[00:47:37 - 00:47:38] I'm sorry.
[00:47:38 - 00:47:44] So no I was just confused because so is that that would be on either side of the body right.
[00:47:45 - 00:47:47] So it's two feet on each side.
[00:47:49 - 00:47:49] Yes.
[00:47:51 - 00:47:56] So it's two feet on each like horizontally on each side of the body and then four feet
[00:47:56 - 00:48:00] from the head to the edge and then from the feet to the edge.
[00:48:01 - 00:48:09] Yeah the actual concrete box in which the body is placed is 34 inches by
[00:48:10 - 00:48:12] seven and a half foot.
[00:48:13 - 00:48:21] I'm going to be allowing a little bit beyond that for the grave itself that the grave
[00:48:22 - 00:48:24] location or the grave area.
[00:48:25 - 00:48:33] So in the box there would be the body and then when we say four that we pretty much
[00:48:33 - 00:48:34] were having them close to each other.
[00:48:35 - 00:48:44] Now the other section would be right away from the edges of the box

would allow two feet and then
[00:48:44 - 00:48:48] another section would allow four feet another section would allow five feet.
[00:48:49 - 00:48:49] Okay.
[00:48:49 - 00:48:51] I don't know if I stated enough.
[00:48:51 - 00:48:55] So it's two four and five on either side of the body.
[00:48:56 - 00:48:57] Yes.
[00:48:57 - 00:49:00] Okay so how large are the the caskets then?
[00:49:01 - 00:49:12] The casket it's two feet up and 34 inches by seven and a half foot.
[00:49:13 - 00:49:20] That's the actual concrete box and these have standards with many symmetries around the area.
[00:49:20 - 00:49:26] We get it from different suppliers either from Colma or from Vallejo somewhere.
[00:49:27 - 00:49:28] I was going to ask you to repeat that.
[00:49:29 - 00:49:35] Seven and a half feet long and then it's two feet by what was the other measurement?
[00:49:36 - 00:49:43] Well now you've got two feet and 34 inches together.
[00:49:44 - 00:49:46] We can put approximately three feet.
[00:49:47 - 00:49:48] Yeah about three feet.
[00:49:48 - 00:49:50] Okay two by three by seven.
[00:49:52 - 00:49:57] Then the two inches on either side and the four or two feet from either side four feet from
[00:49:57 - 00:49:59] either side and five feet from either side would be in addition to that.
[00:49:59 - 00:50:07] So yeah to allow people visiting the grave without stepping on the grave itself.
[00:50:07 - 00:50:08] Okay.
[00:50:10 - 00:50:12] They're creating a plot size.
[00:50:12 - 00:50:13] Yeah okay.
[00:50:15 - 00:50:16] You have an option.
[00:50:18 - 00:50:24] Okay so yeah I would say then if it's possible to get those details to scale and then
[00:50:25 - 00:50:31] and if it's possible for you to add callouts kind of describing what section is the casket,
[00:50:31 - 00:50:38] what section is for walking and that kind of thing with the measurements like like
[00:50:38 - 00:50:41] just do one up close to with the measurements that might be good.
[00:50:43 - 00:50:49] Just so we know better kind of what the boxes mean if that makes sense.
[00:50:51 - 00:50:55] Okay so I mean that clears that up a little bit.
[00:50:55 - 00:51:00] I did want to ask so you said it would have natural cover under section 4.1
[00:51:01 - 00:51:10] but then I think there was a section that referenced like
[00:51:20 - 00:51:24] there's something I thought I saw was like native plants and non oh

yeah.
[00:51:26 - 00:51:32] Planting design utilizing not native low water use plants as well as some adapted non invasive
[00:51:32 - 00:51:34] trees, shrubs, ground covers and perennials.
[00:51:35 - 00:51:40] So would you be planting additional landscaping?
[00:51:42 - 00:51:49] That would be pretty much to divide the sections to give it a little bit of privacy as well as
[00:51:51 - 00:51:58] around or on the side of the road to give an appeal as people drive through or walk through
[00:51:59 - 00:52:03] gate to get to the spot.
[00:52:03 - 00:52:05] So basically just landscape buffers then?
[00:52:06 - 00:52:07] Pretty much yeah.
[00:52:07 - 00:52:09] Okay will those need to be irrigated?
[00:52:09 - 00:52:22] Yes I already got the well permit I'm just waiting for the well digger to come and start digging.
[00:52:26 - 00:52:31] Yeah because I remember we had some questions about the water production at least for a while in
[00:52:31 - 00:52:33] that area but that would be for environmental health.
[00:52:34 - 00:52:35] You already obtained the permit.
[00:52:37 - 00:52:43] Okay so I guess environmental health can comment on that one.
[00:52:43 - 00:52:44] Let's see what did I have with the comments.
[00:52:45 - 00:52:50] So it's five foot fencing and that would be just around the burial section right not around the
[00:52:51 - 00:52:51] entire property?
[00:52:55 - 00:53:03] Actually I'm doing the whole property I would not put any fencing around the
[00:53:05 - 00:53:06] sections of the cemetery.
[00:53:07 - 00:53:20] Okay so that's the entire property okay that's one of them so yeah so if the site plan we want to
[00:53:20 - 00:53:29] see setbacks and measurements that are to scale the more specific design specifications for the
[00:53:29 - 00:53:32] graves that would be up close I guess.
[00:53:35 - 00:53:41] So for we were we were looking up the health and safety code regulations
[00:53:41 - 00:53:49] Debbie and Chuck and I were looking into that and it says that so basically it's a minimum of 18 inches
[00:53:50 - 00:53:54] fill on top of the grave above the bodies is the minimum.
[00:53:55 - 00:54:01] Do you I mean have experience with like so when you have multiple people in the grave
[00:54:01 - 00:54:07] obviously they're going to settle differently does that impact the required minimum amount of
[00:54:07 - 00:54:15] coverage on top or would you just be following the 18 inches minimum and if so do you I mean

[00:54:16 - 00:54:21] do you know where that number comes from I know Debbie had some questions too about potential issues.
[00:54:22 - 00:54:31] You would allow four feet of cover of soil cover but in just in case somebody wants to have
[00:54:31 - 00:54:40] five in five bodies in one thing grave then we will observe the 1.8 I mean 1.5
[00:54:41 - 00:54:49] foot coverage unless we can dig deeper so far it doesn't look like in that in that side of the
[00:54:49 - 00:54:58] property if we dig 18 foot it doesn't look like we would reach the water so the
[00:54:59 - 00:55:05] number of bodies that would be contained in a single grave will depend on how
[00:55:06 - 00:55:13] how how you know how low do we get water and then we will stop right there so
[00:55:14 - 00:55:19] sometimes we might not be able to put more than three bodies or two bodies
[00:55:20 - 00:55:26] and that depends on the water table so in that case we would like to keep the four feet
[00:55:28 - 00:55:38] coverage for health reasons or at least traditional health but if we have to then we would keep the 1.8
[00:55:40 - 00:55:48] I mean 1.5 inch of soil coverage if we have to go for the five bodies in one single grave.
[00:55:51 - 00:56:04] Okay because so if you were to have five people in one grave that's like a 13 foot deep hole so
[00:56:05 - 00:56:13] okay so that's the plan so how does that work because you're going to be if you do have a
[00:56:13 - 00:56:23] situation like that with basically a 13 foot deep hole isn't wouldn't it be unstable to have
[00:56:24 - 00:56:27] this is Debbie Larson I'm the Environmental Health Director hi.
[00:56:29 - 00:56:38] So I'm just not familiar with new grave site locations and we had a concern and I don't know
[00:56:38 - 00:56:48] if these concrete caskets kind of overcome that but with buoyancy if if that because I did see
[00:56:48 - 00:57:01] some slow percolation data the soil's are very shallow there and have you actually dug down
[00:57:01 - 00:57:10] deeper through some of that consolidated rock material or I have test stretch data and I have
[00:57:10 - 00:57:21] some perc data from the area where they proposed a septic for the residents so I'm I I'm just I don't
[00:57:21 - 00:57:31] know what happens to those concrete caskets if they're getting seasonal groundwater around them
[00:57:31 - 00:57:40] that we didn't anticipate. These okay answering the first question yes I have dug 10 foot in

[00:57:40 - 00:57:52] that specific area all the way to the top and we didn't see much of water accumulation so we
[00:57:52 - 00:58:01] from my observation on that side probably we can go 12 foot and and be safe without having any water
[00:58:02 - 00:58:14] issue the boxes that we are placing inside those graves or holes they are not closed boxes they are
[00:58:14 - 00:58:24] open from the bottom to speed up the deterioration of the body so as it comes closer to the soil
[00:58:24 - 00:58:31] and the sim similarly if we want to do the one on top of that we will place about six inches
[00:58:32 - 00:58:40] of soil underneath the body and and we'd go to the third one and do the same thing put about six
[00:58:40 - 00:58:49] inches of soil to be able to speed up the deterioration of the body most options would be one
[00:58:49 - 00:58:58] grave one one body per grave some might require two but we just in case get
[00:58:59 - 00:59:06] you know a family that want to exercise that choice we would entertain it if it's an issue to the
[00:59:06 - 00:59:17] county we'll knock it down we'll just keep it one or two. So the the I think it's in the
[00:59:17 - 00:59:32] regs I think it's title 16 CCR title 16 it goes over maintenance of the sites and there is are you
[00:59:32 - 00:59:39] familiar with that title 16? I don't believe I read it. It goes over your maintenance requirements for
[00:59:41 - 00:59:46] if there is settling in that it's it's described in there just wanted to throw that out there.
[00:59:47 - 00:59:59] Okay I wanted to say so when we were going through the health and safety regs there is a section that
[00:59:59 - 01:00:13] addresses double burials and and the remains of more than one body in single plot so I don't know
[01:00:13 - 01:00:19] it doesn't really say anything beyond double I don't know I mean I can look more to see if
[01:00:19 - 01:00:26] there's anything like addressing that but yeah I only saw the reference to the double so I don't know
[01:00:26 - 01:00:31] if there's a limitation of what what would be allowed if it's not allowed that be more than two
[01:00:35 - 01:00:44] yeah that's just the contact. Oh in that case we can just limit it to two without further delaying
[01:00:44 - 01:00:54] the project. Okay so I mean if that is what you want to do then when if you are to submit
[01:00:54 - 01:01:01] an updated application packet we'd want to see that reflected and I don't know if that means that if
[01:01:01 - 01:01:09] you are going to just limit it to two bodies per plot if that would

impact how many plots you're
[01:01:09 - 01:01:19] requesting overall as well so if that if that is something that would affect that we'd also
[01:01:19 - 01:01:25] want to see updated numbers. Was there anything that you recall when we were if this is in a
[01:01:25 - 01:01:33] separate section of code that we don't enforce but was it did you could do open
[01:01:36 - 01:01:47] non-enclosed burial? I mean I don't know. Is that a question for me or? Oh sure.
[01:01:51 - 01:01:58] Yeah say the question again please. So I just wasn't this is a section of the code that we don't
[01:01:58 - 01:02:09] usually work with and it's enforced by the Bureau of Funerals and Cemetery's but
[01:02:12 - 01:02:18] for some reason I thought that they couldn't be an open burial it had to be in some kind of closed
[01:02:18 - 01:02:29] container is that but you're not understanding that as well. Traditionally and following the
[01:02:29 - 01:02:38] old traditions of religion as well as practices of people for thousands of years the body will be
[01:02:38 - 01:02:49] clothed with cloth shroud and the body will be brought down from the top to the bottom just
[01:02:50 - 01:02:57] the shroud itself and then the box will be covered and then the soil will be on top
[01:02:58 - 01:03:06] but again if there is any regulation from the county we would cater for the boxes even though
[01:03:08 - 01:03:15] we don't like that we want to do it exactly the old traditional way religious way that was done by
[01:03:16 - 01:03:23] the greatest Moses Jesus as well as Muhammad peace be upon all and we want to go with that
[01:03:23 - 01:03:36] continued tradition if we can have you contacted the Bureau of Funerals and Cemetery's
[01:03:37 - 01:03:48] it's a California State Bureau no no the the uh yes I had yeah I've done that yeah
[01:03:49 - 01:03:56] and do you have an app your application into there or where are you in that process
[01:03:57 - 01:04:03] uh from my understanding is that they said go ahead go try to get the approval and then
[01:04:04 - 01:04:11] you will send us both applications one application for cemetery management and then the application
[01:04:11 - 01:04:18] for the cemetery thank you and I wanted to ask Minier if it's possible if you do have a contact
[01:04:18 - 01:04:22] at the state cemetery board if it's possible can you send me that contact so we can ask

[01:04:22 - 01:04:26] some questions too because again we don't have a lot of cemetery applications so we're kind of
[01:04:26 - 01:04:32] new to a lot of this so um if it's possible to get that um contact that would probably be very helpful
[01:04:34 - 01:05:02] so I'm still looking through the rags hi this is uh Glenn Spitzer deputy county council
[01:05:03 - 01:05:10] I just have a few comments here first of all I think the Bureau of Funerals and Cemetery's
[01:05:10 - 01:05:17] should be definitely be involved in this process and I don't think you can deem an
[01:05:17 - 01:05:22] application complete until you've coordinated with them and ensure that you have everything that
[01:05:22 - 01:05:31] they would need also just just to to ensure that yeah I mean that makes sense to me um we have
[01:05:31 - 01:05:37] included them and reached out to them um and I mean we can continue to do that but I was going to
[01:05:37 - 01:05:42] say if if Minier if you've you've talked to them so if you can provide I don't know if you
[01:05:42 - 01:05:46] have a number a name of someone that has been responsive that would be helpful and
[01:05:46 - 01:05:51] appreciated too and it would probably help us move your application along the better and have a better
[01:05:51 - 01:05:58] kind of idea of what we need to do as far as um regulations and because they could also clue you
[01:05:58 - 01:06:07] into unique environmental issues for example this this issue about um an open ended on the bottom
[01:06:08 - 01:06:14] with water sources underneath is I mean just jumps out as a pretty big concern I don't know what
[01:06:14 - 01:06:23] kind of what that water is used for if that's potable water it does anybody know the the um
[01:06:24 - 01:06:30] actually I was looking for a setback I was trying to find a setback from a water well to a grave and
[01:06:30 - 01:06:40] I I found one uh one item but um it's not in our lamp the or the lamp that we have here um
[01:06:40 - 01:06:48] in looking through the the law the California Health and Safety Code and the Title 16 CCR
[01:06:49 - 01:06:56] a lot of what's there is just administrative like the manager and the fines and the
[01:06:57 - 01:07:03] what they can charge and it didn't go into so much of um the health and safety
[01:07:03 - 01:07:13] issues of water water impact and that that kind of thing so I have a little more research to do
[01:07:16 - 01:07:24] yeah to try and and get some more information on what the typical

guidelines are for that
[01:07:26 - 01:07:33] I would suggest we already asked for a site plan to scale that site plan
[01:07:34 - 01:07:41] obviously is going to include the locations of the graves the dimensions and but should include
[01:07:41 - 01:07:53] the fencing the landscaping the hardscaping that's proposed setbacks walkways and um and
[01:07:53 - 01:08:04] you mentioned some soil um some some soil information or or digging that you did if you if you
[01:08:04 - 01:08:15] have any formal soil data that would that should be provided as well uh and um and if you have any
[01:08:17 - 01:08:23] any estimates about water tables because it sounds like you have some information on that too
[01:08:23 - 01:08:29] that would that would be helpful and I'm going to add to um if it's impossible when you
[01:08:30 - 01:08:37] will resubmit the application to also give us kind of a detailed description of how the bodies are
[01:08:37 - 01:08:43] prepared um just as you did today um but just on paper that would help us to better understand
[01:08:43 - 01:08:56] potential you know impacts of internment of the bodies um want to say too so the regs for
[01:08:56 - 01:09:04] private cemeteries there's a whole section about you know um not precluding certain like
[01:09:07 - 01:09:14] it's uh preventing exclusion of people within different social social cultural other groups
[01:09:14 - 01:09:19] and stuff so the way that we have to address the application and conditioning I mean I know
[01:09:19 - 01:09:26] you're saying that this is the way that um your the intended burial is you know for
[01:09:26 - 01:09:31] these specific demographics but we'll need to condition it um separately from that too
[01:09:32 - 01:09:35] just in the understanding that maybe you would sell it and someone else would you know
[01:09:35 - 01:09:40] want to bury bodies differently or something like that so everything needs to be accounted for
[01:09:40 - 01:09:46] from our end as a regulatory standpoint um so that just because I know it's intended as uh
[01:09:47 - 01:09:51] to primarily serve the Muslim community as state in your application but we also need
[01:09:51 - 01:09:57] we can't limit it to that um especially in the way that we're going to be conditioning it so
[01:09:58 - 01:10:02] that's just something to be aware of as well and that's for all of us okay

[01:10:03 - 01:10:10] monia this is uh deputy county council glenn spitzer again um I just uh curious if you had
[01:10:10 - 01:10:16] any experience with this with having cemeteries in the in the past if you if you have any others
[01:10:16 - 01:10:26] you can point to or or otherwise if you can point the county to a sample cemetery that is along the
[01:10:26 - 01:10:33] lines of of what you are proposing here so that maybe we can take a look at that and and see what
[01:10:33 - 01:10:40] issues may have come up with respect to that cemetery those are two other ideas that just
[01:10:40 - 01:10:46] came into me yeah I have done with many cemeteries in the Bay Area in San Francisco area uh it
[01:10:46 - 01:10:56] turned at home uh uh uh it doesn't come to my mind many other numbers many other
[01:10:57 - 01:11:06] names but the greek Orthodox cemetery I dealt with and uh uh what is it uh
[01:11:07 - 01:11:14] Sinai some Italian cemetery uh Russian cemetery and uh
[01:11:15 - 01:11:24] um I am modeling pretty much the operation and the details uh after the eternal home which is
[01:11:25 - 01:11:33] being in existence for the last 250 years and it's a Jewish cemetery that has been doing
[01:11:33 - 01:11:42] traditional burial since and uh they have very much open uh bottom casket or or uh
[01:11:42 - 01:11:50] concrete box to allow the deterioration of the body quickly and that didn't seem to affect
[01:11:50 - 01:11:57] the water table and uh it's a practice that is being going on for hundreds of years in Colma
[01:11:57 - 01:12:06] at least that is my area of experience and exposure um okay thank you can you provide
[01:12:06 - 01:12:15] those uh those samples of cemeteries to uh to Krista your yeah if you can just email me the list of
[01:12:15 - 01:12:21] the names and I can do some research into that too and that might also by the way this is Mark
[01:12:21 - 01:12:28] Hopkins um having the the counties themselves so we can also reach out to the counties uh
[01:12:28 - 01:12:45] potentially so that would be wonderful sir um all righty any other questions any other comments
[01:12:46 - 01:12:52] I I mean I have a few extra comments um so I mean just looking at kind of how the regulations
[01:12:52 - 01:12:58] are for cemeteries for us moving like when this project does move forward um I just
[01:12:59 - 01:13:04] have an idea of some conditions that will very likely you know be placed on the project so one

[01:13:04 - 01:13:11] would be requiring license for the operator to be on file um with the county um we'll want to know
[01:13:11 - 01:13:15] oh for the description too if there are going to be no like employees we want to know how many
[01:13:15 - 01:13:20] employees would be um on site during the funerals or on site during regular operations but there's
[01:13:20 - 01:13:27] not a funeral taking place that kind of thing um we also would like to know kind of the idea
[01:13:27 - 01:13:35] for maintenance um if there's going to be like I don't know I mean I guess people would come and
[01:13:35 - 01:13:41] visit the cemeteries and I don't know if it's hours of operation yeah well we think we yeah we would
[01:13:41 - 01:13:45] need hours of operation um we have the number of events but if there's going to be open hours
[01:13:45 - 01:13:52] for people to come visit when it's outside of the funerals that are scheduled um and then
[01:13:52 - 01:13:58] I know also since you would be doing some heavy duty excavating probably we would want to um
[01:13:59 - 01:14:04] very likely you'd want to store fuel and stuff on the property so if if that is the case you would
[01:14:04 - 01:14:08] you would need to have a hazardous materials business plan that kind of thing um all the
[01:14:08 - 01:14:14] associated stuff with environmental health for that kind of structure for any housing of
[01:14:15 - 01:14:22] equipment stock yeah if there's storage I know there is one storage building on the process and
[01:14:23 - 01:14:31] that you stated was not going to be used with the um the cemetery so if there is going to be
[01:14:31 - 01:14:35] equipment on site if it's going to be in a specific lot stored outside or if there's going
[01:14:35 - 01:14:43] to be a structure that's stored inside um we'd want to see that reflected as well um I mean
[01:14:43 - 01:14:50] other than that I think Debbie did you have questions about the water usage for visitors
[01:14:51 - 01:14:58] so um so you have the permit for the well it hasn't been drilled yet do you have a time frame for that
[01:14:59 - 01:15:06] uh well it was supposed to be uh about a month and a half ago oh okay all right
[01:15:06 - 01:15:11] it each every week and like oh give us a couple more weeks give us a couple more weeks
[01:15:11 - 01:15:16] looks like they're busy I'm thinking to change this business and get into the well digging business
[01:15:16 - 01:15:25] instead so anyway we'll have a time you'll need a consultant design

septic system
[01:15:26 - 01:15:33] when you get further along you'll need to address the septic system for the restroom and um
[01:15:34 - 01:15:43] just whether you have adequate water for the the project yes we have actually tried to
[01:15:44 - 01:15:50] to get the septic system design as requested by the planning but then going back to the
[01:15:50 - 01:15:54] environmental they said well no you're not going to do this till you get the use permit
[01:15:55 - 01:16:00] and it's after the fact that you get the use permit so we put a hold on that one
[01:16:00 - 01:16:06] we got all the data for the calculation test and we got all the testing done it's just a
[01:16:06 - 01:16:13] matter of time when the the use permit is done then we can proceed with the design of the septic tank
[01:16:16 - 01:16:24] so the the system is a system with uh pretreatment to an at-grade disposal field that's the design that
[01:16:24 - 01:16:33] we have um because there are significantly shallow soils there um so so I'm just wondering we we
[01:16:33 - 01:16:44] have information that shows holes with not even 24 inches of soil and um so I don't know
[01:16:44 - 01:16:52] it's consolidated um at least in the area where we have soil profiles it might be
[01:16:53 - 01:16:59] excavatable with a backhoe but not sure that it may perk well and the perk tests are shallow and not
[01:16:59 - 01:17:08] into that material so I like I said we need to look at a little bit more with the um the uh
[01:17:10 - 01:17:19] the shallow or uh consolidated material and um digging deeper holes in that and what that all
[01:17:20 - 01:17:28] means with the water going in that working the way in that case would we be able to build up a certain
[01:17:28 - 01:17:39] area uh with uh with the soft or with the soil uh that is penetrating and that way we can uh
[01:17:40 - 01:17:47] prepare it to be able to take the septic tank or not well we do have a we do have a design from a
[01:17:47 - 01:17:54] consultant that he found an area that he believes is suitable but it's marginal enough that it
[01:17:54 - 01:18:04] needed pretreatment and it's got an at-grade uh disposal field yeah now as far as I understand
[01:18:04 - 01:18:13] that this is required after we get the use of the design so I know that it was for the residents I
[01:18:13 - 01:18:17] think of proposed residents that's what we have the information okay so then that wouldn't apply

[01:18:17 - 01:18:22] to this necessarily well I don't know maybe there was a second set of profile holes that
[01:18:22 - 01:18:32] happened but you're right right there was a uh a proposed residential septic tank and that is
[01:18:33 - 01:18:42] put on the side right now for the development of the residential unit later on but we're not
[01:18:42 - 01:18:49] proceeding with that so far so I guess the concern is just the shallow soils and grave sites in
[01:18:49 - 01:18:57] shallow soils from the information I have in the file so yeah for many of them for his application do
[01:18:57 - 01:19:05] we want to see a preliminary design as part of the application or is as he has indicated just going
[01:19:05 - 01:19:11] I mean is that a requirement as one of the conditions of approval and then you know if he gets to
[01:19:11 - 01:19:16] the point where his project hypothetically is approved and then he tries to put in a septic
[01:19:16 - 01:19:22] and it doesn't work then I mean he's not going to meet that condition so that's that's what could
[01:19:22 - 01:19:29] potentially happen if you did wait to do it if you're addressing it early getting a preliminary
[01:19:29 - 01:19:35] design kind of semi approved and at least reviewed you would be able to address potential issues
[01:19:35 - 01:19:43] and kind of know early on whether or not it's worth moving forward that's right there through
[01:19:43 - 01:19:55] the geo pet that I hired in GD's uh and then then and then when he approached I believe this is thought
[01:19:55 - 01:20:01] he said no you cannot do that till you get the barrier you get the use permit so that's why we
[01:20:01 - 01:20:08] thought yeah like I in the comments I think there's a thread between environmental health
[01:20:08 - 01:20:13] and him and it was it was I like about so it was kind of confusing I'm not sure exactly what
[01:20:13 - 01:20:19] next steps are um but I mean it could be just that it was the wrong time I remember when
[01:20:19 - 01:20:22] you did have an appointment for them to go out I think and then there was like
[01:20:22 - 01:20:27] something happened where it was like the weather or something I made it so that that didn't happen
[01:20:27 - 01:20:35] so um so in the game actually they did come after that uh after the rain the rain see
[01:20:35 - 01:20:44] we did uh get the uh the whole dog and uh documented the data in there and and then my engineer called the
[01:20:45 - 01:20:51] environmental I think he spoke with Mr. Scott and then uh he said

I'm looking for the formula of
[01:20:51 - 01:21:02] which you calculate or which you need the percolation uh rate calculated and at that uh at
[01:21:02 - 01:21:08] that moment uh the he was the engineer was told that no you're not supposed to do this
[01:21:08 - 01:21:14] till you get the barrier permit we're not going to give you any information till you get the use permit
[01:21:15 - 01:21:20] I think that in that situation it might have been that at that point we didn't have a
[01:21:20 - 01:21:26] dialed down project description so I think that was the issue we were running into where we
[01:21:26 - 01:21:30] weren't sure what the project description was so wouldn't have made sense to go forward
[01:21:30 - 01:21:36] with developing a plan for some number of people that may not match up with what you needed I think
[01:21:36 - 01:21:45] that was the issue at that point so I mean how close is the area of the previous um test
[01:21:45 - 01:21:51] information to where the new restroom and where the septic would be is it is it fairly close
[01:21:52 - 01:22:01] yeah it's within 20 feet oh so we can we can use the soils information that we have if it's
[01:22:01 - 01:22:08] truly that close okay so then do we not need anything more well I think we can hold off for now he's
[01:22:08 - 01:22:23] already got pre-treatment to an at grade okay as a design that's you know okay oh okay so well moving on
[01:22:23 - 01:22:29] I guess this was there was one more thing um the whole mineral resources zone general plan
[01:22:29 - 01:22:39] designation so a cemetery would definitely potential you know have impact potential um access to mineral
[01:22:39 - 01:22:47] resources on site so in that way the application I mean the it is consistent with the zoning but
[01:22:47 - 01:22:56] it is inconsistent with the general plan designation so I mean correct me if I'm incorrect um so if
[01:22:56 - 01:23:01] you know you came forward with an application that was complete um and that would the issue with the
[01:23:01 - 01:23:07] general plan not being consistent is definitely a technical objection that tac would have at this
[01:23:07 - 01:23:14] point so I don't know if you would want to address that with potentially an application for general
[01:23:14 - 01:23:27] plan amendment or I don't know what this protocol is in that case this is chuck made the planning
[01:23:27 - 01:23:33] director so if the I think if the application didn't include a request for a general plan

[01:23:33 - 01:23:39] amendment amendment the planning commission is going to have a hard time approving an application when
[01:23:39 - 01:23:49] tac has a technical objection to the basic land use on the parcel so but even if you were to
[01:23:49 - 01:23:53] apply for a general plan amendment to change it to something that's consistent with the existing
[01:23:53 - 01:23:58] zoning the evaluation of that general plan amendment would also include that removing it from mineral
[01:23:58 - 01:24:06] resources zone is going to restrict access to mineral resources on site right so isn't that
[01:24:06 - 01:24:11] kind of a lose lose situation I don't I'm not sure what you've got it you've got it you
[01:24:11 - 01:24:18] it still has to be evaluated okay well either way it's not to be evaluated uh I'll jump in here
[01:24:19 - 01:24:26] deputy county council glenn spitzer it's um yeah they're they're the environmental issues to be
[01:24:26 - 01:24:32] assessed but it's really a legislative decision so there's wide discretion
[01:24:32 - 01:24:43] and they just change the designation so I don't know if that's something you want to look into
[01:24:43 - 01:24:49] monair if you would want to apply for a general plan amendment to a different designation
[01:24:52 - 01:24:58] seems like something you would have to do right here well I'm looking for a direction from you
[01:24:58 - 01:25:07] on guidance so that would be the guidance to apply for a general plan amendment wonderful so um I can
[01:25:07 - 01:25:12] send you over the information and a lot of the stuff that you submitted with this application
[01:25:12 - 01:25:16] would apply to that so you wouldn't have to resubmit some of the information it's just
[01:25:17 - 01:25:28] I'll send you the packet you can review it all right any other questions any other comments at
[01:25:28 - 01:25:37] the moment I can't believe I'm the only one I've been to funerals but um I'm familiar with the
[01:25:38 - 01:25:44] funerals in and comb on my parents and grandparents are buried there and there's tons of funerals out
[01:25:44 - 01:25:50] there and I've just been to a military funeral in citrus heights but the question I got here is
[01:25:50 - 01:26:01] um they mention 100 events annually is that 100 new burial or doesn't include people to go visit
[01:26:02 - 01:26:14] you know the deceased okay we've done that new burial okay all right and an only question I got is
[01:26:15 - 01:26:21] if you're going to have a cemetery you certainly got to have a

somebody's going to maintain a
[01:26:22 - 01:26:28] gardener or some sort of maintenance building there because they all be just like a
[01:26:31 - 01:26:36] a landscape gardener you need somebody to take care of daily just about there's going to be a
[01:26:36 - 01:26:41] structure there um I know you're going to put a bathroom but I think you're going to have to put
[01:26:41 - 01:26:47] a a facility there for somebody to take care of the of the area unless you're going to have one
[01:26:48 - 01:26:53] of those people would drive there take care and leave but um every place I've been to there's
[01:26:54 - 01:26:59] there's a pretty decent side building where they have all the equipment to maintain a cemetery
[01:27:02 - 01:27:07] well the plan is as you mentioned earlier uh a maintenance uh company would come and take
[01:27:07 - 01:27:13] care of it and then leave uh on the long run we might be able to uh request for a shop that
[01:27:13 - 01:27:21] to be used for the cemetery used for uh historic equipment but right now the plan we can
[01:27:22 - 01:27:35] relatively the size of the grave uh uh plots or lots are small so the maintenance for that
[01:27:35 - 01:27:41] section for the developed cemetery is going to be really uh left to a company an outside
[01:27:41 - 01:27:52] company to come and take care of it um this is a public works um Richard Vila on that I would
[01:27:52 - 01:27:58] echo um what Pat's saying I mean I would imagine you went on a store equipment there that
[01:27:58 - 01:28:05] are is going to be used to dig the plots um irregardless of the maintenance of it after the
[01:28:05 - 01:28:12] fact so unless you're going to haul in a a backhoe every time you have a funeral I would
[01:28:12 - 01:28:18] imagine you want to have equipment stored there and and again as I mentioned before with fuel
[01:28:19 - 01:28:28] and and um some tools and whatever so I can't envision not having a some sort of a working
[01:28:29 - 01:28:36] shop or or storage area on site and maybe it's built a conjunction with the restroom
[01:28:36 - 01:28:44] I don't know but to think that it wouldn't be there it's kind of hard to comprehend I think
[01:28:44 - 01:28:52] for most people and and also I I just wanted to follow up on the discussion we just had with
[01:28:52 - 01:28:59] this water and septic and such I would think this group would probably want to see a preliminary

[01:28:59 - 01:29:10] plan that details all those facilities on the site because um I know that it's it's
[01:29:10 - 01:29:16] challenging there with with septic because of the of the of the soils and such and and where
[01:29:16 - 01:29:21] you site your well and your septic and grave sites you don't want all three of those things
[01:29:22 - 01:29:33] conflicting with each other and um and also with the drainage on site you don't need to have
[01:29:35 - 01:29:42] grave sites becoming floating and and and such I mean I know this last winter there was a lot of
[01:29:42 - 01:29:50] rain and that what that area down there was looked like a lake and I don't know about your
[01:29:51 - 01:29:59] specific property but it can be an issue so I think as as simple as the stuff sounds on the surface
[01:30:00 - 01:30:07] given that particular area I think this group would be who was to have a more of a comprehensive
[01:30:07 - 01:30:14] site plan than what's been given so that we can have the confidence that that everything's been
[01:30:14 - 01:30:22] thoroughly thought through and that you know if this group is going to approve a plan we have to
[01:30:22 - 01:30:30] have the confidence that it's going to work. uh Deputy County Counsel Glenn Spitzer I'm just
[01:30:30 - 01:30:37] that raises another issue I don't know if there if we have flood zone information for this area
[01:30:38 - 01:30:45] if not we we should the applicant or somebody should obtain it so we can get a sense of you
[01:30:45 - 01:30:50] you do yeah we can okay I'm pretty sure it's not in the flood zone but I'll double check
[01:30:52 - 01:30:59] yeah it's not in the flood zone commenting on the storage area would you would I be able to
[01:31:00 - 01:31:07] include the existing uh steel building that is about 1500 square foot would I be including that
[01:31:07 - 01:31:15] into the project of the cemetery as a storage for the equipment to satisfy that condition
[01:31:16 - 01:31:21] I mean it was it's just at this point it's a recommendation it's up to you if if you're going
[01:31:21 - 01:31:26] to go the route of having a structure on site for the equipment it just makes sense from
[01:31:26 - 01:31:31] I guess from most of our perspectives to do that and I mean if you were to store
[01:31:31 - 01:31:34] equipment on site that's associated with the cemetery you know you would be looking at less
[01:31:34 - 01:31:39] impacts to the surrounding areas too because people wouldn't be

having to cart equipment on
[01:31:39 - 01:31:43] and off the property so I mean there are advantages to that but I mean if you don't
[01:31:43 - 01:31:47] want to build a building we're not forcing you to build a building so I mean you could definitely
[01:31:47 - 01:31:55] revise your site plan to include that if you'd like to do so I did want to ask so if Mooner did
[01:31:55 - 01:32:00] choose to not have a building at this time he would be and if he went through all the the
[01:32:00 - 01:32:06] process and his application was approved he would be required to obtain a amendment if you
[01:32:06 - 01:32:10] were to add want to add a structure later and it's approved with no structures involved
[01:32:10 - 01:32:17] correct it needs to be included in the site plan it needs to be included in the overall project
[01:32:17 - 01:32:22] description if it's going to be a separate building or the building that's currently on site yeah so
[01:32:22 - 01:32:26] I mean now would be the time if you are going to be putting a building to include that
[01:32:28 - 01:32:33] and again that that would be the storage building because we did I remember you had
[01:32:33 - 01:32:40] discussion about buildings involved in the actual funeral prepare preparations and stuff
[01:32:40 - 01:32:45] so that would also I mean I believe you took that out of the application so
[01:32:46 - 01:32:50] you'll want to specify if you are adding a building what that it is for storage
[01:32:51 - 01:32:57] and that would also allow you to have security and all of that to to maintain it
[01:32:58 - 01:33:04] and have some instead of having just equipment out there out in the middle of being weathered on
[01:33:05 - 01:33:11] you know that it's in a stored place where you don't have to worry about elements vandalism or
[01:33:11 - 01:33:19] anything like that so well I'll go ahead and revise it with the with including the 1500 square foot
[01:33:19 - 01:33:30] speed building into the can as to be used for the cemetery and I did want to say so as far as
[01:33:30 - 01:33:36] like preparation of the bodies that would that would be done off site then yes okay so yeah I would
[01:33:36 - 01:33:45] also include that statement in the application too just for clarity I hope you're taking notes
[01:33:49 - 01:33:54] and then I was going to say if you're not taking notes we are so I will be sending a letter

[01:33:54 - 01:34:12] after the meeting summarizing all of our comments too thank you all righty anything else so at this
[01:34:12 - 01:34:18] point he's appears that we have no comments up here we'll open it up to the public
[01:34:33 - 01:34:43] my name is Nick Beck I live at triple eight eagles ranch road and it seems to me that it's customary
[01:34:44 - 01:34:51] before you start clearing grading tree removal and everything to have your permits in hand
[01:34:52 - 01:34:59] now if you look at the proposed general plan for this cemetery
[01:34:59 - 01:35:09] and I've seen it I'm also watching on almost daily basis that the clearing grading moving
[01:35:09 - 01:35:18] hundreds or not thousands of yards of material is ongoing every day a few weeks ago a standing
[01:35:18 - 01:35:26] healthy oak tree right near the road was cut down now we had a lot of trees blowdown
[01:35:26 - 01:35:33] but this one survived the storm but it didn't survive someone's chainsaw it's it was a large one
[01:35:33 - 01:35:39] I think it might have been a heritage oak it's just off the uh off Lambert you can see it and that's
[01:35:39 - 01:35:48] the first tree there are others so that the process is ongoing as if they had their permits
[01:35:48 - 01:35:55] which they do not so this property is being conformed to their eventual wishes
[01:35:55 - 01:36:01] without any permits and this is going on on a regular basis it's hard to see from the road
[01:36:01 - 01:36:11] but it's real easy to see from the air I think that should be looked into and probably a cease
[01:36:11 - 01:36:20] and desist order issued so that property does go through further damage without any chance of having
[01:36:20 - 01:36:28] a proper conclusion to this whole effort it's damaging the area and I also think that the
[01:36:28 - 01:36:36] overall idea is totally incompatible with this neighborhood and everything around it that's all
[01:36:36 - 01:36:55] I have to say thank you may I comment yes sir regarding the tree uh that uh on Lambert
[01:36:55 - 01:37:03] that was cut because it fell because of the wind there are other five long five trees that also fell
[01:37:03 - 01:37:11] one uh close to the gate that is on the on the other gate in the other side of the road and
[01:37:12 - 01:37:19] cut them down other than that trees are sacred in our understanding and they cannot be touched
[01:37:19 - 01:37:31] unless it's to clear for fire or to remove dead uh uh trunk and that's it thank you is there is there

[01:37:31 - 01:37:43] comment on the grading uh the grading uh has been before I I bought the land the grading was uh was
[01:37:43 - 01:37:53] going since I got the land the only thing was done is clearing some of the areas to uh to put the gravel
[01:37:53 - 01:38:01] for the road but there were no movement or significant I should say movement of soil
[01:38:01 - 01:38:08] from one location to another other than either cutting some grass or cleaning some grass to put
[01:38:08 - 01:38:20] gravel on and uh that's it I also have a comment I did want to say that a oak woodland study was
[01:38:20 - 01:38:24] proposed as part of the application um I mean performed as part of the application included
[01:38:24 - 01:38:32] in the application packet and it does um includes um um biologists recommendations to preserve trees
[01:38:32 - 01:38:38] and everything for the actual um cemetery area so that would be accounted for um
[01:38:42 - 01:38:50] all right sir you're up hi my name is Tom McCleary and I'm also a resident uh out by the airport
[01:38:51 - 01:39:05] in this neighborhood um for the record I'm opposed to this project um I believe like Nick said
[01:39:05 - 01:39:14] just previously that very incompatible usage of this area in my opinion I am the aviation
[01:39:14 - 01:39:26] safety officer out there at the airport and um I am concerned that the proposed hundred events
[01:39:26 - 01:39:38] a year that's twice a week that we would have significant people involved in a commercial
[01:39:38 - 01:39:50] operation and right next to our airport does provide or induce a safety concern and possible
[01:39:50 - 01:40:04] hazard uh also um to the uh issue of water uh there this winter obviously was uh very heavy one
[01:40:05 - 01:40:12] but there was a lot of water coming off of that particular property and as a matter of fact
[01:40:12 - 01:40:20] there are still barricades right across Carbondale Road uh where uh in the gutter it's
[01:40:20 - 01:40:27] washed out uh there was a lot of water coming off of that property so just a point there and
[01:40:27 - 01:40:33] from a safety concern we were concerned about the amount of water standing water on the roadway
[01:40:33 - 01:40:42] there but uh just for the record uh I don't think it's an appropriate project for this area thanks
[01:40:55 - 01:41:01] hi my name is Georgiana Presscar my husband and I live out at the airport
[01:41:02 - 01:41:07] and we are the well not the previous owners of that property but we

sold the property to the
[01:41:07 - 01:41:17] gentleman who sold it to this gentleman who proposes the cemetery and um I have watched trees cut down
[01:41:18 - 01:41:24] in that area I was involved in that property for a while so they have been deliberately cut
[01:41:24 - 01:41:33] um before the permit number two I do not believe it is also appropriate to put this
[01:41:33 - 01:41:39] in that area because of traffic it's my understanding correct me if I'm wrong that
[01:41:40 - 01:41:49] all the churches around or the Muslim religion invites other churches in the Sacramento area
[01:41:49 - 01:41:58] to come to each burial which means that there can be quite a few people coming to each service
[01:41:58 - 01:42:06] in our area the roads are small out there and there will be a lot of traffic I don't think
[01:42:06 - 01:42:13] it's good for us to have that type of traffic there for safety for people also for medical
[01:42:13 - 01:42:19] personnel to get their ambulances etc if there are things going on I don't know if they're
[01:42:19 - 01:42:28] going to provide enough parking for it so I think that I also would like to know what type of
[01:42:30 - 01:42:37] service goes on if there will be noises that will be presented at that time
[01:42:38 - 01:42:43] not that we don't have airplanes that fly over so I can't say anything about that but I just
[01:42:43 - 01:42:48] think that we need to know all the aspects of that and I am concerned about that I appreciate
[01:42:48 - 01:42:57] you listening to me and thank you so much I think the applicants and states limit to 50 attendees
[01:42:57 - 01:43:01] for event well that's what I'm trying to say to you how can he limit that when all of the
[01:43:03 - 01:43:11] churches mosques are invited to come to the services from the Sacramento area I've looked
[01:43:11 - 01:43:17] this up online I've done research on this they are all invited to come to these services
[01:43:17 - 01:43:25] so how can they limit the attendees to 50 is my question maybe he could answer me that now
[01:43:27 - 01:43:30] I can address that really that would be a violation of the use permit
[01:43:33 - 01:43:43] that'd be right what do we do so if it's a violation of the use permit the use permit can be revoked
[01:43:44 - 01:43:50] and that number was proposed by the applicant so I mean unless he proposes otherwise that that is what
[01:43:50 - 01:44:00] he so in other words these air these other mosques would not be

invited to come to the service from
[01:44:00 - 01:44:07] the other well they may be invited but they will be limited to 50 but the problem is if if they
[01:44:07 - 01:44:12] actually show up it's a violation of the use permit in which case the use permit would be
[01:44:12 - 01:44:25] revoked okay so we have that guarantee then yeah okay thank you very much sure hi there yeah
[01:44:25 - 01:44:34] Mike Preskar her husband and anyway I'd like to approach this just from a just from a tack
[01:44:36 - 01:44:45] completeness of this application so it's kind of hard to ignore what this gentleman has applied
[01:44:45 - 01:44:55] for before he applied for a burial of 450,000 people over 100 years so then he was down to
[01:44:55 - 01:45:02] whatever you want whatever you want so his I don't know how you can accept this as a complete
[01:45:03 - 01:45:08] application so he talks about phase one well what's phase two phase three phase four
[01:45:09 - 01:45:17] how far does it go out he talks about 100 per year 100 barrels per year with a total of 400 and I mean
[01:45:18 - 01:45:25] yeah over the total of 404 that means this project would be complete in four and a half years so
[01:45:26 - 01:45:31] he talked about in his initial application and I somehow can't get that out of my mind
[01:45:31 - 01:45:38] he talks about that's going on for a hundred years a hundred years so I would seem to think
[01:45:38 - 01:45:43] that you'd want to know what his overall plan is how this property is going to be used over the next
[01:45:43 - 01:45:50] 10 years 20 years 25 years 100 years so he's not going to be around in 100 years unless you know
[01:45:50 - 01:46:00] somebody that I don't and I would this is totally ridiculous he has stated nothing of his long-term
[01:46:00 - 01:46:10] intent and I thank you for the time may I comment in this case yes you may
[01:46:11 - 01:46:18] the whole idea of a cemetery is to start and to never end hopefully till the day of judgment
[01:46:19 - 01:46:26] so it's going to be open till it fills up so whether it's a hundred years thousand years
[01:46:26 - 01:46:34] ten thousand years if we live to or if humanity continues to live to that time but the whole
[01:46:34 - 01:46:45] idea is that this is a cemetery to start serving about a hundred people a year and it would continue
[01:46:45 - 01:46:52] to grow and as the play as the states and so then we apply for another space to be developed and

[01:46:52 - 01:47:02] so on and so forth I have a comment to that comment so if that's the case then why don't
[01:47:02 - 01:47:08] you state that in your initial use permit how can you come into a program like this and make a
[01:47:08 - 01:47:15] statement that is not true you want x numbers of burials per year but you don't want to tell
[01:47:15 - 01:47:20] them how many years this is going to go on for how many total burials that you're talking about
[01:47:21 - 01:47:27] in your initial plan you had you were very clear you wanted 50 000 burials over 100 years
[01:47:27 - 01:47:33] so 50 000 was the end mark so what is this going to go on a hundred a year for well what's that
[01:47:33 - 01:47:42] what's the math it's a long damn time okay so like 500 years okay um I don't think that's
[01:47:42 - 01:47:48] application is complete thank you there's a good question i mean is that a piece of an issue
[01:47:48 - 01:47:56] I did want to address that so is there a um money or this is deputy county council
[01:47:56 - 01:48:03] glensburg so i'm just asking um is there a present plan in place right now for phases
[01:48:04 - 01:48:17] do you have um more more plans in the foreseeable future no uh originally we again with the
[01:48:17 - 01:48:23] little experience we had with the development of semantics we thought that if we put all the
[01:48:23 - 01:48:31] ideas on the plan that would make it clear apparently we had to go through changes and
[01:48:31 - 01:48:45] settle to the proposed project that you have it right now all the cemeteries in hafkow bay
[01:48:45 - 01:48:53] in colma they don't develop the cemetery uh all at once what they do is they go section by section
[01:48:55 - 01:49:04] and then it moves on and as the uh area that is owned by that organization or that individual
[01:49:04 - 01:49:12] is filled that's when the cemetery pretty much cemetery boundaries stop I have another comment
[01:49:12 - 01:49:19] for that so how can you come to this how can you come to this committee and present a half
[01:49:20 - 01:49:27] a tenth or an incomplete project application we're in full in full excuse me i'm going to have to
[01:49:27 - 01:49:33] stop you now okay okay because all we're going to do is go back and forth thank you the reason why
[01:49:33 - 01:49:39] i'm also stopping you i just got back from going to arlington the cemetery is still growing
[01:49:39 - 01:49:55] we have no clue when it's going to stop very soon so vice president

eagles nest owners association
[01:49:57 - 01:50:01] i don't want to be too redundant and just reiterate what some of the other owners have said but i do want
[01:50:01 - 01:50:07] to um for the record say that there are 23 families that that own and operate the airport and we
[01:50:07 - 01:50:14] are adamantly against having a burial ground cemetery um whatever that my vision of what that
[01:50:14 - 01:50:21] looks like um right adjacent to our airport we coexist with the agriculture ranches and mining
[01:50:21 - 01:50:28] operations and have for a long long time um just to speak for the rest of the owners we do not see
[01:50:28 - 01:50:49] this as a compatible use for the area we think it should not proceed thank you i think mr.
[01:50:49 - 01:50:56] mohnear kind of contradicted what i said but it's either uh you pay attention to your facts
[01:50:56 - 01:51:05] or your lying eyes i know what i see on a daily basis this place is being changed without permits
[01:51:05 - 01:51:12] there is grating and clearing going on and there wasn't anything wrong with that big oak tree
[01:51:13 - 01:51:17] or some of the other ones there was no wind damage or nothing it was healthy
[01:51:17 - 01:51:22] as were the rest of the trees in that particular parcel a lot of the large ones
[01:51:22 - 01:51:28] they're cutting them down either that or somebody sneaking in there at night with heavy
[01:51:28 - 01:51:35] equipment and chainsaws and doing their work but i know what i see and you'd see the same thing
[01:51:39 - 01:51:51] we have a zoom comment comment oh sorry yeah uh Brett uh uh the previous owner of of the land
[01:51:52 - 01:52:03] he is the one who maintains and advises on clearing brushes clearing uh dry wood and uh
[01:52:04 - 01:52:14] his understanding my understanding we do not touch healthy trees and he and and Brett mentioned that
[01:52:15 - 01:52:23] about five trees fell down along the carpentail as well as one and Lambert uh
[01:52:24 - 01:52:35] uh and uh he went and cut cut one down just to uh pretty much clear the road or clear the uh
[01:52:36 - 01:52:43] the way and uh the one on southern data as well because it pretty much locked the uh
[01:52:44 - 01:52:51] the driveway by the gate and he went down and got it other than that we do not touch trees
[01:52:54 - 01:53:08] all righty let's go with the zoom person okay mark go ahead yes hi this is yes thank you um this is

[01:53:08 - 01:53:18] mark dannon how I live on carpentail road uh just uh north of the property and um i i i really
[01:53:18 - 01:53:26] don't understand how you know a hundred events a year um with 50 people is crazy i mean i have to
[01:53:26 - 01:53:36] replace hello i have to uh replace the my suspension parts on my car because the road on
[01:53:36 - 01:53:44] carpentail is so bad and so tore up um how on earth could this support that much traffic to our
[01:53:44 - 01:53:52] roads that are all tore up and the other thing as i had a question for the owner is why i don't
[01:53:52 - 01:53:58] understand why a cemetery for people that don't live here i could understand a cemetery for somebody
[01:53:58 - 01:54:05] that for people that grew up here or lived here their whole lives and they want to be buried here
[01:54:05 - 01:54:12] why why do it here where it's nobody's associated the people are going to be buried there aren't
[01:54:12 - 01:54:18] going to be associated with this and then i mean i and and and then also my other comment
[01:54:18 - 01:54:26] about this is the land use how on earth is a cemetery just it you know we we have cows we have
[01:54:26 - 01:54:36] there's an airport we have mining um there's some agricultural but a cemetery for some for
[01:54:36 - 01:54:41] people coming from other places of the state it makes absolutely no sense so i'm
[01:54:42 - 01:54:53] against this project too thank you veneer i'm trying to unmute you all right but we'll go ahead
[01:54:53 - 01:55:01] and i'll continue to try we have um james we have uh someone in the room who's ready to speak
[01:55:06 - 01:55:13] dav wardall and i'm the president of the homeowners association on the airport um i drive
[01:55:13 - 01:55:22] that and i fly about once a week we have aerial photo reconnaissance capability we have time sequence
[01:55:23 - 01:55:28] photos of that property that will present at the planning commission meeting showing the
[01:55:28 - 01:55:37] destruction and grading since this project was applied for last year there is a heavy cat
[01:55:37 - 01:55:45] 120 series row grater moved in in the last two months there's a caterpillar paver
[01:55:45 - 01:55:53] capability of going 12 to 15 feet wide in paving there's an 8 10 ton roller in there
[01:55:53 - 01:55:59] there's a john dear or uh you know whatever i can go on with all the list of heavy equipment in there
[01:55:59 - 01:56:06] and all the significant cuts and fills and we can document that of at

least 3000
[01:56:06 - 01:56:13] kupi guards of dirt and the destruction of all the plants in that area that area is known for
[01:56:13 - 01:56:21] endangered species there's no permits no nothing so it uh i would ask that the planning department
[01:56:21 - 01:56:28] code enforcement go out and take a look and issue is stop work order until this goes through
[01:56:28 - 01:56:46] the planning process thank you comment yes thank you mr. vodal for your comment uh the equipments
[01:56:46 - 01:56:58] are there yet uh they have not been used in any of the uh uh things the operation that has been
[01:56:58 - 01:57:07] mentioned uh they are there waiting for us to get the permit so we can prepare the road as well as
[01:57:09 - 01:57:15] make it uh asphalt and maybe he mentioned maybe he forgot to mention the paver we also get a
[01:57:15 - 01:57:24] paver to uh to do asphalt uh road after we get the permits and uh require permits to proceed
[01:57:25 - 01:57:37] but so far none of these machines have been used uh that's all all righty we have zoom comment
[01:57:37 - 01:57:46] from mr. donovan all righty uh good afternoon my name's jim donovan i live in the area and um i just
[01:57:46 - 01:57:55] want to confirm that one of you said earlier that that this cemetery is compatible with r1a
[01:57:55 - 01:58:04] zoning did i hear that correctly cemeteries are allowed i believe in all uh zoning districts with
[01:58:04 - 01:58:11] the use permit i'm looking at the zoning the zoning regulations on your county website
[01:58:11 - 01:58:20] and uses permitted is not listing a cemetery and uh uses by use permit is not listing a cemetery
[01:58:20 - 01:58:29] so um and there's only two citations of cemetery in your zoning code neither which relate to being
[01:58:29 - 01:58:35] permitted to be used on an r1a district so if you could point me to that uh as well as anybody
[01:58:35 - 01:58:42] else who would be interested um i would be enlightened i believe it's listed under additional uses
[01:58:42 - 01:58:52] but um we're checking up on that right now okay um in a set okay that's all i have thank you
[01:58:53 - 01:59:12] thank you all righty we'll go ahead and close public comment and anything further to add
[01:59:13 - 01:59:22] yeah uh section 19.2a.20.020 says that provided that a use permit is first obtained the following
[01:59:22 - 01:59:30] uses should be allowed in any district unless otherwise prohibited and then um number e is

[01:59:30 - 01:59:51] cemeteries okay if i'm unmuted i i see that thank you all righty um do we have all the current
[01:59:51 - 02:00:04] information do we have any more questions then at this point we have some items that still are
[02:00:04 - 02:00:14] outstanding correct correct do you want a motion please i'll make a motion that we find the
[02:00:14 - 02:00:20] application incomplete and the staff will provide a uh complete list complete list of
[02:00:20 - 02:00:29] deficiencies within 30 days all righty i have a motion do i have a second i'll second that
[02:00:30 - 02:00:52] all righty i have a first and second all in favor hi hi hi with that thank you goodbye

Exhibit 2-D

Submitted in connection with Use Permit UP-22-2-3, County of Amador

Transcript — Amador County Technical Advisory Committee

Meeting of September 18, 2025

Source: Machine transcription of Amador County's published meeting audio. **Not an official County transcript.** Amador County produces no written TAC minutes; the audio recording is the sole official record. Verify every quotation against the recording at the cited timestamp before entering it into the administrative record.

Timestamps are shown as [HH:MM:SS - HH:MM:SS] and refer to elapsed time in the audio file.

[00:00:00 - 00:00:04] The first item on the agenda is correspondence.
[00:00:04 - 00:00:07] Any correspondence that was received prior to publication
[00:00:07 - 00:00:10] of the agenda is included in the agenda packet.
[00:00:10 - 00:00:14] We receive any correspondence after publication of the agenda.
[00:00:14 - 00:00:18] There was a diagram that was with some annotations
[00:00:18 - 00:00:22] that was submitted by the applicant and that has been provided
[00:00:22 - 00:00:27] at the back of the room as well as we can put it up online.
[00:00:27 - 00:00:31] One more thing to note was that there was a mistake
[00:00:31 - 00:00:35] when we first released the technical, the TAC memo
[00:00:35 - 00:00:37] that had a different number of events
[00:00:37 - 00:00:39] so that has since been corrected.
[00:00:39 - 00:00:42] It should be correct on the agenda and then we also send
[00:00:42 - 00:00:44] a clarifying email with the corrected notice as well.
[00:00:44 - 00:00:47] All right, thank you.
[00:00:47 - 00:00:49] The next item on the agenda are public matters
[00:00:49 - 00:00:51] and persons wishing to address the TAC committee
[00:00:51 - 00:00:53] on non-agenda items.
[00:00:53 - 00:00:56] Is there anyone here who wishes to address the committee
[00:00:56 - 00:00:59] on a non-agenda item?
[00:00:59 - 00:01:03] Zoomers, if you want to comment this afternoon,
[00:01:03 - 00:01:06] please raise your virtual hand so that I can unmute you

[00:01:06 - 00:01:06] so you can speak.
[00:01:06 - 00:01:09] And if you have trouble commenting,
[00:01:09 - 00:01:14] please use the chat box to let me know.
[00:01:14 - 00:01:18] Chair, there's no Zoom comment on matters not on the agenda.
[00:01:18 - 00:01:21] All right, see a none in the room and none on Zoom.
[00:01:21 - 00:01:22] We'll move on to the agenda item.
[00:01:22 - 00:01:25] We have one item today and it's a mouthful.
[00:01:25 - 00:01:26] So bear with me.
[00:01:26 - 00:01:28] It's a review of a use permit application
[00:01:28 - 00:01:31] for gardens of newer cemetery.
[00:01:31 - 00:01:33] The 46-acre parcel is owned R1A,
[00:01:33 - 00:01:35] single-family residential and agricultural
[00:01:35 - 00:01:38] and has a mineral resource general plan designation.
[00:01:38 - 00:01:40] The proposed improvements include
[00:01:40 - 00:01:42] driveway parking for 100 cars,
[00:01:42 - 00:01:45] a parking lot with 35 permanent spaces
[00:01:45 - 00:01:47] and permanent restrooms.
[00:01:47 - 00:01:49] Proposed improvements also include a driveway
[00:01:49 - 00:01:51] and parking lot for 100 cars.
[00:01:51 - 00:01:52] That's repeated.
[00:01:52 - 00:01:55] Now the proposed number of funerals would be 60 a month
[00:01:55 - 00:01:59] or 720 annually with a limit of 50 attendees per event.
[00:01:59 - 00:02:03] The APN is 001-220-013,
[00:02:03 - 00:02:07] also known as 16630 Lambert Road just outside of Ione.
[00:02:09 - 00:02:11] First thing I'd like to do is ask the applicant
[00:02:11 - 00:02:13] to, if the applicant's online
[00:02:13 - 00:02:16] or they'll believe he's here in the room,
[00:02:16 - 00:02:22] to tell the attack committee specifically
[00:02:22 - 00:02:23] the specifics of the project
[00:02:23 - 00:02:25] and how it's different from the original project
[00:02:25 - 00:02:26] that was submitted.
[00:02:26 - 00:02:29] Do you want to eliminate the confusion
[00:02:29 - 00:02:31] between the original project submittal
[00:02:31 - 00:02:34] and the current project submittal?
[00:02:34 - 00:02:36] Good afternoon everyone.
[00:02:37 - 00:02:39] I hope everyone is well.
[00:02:40 - 00:02:44] The original project was kind of a draft
[00:02:44 - 00:02:48] not knowing exactly what I need to specify.
[00:02:48 - 00:02:53] I was told by some,
[00:02:53 - 00:02:55] I took some advice from the planning department
[00:02:55 - 00:02:58] to pretty much include everything that is there.
[00:02:58 - 00:03:02] However, I was able to refine
[00:03:02 - 00:03:04] after discussing with the planning department

[00:03:04 - 00:03:08] and other people in the field
[00:03:08 - 00:03:13] to develop a portion of the land.
[00:03:13 - 00:03:18] And the number of attendees pretty much stays the same.
[00:03:20 - 00:03:25] The size of the funeral or the size of the population
[00:03:26 - 00:03:29] that will be at the funeral is about 50.
[00:03:29 - 00:03:31] Sometimes we have it like 25.
[00:03:31 - 00:03:36] Only in few instances it can go a little bit beyond 50 people
[00:03:38 - 00:03:42] but it's about average that number of people.
[00:03:44 - 00:03:49] We're still proposing the pretty much having the road
[00:03:51 - 00:03:55] connecting the entrance with the exit
[00:03:55 - 00:03:57] or the two entrances of the land
[00:03:57 - 00:04:01] connecting it together for an ease of moving
[00:04:02 - 00:04:05] between the entrance and the exit
[00:04:05 - 00:04:06] or whatever two entrances.
[00:04:10 - 00:04:13] Pretty much it eliminated also the building
[00:04:13 - 00:04:17] because it seems to be a little bit more involved
[00:04:17 - 00:04:21] and we don't have the funds for it either.
[00:04:21 - 00:04:24] And what else?
[00:04:27 - 00:04:32] We're still proposing also the digging of the well
[00:04:32 - 00:04:37] to be able to water the plants that's gonna be added
[00:04:38 - 00:04:42] to the landscape instead of just keeping it
[00:04:45 - 00:04:49] keep it exposed where there is no plantation.
[00:04:49 - 00:04:55] That's pretty much the change.
[00:04:55 - 00:04:58] All right, thank you.
[00:04:58 - 00:05:10] Thank you.
[00:05:10 - 00:05:14] I turn it over to staff for your introduction
[00:05:14 - 00:05:17] that I've halfway done, sorry.
[00:05:17 - 00:05:19] Chris, I was with the planning department.
[00:05:19 - 00:05:22] So today we are going to be evaluating
[00:05:22 - 00:05:24] this application for completeness.
[00:05:24 - 00:05:26] So basically we're looking through
[00:05:26 - 00:05:29] and making sure we have enough information
[00:05:29 - 00:05:33] to begin and conclude the environmental review
[00:05:33 - 00:05:34] of the project.
[00:05:36 - 00:05:39] I mean, I know that, oh, I guess one thing to note
[00:05:39 - 00:05:43] was the general plan designation of the property is MRZ
[00:05:43 - 00:05:45] which is Rural Resource Zone.
[00:05:45 - 00:05:47] And the applicant has responded
[00:05:47 - 00:05:51] to potential concerns with that
[00:05:51 - 00:05:53] with a geotechnical study that has been included
[00:05:53 - 00:05:54] in the packet.
[00:05:54 - 00:05:56] So that would be used to determine
[00:05:56 - 00:06:00] if this project is consistent or inconsistent

[00:06:00 - 00:06:04] with that MRZ designation from,
[00:06:04 - 00:06:06] I'm not an engineer, but from what I looked through,
[00:06:06 - 00:06:07] I mean, it definitely appears
[00:06:07 - 00:06:10] like a very comprehensive report.
[00:06:10 - 00:06:15] So I don't personally have any concerns at this point
[00:06:15 - 00:06:18] as far as this project being inconsistent
[00:06:18 - 00:06:20] with the general plan designation.
[00:06:21 - 00:06:23] Another thing to note is that cemeteries
[00:06:23 - 00:06:26] are allowed in any zoning district
[00:06:26 - 00:06:27] with an approved use permit.
[00:06:27 - 00:06:31] So I know that the current zoning for this proposal
[00:06:31 - 00:06:34] is R1A, single family residential and ag.
[00:06:35 - 00:06:40] And that doesn't preclude them from being able to apply
[00:06:41 - 00:06:43] for the use permit to allow this use.
[00:06:45 - 00:06:50] Other than that, I mean, it's really up to
[00:06:50 - 00:06:53] tech members to determine if there are any specific
[00:06:53 - 00:06:55] concerns that they wanna see addressed
[00:06:55 - 00:06:56] that have not already been addressed
[00:06:56 - 00:06:58] through the application.
[00:06:59 - 00:07:03] I know this has been to tech previously
[00:07:03 - 00:07:06] and there were substantial comments received
[00:07:06 - 00:07:08] in those prior submissions.
[00:07:08 - 00:07:10] Those are included as part of the administrative record
[00:07:10 - 00:07:11] for the project.
[00:07:11 - 00:07:16] They were sent as a separate attachment
[00:07:16 - 00:07:19] to the tech packet for this application
[00:07:19 - 00:07:21] just because we didn't want it to be confused
[00:07:21 - 00:07:26] that they applied to this current submission,
[00:07:26 - 00:07:28] but they still are part of the administrative record.
[00:07:31 - 00:07:33] So I guess part of the evaluation,
[00:07:33 - 00:07:35] two of the environmental would be looking through those
[00:07:35 - 00:07:37] previous submission submitted comments
[00:07:37 - 00:07:40] and making sure there are no other environmental concerns
[00:07:40 - 00:07:45] raised that have not since been addressed.
[00:07:45 - 00:07:50] As far as I'm aware, the new submission
[00:07:50 - 00:07:52] of the application does address, I think,
[00:07:52 - 00:07:53] all the comments that we had
[00:07:53 - 00:07:55] from planning department previously.
[00:07:55 - 00:07:57] Okay, all right, thank you.
[00:07:57 - 00:08:00] Have any, excuse me, have any committee comments
[00:08:00 - 00:08:05] or concerns at this time?
[00:08:05 - 00:08:06] Did I hear correctly that they said
[00:08:06 - 00:08:10] there was a building involved in this project as well?

[00:08:10 - 00:08:12] So there is an existing storage building.
[00:08:12 - 00:08:14] I could correct me if I'm wrong, Munir,
[00:08:14 - 00:08:18] on the property and that's, I think it may be used.
[00:08:18 - 00:08:20] I'm not sure if it's going to be used for the cemetery.
[00:08:20 - 00:08:22] Currently it's storage.
[00:08:22 - 00:08:23] I know that the original submission
[00:08:23 - 00:08:25] included a larger religious building
[00:08:25 - 00:08:28] and that has since been removed from the application
[00:08:28 - 00:08:31] for the reasons that Munir specified.
[00:08:31 - 00:08:39] So currently there's no proposed building.
[00:08:39 - 00:08:41] Originally it was proposed,
[00:08:41 - 00:08:46] but I backed off on that proposal
[00:08:47 - 00:08:51] and it was supposed to be part of the cemetery,
[00:08:51 - 00:08:54] but no longer I'm proposing that.
[00:08:54 - 00:08:57] The existing steel building is not gonna be part
[00:08:57 - 00:09:02] of the cemetery and that's pretty much it.
[00:09:04 - 00:09:06] Okay, thank you.
[00:09:06 - 00:09:08] And I had a question for you Munir actually on that.
[00:09:08 - 00:09:11] So I remember previously on the discussion
[00:09:12 - 00:09:13] of the religious building that's no longer part
[00:09:13 - 00:09:14] of the application was going to be
[00:09:14 - 00:09:17] for the preparation of the bodies for the internment.
[00:09:18 - 00:09:20] So will the preparation of the bodies
[00:09:20 - 00:09:24] now be held offsite then?
[00:09:24 - 00:09:27] And then they would just be brought on site for the burial?
[00:09:27 - 00:09:32] Yes, it will be prepared somewhere in West FAC
[00:09:32 - 00:09:38] and then it will be coming prepared in a casket
[00:09:39 - 00:09:44] to like away from the site of the public
[00:09:44 - 00:09:48] and then it will be dropped right at the burial spot.
[00:09:51 - 00:09:53] Thank you.
[00:09:53 - 00:10:00] Thank you.
[00:10:00 - 00:10:01] Community comments?
[00:10:01 - 00:10:05] Yeah, this is a Richard Vila Public Works Director.
[00:10:08 - 00:10:13] In the application it talks about a gravel driveway
[00:10:13 - 00:10:17] and parking area that could accommodate
[00:10:17 - 00:10:22] up to 100 cars and 35 permanent parking spots.
[00:10:22 - 00:10:26] Are there any plans to pave
[00:10:26 - 00:10:32] that internal driveway and the parking lot?
[00:10:32 - 00:10:35] With asphalt, yes.
[00:10:35 - 00:10:40] Yes, because my concern was tracking either dirt
[00:10:41 - 00:10:44] or in wintertime where you've had rainfall
[00:10:44 - 00:10:47] tracking mud onto the public road.
[00:10:47 - 00:10:52] So I would certainly encourage or would want that to happen

[00:10:53 - 00:10:56] that we have those areas that are gonna be
[00:10:58 - 00:11:02] frequented with vehicles to be paved.
[00:11:02 - 00:11:07] Definitely, as we after you've generous permission,
[00:11:09 - 00:11:13] if we are granted the use permit,
[00:11:13 - 00:11:14] then there would be fun to go ahead
[00:11:14 - 00:11:19] and do the asphalt, maybe some other areas
[00:11:20 - 00:11:22] would be concrete as well.
[00:11:22 - 00:11:27] Okay, cut it on the same note.
[00:11:27 - 00:11:32] I think it would be beneficial for the staff
[00:11:32 - 00:11:36] and anyone who's reviewing your application.
[00:11:36 - 00:11:38] If you're gonna have these site improvements,
[00:11:38 - 00:11:40] we'd probably need a plan that would show
[00:11:40 - 00:11:44] these site improvements that would show,
[00:11:44 - 00:11:46] specifically where your driveway goes,
[00:11:46 - 00:11:51] where your parking area is showing dimensions of width
[00:11:52 - 00:11:55] and length and that sort of thing,
[00:11:55 - 00:11:58] a regular site plan that we would require
[00:11:58 - 00:12:01] from any other type of development
[00:12:01 - 00:12:04] so that we could properly ascertain the improvements
[00:12:04 - 00:12:07] that you're planning to make on the site.
[00:12:10 - 00:12:13] On the page number one of the proposal,
[00:12:13 - 00:12:16] it shows a line and that would be
[00:12:16 - 00:12:18] pretty much the location of it.
[00:12:18 - 00:12:22] If you need any more specifications,
[00:12:22 - 00:12:25] any more details, yeah, we will be able to provide them.
[00:12:25 - 00:12:30] Right, so I have your application in front of me,
[00:12:31 - 00:12:35] but it doesn't show me how your parking lot's laid out.
[00:12:35 - 00:12:39] Is it gonna be 50 feet wide by 100 feet long
[00:12:39 - 00:12:42] and the layout of the stalls
[00:12:42 - 00:12:46] and how wide is your driveway?
[00:12:46 - 00:12:49] Is it gonna be wide enough to accommodate
[00:12:49 - 00:12:53] two-way traffic or is it too narrow for that?
[00:12:53 - 00:12:57] Those are the kind of details we would need to see
[00:12:57 - 00:13:01] to make sure that what you're proposing
[00:13:01 - 00:13:05] is gonna work and that you really should have on your own
[00:13:05 - 00:13:09] so that you have a successful development on the property
[00:13:09 - 00:13:12] that you don't get into something that you,
[00:13:12 - 00:13:15] and all of a sudden you get yourself back into a corner
[00:13:15 - 00:13:18] because there might have been something
[00:13:18 - 00:13:22] that wasn't considered so I think that would be a benefit
[00:13:22 - 00:13:27] for everyone involved to have that kind of a more detailed
[00:13:27 - 00:13:32] plan, I mean, what's shown is more schematic in nature.
[00:13:34 - 00:13:39] We need more specific dimensions and such.

[00:13:40 - 00:13:43] Yeah, I believe it was mentioned that it's gonna be
[00:13:43 - 00:13:48] about 21 foot for the road width to allow
[00:13:49 - 00:13:52] pretty much two cars in two directions.
[00:13:54 - 00:14:00] Let me see, yeah, I'll be able to provide that.
[00:14:01 - 00:14:05] And also for the parking lot, the dimensions.
[00:14:05 - 00:14:09] Right, and I think too, the other thing I was looking at,
[00:14:09 - 00:14:12] I know there are two existing encroachments,
[00:14:12 - 00:14:16] one onto Lambert Road and one onto Carbondale Road
[00:14:16 - 00:14:19] that they're currently paved encroachments,
[00:14:19 - 00:14:23] which is good because it was already in place,
[00:14:23 - 00:14:27] but with your site plan to be able to see
[00:14:27 - 00:14:31] how well those encroachments will tie into your improvements
[00:14:31 - 00:14:33] and see if there's, because you may decide,
[00:14:33 - 00:14:35] well, I don't like the angle of this encroachment,
[00:14:35 - 00:14:38] I wanna realign it or something,
[00:14:38 - 00:14:43] especially the existing encroachment off of Lambert,
[00:14:45 - 00:14:48] which comes in at, your driveway comes in on an angle
[00:14:48 - 00:14:53] and it may be something you may wanna straighten out,
[00:14:53 - 00:14:55] so it comes in more perpendicular
[00:14:56 - 00:15:01] so that it provide more ease of people exiting
[00:15:01 - 00:15:05] and entering through that driveway.
[00:15:05 - 00:15:07] Your schematic shows it kind of straight on,
[00:15:07 - 00:15:11] but in reality, it comes in at an angle.
[00:15:11 - 00:15:16] Okay, yeah, definitely, and also it has to be enlarged.
[00:15:17 - 00:15:22] It's having 20 foot, it's gonna be 24 to accommodate
[00:15:22 - 00:15:24] the commercial requirements for the gate,
[00:15:24 - 00:15:28] and yeah, we'll be able to do that.
[00:15:28 - 00:15:30] Yeah, so if you're gonna be modifying that,
[00:15:30 - 00:15:35] that'll require, even though you have an existing
[00:15:35 - 00:15:37] encroachment, if you're gonna modify that,
[00:15:37 - 00:15:39] you'll have to, just for point of record,
[00:15:39 - 00:15:43] you'll need encroachment permit for each of those locations
[00:15:43 - 00:15:45] if you're gonna modify them,
[00:15:45 - 00:15:46] and then we can go through those details
[00:15:46 - 00:15:51] as far as what would require for width and radiuses,
[00:15:52 - 00:15:54] turning radiuses and what have you.
[00:15:54 - 00:15:55] Definitely.
[00:16:00 - 00:16:04] One other concern I have, I'm assuming
[00:16:04 - 00:16:06] and I shouldn't assume, that's why I'm gonna ask the
[00:16:06 - 00:16:10] question, most of your, the people that will be
[00:16:10 - 00:16:13] frequenting this, are they gonna be coming pretty much
[00:16:13 - 00:16:17] from the Sacramento area in general?
[00:16:17 - 00:16:22] Sacramento and also Ayun and Jackson.

[00:16:24 - 00:16:27] Okay, I guess where I'm coming from with this
[00:16:27 - 00:16:32] is looking at the road system that will serve this property.
[00:16:34 - 00:16:39] If you have a, most of you're, I'm guessing,
[00:16:41 - 00:16:43] you know, if you have a sizable amount of people
[00:16:43 - 00:16:45] that are coming from the Sacramento area,
[00:16:45 - 00:16:48] they'll probably come up Highway 16,
[00:16:48 - 00:16:53] turn on Michigan Bar Road or I own road as it is
[00:16:53 - 00:16:58] in Sacramento County, and then turn on to Maxwell,
[00:16:58 - 00:17:02] and Maxwell to get to Lambert,
[00:17:02 - 00:17:07] and Maxwell Road is narrow,
[00:17:07 - 00:17:09] it's in very rough condition,
[00:17:10 - 00:17:13] the county hasn't put a lot of effort
[00:17:13 - 00:17:15] into keeping it in pristine condition,
[00:17:15 - 00:17:19] because it's not used by a lot of people, it is used,
[00:17:19 - 00:17:21] but I think that the people who use it
[00:17:21 - 00:17:23] probably wish it was in better condition.
[00:17:25 - 00:17:26] Or wheel drive.
[00:17:26 - 00:17:28] Yeah, it's rough, and granted,
[00:17:28 - 00:17:30] we need to do some work on it.
[00:17:30 - 00:17:34] However, if you're gonna have, you know,
[00:17:34 - 00:17:38] a funeral and you're gonna have 35 vehicles
[00:17:38 - 00:17:40] or whatever coming from the Sacramento there,
[00:17:41 - 00:17:45] I'm concerned that that road is not gonna be able
[00:17:45 - 00:17:50] to accommodate that usage without a lot of improvement,
[00:17:50 - 00:17:55] and I don't think your patrons will enjoy
[00:17:57 - 00:17:58] going on that road either,
[00:17:58 - 00:18:02] so I do have that concern,
[00:18:02 - 00:18:09] and because we, you know, the county,
[00:18:09 - 00:18:12] has to make a choice on where it does its maintenance,
[00:18:12 - 00:18:15] and I'm sure the folks that live in that area
[00:18:15 - 00:18:17] wish the road was maintained better,
[00:18:17 - 00:18:20] but it doesn't have a lot of traffic,
[00:18:20 - 00:18:23] and so that's why it's kind of in the state that it's in,
[00:18:23 - 00:18:25] but with this proposal,
[00:18:25 - 00:18:29] there's gonna be potentially a larger increase,
[00:18:29 - 00:18:32] and I have concerns that that road's not gonna be able
[00:18:32 - 00:18:37] to hold up to the events that you're having,
[00:18:37 - 00:18:40] not that they're large, but they're there,
[00:18:40 - 00:18:42] and which there's none now,
[00:18:42 - 00:18:46] so I just wanted to make that comment,
[00:18:46 - 00:18:51] and that's a concern for me.
[00:18:51 - 00:18:56] Yeah, the note was well documented before,
[00:18:56 - 00:19:00] and we discussed it with our people pretty much,

[00:19:00 - 00:19:02] the groups that are gonna be pretty much interested
[00:19:02 - 00:19:07] in the spot, whether they are in Jackson,
[00:19:07 - 00:19:11] Ion, or Sacramento, and they pretty much will be coming
[00:19:11 - 00:19:14] from the highway, Highway 16, to Carpendale,
[00:19:14 - 00:19:19] or they're gonna come through the other paved road,
[00:19:20 - 00:19:26] they're not gonna use the county road in Maxwell.
[00:19:26 - 00:19:30] Okay, well, I mean, unless you're directing
[00:19:30 - 00:19:34] your patrons to go a specific route,
[00:19:34 - 00:19:37] they'll follow their GPS, that's just the way it is,
[00:19:38 - 00:19:42] so it's just a concern.
[00:19:42 - 00:19:46] Yeah, yeah, no, no, because we care about the safety
[00:19:46 - 00:19:49] of the cars as well, because going through bumps
[00:19:49 - 00:19:54] has put short in the life of the sharks in the car,
[00:19:54 - 00:19:56] so we already mentioned that,
[00:19:56 - 00:19:59] that they have to use the other longer route
[00:19:59 - 00:20:03] that would come from Highway 16 to Carpendale,
[00:20:03 - 00:20:06] and make a right, and then come down all the way.
[00:20:07 - 00:20:12] Okay, otherwise you'll have to increase your capability,
[00:20:12 - 00:20:16] your sight, to dispose of cars.
[00:20:18 - 00:20:22] Or if we make a lot of money, and that goes to the taxes
[00:20:22 - 00:20:25] in the county, hopefully we'll be able to improve
[00:20:25 - 00:20:29] that Maxwell way of my life, way for that.
[00:20:31 - 00:20:33] I wanted to say, I think in the past,
[00:20:33 - 00:20:38] not for cemeteries, but there have been conditions
[00:20:38 - 00:20:40] where we can say if there's posted online
[00:20:40 - 00:20:42] or through scheduling, because I would assume
[00:20:42 - 00:20:46] that this would be by per scheduled appointment only,
[00:20:46 - 00:20:51] they can specify the directions to navigate a certain way
[00:20:51 - 00:20:53] and also give disclaimers as far as the road
[00:20:53 - 00:20:56] and everything, so I think that would be very feasible
[00:20:56 - 00:20:59] just to include as a condition that any posted,
[00:20:59 - 00:21:04] posted navigation or scheduling appointment
[00:21:04 - 00:21:08] or whatever refer to the navigation
[00:21:08 - 00:21:11] that would use the Highway rather than Maxwell.
[00:21:12 - 00:21:14] True, true, that would be also mentioned in the website
[00:21:14 - 00:21:19] where which route to take and stick with it,
[00:21:19 - 00:21:21] otherwise we're gonna tell them,
[00:21:21 - 00:21:24] otherwise if you don't stick with these recommendations,
[00:21:24 - 00:21:26] we're gonna lose it, so.
[00:21:27 - 00:21:28] And they better follow it,
[00:21:28 - 00:21:30] because they are the ones who benefited from it,
[00:21:30 - 00:21:34] they are the public, should be also responsible
[00:21:34 - 00:21:40] to follow the guidance that we provide.

[00:21:40 - 00:21:49] And we're serious about it, we're not kidding around.
[00:21:49 - 00:21:51] Any other committee comments?
[00:21:51 - 00:21:53] Yes, I did have a couple comments today.
[00:21:53 - 00:21:56] Scott Meyer with Environmental Health.
[00:21:57 - 00:22:02] I'd like to talk about the proposed
[00:22:02 - 00:22:06] sewage disposal treatment system
[00:22:06 - 00:22:10] that would be servicing the restrooms.
[00:22:10 - 00:22:13] And I do understand you have a
[00:22:13 - 00:22:17] geotechnical engineering investigation from 2024,
[00:22:17 - 00:22:21] but what you would need is to contact an engineer
[00:22:21 - 00:22:25] or a geologist, licensed geologist
[00:22:25 - 00:22:29] or professional engineer regarding a design
[00:22:29 - 00:22:32] for the sewage disposal system.
[00:22:32 - 00:22:35] So you'd wanna, actually you're gonna have to file
[00:22:35 - 00:22:39] an application here and with my department,
[00:22:39 - 00:22:43] Environmental Health, and contact an engineer
[00:22:43 - 00:22:46] and schedule what we call soil site investigations
[00:22:46 - 00:22:51] with myself, likely, out on the property
[00:22:51 - 00:22:54] to determine the best location for the proposed
[00:22:54 - 00:22:59] leach field or whatever the design will end up being.
[00:23:02 - 00:23:07] Our ordinance is quite detailed
[00:23:07 - 00:23:10] regarding onsite sewage disposal.
[00:23:10 - 00:23:16] And I'd like to send that to you electronically
[00:23:16 - 00:23:21] so you can take a look at the ordinance itself.
[00:23:21 - 00:23:25] Also regarding the map, I didn't see where the well location
[00:23:25 - 00:23:27] was on your map there.
[00:23:27 - 00:23:33] How far is the well from the proposed burial sites?
[00:23:36 - 00:23:38] Way, way more than 300 feet.
[00:23:39 - 00:23:41] I'm gonna get you big.
[00:23:41 - 00:23:43] And then as far as the well, the site has been approved
[00:23:43 - 00:23:45] but it hasn't been drilled yet.
[00:23:47 - 00:23:49] Are you planning on using that?
[00:23:49 - 00:23:50] No, because I was holding water.
[00:23:50 - 00:23:54] Okay, are you planning on using the well water
[00:23:54 - 00:23:56] to serve the restrooms or are you gonna use
[00:23:56 - 00:24:03] the treated Amador water agency water?
[00:24:03 - 00:24:06] It's gonna be the city water for the restrooms.
[00:24:06 - 00:24:07] Okay, I did.
[00:24:07 - 00:24:11] And the well water for the.
[00:24:11 - 00:24:12] For the landscaping.
[00:24:12 - 00:24:13] So you're ahead.
[00:24:13 - 00:24:15] Yeah, for the landscaping.
[00:24:15 - 00:24:16] Okay.

[00:24:17 - 00:24:19] Yeah, I did confirm that with a water agency.
[00:24:19 - 00:24:23] You have treated water provided there at the parcel.
[00:24:24 - 00:24:26] But you will likely, and I'll check
[00:24:26 - 00:24:28] with the water agency as well,
[00:24:28 - 00:24:31] you'll need a backflow prevention device
[00:24:31 - 00:24:34] on that well water well.
[00:24:34 - 00:24:37] And that needs to be tested annually.
[00:24:37 - 00:24:39] But I'll check with the water agency
[00:24:39 - 00:24:42] and you should also check with their engineering department
[00:24:42 - 00:24:46] at the Amador water agency.
[00:24:46 - 00:24:47] Okay.
[00:24:47 - 00:24:49] So those were just two items I wanted
[00:24:49 - 00:24:54] to let you know about because there'll be conditions.
[00:24:54 - 00:24:55] Thank you.
[00:24:55 - 00:24:58] Yeah, and for the, I'm sorry, thank you.
[00:24:58 - 00:24:59] The first one that you mentioned
[00:24:59 - 00:25:02] about the disposal of the sewage,
[00:25:02 - 00:25:05] I have two companies pretty much.
[00:25:05 - 00:25:08] I talked to them regarding the septic tank design
[00:25:08 - 00:25:11] as well as the building of that.
[00:25:11 - 00:25:12] Okay, they said.
[00:25:12 - 00:25:14] They could reach out to me.
[00:25:14 - 00:25:18] I could send them that ordinance information.
[00:25:18 - 00:25:19] Okay.
[00:25:19 - 00:25:22] And electronically and they can take a look
[00:25:22 - 00:25:24] at what's required for these.
[00:25:24 - 00:25:27] You know, because it's either gonna be several
[00:25:27 - 00:25:29] on-site sewage disposal systems or one large one.
[00:25:29 - 00:25:34] So that's a lot of people you're proposing to have on site.
[00:25:37 - 00:25:39] Yeah, that'd be one of your first steps
[00:25:39 - 00:25:43] you wanna get moving on, really.
[00:25:43 - 00:25:47] Okay, one of them is construction,
[00:25:47 - 00:25:49] septic incorporation.
[00:25:49 - 00:25:52] They're both out in the segmental area.
[00:25:52 - 00:25:55] And yeah.
[00:25:55 - 00:25:57] Yeah, okay.
[00:25:57 - 00:25:59] Yeah, they could just reach out to Scott Meyer,
[00:25:59 - 00:26:03] Amador County Environmental Health.
[00:26:03 - 00:26:10] Send me an email if we can get the ball rolling.
[00:26:10 - 00:26:13] Thank you.
[00:26:13 - 00:26:15] Thank you.
[00:26:17 - 00:26:18] Ashley and I have Fire Prevention Officer
[00:26:18 - 00:26:20] with Amador Fire.

[00:26:20 - 00:26:24] I do wanna kind of piggyback on what Mr. Vila
[00:26:24 - 00:26:28] was talking about with more specified plans.
[00:26:28 - 00:26:32] I see on approximately page 16, I believe it is,
[00:26:32 - 00:26:36] that you have called out the road width
[00:26:36 - 00:26:39] and listed gates and whatnot.
[00:26:40 - 00:26:44] As far as length goes, unless I'm missing it,
[00:26:44 - 00:26:49] I have not seen any designation as to how long
[00:26:49 - 00:26:52] you plan to, or how long you plan to make this road
[00:26:52 - 00:26:55] that goes from one end of the property to the other,
[00:26:57 - 00:26:59] the entirety of the road will have to comply
[00:26:59 - 00:27:04] with ordinance 15.30 for fire and life safety
[00:27:04 - 00:27:05] from the county.
[00:27:06 - 00:27:09] So that will be one of the conditions as well
[00:27:09 - 00:27:12] as is going to call out a little bit better,
[00:27:12 - 00:27:16] those dimensions, if it's longer than the allowed length,
[00:27:16 - 00:27:19] then we need to talk about turnouts.
[00:27:19 - 00:27:23] And I don't think you'll have a grading problem
[00:27:23 - 00:27:26] for greater than 16% down there,
[00:27:26 - 00:27:30] but yeah, there's just a number of things
[00:27:30 - 00:27:34] when it comes to the road that I'll be wanting
[00:27:34 - 00:27:35] to take into consideration.
[00:27:35 - 00:27:37] And then the gates as well, all gates,
[00:27:37 - 00:27:40] just for your knowledge, are required
[00:27:40 - 00:27:46] to have NOx locks on them for fire department access.
[00:27:46 - 00:27:48] But I think, I think those are my biggest comments
[00:27:48 - 00:27:49] right now.
[00:27:49 - 00:27:52] The fire tank be required?
[00:27:53 - 00:27:59] Hmm, he's not, we don't have any new structures going,
[00:27:59 - 00:28:02] usually that's a new structure trigger.
[00:28:02 - 00:28:06] However, given the amount of people
[00:28:06 - 00:28:09] that he anticipates, that's approximately
[00:28:09 - 00:28:13] 3,000 people per month that he's estimating.
[00:28:14 - 00:28:17] Yes, we will discuss that as well.
[00:28:17 - 00:28:21] A fire water tank, or maybe a couple given
[00:28:21 - 00:28:28] the size of the property.
[00:28:28 - 00:28:29] Okay, thank you.
[00:28:31 - 00:28:32] Thank you.
[00:28:32 - 00:28:34] That's it for me.
[00:28:34 - 00:28:35] I mean here this is Chuck Bady also
[00:28:35 - 00:28:37] with the planning department.
[00:28:37 - 00:28:39] And this is in reference to the same page
[00:28:39 - 00:28:42] that I actually just discussed, which is page 16,
[00:28:42 - 00:28:44] that shows the overall schematic,

[00:28:47 - 00:28:50] which shows on the north side of the property,
[00:28:50 - 00:28:53] a grave's along, or close to that northern property line
[00:28:53 - 00:28:57] between the internal road and the northern property line.
[00:28:58 - 00:29:00] How many grave sites are shown there?
[00:29:00 - 00:29:04] I mean, it looks like about 14 or 1500,
[00:29:04 - 00:29:11] but I couldn't count them all that fast.
[00:29:11 - 00:29:15] To be honest with you, I can do the calculation,
[00:29:15 - 00:29:20] but I don't, I probably have the count somewhere,
[00:29:22 - 00:29:24] but I don't have it with me at the moment.
[00:29:24 - 00:29:29] But I would say, you know, the 120 divided by three,
[00:29:30 - 00:29:33] and then the 150 divided by 7.5,
[00:29:33 - 00:29:36] that will give me the width and the length.
[00:29:36 - 00:29:39] So I went with the measurements,
[00:29:39 - 00:29:41] and then I specified the size of each grave.
[00:29:41 - 00:29:46] So it would be a simple calculation if I have the time,
[00:29:46 - 00:29:49] and then I'll, I mean, if I have the,
[00:29:49 - 00:29:50] since I have the note, I'll go ahead
[00:29:50 - 00:29:53] and put it underneath as well, the number of grave.
[00:29:53 - 00:29:56] Because the point of my two points of that question are,
[00:29:56 - 00:29:58] are those the only place, is that the only place
[00:29:58 - 00:30:01] on site where graves will be located?
[00:30:01 - 00:30:03] Because if it's not, then we need to know
[00:30:03 - 00:30:04] on the site plan, you know,
[00:30:04 - 00:30:07] everywhere that they would be located.
[00:30:07 - 00:30:10] And if it's, if that's, if that rough number,
[00:30:10 - 00:30:14] based on the calculation I did is about 14 or 1500,
[00:30:14 - 00:30:20] at 720 a year, that's your full in a couple of years.
[00:30:20 - 00:30:25] Well, that's why we wanna be applying in six months
[00:30:25 - 00:30:27] for another edition.
[00:30:27 - 00:30:32] It depends on how, how our organizations
[00:30:33 - 00:30:35] or groups respond to this.
[00:30:36 - 00:30:41] We need to proceed with more proposals later on.
[00:30:41 - 00:30:45] Okay, so then just as a point of clarification for everyone,
[00:30:45 - 00:30:47] if what's shown on the site plan is all that's included
[00:30:47 - 00:30:49] in the use permit, that's all the Planning Commission
[00:30:49 - 00:30:52] could approve when it gets to them,
[00:30:52 - 00:30:54] and then any expansion to that would require
[00:30:54 - 00:30:57] an amended use permit at some point in the future.
[00:30:57 - 00:31:07] True.
[00:31:07 - 00:31:10] Am I correct that the restrooms would be located
[00:31:10 - 00:31:12] in the existing 30 by 50 shed,
[00:31:12 - 00:31:15] or is that gonna be a separate building, a new building?
[00:31:17 - 00:31:20] I was talking to the previous owner.

[00:31:20 - 00:31:25] He said that he has already an engineered septic tank plan
[00:31:25 - 00:31:29] and we talked about it before,
[00:31:29 - 00:31:33] and I don't remember if somebody came on site
[00:31:33 - 00:31:36] and checked two places,
[00:31:36 - 00:31:39] one the area that is kind of rocky
[00:31:39 - 00:31:43] and it required the engineered septic tank,
[00:31:43 - 00:31:47] and then there is another property site
[00:31:47 - 00:31:52] that has softer soil,
[00:31:52 - 00:31:56] and that was the second place
[00:31:56 - 00:32:01] that could be a proposed place for the restroom.
[00:32:01 - 00:32:04] So I have to check back with my friend,
[00:32:04 - 00:32:06] the previous owner of the property
[00:32:06 - 00:32:08] and get that going.
[00:32:08 - 00:32:12] Yeah, would that be the gentleman staying at the house?
[00:32:12 - 00:32:17] Is there a house that is now the previous owners?
[00:32:19 - 00:32:24] Yes, Mr. Brett Carlson.
[00:32:24 - 00:32:27] Okay, yeah, we may have done some work.
[00:32:27 - 00:32:28] I'll take a look.
[00:32:28 - 00:32:31] We may have done some soils investigation for the house,
[00:32:31 - 00:32:34] but I don't think we've done any on site
[00:32:34 - 00:32:39] so we just pulled the soil investigation on this parcel.
[00:32:39 - 00:32:42] Yeah, he said that he has the plans already
[00:32:42 - 00:32:43] and he submitted it.
[00:32:43 - 00:32:46] Yeah, that might be for his house.
[00:32:46 - 00:32:49] And is his house on a separate parcel?
[00:32:51 - 00:32:54] Well, it's the same parcel,
[00:32:54 - 00:32:59] but we are not proceeding with the house idea.
[00:32:59 - 00:33:03] So we just got the septic tank in that area,
[00:33:03 - 00:33:07] commercial septic tank.
[00:33:07 - 00:33:09] Okay, sure, we can talk about that
[00:33:09 - 00:33:12] and I can talk to the consultants you have too.
[00:33:12 - 00:33:14] So that'd be great.
[00:33:14 - 00:33:17] Thank you.
[00:33:17 - 00:33:23] So then the restrooms would be in a new separate building?
[00:33:23 - 00:33:30] Oh, yes.
[00:33:30 - 00:33:31] Monare, this is Krista.
[00:33:31 - 00:33:34] I just had a question for planning.
[00:33:34 - 00:33:39] What hours would the site be open?
[00:33:39 - 00:33:44] Like would you shut down a sunset kind of thing
[00:33:44 - 00:33:48] or would there be lights that would allow for?
[00:33:49 - 00:33:51] I would go for light.
[00:33:53 - 00:33:57] As light changes between winter and summer,
[00:33:57 - 00:34:00] we would like to use as much light as possible.

[00:34:00 - 00:34:05] So do I need to specify hours or can we just say light
[00:34:06 - 00:34:11] from sunrise pretty much till sunset?
[00:34:12 - 00:34:16] I mean, I think sunrise and sunset would be fine for us
[00:34:16 - 00:34:18] as far as determining, you know,
[00:34:18 - 00:34:19] basically no nighttime operation.
[00:34:19 - 00:34:21] I think that would be fine.
[00:34:21 - 00:34:22] Yeah.
[00:34:22 - 00:34:25] Okay.
[00:34:25 - 00:34:28] But you're not proposing any nighttime events
[00:34:28 - 00:34:31] or nighttime lighting, right?
[00:34:31 - 00:34:34] We discussed that part of our community,
[00:34:34 - 00:34:36] they have a specific night,
[00:34:36 - 00:34:40] which is the 15th of the ninth month
[00:34:40 - 00:34:42] of the lunar calendar.
[00:34:42 - 00:34:45] The ninth month, the middle of that month,
[00:34:45 - 00:34:50] they would like to come and do some kind of a prayer
[00:34:50 - 00:34:53] in there, but we voted it down
[00:34:53 - 00:34:58] because it might create inconveniences to the neighbors.
[00:34:58 - 00:34:59] Okay.
[00:34:59 - 00:35:00] So that's not part of the,
[00:35:00 - 00:35:03] so it would just be during the daytime then?
[00:35:03 - 00:35:03] During the daytime.
[00:35:03 - 00:35:04] Okay.
[00:35:04 - 00:35:05] Okay.
[00:35:05 - 00:35:06] Yeah, because we'll probably include that
[00:35:06 - 00:35:07] as a condition of approval.
[00:35:09 - 00:35:10] Yeah.
[00:35:10 - 00:35:10] Once this does move forward to that stage.
[00:35:10 - 00:35:14] Okay.
[00:35:14 - 00:35:16] And then maintenance would also be during the day,
[00:35:16 - 00:35:19] obviously watering probably at night maybe?
[00:35:23 - 00:35:27] From experience, I had a property before,
[00:35:27 - 00:35:29] that was like five acres with trees
[00:35:29 - 00:35:31] that I cared really about.
[00:35:31 - 00:35:34] I was running the sprinkler system
[00:35:34 - 00:35:38] pretty much 12 hours at night.
[00:35:38 - 00:35:43] And it was, it was very convenient for the trees
[00:35:44 - 00:35:48] and it kept the plants healthy.
[00:35:48 - 00:35:52] This is from previous experience.
[00:35:52 - 00:35:54] Unless you propose something else,
[00:35:54 - 00:35:58] then we will follow it.
[00:35:58 - 00:35:59] I don't think that needs to be.
[00:35:59 - 00:36:01] No, I don't think so.

[00:36:01 - 00:36:02] I think it was just more curious.
[00:36:02 - 00:36:03] More curiosity.
[00:36:03 - 00:36:05] Yeah, when you're gonna be planting trees
[00:36:05 - 00:36:09] and when you'd be pruning and if there's lawn to mow,
[00:36:09 - 00:36:12] that would be during the day.
[00:36:12 - 00:36:13] During the day, definitely.
[00:36:13 - 00:36:17] I'm not gonna wake up at midnight mowing grass.
[00:36:18 - 00:36:19] I'm not that bored.
[00:36:20 - 00:36:27] Any other staff or committee comments?
[00:36:27 - 00:36:30] And I'll open it up for any public comments.
[00:36:30 - 00:36:48] We'll start with those in the room.
[00:36:48 - 00:36:50] Thank you for the opportunity to comment
[00:36:50 - 00:36:55] to the county staff and planning department and councillor.
[00:36:56 - 00:36:57] Appreciate that.
[00:36:57 - 00:37:00] My name is Wesley David Wardall
[00:37:00 - 00:37:04] and I live at 17069 Lambert Road
[00:37:04 - 00:37:06] at Eagles Nest Airport.
[00:37:07 - 00:37:10] I retired Cal Fire, so I've been involved
[00:37:10 - 00:37:15] in various, mostly air tanker operations
[00:37:15 - 00:37:19] but I had to attend a lot of classes on fire planning,
[00:37:19 - 00:37:21] pre-fire planning, et cetera.
[00:37:22 - 00:37:26] Let me start off with this document here.
[00:37:26 - 00:37:29] This is the applicants checklist.
[00:37:29 - 00:37:34] This is as bogus and full of misrepresentations as possible.
[00:37:34 - 00:37:36] It does not reflect the character
[00:37:36 - 00:37:38] or area of the property.
[00:37:38 - 00:37:42] It has very, very many misstatements.
[00:37:42 - 00:37:44] Let's go down to item number 19,
[00:37:44 - 00:37:49] change in pattern, scale and character of the project.
[00:37:49 - 00:37:52] This isn't a ranch house or something else going
[00:37:52 - 00:37:57] as a full commercial operation of a graveyard.
[00:37:57 - 00:38:02] The item 21, change in dust as smoke infumes.
[00:38:02 - 00:38:05] With the vehicle load coming in there,
[00:38:05 - 00:38:10] there'd be significant exhaust and carbon dioxide.
[00:38:10 - 00:38:12] And we'll get to the vehicle count
[00:38:12 - 00:38:14] but I think it's way low
[00:38:14 - 00:38:17] and I think the people count is way low.
[00:38:17 - 00:38:21] If we go down to item 22, change in the streams,
[00:38:21 - 00:38:23] groundwater quality, all the duration
[00:38:23 - 00:38:25] of existing drainage patterns.
[00:38:25 - 00:38:28] I'm gonna ask Ron Woodhouse to address
[00:38:28 - 00:38:31] the drainage issues and let me finish, Ron.
[00:38:31 - 00:38:34] And then I'll have you come up.

[00:38:34 - 00:38:36] Substantial change in existing noise
[00:38:36 - 00:38:39] and vibration levels in the vicinity.
[00:38:39 - 00:38:44] There'll be a lot of vehicles and cars.
[00:38:44 - 00:38:47] Substant, that's item 23, item 27,
[00:38:47 - 00:38:50] substantially increased fossil fuel consumption.
[00:38:50 - 00:38:53] Yep, you're gonna have that many cars.
[00:38:53 - 00:38:56] We're gonna have a lot more fossil fuel consumption.
[00:38:56 - 00:38:58] Does the project have a relationship
[00:38:58 - 00:39:01] to a larger project or other series?
[00:39:01 - 00:39:03] You bet it does.
[00:39:03 - 00:39:07] There's, if you get in and look at the geotechnical report,
[00:39:07 - 00:39:10] it puts in there, they're adding additional buildings
[00:39:10 - 00:39:14] and adding buildings with two-story footings.
[00:39:14 - 00:39:17] So this is a lot of misrepresentation
[00:39:17 - 00:39:19] of what is going on.
[00:39:19 - 00:39:25] Describe that down item number 29
[00:39:25 - 00:39:27] is described as project site as exists
[00:39:27 - 00:39:30] before the project, including information
[00:39:30 - 00:39:33] to topography, plants, animals, et cetera.
[00:39:34 - 00:39:35] We have aerial photos.
[00:39:35 - 00:39:38] We had American aerial surveys based on the airport
[00:39:38 - 00:39:42] and they took photos of our area and the surrounding lands.
[00:39:42 - 00:39:44] There were a lot of oak trees
[00:39:44 - 00:39:46] on that property that had been removed
[00:39:46 - 00:39:47] and you can see it's clear.
[00:39:47 - 00:39:51] That's oak and there's a lot of brush removed
[00:39:51 - 00:39:54] but there's a California oak tree ordinance,
[00:39:54 - 00:39:59] the state of California oak tree preservation program,
[00:39:59 - 00:40:05] totally ignored, not addressed.
[00:40:05 - 00:40:07] Describe the surrounding properties,
[00:40:07 - 00:40:09] including information on plants, animals,
[00:40:09 - 00:40:11] and cultural, historic lands.
[00:40:11 - 00:40:15] Initiate the type of land use, residential, commercial.
[00:40:15 - 00:40:17] This is a commercial operation.
[00:40:17 - 00:40:20] So that's on the checklist.
[00:40:20 - 00:40:25] And if we go through and look at some of the drawings here,
[00:40:39 - 00:40:42] on the cemetery plan on page two,
[00:40:42 - 00:40:45] they have a 100 car parking lot
[00:40:45 - 00:40:48] and they indicate 50 people per funeral.
[00:40:48 - 00:40:51] Funeral lands will occur 60 per month.
[00:40:51 - 00:40:53] I think these numbers are low.
[00:40:53 - 00:40:56] They may have 60 funerals a month
[00:40:56 - 00:40:59] but I think the people count is low

[00:40:59 - 00:41:04] and I think the car count of whatever 20 cars baloney.
[00:41:04 - 00:41:08] With that many people and a why 100 car parking lot.
[00:41:08 - 00:41:13] And so I think it'd be looking at 75 to 80 cars
[00:41:14 - 00:41:17] per funeral would be more realistic.
[00:41:17 - 00:41:25] On page four, it says the gravel road
[00:41:25 - 00:41:30] from the entrance will provide additional parking spaces
[00:41:30 - 00:41:33] for 100 cars in addition to the 35.
[00:41:33 - 00:41:39] So you're looking at 135 parking spaces.
[00:41:39 - 00:41:42] Okay, 1.7 acres will be developed.
[00:41:42 - 00:41:46] Okay, how are you gonna get 50,000 grave plots
[00:41:46 - 00:41:48] in 1.7 acres?
[00:41:48 - 00:41:51] What is gonna be in the future?
[00:41:53 - 00:41:58] If you go to page six of the Garden Eden Report,
[00:42:01 - 00:42:05] they have consistency with existing zoning.
[00:42:05 - 00:42:09] Well, the zoning is for ag and minerals.
[00:42:09 - 00:42:14] So a commercial operation is inconsistent use.
[00:42:14 - 00:42:16] Consistency with visual character
[00:42:16 - 00:42:20] and or quality of the project and surrounding area.
[00:42:20 - 00:42:30] It'll be different than open ranch land.
[00:42:30 - 00:42:33] In looking through the report, I made some notes
[00:42:33 - 00:42:36] and I like to go through those notes.
[00:42:38 - 00:42:41] I talked about the 100 car and 35 car lot together.
[00:42:43 - 00:42:46] Amador Water Agency, they have a five eighths inch
[00:42:46 - 00:42:51] water meter and that's a lots up to 400 gallons a day.
[00:42:52 - 00:42:57] There is no fire protection water available to that property.
[00:42:57 - 00:42:59] The pipeline is maxed out
[00:42:59 - 00:43:04] and when they wanted to add a little bit bigger
[00:43:04 - 00:43:09] inch and a half water meter in the Grand Inner site,
[00:43:09 - 00:43:13] we okayed that to help out the community.
[00:43:13 - 00:43:16] But that has a pressure shut off valve
[00:43:16 - 00:43:20] that the fire main drops below 90 PSI
[00:43:20 - 00:43:21] that shuts the water off.
[00:43:21 - 00:43:26] So we're maxed out on the pipeline
[00:43:26 - 00:43:30] and the water agency has provided a letter
[00:43:30 - 00:43:33] that only the five eighths inch water meter
[00:43:33 - 00:43:35] at 400 gallons a day is available.
[00:43:35 - 00:43:37] So if they put buildings in there,
[00:43:38 - 00:43:41] you can't have by the new code,
[00:43:41 - 00:43:44] you cannot have any buildings with an assemblage of people.
[00:43:44 - 00:43:49] So that would remove anything there you can have
[00:43:49 - 00:43:51] and you get into this report.
[00:43:51 - 00:43:52] Let me get down here.
[00:43:53 - 00:43:56] Let's see.

[00:43:56 - 00:44:01] The Geotechnical Report on page 27 of 75
[00:44:01 - 00:44:03] lists an office building, a caretaker building,
[00:44:03 - 00:44:07] an equipment building, perhaps accessory buildings,
[00:44:07 - 00:44:10] undefined, what is it?
[00:44:10 - 00:44:13] So a lot of concern here that the applicant
[00:44:13 - 00:44:15] is not being honest with us
[00:44:15 - 00:44:25] of what the plan is and the build out.
[00:44:25 - 00:44:28] Wells, all the wells we've done,
[00:44:29 - 00:44:33] I think 10 wells on our property trying to find water
[00:44:33 - 00:44:35] so we didn't have to put in a pipeline
[00:44:35 - 00:44:38] and we're in the ion formation with clay.
[00:44:38 - 00:44:40] On the east side of Lambert Road,
[00:44:40 - 00:44:43] we went down deep at 700 feet.
[00:44:43 - 00:44:45] The best we could get is a three quarter gallon
[00:44:45 - 00:44:49] a minute of well and a very, very bad toxic water.
[00:44:49 - 00:44:50] So good luck with that.
[00:44:50 - 00:44:52] You know, they have at it.
[00:44:52 - 00:44:55] Yeah, we spent over 100 grand in drilling wells
[00:44:55 - 00:44:57] and looking for it.
[00:44:57 - 00:45:01] So we put in a six inch C900 water main
[00:45:01 - 00:45:03] from Meal Creek State Prison.
[00:45:03 - 00:45:06] It comes into the subdivision at 190 psi
[00:45:06 - 00:45:10] and then we lower that through the subdivision
[00:45:10 - 00:45:12] down to 105.
[00:45:12 - 00:45:13] But we bought it.
[00:45:13 - 00:45:15] I had to get the right away.
[00:45:15 - 00:45:17] I had to buy the pipe, get a contractor,
[00:45:17 - 00:45:19] get it and put it all in.
[00:45:19 - 00:45:21] And then we had to pay the water
[00:45:21 - 00:45:23] and see 10 grand to go out and look at it,
[00:45:23 - 00:45:26] another 10 grand to inspect it.
[00:45:26 - 00:45:29] They got a free pipeline and all the hookup fees
[00:45:29 - 00:45:34] that they came in, it was a cash cow for them.
[00:45:34 - 00:45:38] So I get a little bit agitated
[00:45:38 - 00:45:41] if somebody wants to come in and get fire water,
[00:45:41 - 00:45:44] fire protection water on a pipeline that we paid for
[00:45:44 - 00:45:45] and it's at max.
[00:45:46 - 00:45:49] We would, that's gonna go to court.
[00:45:49 - 00:45:53] So I'll put my 14D down very firmly.
[00:45:53 - 00:45:58] What is the main building size?
[00:45:58 - 00:46:01] So all these buildings that they're talking about
[00:46:01 - 00:46:03] are undefined.
[00:46:03 - 00:46:07] Can you bring up the plot plan of the property, please?

[00:46:07 - 00:46:12] There's so many inconsistencies and lack of definition
[00:46:12 - 00:46:33] and lack of clarity on this.
[00:46:33 - 00:46:34] If you look at the buildings,
[00:46:35 - 00:46:39] there are no buildings illustrated on here.
[00:46:39 - 00:46:43] The steel shed is an arched steel shed.
[00:46:43 - 00:46:45] There is a building permit on it,
[00:46:45 - 00:46:49] but it talks about bathrooms.
[00:46:49 - 00:46:52] That would not be a structure that you could put
[00:46:53 - 00:46:54] a bathroom in.
[00:46:55 - 00:46:57] I'll point out from fire safety,
[00:46:57 - 00:47:00] if you got a parking lot there
[00:47:00 - 00:47:02] and you have a fire coming in one way or another,
[00:47:02 - 00:47:04] how are you gonna get traffic out
[00:47:04 - 00:47:08] going to Carvindale Road with two gates?
[00:47:08 - 00:47:12] So I just point that out to the fire department
[00:47:12 - 00:47:14] on Ingress, Egress.
[00:47:14 - 00:47:18] But there's nothing depicted on here on buildings.
[00:47:18 - 00:47:22] The buildings are not illustrated with location,
[00:47:22 - 00:47:27] size, square footage, or number of stories, or purpose.
[00:47:27 - 00:47:31] So the question I have,
[00:47:31 - 00:47:36] it says in the little graveyard casket size,
[00:47:37 - 00:47:42] it says the bodies will be prepared or whatever at a mosque.
[00:47:43 - 00:47:45] I'd like to have a clarification
[00:47:45 - 00:47:49] that there will be no body preparation at the site
[00:47:49 - 00:47:53] because of that waste-generated water consumption and so on.
[00:47:56 - 00:47:59] That's gonna be at a mosque, that's offsite,
[00:47:59 - 00:48:04] that's their business.
[00:48:04 - 00:48:07] Increase in traffic, 20 vehicles a day.
[00:48:07 - 00:48:08] We already talked about that.
[00:48:09 - 00:48:11] Bogus is a $3 bill.
[00:48:13 - 00:48:18] The building chart has foundations listing in it
[00:48:19 - 00:48:24] and it lists two-story buildings with the footings for that.
[00:48:24 - 00:48:28] Why are you gonna have a two-story building
[00:48:28 - 00:48:30] for toilets or an office?
[00:48:30 - 00:48:35] What's going on and what's the no size or intention?
[00:48:35 - 00:48:39] Any buildings that are there,
[00:48:39 - 00:48:44] no assembly of persons are permitted
[00:48:44 - 00:48:53] in accordance with the county ordinance.
[00:48:53 - 00:48:56] I'll say again, the geotechnical report
[00:48:56 - 00:48:59] was office building caretaker building,
[00:48:59 - 00:49:03] equipment building, and perhaps accessory buildings.
[00:49:03 - 00:49:07] All that has to really be defined, mapped, located,
[00:49:07 - 00:49:19] and with the dimensions of the buildings and purpose.

[00:49:19 - 00:49:21] We would be looking if this goes through
[00:49:21 - 00:49:23] for a navigation easement for the right to fly,
[00:49:23 - 00:49:26] create exhausts, noises, and particulate matter
[00:49:26 - 00:49:40] over the property.
[00:49:40 - 00:49:45] That grave map that's up there is 1,730 feet long
[00:49:46 - 00:49:49] and that would allow, if you divide,
[00:49:49 - 00:49:54] look at the 43,560 for the square feet per acre,
[00:49:55 - 00:50:00] with that times 1.7 and divide by that, 1,730.
[00:50:00 - 00:50:03] You're looking at 53 feet would be the maximum width
[00:50:03 - 00:50:06] of that area for the grave sites.
[00:50:06 - 00:50:08] And that far exceeds that.
[00:50:08 - 00:50:13] Again, it's what they're proposing in 1.7 acres.
[00:50:14 - 00:50:19] You know, that whole area is gonna probably build out.
[00:50:19 - 00:50:22] And I don't wanna have to come back again
[00:50:22 - 00:50:24] and go through this exercise
[00:50:24 - 00:50:27] because they weren't on a subfront of what is the intent?
[00:50:27 - 00:50:31] What is the end build out?
[00:50:31 - 00:50:33] So that's all I have.
[00:50:33 - 00:50:37] I thank you very much for the opportunity to comment.
[00:50:37 - 00:50:41] Look forward to answers.
[00:50:41 - 00:50:45] And I'm gonna ask to get a printed run out.
[00:50:45 - 00:50:49] I should have put my hearing aids in a printed copy
[00:50:49 - 00:50:53] of the minutes of the meeting, please.
[00:50:53 - 00:50:58] Mr. Wargel, we only have audio of our attack meetings,
[00:50:59 - 00:51:04] but they will be uploaded this afternoon.
[00:51:04 - 00:51:06] The audio will be available.
[00:51:06 - 00:51:12] The actual written minutes are not done for TAC.
[00:51:13 - 00:51:14] Thank you.
[00:51:14 - 00:51:31] Thank you for the opportunity to comment.
[00:51:31 - 00:51:33] Thank you for the opportunity.
[00:51:35 - 00:51:37] My name's Ron Woodhouse.
[00:51:37 - 00:51:42] I own 160 acres at 1,9500 Lambert Road,
[00:51:42 - 00:51:46] which is about a mile from this property.
[00:51:47 - 00:51:50] And I've driven that road Carvindale many, many times,
[00:51:50 - 00:51:52] including in the winter.
[00:51:52 - 00:51:55] And I'm here to tell you that road floods.
[00:51:55 - 00:51:57] And I have video right now in my pocket,
[00:51:57 - 00:51:59] and I can share it with you.
[00:52:00 - 00:52:05] March 18th, 2023, water is pouring out of that
[00:52:07 - 00:52:09] entrance on Carvindale.
[00:52:09 - 00:52:11] I mean, it is an inch to two inches thick.
[00:52:11 - 00:52:13] It comes down to Carvindale,
[00:52:13 - 00:52:16] runs all the way down the north side of Carvindale,

[00:52:16 - 00:52:20] hits the Y, and floods that intersection.
[00:52:20 - 00:52:23] And county public works goes out every winter
[00:52:23 - 00:52:26] and puts up a sign to stop the traffic.
[00:52:26 - 00:52:28] That's what's going on.
[00:52:28 - 00:52:33] That area floods, and I think it has implications
[00:52:33 - 00:52:37] regarding the sewer and bodies that are buried there.
[00:52:37 - 00:52:41] So I've got a lot more to say about its impact
[00:52:41 - 00:52:46] on the community and traffic and our lifestyle
[00:52:46 - 00:52:48] and our property values.
[00:52:48 - 00:52:51] But, and nobody I've talked to wants this.
[00:52:54 - 00:53:00] It is supposedly to serve the growing Muslim population
[00:53:02 - 00:53:04] in Amador County.
[00:53:04 - 00:53:07] And he mentioned Ioun and Jackson.
[00:53:07 - 00:53:09] I live there, you live there.
[00:53:09 - 00:53:13] I shop everywhere from Walmart to Lowe's,
[00:53:13 - 00:53:14] and I'm not seeing it.
[00:53:15 - 00:53:18] I don't think they're coming from Amador County.
[00:53:18 - 00:53:22] This is to serve Sacramento County, Stockton,
[00:53:22 - 00:53:25] Elk Grove, but not us.
[00:53:25 - 00:53:28] So I'd urge you to take a look at public works
[00:53:28 - 00:53:31] at the water situation there.
[00:53:31 - 00:53:45] Thank you.
[00:53:45 - 00:53:48] My name's Dave Livingstone.
[00:53:48 - 00:53:51] I'm a taxpayer in Amador County.
[00:53:51 - 00:53:53] I live in Ioun.
[00:53:53 - 00:53:57] And I have concerns about this property development.
[00:53:57 - 00:54:01] And I share some of the questions and concerns
[00:54:01 - 00:54:04] that my preceding speakers had.
[00:54:06 - 00:54:10] I drove around this property just yesterday.
[00:54:10 - 00:54:14] In the roads I can testify are horrible.
[00:54:14 - 00:54:18] And I could not see as the one gentleman explained
[00:54:18 - 00:54:20] in wintertime when it rains,
[00:54:20 - 00:54:23] how those roads are gonna hold up.
[00:54:23 - 00:54:25] And to the lady over here with the fire,
[00:54:26 - 00:54:29] I would think about responding
[00:54:29 - 00:54:31] if they had emergencies out there.
[00:54:31 - 00:54:35] How you're gonna get equipment in and out of there safely
[00:54:35 - 00:54:36] and in a timely manner.
[00:54:36 - 00:54:38] I don't think that could be done.
[00:54:41 - 00:54:45] So that's just a couple of my concerns.
[00:54:46 - 00:54:52] I attend the Ioun City Council meetings every other week.
[00:54:52 - 00:54:56] And I have not heard anybody bring this project up.
[00:54:56 - 00:54:59] And I intend to bring it up.

[00:54:59 - 00:55:02] So all the information we can have
[00:55:02 - 00:55:04] would be great.
[00:55:04 - 00:55:09] I think it would help the citizens of Ioun take a look at this.
[00:55:09 - 00:55:12] So thank you for your time today.
[00:55:12 - 00:55:16] And I look forward to the progress.
[00:55:16 - 00:55:22] Thank you.
[00:55:22 - 00:55:27] Any additional public comments in the room?
[00:55:27 - 00:55:30] And then we'll move to teleconference.
[00:55:30 - 00:55:33] Zoomers, now it's time to raise your virtual hand
[00:55:33 - 00:55:35] if you have any comments
[00:55:35 - 00:55:44] regarding the completeness of the application.
[00:55:44 - 00:55:45] The applicant would like to speak.
[00:55:45 - 00:55:46] Go ahead, Munir.
[00:55:48 - 00:55:53] Well, definitely we are not there to disturb the neighbors.
[00:55:54 - 00:55:57] We wanna be good guests in your neighborhood.
[00:55:59 - 00:56:01] We would like however, the project to keep going
[00:56:02 - 00:56:05] to fulfill the needs of the Muslim community
[00:56:05 - 00:56:07] and their families.
[00:56:07 - 00:56:10] We have a lot of families
[00:56:12 - 00:56:16] from Sacramento, from the area
[00:56:16 - 00:56:18] that are exposed to Islam.
[00:56:18 - 00:56:23] And therefore, we would like to have that cemetery to house
[00:56:23 - 00:56:26] or to be their final home for the families
[00:56:26 - 00:56:30] and their relatives, even though they could not be Muslims,
[00:56:30 - 00:56:32] they could be with other faiths.
[00:56:32 - 00:56:36] But that would be also taken into consideration
[00:56:36 - 00:56:40] because families, no matter what kind of a faith you have,
[00:56:40 - 00:56:45] they like to be together at the end in the community
[00:56:46 - 00:56:51] time of being dead.
[00:56:51 - 00:56:54] And so it's gonna be for Muslims as well
[00:56:54 - 00:56:57] as their relatives and their friends.
[00:56:57 - 00:57:02] And we would appreciate if you would have that going.
[00:57:03 - 00:57:06] And of course, we have to follow the regulations
[00:57:06 - 00:57:09] of the county, the health department
[00:57:09 - 00:57:11] as well as the state regulations.
[00:57:11 - 00:57:16] And regarding the other details of there is an access
[00:57:18 - 00:57:20] of number of parking.
[00:57:20 - 00:57:24] It's not to say that we're gonna have more than 50.
[00:57:24 - 00:57:29] It's just to show that the road itself could be used for it.
[00:57:29 - 00:57:32] If somebody wants to park on the road
[00:57:32 - 00:57:35] or park in the parking lot, that would be your choice.
[00:57:35 - 00:57:40] Their choice, it's not to say that we're gonna have
[00:57:40 - 00:57:42] more than 50 cars.

[00:57:42 - 00:57:44] And regarding the fire,
[00:57:45 - 00:57:50] we are there to follow the instructions
[00:57:51 - 00:57:55] and regulations of the fire department
[00:57:55 - 00:57:59] how to be safe over there for ourselves as well
[00:57:59 - 00:58:02] as well as the visitors and the neighbors.
[00:58:02 - 00:58:06] And about the clearing of the brushes.
[00:58:06 - 00:58:11] Yes, a lot of the brushes, anything less than six inches
[00:58:11 - 00:58:16] of trees would have to be removed
[00:58:16 - 00:58:19] for safety from fires.
[00:58:19 - 00:58:24] And also we will address also to cut down on some trees
[00:58:28 - 00:58:32] that is less than six inches of thickness
[00:58:32 - 00:58:35] to be able to prevent canopy fires.
[00:58:35 - 00:58:40] So we will do everything that the law requires
[00:58:41 - 00:58:44] and regulations of the county and the state.
[00:58:44 - 00:58:46] We're not there to create problems.
[00:58:46 - 00:58:49] Yes, Muslims are known in the media
[00:58:49 - 00:58:52] to create problems somewhere else in the world.
[00:58:52 - 00:58:55] And, but that's media.
[00:58:55 - 00:59:00] We have to get real and look into our lives here
[00:59:01 - 00:59:05] in the United States and our beloved counties,
[00:59:05 - 00:59:10] Sacramento, Amador and make a good life out of it
[00:59:11 - 00:59:18] away from the noise of the media.
[00:59:18 - 00:59:19] Thank you.
[00:59:19 - 00:59:21] I had a question for you, Muneer.
[00:59:21 - 00:59:26] I believe Mr. Wardall did refer to the geotech report.
[00:59:26 - 00:59:28] I was going to say, was that prepared
[00:59:29 - 00:59:33] before all of the buildings that were proposed
[00:59:33 - 00:59:33] were removed?
[00:59:33 - 00:59:36] Is that why it refers to it?
[00:59:36 - 00:59:37] And I'm not sure.
[00:59:37 - 00:59:40] I didn't see exactly where he was referring to,
[00:59:40 - 00:59:46] but I mean, I was just wondering for clarification.
[00:59:46 - 00:59:49] Is that why it might have referred to buildings
[00:59:49 - 00:59:50] in that case?
[00:59:50 - 00:59:51] Because I mean, obviously we've talked about it
[00:59:51 - 00:59:53] multiple times and you've confirmed and we confirmed
[00:59:53 - 00:59:55] that there was no proposed building
[00:59:55 - 00:59:57] other than what it sounds like the restroom.
[01:00:00 - 01:00:03] No, no, no proposed building except dimensioning
[01:00:03 - 01:00:05] of the steel that is existing over there
[01:00:05 - 01:00:07] and it's not going to be used for the cemetery.
[01:00:07 - 01:00:09] The only thing we're going to do is pretty much
[01:00:09 - 01:00:12] put that roof for the restroom.

[01:00:12 - 01:00:15] Okay.
[01:00:15 - 01:00:17] So I'll have to look through the geotech
[01:00:17 - 01:00:21] and see exactly where Mr. Wardall was mentioning
[01:00:21 - 01:00:24] where he saw the reference to the footings.
[01:00:24 - 01:00:26] Oh, it looks like he can come confirm that.
[01:00:26 - 01:00:30] But I guess going forward since the application
[01:00:30 - 01:00:34] has been revised to remove the buildings,
[01:00:34 - 01:00:38] I mean the report itself is still considered valid.
[01:00:38 - 01:00:41] It would just need to be, we would only take into account
[01:00:41 - 01:00:44] the sections that are applicable to the site development
[01:00:44 - 01:00:46] without the buildings.
[01:00:46 - 01:00:48] Yeah, that information was on page
[01:00:48 - 01:00:51] 27 of 25.
[01:00:51 - 01:00:54] It listed office building, caretaker building,
[01:00:54 - 01:00:58] equipment building, perhaps accessory buildings.
[01:00:58 - 01:01:01] And that's just, you know, it's kind of an indication
[01:01:01 - 01:01:06] to me of what was discussed with the geotechnical group
[01:01:06 - 01:01:08] and the project proponent.
[01:01:08 - 01:01:11] And maybe the project proponent didn't volunteer
[01:01:11 - 01:01:13] that information, but it was listed
[01:01:13 - 01:01:15] in that geotechnical report.
[01:01:15 - 01:01:20] It remains a big concern for me.
[01:01:20 - 01:01:22] And if this project would go forward,
[01:01:22 - 01:01:24] there'd have to be severe constrictions
[01:01:24 - 01:01:27] and limitations on future buildings
[01:01:27 - 01:01:32] because they're, you know, maybe have been removed
[01:01:32 - 01:01:37] out of the applicants report, but intentions show otherwise.
[01:01:38 - 01:01:41] Well, just to confirm, I mean, as far as the use goes,
[01:01:41 - 01:01:43] if there's no building proposed,
[01:01:43 - 01:01:45] it would not be allowed under the use permit.
[01:01:45 - 01:01:47] Thank you.
[01:01:47 - 01:01:49] Yeah, and if there were changes to that,
[01:01:49 - 01:01:55] they would have to come and apply for an amendment.
[01:01:55 - 01:01:56] Okay, I mean, that was just my comment.
[01:01:56 - 01:01:59] Just for everyone's information,
[01:01:59 - 01:02:01] the Topo survey that's in the geotech report
[01:02:01 - 01:02:04] has a date of December 2023 on it.
[01:02:04 - 01:02:06] Okay, so I'm not sure exactly.
[01:02:06 - 01:02:09] So that was prior to the application revision,
[01:02:09 - 01:02:11] but it does include the caretakers building
[01:02:11 - 01:02:12] and other things that Mr. Wardall had mentioned.
[01:02:12 - 01:02:14] So, I mean, those are just.
[01:02:14 - 01:02:20] And the confusion, yeah.

[01:02:20 - 01:02:22] So I mean, it's up to you, Muneer,
[01:02:22 - 01:02:24] if you wanna approach the geotech
[01:02:24 - 01:02:26] and see if they wanna amend it just so it's more current,
[01:02:26 - 01:02:27] just for the sake of ease.
[01:02:27 - 01:02:30] But as far as our evaluation,
[01:02:30 - 01:02:33] I think we can determine which parts of that report
[01:02:33 - 01:02:36] are applicable and which would be disregarded
[01:02:36 - 01:02:40] as not being referring to an updated application.
[01:02:40 - 01:02:44] I'm trying to see, is it the page 17 of the report
[01:02:44 - 01:02:46] or of the project?
[01:02:46 - 01:02:47] It would be of the report, right?
[01:02:47 - 01:02:48] I believe.
[01:02:48 - 01:02:50] I believe it's figure one A of the report
[01:02:50 - 01:02:52] is what I'm looking at.
[01:02:54 - 01:03:04] I'm looking at a different figure one A than.
[01:03:04 - 01:03:17] Okay.
[01:03:17 - 01:03:19] Cause I'm seeing the.
[01:03:19 - 01:03:22] Okay, I'm looking at one A.
[01:03:22 - 01:03:26] Is that the pretty much profile?
[01:03:26 - 01:03:33] And it's about the elevation of the land.
[01:03:35 - 01:03:37] Cause I'm seeing some of the specifications
[01:03:37 - 01:03:39] for retaining walls and things,
[01:03:39 - 01:03:43] but I assume, yeah, and then there's some references.
[01:03:43 - 01:03:46] It's a lot of the details.
[01:03:47 - 01:03:48] The construction details,
[01:03:48 - 01:03:51] they look like they're referring to buildings,
[01:03:51 - 01:03:53] thematics rather than.
[01:03:55 - 01:03:56] Okay.
[01:03:56 - 01:03:58] It's guessing guide specification for sub drains
[01:03:58 - 01:04:01] behind retaining walls.
[01:04:01 - 01:04:05] Well, that, I thought that this is a genetic thing.
[01:04:05 - 01:04:10] If a retaining wall was to be put,
[01:04:10 - 01:04:15] then the soil report will guide us
[01:04:15 - 01:04:16] so how to do that.
[01:04:16 - 01:04:20] The intention of pouring any concrete
[01:04:20 - 01:04:24] other than the roads or pretty much the pad
[01:04:24 - 01:04:26] on the grave itself to put the monument.
[01:04:26 - 01:04:27] And that's it.
[01:04:27 - 01:04:29] And I mean, ultimately you'd be limited
[01:04:29 - 01:04:30] to what's allowed for the use permit,
[01:04:30 - 01:04:32] regardless of what.
[01:04:32 - 01:04:34] Of course you guys have the floor to.
[01:04:34 - 01:04:35] Is it?

[01:04:35 - 01:04:43] I'm going to say a bait and it will be a baited.
[01:04:43 - 01:04:44] I'm not going to put any money in there
[01:04:44 - 01:04:50] and have a statement saying a bait.
[01:04:50 - 01:04:53] It was money both ways, putting it up and putting it down.
[01:04:53 - 01:05:03] No, that's not why.
[01:05:03 - 01:05:04] Any more?
[01:05:04 - 01:05:07] I can do a summary, I guess.
[01:05:07 - 01:05:10] Are we still having a Zoom comment if there is any?
[01:05:10 - 01:05:14] Is there any?
[01:05:14 - 01:05:17] There's no Zoom comment.
[01:05:17 - 01:05:22] Public comment in the room.
[01:05:22 - 01:05:24] And I'll bring it back to the committee
[01:05:24 - 01:05:27] for additional discussion or recommendation
[01:05:27 - 01:05:35] on finding the application complete or incomplete.
[01:05:35 - 01:05:37] Well, I think we talked about the need
[01:05:37 - 01:05:42] to have a comprehensive site plan.
[01:05:42 - 01:05:47] So I think that in itself would probably
[01:05:47 - 01:05:51] be missing incomplete at this time.
[01:05:51 - 01:05:54] I feel like I can go through what I have as far as what we probably
[01:05:54 - 01:05:57] need for planning and for what we've discussed today.
[01:05:57 - 01:06:01] And then if I miss anything, you guys can let me know.
[01:06:01 - 01:06:06] So right now I have that we need more, I guess, dimensions
[01:06:06 - 01:06:07] and annotations on the map.
[01:06:07 - 01:06:09] So especially with reference to the road
[01:06:09 - 01:06:12] and where it's entering and exiting.
[01:06:12 - 01:06:15] And then the size of the roads and road widths and turns
[01:06:15 - 01:06:16] and everything.
[01:06:16 - 01:06:18] We want to see the location of the parking,
[01:06:18 - 01:06:24] the location of the restrooms, and location of the well.
[01:06:24 - 01:06:27] And then I have here specified that there will be,
[01:06:27 - 01:06:30] I guess, AWA service to the restrooms.
[01:06:30 - 01:06:32] And then the well will service the irrigation
[01:06:32 - 01:06:35] for the site.
[01:06:35 - 01:06:38] Munir will have to talk to environmental health
[01:06:38 - 01:06:40] regarding the sewage disposal system.
[01:06:40 - 01:06:42] I assume that we'll want to see an annotation or at least
[01:06:42 - 01:06:44] a ballpark estimate of where that
[01:06:44 - 01:06:49] would be located with respect to the restrooms on site.
[01:06:49 - 01:06:53] I think an exact number of graves in each block
[01:06:53 - 01:06:54] would be helpful for us to know.
[01:06:54 - 01:06:58] And that can be just an annotation on the site plan.
[01:06:58 - 01:07:00] And then I have here that the hours of operation
[01:07:00 - 01:07:03] would be sunrise to sunset.

[01:07:03 - 01:07:06] And then if possible, remove any reference
[01:07:06 - 01:07:13] to the buildings that aren't part of the updated application.
[01:07:13 - 01:07:16] On the other side of things, I know
[01:07:16 - 01:07:17] that we do have some recommendations.
[01:07:17 - 01:07:19] We'll have to look into the water tank requirements
[01:07:19 - 01:07:23] and see if that's going to be added to the site plan.
[01:07:23 - 01:07:27] We would want to see where that's located as well.
[01:07:27 - 01:07:32] And then I don't know if we can get an updated project
[01:07:32 - 01:07:34] description just specifying those hours of operation,
[01:07:34 - 01:07:37] number of graves, that the bodies are prepared off site,
[01:07:37 - 01:07:40] and then just emphasizing the fact that there aren't
[01:07:40 - 01:07:47] any new buildings proposed, with exception of the restroom.
[01:07:47 - 01:07:48] So that's what I have.
[01:07:48 - 01:07:51] I don't know if you guys, if there's anything I missed,
[01:07:51 - 01:07:53] let me know.
[01:07:53 - 01:07:55] But I think from planning, I think
[01:07:55 - 01:07:58] we definitely need that updated site plan with those items
[01:07:58 - 01:08:00] addressed to find it complete, just so we know exactly what
[01:08:00 - 01:08:01] we're looking at.
[01:08:01 - 01:08:09] And we can also have an updated project description that's
[01:08:09 - 01:08:10] watertight as far as understanding
[01:08:10 - 01:08:13] what exactly the project is.
[01:08:13 - 01:08:15] And then I know that there were some other concerns
[01:08:15 - 01:08:16] of the environmental stuff.
[01:08:16 - 01:08:20] I know all of that will be evaluated comprehensively
[01:08:20 - 01:08:22] if once we have a complete project application,
[01:08:22 - 01:08:24] and we move on to the initial study for the project, which
[01:08:24 - 01:08:27] is where we look through each environmental factor one
[01:08:27 - 01:08:28] at a time.
[01:08:28 - 01:08:31] So I know that there are concerns about flooding, water,
[01:08:31 - 01:08:33] fire, and some of the road stuff too and traffic.
[01:08:33 - 01:08:35] All of that will be evaluated too once we
[01:08:35 - 01:08:36] have a complete application.
[01:08:36 - 01:08:41] So I don't know if we need anything else as of now.
[01:08:41 - 01:08:43] I don't know.
[01:08:43 - 01:08:44] It's up to you guys.
[01:08:44 - 01:08:46] Committee members, do we have other items
[01:08:46 - 01:08:49] that Krista didn't mention because we'll get that exhaustive
[01:08:49 - 01:08:54] list to the applicant?
[01:08:54 - 01:08:56] No, I mean, I think he picked everything up.
[01:08:56 - 01:09:00] I was going to ask the applicant,
[01:09:00 - 01:09:09] there was a concern here by the public about the size
[01:09:09 - 01:09:15] of the event, whether it is really only 50 people there.

[01:09:15 - 01:09:17] How did you come up with those numbers?
[01:09:17 - 01:09:23] Is that do you restrict the attendance of these things?
[01:09:23 - 01:09:24] I mean, who's to say?
[01:09:24 - 01:09:28] I mean, you have a very popular person in the community.
[01:09:28 - 01:09:30] You may have 200 or 300 people want
[01:09:30 - 01:09:32] to come to this event.
[01:09:32 - 01:09:34] And some people don't know anybody.
[01:09:34 - 01:09:36] Luckily, they have family there.
[01:09:36 - 01:09:41] So I mean, how do you control how many people show up
[01:09:41 - 01:09:42] at these things?
[01:09:42 - 01:09:46] Or is there something in place that
[01:09:46 - 01:09:49] does limit the number of attendees
[01:09:49 - 01:09:54] at these funeral events?
[01:09:54 - 01:09:56] Well, regulations for everything.
[01:09:56 - 01:10:00] So if we say that no number can be seen,
[01:10:00 - 01:10:05] this number, blah, blah, then people have to follow.
[01:10:05 - 01:10:06] It's not a choice.
[01:10:06 - 01:10:09] That's why we have the laws and the regulations.
[01:10:09 - 01:10:15] So with the whatever the county says,
[01:10:15 - 01:10:18] whatever the state says, they have to follow.
[01:10:18 - 01:10:21] There's no change around with that.
[01:10:21 - 01:10:23] I can respond to, because the way
[01:10:23 - 01:10:26] we've treated events at a lot of our commercial properties,
[01:10:26 - 01:10:29] like wineries and tasting rooms that are allowed events,
[01:10:29 - 01:10:31] with the limitation of number of people,
[01:10:31 - 01:10:36] there is a standard condition we have for basically
[01:10:36 - 01:10:38] the operator of the use permit.
[01:10:38 - 01:10:41] They have to log the attendance, and if there are any concerns
[01:10:41 - 01:10:42] that are raised throughout the year,
[01:10:42 - 01:10:44] and then that is submitted to the planning department
[01:10:44 - 01:10:46] at the end of the year.
[01:10:46 - 01:10:48] So if there are any significant concerns,
[01:10:48 - 01:10:50] or complaints or anything like that,
[01:10:50 - 01:10:52] that would factor into whether or not
[01:10:52 - 01:10:55] they're able to be in line with what
[01:10:55 - 01:10:56] their use permit allows.
[01:10:56 - 01:10:59] So obviously it is to the benefit of the property owner
[01:10:59 - 01:11:02] if they are able to enforce those limitations,
[01:11:02 - 01:11:06] because otherwise they would be in danger of losing
[01:11:06 - 01:11:06] their use permit.
[01:11:06 - 01:11:09] So that's just kind of how we've treated it.
[01:11:09 - 01:11:13] Correct me if I'm wrong, Chuck, but it's just whatever
[01:11:13 - 01:11:15] they apply for is that limitation.

[01:11:15 - 01:11:17] And then if they're found in excess of that,
[01:11:17 - 01:11:21] then they'd be in violation of their use permit.
[01:11:21 - 01:11:23] How have that level of onsite and what
[01:11:23 - 01:11:26] the annual monitoring report is very beneficial to us
[01:11:26 - 01:11:27] and the applicant?
[01:11:27 - 01:11:27] Yeah.
[01:11:27 - 01:11:31] And I would also assume it for events of this type,
[01:11:31 - 01:11:35] it's not like people are just, oh, let's stop by and go
[01:11:35 - 01:11:36] tour the cemetery.
[01:11:36 - 01:11:39] These are planned events, I would assume, with a guest list.
[01:11:39 - 01:11:40] And I think that would be fairly easy to request
[01:11:40 - 01:11:42] that those be monitored.
[01:11:42 - 01:11:45] And I also know that there is, I think,
[01:11:45 - 01:11:49] some state regulation of cemeteries and funerals.
[01:11:49 - 01:11:52] And the funeral bureau requires registration of bodies
[01:11:52 - 01:11:54] and stuff just when it comes to cemeteries,
[01:11:54 - 01:11:58] because they do want to keep the record of deaths
[01:11:58 - 01:12:00] and everything updated.
[01:12:00 - 01:12:04] So I think that, as far as making sure things are reported,
[01:12:04 - 01:12:08] funeral operators, it's not something new for them
[01:12:08 - 01:12:14] to be able to log that kind of thing.
[01:12:14 - 01:12:15] Yes?
[01:12:15 - 01:12:18] I'm not an expert, though.
[01:12:18 - 01:12:21] I think we've given a pretty decent list of items
[01:12:21 - 01:12:27] that are absent from this particular application, stuff
[01:12:27 - 01:12:29] that needs to be revisited.
[01:12:29 - 01:12:31] I wish building was here so they could,
[01:12:31 - 01:12:34] I'm sure they've got comments as well.
[01:12:34 - 01:12:38] For the restroom in regards to if it's new,
[01:12:38 - 01:12:41] it needs to be built, ADA and all of those good things
[01:12:41 - 01:12:45] that go into putting up a new restroom.
[01:12:45 - 01:12:46] So just maybe keep that in mind,
[01:12:46 - 01:12:48] speak with the building department,
[01:12:48 - 01:12:52] see what their requirements are going to be as well.
[01:12:52 - 01:12:53] Good point.
[01:12:53 - 01:12:59] All right, then.
[01:12:59 - 01:13:02] Do I have a motion to find the application complete
[01:13:02 - 01:13:06] or incomplete?
[01:13:06 - 01:13:09] I make a motion to find the application incomplete
[01:13:09 - 01:13:11] as presented.
[01:13:11 - 01:13:12] There's a second.
[01:13:12 - 01:13:14] I'll second that.
[01:13:14 - 01:13:17] Motion and a second to find the application incomplete.

[01:13:17 - 01:13:18] If it's found incomplete, there will
[01:13:18 - 01:13:22] be a list of deficiencies submitted to the applicant
[01:13:22 - 01:13:28] so that they can respond to those and amend the application.
[01:13:28 - 01:13:32] All in favor of the motion to find the application incomplete?
[01:13:32 - 01:13:32] Aye.
[01:13:32 - 01:13:33] Aye.
[01:13:33 - 01:13:34] It's as you an unanimous decision.
[01:13:34 - 01:13:37] So the application is found incomplete.
[01:13:37 - 01:13:39] There will be a list of deficiencies submitted
[01:13:39 - 01:13:41] to the applicant within 30 days.
[01:13:41 - 01:13:44] And then it'll be there scheduled to respond to those
[01:13:44 - 01:13:46] with a revised application.
[01:13:46 - 01:13:46] Thank you.
[01:13:46 - 01:13:48] And I will be in touch with you, Nair,
[01:13:48 - 01:13:51] so I will get that letter to you either this week or next week.
[01:13:51 - 01:13:54] And then we will see you in the back.
[01:13:54 - 01:13:56] With that, we are adjourned.
[01:13:56 - 01:13:56] Thank you.
[01:13:56 - 01:13:57] Thank you.
[01:13:57 - 01:13:58] Thank you all.

Exhibit 2-E

Submitted in connection with Use Permit UP-22-2-3, County of Amador

Transcript — Amador County Technical Advisory Committee

Meeting of May 7, 2026

Source: Machine transcription of Amador County's published meeting audio. **Not an official County transcript.** Amador County produces no written TAC minutes; the audio recording is the sole official record. Verify every quotation against the recording at the cited timestamp before entering it into the administrative record.

Timestamps are shown as [HH:MM:SS - HH:MM:SS] and refer to elapsed time in the audio file.

[00:00:05 - 00:00:07] This meeting is being recorded.
[00:00:07 - 00:00:08] Thank you.
[00:00:08 - 00:00:15] We'll call to order the May 7th, 2026 meeting of the Amador County Technical Advisory Committee.
[00:00:15 - 00:00:20] The first item on the agenda correspondence, anything that was received prior to the publication
[00:00:20 - 00:00:22] of the agenda was included in the agenda packet.
[00:00:22 - 00:00:27] Did we receive anything?
[00:00:27 - 00:00:34] We received an item of correspondence just now that was proposed through to or presented
[00:00:34 - 00:00:38] to all of the check members and we have it before staff.
[00:00:38 - 00:00:43] Other than that, there was nothing additional.
[00:00:43 - 00:00:45] Those will become part of the project record.
[00:00:45 - 00:00:50] All right, next item are public matters and persons wishing to address the committee
[00:00:50 - 00:00:51] on non-agenda items.
[00:00:51 - 00:00:58] Is there anyone present or on Zoom who wants to address the committee on a non-agenda?
[00:00:58 - 00:01:02] Comments, please raise your virtual hand so I can unmute you if you would like to
[00:01:02 - 00:01:03] comment.

[00:01:03 - 00:01:07] And if you have trouble commenting, please use the chat box today.
[00:01:07 - 00:01:12] Chair, there are no comments on matters not on the agenda.
[00:01:12 - 00:01:13] All right, see you then.
[00:01:13 - 00:01:18] We'll move on to the only agenda item, which is a request for a youth permit number 2223
[00:01:18 - 00:01:25] for gardens of newer cemeteries which proposes 1832 gravesites divided among seven blocks
[00:01:25 - 00:01:30] on the north end of a parcel identified by APN 001 220013.
[00:01:30 - 00:01:35] That's a 46-acre parcel, zoned R1A, single-family residential and agricultural and
[00:01:35 - 00:01:49] has them the parking for up to 64 permanent spaces and permanent restroom.
[00:01:49 - 00:01:56] 60 per month with a limit of 50 attendees per revenue or the project is located in Super
[00:01:56 - 00:02:03] Visorio District 5, 857 Carbondale Road slash 1633 Lambert Road in Iowne.
[00:02:03 - 00:02:07] And tax responsibility today is to review the application for completeness.
[00:02:07 - 00:02:12] So we just play that that is our only responsibility today is determine whether or not there is
[00:02:12 - 00:02:17] enough information in the application so that we can move forward with an environmental
[00:02:17 - 00:02:18] review.
[00:02:18 - 00:02:24] That doesn't approve projects, deny projects or even recommend approval or denial of projects.
[00:02:24 - 00:02:29] So today's our responsibility today is to determine if there's enough information that
[00:02:29 - 00:02:30] we can move forward with environmental review.
[00:02:30 - 00:02:44] So finally, we reviewed this was in September of last year and we submitted a list of deficiencies
[00:02:44 - 00:02:45] to the applicant.
[00:02:45 - 00:02:50] The purpose of today is to determine whether or not that deficiency list was satisfied.
[00:02:50 - 00:02:54] Well, I can go through that.
[00:02:54 - 00:02:58] I did want to note, so when the referral did go out for this project, there was
[00:02:58 - 00:03:05] an additional packet of comments and those comments all related to this project, but previous
[00:03:05 - 00:03:06] iterations.
[00:03:06 - 00:03:10] So they were separately called out in a separate file.
[00:03:10 - 00:03:19] So any new comments received, sent this new application with any revisions were included
[00:03:19 - 00:03:20] in the packet directly.

[00:03:20 - 00:03:22] So I just wanted to make note of that.
[00:03:22 - 00:03:27] As far as the deficiencies that were listed previously, I can go through them kind of
[00:03:27 - 00:03:28] one at a time.
[00:03:28 - 00:03:34] As far as from a plant, and so this deficiency notice was issued from all of TAC.
[00:03:34 - 00:03:39] It was put together by the planning department, but we did have comments from all the different
[00:03:39 - 00:03:41] departments within community development.
[00:03:41 - 00:03:47] So as far as those items first was the site plan.
[00:03:47 - 00:03:54] So previously we did need additional information as far as dimensions and those were provided.
[00:03:54 - 00:03:58] There was also specifications regarding the road location and encroachments.
[00:03:58 - 00:04:04] I did want to note that the location of the grave sites and the scale of them, I mean,
[00:04:04 - 00:04:10] hasn't changed from the original proposal, but it was more in depth as far as laying
[00:04:10 - 00:04:12] out exactly where everything must be located.
[00:04:12 - 00:04:18] And it did note that those are on the northern end of across the northern end of the property.
[00:04:19 - 00:04:23] The location of the restroom building has been added.
[00:04:23 - 00:04:24] The parking areas have been added.
[00:04:24 - 00:04:31] I did have a comment about the road parking and that being that the proposed road does show
[00:04:31 - 00:04:39] that it's a 20-foot wide road and that I don't believe would accommodate for roadside parking
[00:04:39 - 00:04:41] to maintain adequate road access.
[00:04:41 - 00:04:45] So that is a comment that we have that would need to be addressed.
[00:04:47 - 00:04:51] The number of graves in each block were specified and then there was a map that was included
[00:04:51 - 00:04:53] with the topographic contours.
[00:04:53 - 00:05:00] So sewage disposal system, from what I understand they have submitted an onsite sewage disposal system,
[00:05:00 - 00:05:05] but I believe it was associated with the house site that was previously proposed.
[00:05:05 - 00:05:09] I do know that they have been in communication with Environmental Health
[00:05:09 - 00:05:14] and they are aware of the requirements for that item.
[00:05:14 - 00:05:18] I'm not sure exactly where they are in that process.
[00:05:18 - 00:05:25] Equipment or fuel storage, I did see that there were still the existing storage buildings
[00:05:25 - 00:05:27] on the site plan.

[00:05:27 - 00:05:36] I know that there was previously comments regarding building specifically for cemetery
[00:05:36 - 00:05:41] maintenance use that would be for I guess the equipment and everything in the storage
[00:05:41 - 00:05:42] and fuel stuff.
[00:05:42 - 00:05:46] It says that it has been removed from the project description.
[00:05:47 - 00:05:55] I believe that they did elaborate on what kind of maintenance equipment they would be
[00:05:55 - 00:06:01] having onsite in the revised project description.
[00:06:01 - 00:06:08] Operational information was updated and that was in the narrative that was provided
[00:06:08 - 00:06:11] and application consistency.
[00:06:11 - 00:06:17] So I did notice that in some of the geotech stuff it did refer to previous, I guess,
[00:06:17 - 00:06:21] site plans, but the data within that is still relevant.
[00:06:21 - 00:06:29] So we are able to apply whatever was included in those studies towards the current project
[00:06:29 - 00:06:37] description and that's on us as far as being able to utilize the resources for our environmental
[00:06:37 - 00:06:38] review.
[00:06:38 - 00:06:43] So if we need specification, we can reach out to those consultants up to prepare those
[00:06:43 - 00:06:47] studies and obtain specification as needed.
[00:06:47 - 00:06:50] I think that it adequately does provide answers for us.
[00:06:50 - 00:06:56] I think the primary reason for the geo study was because of the mineral resources
[00:06:56 - 00:07:00] plan general plan designation and the study that provided did not call out any
[00:07:00 - 00:07:06] specific unique mineral resources that would be restricted through development of
[00:07:06 - 00:07:09] the site on the property.
[00:07:09 - 00:07:14] So in that case, I don't think that there's any inconsistency from this project
[00:07:14 - 00:07:17] with the existing general plan designation.
[00:07:17 - 00:07:21] So I don't think they would be required to have a general plan amendment
[00:07:22 - 00:07:26] because obviously gravesites would restrict access to any present minerals.
[00:07:26 - 00:07:30] But from what the report said, I don't think there's any state that would be
[00:07:32 - 00:07:35] significant to the county that they would lose access to.
[00:07:37 - 00:07:40] So that's all the items that were on the deficiency notice.
[00:07:40 - 00:07:43] I guess separately from a planning perspective with their updated

site
[00:07:43 - 00:07:49] plan, the primary concerns, I guess, are just that road location
[00:07:49 - 00:07:54] and just the general moving everything to that northern property
[00:07:54 - 00:07:58] boundary, because I know that this is within a residential area.
[00:07:58 - 00:08:02] So I think that it's very reasonable to assume that if we do move on to the
[00:08:02 - 00:08:06] environmental review of the project, there would be mitigations that would
[00:08:06 - 00:08:11] be expected for visual and aesthetic impacts and noise impacts.
[00:08:11 - 00:08:16] So I would like to see some ability to mitigate that, whether it be from
[00:08:16 - 00:08:19] like a vegetative buffer or fencing, something like that, because, I mean,
[00:08:19 - 00:08:23] realistically, people are going to be driving along that and there'll be noise
[00:08:23 - 00:08:27] associated with any additional commercial gathering of people.
[00:08:28 - 00:08:31] And the way that the site plan currently is called out, it doesn't really
[00:08:32 - 00:08:35] allow for any mitigations to be placed in that area.
[00:08:36 - 00:08:39] So I don't know if the applicant would be amenable to perhaps
[00:08:40 - 00:08:44] shifting the development to allow for more space, more of a buffer there.
[00:08:45 - 00:08:48] But again, it's not our job as tack to advise on their project.
[00:08:48 - 00:08:52] And that's necessarily just the potential mitigations that may come up down the line.
[00:08:53 - 00:08:58] And as recording secretary, I'm seeing a comment from Robin Peters,
[00:08:58 - 00:09:01] the engineer, when you're ready for that.
[00:09:01 - 00:09:03] And then also so that we know who's on Zoom.
[00:09:04 - 00:09:08] We have Robin Peters staff and a Stephanie Hesler.
[00:09:09 - 00:09:15] I do not see that applicant himself or I do not believe there's a representative
[00:09:16 - 00:09:19] unless Stephanie Hesler is repressable.
[00:09:19 - 00:09:22] And that I mean, Stephanie Hesler is with environmental health.
[00:09:23 - 00:09:24] Oh, that's right.
[00:09:24 - 00:09:28] And I was going to say, so sorry, I think I did go beyond just introducing the project.
[00:09:28 - 00:09:33] But as far as planning and our introduction of the project, that's where I have.
[00:09:33 - 00:09:36] So I would assume that the next would be to offer any comments.
[00:09:36 - 00:09:38] But I'll pass it over to the chair.
[00:09:39 - 00:09:42] All right. Do you want me to read the comment from Robin Peters in the chat?
[00:09:42 - 00:09:45] I believe he's having trouble raising his virtual hands.

[00:09:45 - 00:09:48] Or go ahead. Oh, I'm sorry.
[00:09:49 - 00:09:51] Christopher saying I should wait for you to open.
[00:09:56 - 00:09:57] Go ahead and call on Robin.
[00:09:57 - 00:10:00] You can go ahead and get his comment out of public hearing.
[00:10:00 - 00:10:02] OK, I'm going to go ahead and read his comment.
[00:10:03 - 00:10:05] Delta Engineering has submitted to Environmental Health,
[00:10:05 - 00:10:08] a septic system concept plan for the cemetery.
[00:10:09 - 00:10:12] It will be revised once conditions are issued to make it fit.
[00:10:12 - 00:10:14] The final project configuration.
[00:10:14 - 00:10:18] There is plenty of septic capacity for the proposed use.
[00:10:18 - 00:10:20] All right. Thank you.
[00:10:20 - 00:10:24] And open it up for committee comments.
[00:10:24 - 00:10:27] Stephanie's on Zoom for thanks for joining us.
[00:10:28 - 00:10:32] Just go ahead and unmute yourself and jump in if you feel the need.
[00:10:41 - 00:10:42] It appreciate it.
[00:10:42 - 00:10:44] I saw it somewhere in the packet.
[00:10:44 - 00:10:48] AWA's letter called out the need for fire water.
[00:10:49 - 00:10:53] And so we will once the project gets to that point,
[00:10:53 - 00:10:54] we will discuss that.
[00:10:58 - 00:11:05] AWA submitted their letter that did call out the need to have fire water
[00:11:06 - 00:11:08] and a hydrogen system if necessary.
[00:11:08 - 00:11:11] So when we get to that point of the project, then we will.
[00:11:12 - 00:11:20] We will address that.
[00:11:20 - 00:11:24] My understanding correctly, we don't have a representative here for the project.
[00:11:25 - 00:11:30] We're saying we still have no other zoomers than prior Lee mentioned.
[00:11:31 - 00:11:36] Okay. We're just looking at the restroom building and then a shed.
[00:11:37 - 00:11:40] And I didn't see very many other like there was no other real structures.
[00:11:41 - 00:11:44] Right. At one time there was one proposed, but that was removed from the application.
[00:11:44 - 00:11:47] Okay. That's what I was iterations ago.
[00:11:47 - 00:11:55] I do remember that their committee comments. Maybe.
[00:12:00 - 00:12:05] Public work thinks the they will have to get commercial encroachment permits
[00:12:05 - 00:12:11] for both roads, the Caban deal and for Lambert route.
[00:12:14 - 00:12:17] We would have to collect traffic litigation fee.
[00:12:23 - 00:12:28] I would imagine a reasonable condition from public works would be that access
[00:12:28 - 00:12:32] would only be from the car.
[00:12:32 - 00:12:36] And I wrote in from Lambert road, but, but access to the facility in

general
[00:12:36 - 00:12:39] would only be off of Carbondale road either from 16 or from Michigan bar road
[00:12:39 - 00:12:42] and not through Maxwell road or any of those side roads that connect back
[00:12:42 - 00:12:46] over to Michigan bar road or I am road because they would have to coming from
[00:12:46 - 00:12:48] the 16, not suited for that.
[00:12:48 - 00:12:59] The roads on the property themselves will need to be brought up to appropriate
[00:12:59 - 00:13:05] code as far as weight capacity and width and all of that stuff.
[00:13:07 - 00:13:10] You know, it's considered private once it gets onto the property.
[00:13:10 - 00:13:13] And then were you saying they plan on having roadside parking?
[00:13:15 - 00:13:17] Not on the county road on there, the internal.
[00:13:17 - 00:13:23] Within their property. Yeah. The width definitely does not is not sufficient for that.
[00:13:23 - 00:13:24] I saw the parking spaces.
[00:13:24 - 00:13:29] I thought that was the that was the plan was to have them park in a parking lot.
[00:13:29 - 00:13:34] But yeah, the roads on the the parcel itself would need to be addressed.
[00:13:36 - 00:13:38] Main be maintained at the width that's on the site plan.
[00:13:38 - 00:13:42] Then the condition is not to have any parking on that road.
[00:13:42 - 00:13:44] Okay. Well, that is condition.
[00:13:44 - 00:13:57] The other committee comments. Stephanie, do you have any thing to
[00:13:57 - 00:14:05] a moment? I need to unmute. Yeah.
[00:14:05 - 00:14:08] Go ahead. Can you guys hear me? Yes.
[00:14:08 - 00:14:12] Perfect. I was just going to say no, I don't have anything to add.
[00:14:12 - 00:14:17] I did look it over. And as Robin Peters had mentioned,
[00:14:17 - 00:14:21] we do have a plan in with E.H.
[00:14:22 - 00:14:24] kind of awaiting the next steps.
[00:14:24 - 00:14:29] And as he mentioned, there is or as you mentioned, there is a pretty good space.
[00:14:30 - 00:14:34] So not too concerned with the septic side of things.
[00:14:37 - 00:14:38] All right. Thank you.
[00:14:38 - 00:14:40] Well, that will open it up for public comment.
[00:14:40 - 00:14:50] Does anyone will start in the room public comment?
[00:14:50 - 00:15:00] Mark Bennett, Tine Grove, prior prior additions of this proposal
[00:15:00 - 00:15:05] included a religious building and I'm quoting using their term.
[00:15:06 - 00:15:10] Is that in the current proposal that's been removed from the proposal?
[00:15:10 - 00:15:13] It is. Yes. Thank you.
[00:15:25 - 00:15:27] Good afternoon. My name is Tom McCleary.

[00:15:27 - 00:15:34] I'm representing some of the folks down at Eagle's Nest Airport.
[00:15:35 - 00:15:41] I'm the president of our homeowner association there.
[00:15:41 - 00:15:46] And my concern is, and I think I just heard you guys talk about it a little bit,
[00:15:46 - 00:15:53] but the traffic mitigation issue, as we can see,
[00:15:53 - 00:16:00] they're proposing 60 funerals a month
[00:16:01 - 00:16:05] with 50 attendance maximum.
[00:16:05 - 00:16:11] That's 3000 people a month into, as you noted,
[00:16:12 - 00:16:15] a area that is single family homes,
[00:16:16 - 00:16:22] agricultural properties, that's a small community, rural,
[00:16:23 - 00:16:30] to have that level of commercial enterprise
[00:16:31 - 00:16:33] in a small area there.
[00:16:34 - 00:16:39] I'm concerned that we address the issue of traffic mitigation.
[00:16:39 - 00:16:41] They're narrow roads.
[00:16:41 - 00:16:47] The access from the Sacramento area
[00:16:47 - 00:16:53] and to the West is along a single lane road, Maxwell,
[00:16:53 - 00:16:57] Carbondale Road, very poor condition.
[00:16:58 - 00:17:01] Lambert Road is the same.
[00:17:02 - 00:17:10] So that's my main concern is the level of commercial operation
[00:17:11 - 00:17:19] in a very small, smallly populated area.
[00:17:22 - 00:17:29] If you have any questions for me, we would strongly oppose
[00:17:31 - 00:17:57] this particular event from Eagle's Nest, Eagle's Ranch Association.
[00:17:57 - 00:18:01] Years ago, I bought a piece of property at the end of Lambert Road,
[00:18:02 - 00:18:05] and we had to pay a rather stiff traffic mitigation fee.
[00:18:07 - 00:18:08] And I kind of laughed at the time.
[00:18:09 - 00:18:11] I said, well, gosh, there's only two of us moving out there.
[00:18:11 - 00:18:14] How can we impact the traffic?
[00:18:15 - 00:18:17] But I paid the fee and moved on.
[00:18:18 - 00:18:22] Anyway, you got a proposed project here that's coming
[00:18:22 - 00:18:27] into a residential area that is quiet and peaceful
[00:18:28 - 00:18:31] and with relatively few cars up and down the road.
[00:18:31 - 00:18:33] The roads are actually horrendous.
[00:18:33 - 00:18:36] Amador County can't even keep track, can't even keep up with the
[00:18:37 - 00:18:38] the pothole fill on those roads.
[00:18:38 - 00:18:41] They're out there three, four times a year putting, you know,
[00:18:43 - 00:18:48] asphalt in those holes and to no effect.
[00:18:49 - 00:18:52] The bottom line is that since the topic has already been raised
[00:18:53 - 00:18:59] that this religious topic that if this is a religious
[00:18:59 - 00:19:04] specific cemetery, and I believe it is, there are very few
[00:19:04 - 00:19:06] other options in Northern California.
[00:19:06 - 00:19:10] So this project is not going to just attract people from Amador County,
[00:19:10 - 00:19:13] but it's going to attract people from all over the Northern California.

[00:19:14 - 00:19:18] And with that in mind, the traffic could be horrendous there.
[00:19:18 - 00:19:21] Okay. I don't think the roads are capable.
[00:19:21 - 00:19:23] I don't think the areas conducive for that.
[00:19:24 - 00:19:27] This project really needs to be on a major thoroughfare.
[00:19:27 - 00:19:29] One that has, I mean, there's another project down in
[00:19:30 - 00:19:33] Livermore, California, it's called Five Pillars Cemetery
[00:19:33 - 00:19:38] and it's right off of 580 and has much better access.
[00:19:38 - 00:19:42] I think that kind of access is what's necessary for this type of project.
[00:19:43 - 00:19:58] Thank you. My name is Ron Woodhouse.
[00:19:58 - 00:20:03] I own property about a mile from this proposed cemetery.
[00:20:04 - 00:20:07] I'm not part of the airport, but I have a ranch there and run cattle.
[00:20:10 - 00:20:13] And I am also concerned with the traffic.
[00:20:14 - 00:20:18] I've also driven by that property many times after it rains
[00:20:19 - 00:20:24] and I have videos of water just pouring out of that driveway on Carbondale.
[00:20:24 - 00:20:29] An inch deep, running out, running down to the Y there with Carbondale and Lambert.
[00:20:31 - 00:20:35] The county puts up saw horses, it's safe flooded,
[00:20:36 - 00:20:39] it's washed out the asphalt.
[00:20:39 - 00:20:44] I can't imagine putting a cemetery in a floodplain like that.
[00:20:47 - 00:20:49] That's a major concern.
[00:20:49 - 00:20:52] I know at the last meeting, we had an addendum
[00:20:53 - 00:20:55] that talked about the preparation of the bodies.
[00:20:57 - 00:21:00] And if you read that, and I wish I had a copy of it,
[00:21:00 - 00:21:04] but it's in this report and it's very vague about how they're going to be
[00:21:04 - 00:21:09] handled and buried and it looks like they're going to be wrapped in a cloth
[00:21:10 - 00:21:12] and put in the ground and not in a casket.
[00:21:13 - 00:21:16] If you read that, this was kind of slipped in at the last minute,
[00:21:17 - 00:21:22] but it's in there and I'd like that clarified if you would.
[00:21:22 - 00:21:29] And the traffic, like Michael said, is not just Carbondale and Lambert.
[00:21:31 - 00:21:33] They're talking about in that proposal,
[00:21:34 - 00:21:40] El Dorado County, Plaster County, Sacramento County, Stockton, Galt
[00:21:41 - 00:21:44] all the way down to Lodi.
[00:21:44 - 00:21:53] Traffic will be coming up City of Ione, coming up.
[00:21:56 - 00:21:58] If you could imagine that.
[00:21:58 - 00:22:00] So the numbers I'm also concerned about.
[00:22:02 - 00:22:07] You mentioned how many grave sites are there?
[00:22:07 - 00:22:09] I thought there were 50,000.
[00:22:09 - 00:22:11] Can you change that?
[00:22:11 - 00:22:14] This keeps changing.

[00:22:14 - 00:22:17] Originally, it was a 20,000 square foot mosque,
[00:22:18 - 00:22:22] which, by the way, had been turned down by Sacramento County
[00:22:23 - 00:22:26] with the same person over on Dillard Road.
[00:22:27 - 00:22:31] 20,000 square feet goes from on a football field
[00:22:32 - 00:22:35] from the end zone all the way out past the 50 yard line.
[00:22:35 - 00:22:37] That's how big he was talking about.
[00:22:37 - 00:22:41] I don't know what's going on with this proposal now.
[00:22:45 - 00:22:48] The way things keep changing on this proposal.
[00:22:51 - 00:22:55] Again, you're running 25 cars in a funeral procession
[00:22:55 - 00:23:00] three times a day out these Amador County roads.
[00:23:01 - 00:23:03] We can't handle it.
[00:23:03 - 00:23:06] And it's a rural environment.
[00:23:08 - 00:23:13] We moved out here to enjoy it, totally destroy it.
[00:23:13 - 00:23:37] Good afternoon, County staff and counselor and planning staff.
[00:23:37 - 00:23:39] Thank you for the opportunity to comment.
[00:23:39 - 00:23:44] My name is David Wardall and we bought property here
[00:23:44 - 00:23:50] in Close Desk Grove on February 2nd, 1987.
[00:23:51 - 00:23:54] And that summer we had a dirt runway on the property
[00:23:54 - 00:23:56] for the Air Park community.
[00:23:58 - 00:24:02] The county has had a lot of benefits from this airport.
[00:24:03 - 00:24:07] The property taxes out there, these are all million dollar properties.
[00:24:07 - 00:24:12] And our assessor is very, very judicious in
[00:24:13 - 00:24:17] increasing the tax rolls from the improvements on the property.
[00:24:18 - 00:24:22] A little bit about the airport.
[00:24:22 - 00:24:25] And the day after 9-11, we had two bird kernels
[00:24:25 - 00:24:27] from Travis Air Force Space Zone.
[00:24:28 - 00:24:29] And they said, if all hell breaks loose,
[00:24:29 - 00:24:31] you want to hide up 16s out there.
[00:24:32 - 00:24:34] And I talked to the supervisors, said,
[00:24:34 - 00:24:37] if we break the nodes, everybody said,
[00:24:37 - 00:24:39] come on in, including the airport.
[00:24:39 - 00:24:42] So it's a mediback area.
[00:24:42 - 00:24:46] It's a helicopter landing site for Cal Fire
[00:24:46 - 00:24:49] and Cal Fire tankers have landed on the runway.
[00:24:50 - 00:24:53] So with that, let's get into this right away.
[00:24:53 - 00:24:59] I gave everybody here a copy of the page 26 out of 84
[00:24:59 - 00:25:03] of the report, which is the second page
[00:25:03 - 00:25:05] on the environmental assessment.
[00:25:05 - 00:25:07] This is a joke.
[00:25:07 - 00:25:09] What's been submitted is inaccurate.
[00:25:09 - 00:25:13] This is misrepresentation and omissions.
[00:25:13 - 00:25:17] If you look at this, we'll go through this point by point
[00:25:17 - 00:25:18] in my letter.

[00:25:18 - 00:25:23] If you have question 17, change in existing feature hills
[00:25:24 - 00:25:27] and substantial alleration of ground contours,
[00:25:27 - 00:25:30] removal of protected native oak trees
[00:25:31 - 00:25:34] and regrading upper 15 acres of land.
[00:25:35 - 00:25:38] That is, we'll get into it later,
[00:25:38 - 00:25:41] but California Oak Tree Preservation Ordinance,
[00:25:41 - 00:25:42] that's been violated.
[00:25:43 - 00:25:45] On the upper area, if you have some of that,
[00:25:45 - 00:25:51] you have a map, I think it's on page 6 or 7.
[00:25:52 - 00:25:55] It shows the right there.
[00:25:55 - 00:25:57] If you go, there you go.
[00:25:57 - 00:25:59] If you look at that, well, there's another one,
[00:25:59 - 00:26:00] the grading map.
[00:26:00 - 00:26:03] Okay, that map.
[00:26:03 - 00:26:05] If you look at the upper area there,
[00:26:06 - 00:26:10] that's about 20 percent of the oak tree population
[00:26:10 - 00:26:11] is wiped out.
[00:26:11 - 00:26:14] Now, the other thing you look at is you look at the number
[00:26:14 - 00:26:18] of oak trees remaining and go back to the plot plan map.
[00:26:18 - 00:26:19] I think it's page 3.
[00:26:25 - 00:26:29] That plot plan map shows only about 20 percent
[00:26:29 - 00:26:31] of the area having oak trees on it.
[00:26:32 - 00:26:34] And it's total misrepresentation.
[00:26:34 - 00:26:37] This whole report, if you go through and study it,
[00:26:37 - 00:26:40] has misrepresentation and omissions on it.
[00:26:40 - 00:26:42] So we will continue.
[00:26:42 - 00:26:46] Item 18 is checked.
[00:26:46 - 00:26:47] Yes. No.
[00:26:48 - 00:26:52] Change in scenic VISTA views and residential areas
[00:26:52 - 00:26:53] and public lands or roads.
[00:26:54 - 00:26:56] Well, you wipe out all the oak trees and remove all
[00:26:56 - 00:27:00] of the iron manzanita that's a threatened species.
[00:27:00 - 00:27:04] And with the bare grave land,
[00:27:04 - 00:27:07] and there it's going to change the views.
[00:27:07 - 00:27:08] That should be checked, yes.
[00:27:09 - 00:27:12] The third one down, change in pattern scale,
[00:27:12 - 00:27:14] character of generally use of the land.
[00:27:16 - 00:27:20] This area is open ranch land and rural agriculture
[00:27:20 - 00:27:21] with ranch houses.
[00:27:21 - 00:27:25] A commercial cemetery does not fit in this rural cattle area,
[00:27:26 - 00:27:27] ag and MRZ zoning.
[00:27:28 - 00:27:31] You know, folks, if you have a commercial operation cemetery,
[00:27:32 - 00:27:38] Sunset Cemetery on 88, the Catholic Cemetery on 104,

[00:27:38 - 00:27:41] you have main feeder arteries to support the cemetery.
[00:27:42 - 00:27:44] And the roads here can't handle that.
[00:27:44 - 00:27:46] I'll speak to that later.
[00:27:46 - 00:27:52] But this is a commercial operation in a residential ranch area.
[00:27:53 - 00:27:53] It doesn't fit.
[00:27:54 - 00:28:08] Item 21, change in dust and ash and odors.
[00:28:08 - 00:28:13] The influx of 60 funerals per month with a minimum of 50 people.
[00:28:13 - 00:28:14] And that's slow.
[00:28:14 - 00:28:17] The Muslim funeral, if you start looking on the Internet,
[00:28:17 - 00:28:20] all the family's friends and other people,
[00:28:21 - 00:28:23] if it's a Muslim field, only come and show up.
[00:28:23 - 00:28:27] I'd say you're more likely going to have 150 people instead of 50.
[00:28:28 - 00:28:30] It'll clock the narrow roads.
[00:28:30 - 00:28:32] It'll be hard to passable.
[00:28:33 - 00:28:37] The fire department, sheriff department will have a hard time getting through.
[00:28:37 - 00:28:45] And in the dust, you have gravel interior roads
[00:28:45 - 00:28:47] and a gravel parking lot.
[00:28:47 - 00:28:51] So if you're looking at that, what you're looking at is
[00:28:51 - 00:28:55] 12,000 vehicle movements per month coming in
[00:28:55 - 00:28:58] and 12,000 vehicle movements for months going out.
[00:29:00 - 00:29:01] That's not declared.
[00:29:01 - 00:29:02] It's not discussed.
[00:29:02 - 00:29:06] But that, from my calculations, what I think is going to happen.
[00:29:06 - 00:29:10] And the road deterioration on that,
[00:29:11 - 00:29:16] I just, I think that the county needs to look at
[00:29:16 - 00:29:21] is having a traffic mitigation fee and having paved all of the roads
[00:29:21 - 00:29:25] just like they did for the casino over in Buena Vista.
[00:29:26 - 00:29:29] That would be a mitigating measure how to fix that problem.
[00:29:31 - 00:29:36] Item 22, change in lake stream groundwater quality.
[00:29:36 - 00:29:40] OK, if you, the drainage pattern there is really bad.
[00:29:40 - 00:29:43] I have a video that will present at the Planning Commission meeting
[00:29:44 - 00:29:49] showing, you know, a river heavy stream coming out of that property
[00:29:50 - 00:29:53] after a heavy rain and the impacts on
[00:29:54 - 00:29:58] Carbondale Road and flooding going all over around the Lambert Road.
[00:29:59 - 00:30:05] But the the the rating and removing of all the trees
[00:30:05 - 00:30:09] and the shrubs and everything is going to increase the water flow
[00:30:09 - 00:30:11] coming down off that hill.
[00:30:11 - 00:30:13] No discussion on that.
[00:30:13 - 00:30:28] OK, continuing on and thank you for your patience, folks.
[00:30:28 - 00:30:31] We appreciate it.

[00:30:31 - 00:30:34] Number 26, substantial change in man
[00:30:34 - 00:30:36] from municipal service, police and fire.
[00:30:37 - 00:30:40] Police and fire services, well, in this case,
[00:30:40 - 00:30:42] Sheriff Department and Fire Department.
[00:30:43 - 00:30:46] There'll be an increase in that just because of the traffic problem.
[00:30:46 - 00:30:49] Maybe accidents or whatever.
[00:30:49 - 00:30:52] Security issues on the property.
[00:30:53 - 00:30:58] The the big thing is the lack of water.
[00:30:58 - 00:31:01] There's a letter from the Amador Water Agency.
[00:31:01 - 00:31:04] They have a five eighths by three quarter water meter.
[00:31:04 - 00:31:07] How are you going to get fire protection to the buildings
[00:31:07 - 00:31:10] for with that meter can't go won't work.
[00:31:10 - 00:31:13] We've dealt drilled eight wells.
[00:31:14 - 00:31:18] I'm sorry, 10 wells all over the property is deep at 700 feet.
[00:31:18 - 00:31:22] And we figured we get that we ended up having to take all our asphalt
[00:31:22 - 00:31:27] money for the runway and put in 37000 feet of six inch water main.
[00:31:28 - 00:31:30] And that was sized for our subdivision.
[00:31:31 - 00:31:37] And it was sized for a few parcels along Highway 104.
[00:31:38 - 00:31:47] That would be the coming into I own for landowners trading right
[00:31:47 - 00:31:48] away for a water connection.
[00:31:48 - 00:31:53] So there's 36 authorized water connections on that pipeline.
[00:31:54 - 00:31:57] And we had to have a reserve of 500 gallon a minute fire flow.
[00:31:58 - 00:31:59] And we are there.
[00:31:59 - 00:32:00] We're there now.
[00:32:00 - 00:32:02] There is no extra water.
[00:32:04 - 00:32:06] Good luck with the well.
[00:32:06 - 00:32:10] And our average well put out three quarter gallon a minute.
[00:32:11 - 00:32:15] And it was a high sulfur and high iron content.
[00:32:15 - 00:32:22] So that's going to be up to the fire department and health department
[00:32:22 - 00:32:23] to figure that one out.
[00:32:29 - 00:32:33] One thing I'd like to mention is the initial application had 50,000
[00:32:34 - 00:32:37] indicated 50,000 burial plots.
[00:32:37 - 00:32:40] And the you're quite right.
[00:32:40 - 00:32:44] I counted up and there's 1832 grade plots.
[00:32:44 - 00:32:46] And that that is encompassed.
[00:32:46 - 00:32:51] And I did a count on it of 1.9 1.89 acres.
[00:32:52 - 00:32:55] So if there are going to be a limitation on this use permit
[00:32:56 - 00:33:03] limiting this project to 1.89 acres as illustrated in some of the plots
[00:33:03 - 00:33:05] that are you can bring up.
[00:33:05 - 00:33:08] Or is this going to be a wide open with no limitations?
[00:33:08 - 00:33:15] Very much a concern of because the future impacts you already

have impacts here.
[00:33:15 - 00:33:18] But to give them unlimited use of that ground for additional
[00:33:19 - 00:33:23] grade plots or whatever is a very serious concern.
[00:33:24 - 00:33:29] OK, I'm going to go through on page two additional observations.
[00:33:30 - 00:33:34] We talked about the first item of page three and page seven
[00:33:34 - 00:33:38] of the differences between the illustrated oak trees
[00:33:38 - 00:33:40] and the actual photo of oak trees.
[00:33:40 - 00:33:41] I'll move on.
[00:33:44 - 00:33:52] Just to mention the California Public Resource Code section 21 0 8 3 dot 4
[00:33:53 - 00:33:59] and California Fish and Game Sections Fish and Wildlife 13 60
[00:33:59 - 00:34:04] through 13 72 and the Oak Woodlands Conservation Act.
[00:34:04 - 00:34:06] They're all impacts.
[00:34:07 - 00:34:11] Now, sequel, believe me, I've had to go through with the planning
[00:34:11 - 00:34:16] department and when I cal fire the sequel training.
[00:34:16 - 00:34:21] If you look at this and all the impacts, it's off the map as far as impacts
[00:34:21 - 00:34:24] pertaining to the California Environmental Quality Act.
[00:34:25 - 00:34:30] That alone, this thing is so bogus
[00:34:30 - 00:34:32] that ought to be thrown in the trash can and rejected.
[00:34:33 - 00:34:34] I'll continue.
[00:34:43 - 00:34:49] OK, I get down to increase in traffic with 60 funerals per month
[00:34:49 - 00:34:53] and 50 to 100 people parking lot for 100 cars.
[00:34:53 - 00:34:57] That's the 12,000 trips in and 12,000 trips out.
[00:34:58 - 00:35:02] Our roads, if anybody had been driven down in that area, they're very,
[00:35:02 - 00:35:05] very poor. We and we built the subdivision.
[00:35:05 - 00:35:08] We had to put in 26 and a half feet of gravel
[00:35:09 - 00:35:11] and the road compacted and gravel.
[00:35:12 - 00:35:13] I talked to the county.
[00:35:13 - 00:35:15] I said, hey, this is a pretty nice road.
[00:35:15 - 00:35:18] If we pay for the asphalt, can the county crew pay?
[00:35:18 - 00:35:21] And they said, hell, yeah, that's a hell of a deal.
[00:35:21 - 00:35:24] So the county got we paid for all the asphalt and their road crew
[00:35:24 - 00:35:28] came down and spent a day and a half, two days and paved the road.
[00:35:29 - 00:35:31] So it was a win-win situation.
[00:35:31 - 00:35:34] That pavement now is twenty thirty seven years old.
[00:35:35 - 00:35:38] So and it's it's failing.
[00:35:39 - 00:35:41] And the other pavement is even older than that.
[00:35:41 - 00:35:44] It's it's a system of potholes.
[00:35:48 - 00:35:53] Page 10, this is very on of eighty four, the environmental
[00:35:53 - 00:35:54] constraints table.
[00:35:54 - 00:35:57] It only lists three environmental constraints.

[00:35:58 - 00:36:00] And I listed five items there.
[00:36:01 - 00:36:04] There are several missing environmental concerns
[00:36:04 - 00:36:07] from the environmental constraints table.
[00:36:07 - 00:36:10] No listing for lack of full water supply.
[00:36:10 - 00:36:14] No listing for local secondary road damage.
[00:36:14 - 00:36:17] A thirty five year old fragile asphalt.
[00:36:17 - 00:36:23] No discussion on direct ground burial with no casket, no concrete container.
[00:36:24 - 00:36:28] What are the impacts of that to fifty thousand burial plots
[00:36:28 - 00:36:31] with several bodies and reading their documentation?
[00:36:31 - 00:36:34] They can have up to three bodies per burial plot.
[00:36:35 - 00:36:37] The two adults and one child.
[00:36:40 - 00:36:42] Appropriate drainage control majors.
[00:36:42 - 00:36:43] OK, what is it?
[00:36:43 - 00:36:44] Define it.
[00:36:44 - 00:36:47] We know we got a drainage problem on that property.
[00:36:47 - 00:36:49] And there's nothing on there.
[00:36:49 - 00:36:52] It is appropriate to OK.
[00:36:53 - 00:36:54] I got it.
[00:36:54 - 00:36:55] I just pulled it out of thin air.
[00:36:55 - 00:36:56] There it is.
[00:36:56 - 00:36:58] I can't see or find it.
[00:36:59 - 00:37:03] Land contours have no elevations on the plot plans.
[00:37:05 - 00:37:08] We already talked about the Amador County water,
[00:37:08 - 00:37:10] lack of water and the letter confirming that.
[00:37:12 - 00:37:16] Page thirty two of eighty four, the project scope site description,
[00:37:16 - 00:37:21] second paragraph that says, and perhaps accessory buildings.
[00:37:22 - 00:37:23] What does that mean?
[00:37:23 - 00:37:26] What is the size, shape and purpose of buildings?
[00:37:28 - 00:37:33] That this is given them a blank check for anything they want to do in the
[00:37:33 - 00:37:38] sense that this is a very serious unlimited provision for additional buildings
[00:37:38 - 00:37:41] without any limitations to use.
[00:37:42 - 00:37:45] Or as the use, size or shape or location.
[00:37:46 - 00:37:51] This condition for approval must specifically list each building,
[00:37:51 - 00:37:56] size, location, land use and occupation.
[00:37:58 - 00:38:02] The airport zoning ordinance was passed for prohibits.
[00:38:03 - 00:38:07] The assembly of people and buildings within one mile of the airport.
[00:38:08 - 00:38:17] This property is adjacent and touches our south section twenty nine property
[00:38:17 - 00:38:19] boundary line that's against the airport.
[00:38:19 - 00:38:25] So if they want to have a any type of meeting of people or a building

[00:38:25 - 00:38:29] for a brief service or something can't do it.
[00:38:30 - 00:38:31] That that has to be made clear.
[00:38:32 - 00:38:37] You can't have public meetings or gatherings in any building.
[00:38:38 - 00:38:39] On that property.
[00:38:39 - 00:38:42] I appreciate the opportunity to comment.
[00:38:43 - 00:38:44] Thank you very much.
[00:38:44 - 00:38:46] You guys know how to get a hold of me.
[00:38:46 - 00:38:50] If you have any questions, I'll be happy to reply or answer.
[00:38:54 - 00:38:56] Thank you very much for the time.
[00:38:56 - 00:39:12] There's no zoom comment at this time.
[00:39:12 - 00:39:18] Robin Peters is trying to join as a second entity, but it's not allowing him.
[00:39:18 - 00:39:22] But he was able to successfully chat previously.
[00:39:23 - 00:39:23] So.
[00:39:23 - 00:39:25] All right.
[00:39:25 - 00:39:28] Without any other public comments and I'll bring it back for the committee
[00:39:28 - 00:39:33] for any other discussion or any items that you think need to be addressed
[00:39:33 - 00:39:35] before the application is deemed complete.
[00:39:36 - 00:39:38] It's based on the permit streamlining act.
[00:39:38 - 00:39:43] We get one opportunity to send the list of deficiencies to the applicant
[00:39:43 - 00:39:44] that it respond.
[00:39:45 - 00:39:50] We have 30 days to which we're a little bit past that, but they're not
[00:39:50 - 00:39:58] in order to determine whether the application is complete or the deficiencies.
[00:39:58 - 00:40:00] But we've already done the list of deficiencies.
[00:40:00 - 00:40:04] We'll be sending additional one shot at it.
[00:40:04 - 00:40:11] Any other items that were, excuse me, the items that were addressed from the public
[00:40:11 - 00:40:13] were all matters that were related to environmental review.
[00:40:13 - 00:40:18] So those, if it goes forward, those items will have to be considered in the first,
[00:40:18 - 00:40:21] in the in the CEQA initial study that's prepared for the project.
[00:40:22 - 00:40:24] It would have to be done within the next 30 days.
[00:40:24 - 00:40:29] And we'd have another meeting to do, discuss that environmental review.
[00:40:42 - 00:40:42] Forgive my ignorance.
[00:40:42 - 00:40:46] The airport zoning ordinance that was brought up.
[00:40:46 - 00:40:46] Mm-hmm.
[00:40:47 - 00:40:52] Do we have, do we have that listed anywhere available to read?
[00:40:53 - 00:40:57] That's part of the county zoning code title 19 of the county code.

[00:40:57 - 00:40:58] So that was adopted.
[00:40:58 - 00:41:01] They helped me Dave.
[00:41:01 - 00:41:02] Was that two years ago?
[00:41:02 - 00:41:10] The airport overlay, roughly limitation on assembly in building site.
[00:41:11 - 00:41:14] No more than 50 people pilot time flies.
[00:41:14 - 00:41:16] And boy, it's been at least two years.
[00:41:16 - 00:41:17] No pun intended.
[00:41:17 - 00:41:18] What you did there.
[00:41:18 - 00:41:27] So that, that is correct then that the, the meetings cannot be within a mile.
[00:41:28 - 00:41:32] I have not read that or no assembly within a building, within a mile,
[00:41:33 - 00:41:37] with assembly of 50 people or more, or more within a mile of the airport.
[00:41:37 - 00:41:41] Does that speak to not in a building?
[00:41:41 - 00:41:44] Or is it only only only in a building?
[00:41:48 - 00:41:51] That doesn't quite help anything when they've removed the building from the
[00:41:51 - 00:41:52] project and time does fly.
[00:41:52 - 00:41:55] I think that came from the health and safety code, but don't quote me on that.
[00:41:56 - 00:41:56] Well, good.
[00:41:56 - 00:41:57] I haven't even read it.
[00:41:57 - 00:41:59] So it's, it's fair.
[00:42:00 - 00:42:08] Um, I think between myself and AWA, the firewater issue has been, has been brought
[00:42:08 - 00:42:09] up multiple times.
[00:42:09 - 00:42:13] The applicant knows that it's going to be a requirement.
[00:42:13 - 00:42:15] I hope they know by now.
[00:42:16 - 00:42:20] Um, and I believe I listed that in my last round of deficiencies.
[00:42:21 - 00:42:26] Um, I'm, I'm right there with the concerns about the roads going in.
[00:42:26 - 00:42:30] I know I'm not public works, but we like to use the roads when we need to go
[00:42:30 - 00:42:34] somewhere and as far as emergency response goes.
[00:42:34 - 00:42:43] Um, what mitigations are going to be required or listed as far as that goes.
[00:42:45 - 00:42:47] I guess I had a comment on that.
[00:42:47 - 00:42:48] So I know that.
[00:42:49 - 00:42:54] So the main access road that they're showing, is it sufficient?
[00:42:54 - 00:42:57] To it for 1530, if they don't park on it.
[00:42:57 - 00:42:58] So like the proposed.
[00:42:59 - 00:43:00] Close my packet.
[00:43:00 - 00:43:00] Sorry.
[00:43:01 - 00:43:07] I think it's a proposed 20 foot road with, um, I guess my thing was to,

I'm
[00:43:07 - 00:43:12] not an engineer, but I know that if that is going to be used as, you know,
[00:43:12 - 00:43:17] like for a fire truck or something, is there like a specific setback?
[00:43:18 - 00:43:23] If there's like a whole dug next to it, that any setback to avoid any,
[00:43:23 - 00:43:27] like the compensation for the weight of the vehicles kind of thing.
[00:43:27 - 00:43:30] Um, because I mean, I think the way it's showing, I think it's.
[00:43:31 - 00:43:38] Was it 13 feet from the edge of the road to the grave site, like there.
[00:43:38 - 00:43:41] And I know that I think I did want to also address one of the comments.
[00:43:41 - 00:43:48] Um, they did provide clarification, um, following the previous, um, request to
[00:43:48 - 00:43:50] elaborate on the nature of the burials and everything.
[00:43:50 - 00:43:52] So I did want to answer that in the packet.
[00:43:52 - 00:43:56] It does, um, clarify pretty specifically the nature of the, the, the
[00:43:56 - 00:43:58] burials and the preparation of the bodies.
[00:43:58 - 00:44:01] From what I understand, most of the preparation will be offsite.
[00:44:02 - 00:44:11] Um, so I guess that's one of the things, but as far as the, right.
[00:44:11 - 00:44:11] Yeah.
[00:44:11 - 00:44:16] And so the way that the graves are proposed to, there's essentially a.
[00:44:17 - 00:44:21] Box that supports the walls of the, the grave and it's open on the bottom.
[00:44:21 - 00:44:24] So it would be a shroud wrapped body that would be laid in there.
[00:44:24 - 00:44:28] And then they do have concrete lids that they put to separate the various levels.
[00:44:28 - 00:44:32] So from what I understand the depth of those holes, I mean, it's probably
[00:44:32 - 00:44:34] wrong to have a say 12 feet.
[00:44:34 - 00:44:37] Um, right.
[00:44:37 - 00:44:43] Um, but as far as addressing the, the stress from driving on the road, if
[00:44:43 - 00:44:50] there's like a distance that the road needs to be specifically from those.
[00:44:51 - 00:44:54] Open or temporarily open.
[00:44:54 - 00:44:56] You know, fortified holes.
[00:44:56 - 00:44:56] Yeah.
[00:44:56 - 00:44:59] 15 30 does call out, um, setbacks.
[00:44:59 - 00:45:03] I want to say it's no for residential 10 feet.
[00:45:03 - 00:45:05] I'd have to double check for commercial.
[00:45:05 - 00:45:10] Um, that we would, we would need to discuss that as well.
[00:45:10 - 00:45:13] The, the rows of the hole, because they're going to be used for commercial
[00:45:13 - 00:45:18] operation of so many vehicles would have to meet 15 30.

[00:45:18 - 00:45:19] That would be a condition.
[00:45:19 - 00:45:20] Tiredy.
[00:45:20 - 00:45:20] Yeah.
[00:45:20 - 00:45:25] So yeah, that, that would be a condition that needs to be met on the
[00:45:25 - 00:45:25] property.
[00:45:26 - 00:45:30] Um, as far as coming into the property though that I'm going to leave that
[00:45:30 - 00:45:36] to public works, but yeah, on the property, the rows would have to be met.
[00:45:37 - 00:45:38] We would have to meet 15 30.
[00:45:39 - 00:45:41] And there is a weight capacity.
[00:45:41 - 00:45:48] I want to say it's 40,000, but I'd have to double check on that number.
[00:45:49 - 00:45:49] It'd be more.
[00:45:50 - 00:45:55] Uh, so I mean, as far as that's more specific stuff, I would like to see,
[00:45:55 - 00:45:58] I guess the applicant be able to talk to someone to figure out all that,
[00:45:58 - 00:46:02] but I don't think that's keeping us from declaring it complete at this point.
[00:46:02 - 00:46:07] I mean, if there's an issue, obviously they can amend their site plan to address
[00:46:07 - 00:46:11] that the same goes for if there are, you know, like I brought up the,
[00:46:11 - 00:46:13] the vegetative buffer kind of thing where I would like to see that.
[00:46:14 - 00:46:17] Um, if there's a mitigation, and I spoke to Chuck early about this,
[00:46:17 - 00:46:20] if there's a mitigation measure that's required as a condition of the
[00:46:20 - 00:46:25] project kind of thing, um, they would have to honor that mitigation,
[00:46:25 - 00:46:29] even if the site plan as proposed that before us currently doesn't allow for
[00:46:29 - 00:46:32] that. So they would have to basically amend their site plan to allow for
[00:46:32 - 00:46:35] mitigation. Um, right.
[00:46:35 - 00:46:38] And the same goes for, I guess, the whole thing with the building.
[00:46:38 - 00:46:46] So I, the way that it works for us, if someone is applying for a building
[00:46:46 - 00:46:49] permit under an existing use permit, we look at what's allowed under the
[00:46:49 - 00:46:52] use permit, right? So if it's substantially different from what's
[00:46:52 - 00:46:55] allowed on paper, then they would require an amendment.
[00:46:55 - 00:46:58] So if they were to come in and want additional buildings associated with
[00:46:58 - 00:47:03] this, um, as I understand it, it would require an amendment to the use
[00:47:03 - 00:47:07] permit, um, just because it was clarified that there was no building
[00:47:07 - 00:47:12] associated with this proposed use other than the rest room and the existing

[00:47:12 - 00:47:15] storage building, that's on site. So I guess that's my thing.
[00:47:15 - 00:47:19] Um, I guess one other thing too, I did speak with a B about the,
[00:47:19 - 00:47:22] the traffic and we did, I mean, basically go over and say,
[00:47:22 - 00:47:26] there's no need at this point with what the proposed, um, traffic is for
[00:47:26 - 00:47:32] traffic, um, impact study, but the mitigations and anything that would,
[00:47:32 - 00:47:36] we would review through the environmental review would be, um,
[00:47:36 - 00:47:40] would very likely be adequate, um, to address those potential issues.
[00:47:41 - 00:47:44] Um, so we wouldn't require anything additional on the part of the
[00:47:44 - 00:47:48] applicant at this point. So there's nothing traffic wise that we see
[00:47:48 - 00:47:50] keeping us from determining it complete today.
[00:47:55 - 00:48:00] I think I'm, I am going to add, um, conditions for both the firewater
[00:48:00 - 00:48:04] and the roads, the roads within the parcel,
[00:48:04 - 00:48:10] the that they meet 1530 before operation.
[00:48:12 - 00:48:15] Yeah. And we'll have another technical advisory committee meeting for this
[00:48:15 - 00:48:16] item for the environmental review.
[00:48:16 - 00:48:17] Okay. Yeah.
[00:48:19 - 00:48:22] Maybe did you, you know, I mean, they already said it, uh,
[00:48:22 - 00:48:27] we'll review the mitigations and the encroachments for all the assets.
[00:48:27 - 00:48:34] We have to also track the assets that they will be using both sides of the
[00:48:34 - 00:48:37] property.
[00:48:37 - 00:48:39] I know there were some other public comments back then.
[00:48:39 - 00:48:41] I wanted to give you an opportunity to be heard.
[00:48:44 - 00:48:47] Could you please come to the microphone so our zoomers can hear you.
[00:48:56 - 00:48:59] My name is Linda Woodhouse and, um,
[00:49:00 - 00:49:05] I know you're just checking to see if the application is complete.
[00:49:06 - 00:49:07] But what if it's false?
[00:49:10 - 00:49:11] And it'll be addressed when we,
[00:49:12 - 00:49:15] we get to the planning commission point, correct?
[00:49:15 - 00:49:18] Or when the plan comes, if any of their plans come under review,
[00:49:18 - 00:49:22] if it's clearly false, I mean,
[00:49:22 - 00:49:27] if we can see with our own two eyes that it's inaccurate,
[00:49:28 - 00:49:32] it's still damped as complete.
[00:49:33 - 00:49:35] You're referring to that.
[00:49:35 - 00:49:40] What I can say is probably 95 or maybe more percent of the applications we
[00:49:40 - 00:49:43] get have that exact same notation on them.
[00:49:43 - 00:49:46] And we, we do the environmental review based on what's actually

going to
[00:49:46 - 00:49:50] happen with the project and not put on that sheet of paper.
[00:49:50 - 00:49:54] It's required of us by the California Environmental Quality Act and not
[00:49:55 - 00:49:58] to follow just what's on the, what's on the application is to follow
[00:49:58 - 00:50:01] what the project project impacts really will be.
[00:50:02 - 00:50:06] Well, I'm not talking, I'm, I don't, I don't want to be
[00:50:06 - 00:50:11] obstinate here, but I'm not talking about the impacts or I'm talking about
[00:50:11 - 00:50:15] if he's lying on his application.
[00:50:16 - 00:50:22] So mitigation measures and conditions of rule will be based on
[00:50:22 - 00:50:24] what the applicant is requesting.
[00:50:25 - 00:50:29] And they can't go beyond that without amending the youth permit.
[00:50:31 - 00:50:37] We're issues with other buildings or use of the property that's not
[00:50:37 - 00:50:39] consistent with what's approved by the planning commission.
[00:50:40 - 00:50:42] And there is a revocation process for the permit.
[00:50:43 - 00:50:50] OK, I wasn't prepared to really get into this, but it seems to me that
[00:50:50 - 00:50:57] Dave pointed out that there were things on the application marked no
[00:50:57 - 00:51:03] impact when, or no, when actually they in reality are yes.
[00:51:03 - 00:51:12] And it just, it seems like you could put a proposal in and give
[00:51:12 - 00:51:18] inaccurate information and you could stamp it as a complete application.
[00:51:22 - 00:51:25] I mean, essentially we treat it like a building application, right?
[00:51:25 - 00:51:28] People come in, they submit plans and what we have in front of us, we,
[00:51:29 - 00:51:30] that is what ends up being permitted.
[00:51:30 - 00:51:33] If they go out and build something that doesn't adhere to the plans,
[00:51:33 - 00:51:35] then it would be code enforcement, essentially.
[00:51:35 - 00:51:37] So you take it at face value.
[00:51:37 - 00:51:38] Correct. Yeah.
[00:51:38 - 00:51:41] And it's yeah, we can only engage in application based on what's before us.
[00:51:41 - 00:51:43] Yeah, you letting me van.
[00:51:43 - 00:51:47] Sure. But and OK, thank you.
[00:51:47 - 00:51:48] And I do want to comment too.
[00:51:48 - 00:51:52] So when we do conduct the environmental review, we do take a variety
[00:51:52 - 00:51:57] of different sources from government websites, other inventories and things.
[00:51:57 - 00:51:58] Professor, you go out and look.
[00:51:59 - 00:52:00] Sure. Yeah.
[00:52:00 - 00:52:01] And yeah. OK. Yeah.

[00:52:02 - 00:52:06] It would one look would be, in my opinion, all it would take.
[00:52:08 - 00:52:11] And I would say if you have a specific concern, you're welcome to
[00:52:11 - 00:52:14] put that into the project record and it would be addressed through the
[00:52:14 - 00:52:17] environmental review, if there's something specific that you would like to be
[00:52:17 - 00:52:19] all right. OK.
[00:52:19 - 00:52:20] Well, it's not I'm sorry.
[00:52:20 - 00:52:23] It's not unusual for a project application to say there's no impact,
[00:52:23 - 00:52:27] but the environmental review that we do determines really whether there is
[00:52:27 - 00:52:29] an impact or not. Thank you.
[00:52:29 - 00:52:51] You're welcome. Anyone else?
[00:52:51 - 00:52:55] I kind of skipped over it, but I'd like some clarification about how these
[00:52:55 - 00:52:58] bodies are going to be prepared and put in the ground.
[00:52:59 - 00:53:05] Are they going to be in caskets?
[00:53:05 - 00:53:10] And I think there's a paragraph and I'm not sure what page it is when they
[00:53:10 - 00:53:12] talk about handling the body.
[00:53:27 - 00:53:30] So I did do a sub reading when I was reviewing this application because this
[00:53:30 - 00:53:33] is the first cemetery application I processed.
[00:53:33 - 00:53:39] And there are standards from the was it the department, the cemetery
[00:53:39 - 00:53:46] bureau and they do have limited, I guess, regulations, but they do allow
[00:53:46 - 00:53:50] for a variety of different ways of, you know, writing it.
[00:53:52 - 00:53:57] And the majority of the regulations from the funeral bureau that I found
[00:53:57 - 00:54:02] are related to documentation of the bodies and just making sure that
[00:54:02 - 00:54:04] everything the documentation is in line.
[00:54:04 - 00:54:10] But obviously they these this applicant would be required to register
[00:54:10 - 00:54:14] in everything with the was it the cemetery bureau.
[00:54:14 - 00:54:19] It's CFB, State Cemetery Board.
[00:54:19 - 00:54:20] I think that's what it is.
[00:54:20 - 00:54:23] Now that that is like a government registration process and they would
[00:54:23 - 00:54:26] have to adhere to whatever regulations they have for that.
[00:54:26 - 00:54:30] I did want to note that there is a page in the application.
[00:54:31 - 00:54:32] Sorry, I did not know where the pages.
[00:54:33 - 00:54:33] Step on the screen.
[00:54:34 - 00:54:39] Yeah, it is up on the screen and they do have specific, I guess,

procedures.
[00:54:41 - 00:54:44] Generally speaking, it would be defined as essentially a green burial.
[00:54:44 - 00:54:49] So there's like, I know, because I spoke with Environmental Health about, you
[00:54:49 - 00:54:54] know, there's always potentials from embalming fluid for, you know, was it
[00:54:54 - 00:54:55] contamination of wastewater?
[00:54:55 - 00:55:00] That's one of the big concerns with funerals usually or yeah, the
[00:55:00 - 00:55:05] contamination of groundwater from the fluids that they use for embalming.
[00:55:05 - 00:55:07] And that would not be in this case.
[00:55:07 - 00:55:14] So the conditions of approval would limit the manner of preparation
[00:55:14 - 00:55:16] of bodies to what was proposed in the application.
[00:55:17 - 00:55:21] So that would, I mean, if they did at some point, if someone were
[00:55:21 - 00:55:24] to buy the property and they wanted to repair the bodies differently, they would
[00:55:24 - 00:55:28] have to adhere to whatever was in this application unless they obtained it.
[00:55:28 - 00:55:33] Clearly states there in the last sentence, shrouded body is either either taken
[00:55:33 - 00:55:39] out of the casket or in some cases kept in the casket and lowered into the
[00:55:39 - 00:55:43] grave, which that means to me they're taking it out of the casket and
[00:55:43 - 00:55:45] lower into the grave wrapped in a shroud.
[00:55:46 - 00:55:49] As long as that's a legal means of burial in the state of California,
[00:55:49 - 00:55:50] then we'd have to honor that.
[00:55:51 - 00:55:53] It's legal in California to do that.
[00:55:53 - 00:55:53] Yes.
[00:55:54 - 00:55:54] Okay.
[00:55:54 - 00:55:58] And my question would be you'd have to do groundwater samples and.
[00:55:59 - 00:56:02] And I believe they did supply that with the application.
[00:56:04 - 00:56:04] Thank you.
[00:56:13 - 00:56:15] I guess one more thing I did want to note.
[00:56:15 - 00:56:17] So the application would be forwarded as well and they would be
[00:56:17 - 00:56:21] under whatever regulation from the regional water quality control board
[00:56:21 - 00:56:23] regarding groundwater quality.
[00:56:23 - 00:56:24] Right.
[00:56:24 - 00:56:27] Cause I'll, yeah, as a, all projects as a responsible state
[00:56:27 - 00:56:32] agency, they would have an opportunity to work place conditions on it as well.
[00:56:39 - 00:56:42] You need to find it complete.

[00:56:42 - 00:56:45] But if it's incomplete, we'll have to prepare for deficiencies.
[00:56:48 - 00:56:50] We're moving forward to environmental review.
[00:56:50 - 00:56:51] If it's found, that would be the next step.
[00:56:52 - 00:57:02] Staff would prepare the sequel initial study, attack meeting and to do that
[00:57:02 - 00:57:05] review, and then it would go on to the planning commission unless the further
[00:57:05 - 00:57:06] environmental review was warranted.
[00:57:07 - 00:57:13] We'll make a motion to find the application complete to move forward
[00:57:13 - 00:57:14] to environmental review.
[00:57:14 - 00:57:15] Is the motion there?
[00:57:15 - 00:57:16] Is there a second?
[00:57:18 - 00:57:18] Second.
[00:57:18 - 00:57:20] Second, all in favor?
[00:57:21 - 00:57:22] Finding the application complete.
[00:57:23 - 00:57:23] Aye.
[00:57:24 - 00:57:29] The application is found complete and we will move forward to the study.

Exhibit 2-F

Submitted in connection with Use Permit UP-22-2-3, County of Amador

Transcript — Amador County Technical Advisory Committee

Meeting of June 11, 2026

Source: Machine transcription of Amador County's published meeting audio. **Not an official County transcript.** Amador County produces no written TAC minutes; the audio recording is the sole official record. Verify every quotation against the recording at the cited timestamp before entering it into the administrative record.

Timestamps are shown as [HH:MM:SS - HH:MM:SS] and refer to elapsed time in the audio file.

[00:00:28 - 00:00:29] the technical advisory committee.
[00:00:29 - 00:00:33] If I am a business of correspondence, do we have any,
[00:00:33 - 00:00:38] do we receive any correspondence with the agenda package?
[00:00:38 - 00:00:41] Yes, we did receive several items of correspondence
[00:00:41 - 00:00:43] after the publishing of the agenda.
[00:00:43 - 00:00:45] Those items have been provided to the tech members
[00:00:45 - 00:00:47] and are also available in the back of the room.
[00:00:47 - 00:00:50] Thank you.
[00:00:50 - 00:00:52] Second item would be public matters and persons wishing
[00:00:52 - 00:00:54] to address the committee on non-agenda items.
[00:00:54 - 00:01:13] Is there anyone to the regular agenda?
[00:01:13 - 00:01:19] There's a parcel map number 2935 proposing the division
[00:01:19 - 00:01:23] of one legal parcel of 33 acres and to three parcels of five,
[00:01:23 - 00:01:26] 5.6 and 22.9 acres.
[00:01:26 - 00:01:29] The parcel split zone between single family residents on Ag
[00:01:29 - 00:01:33] and the T2 mobile home park slash camp district.
[00:01:33 - 00:01:35] The general plan designation is Ag transition
[00:01:35 - 00:01:36] with a five to 20 acre minimum.
[00:01:36 - 00:01:40] The APN is zero zero, excuse me, zero one one two seven zero
[00:01:40 - 00:01:42] zero zero one.
[00:01:42 - 00:01:43] The applicant is the Smith Family Trust

[00:01:43 - 00:01:46] represented by Toman Associates
[00:01:46 - 00:01:48] and the project specifically located
[00:01:48 - 00:01:56] in Supervive and Jackson.
[00:01:56 - 00:02:00] I don't have much to add to that, but I did want to clarify
[00:02:00 - 00:02:03] because there was one question posed
[00:02:03 - 00:02:06] that the proposed use of the property
[00:02:06 - 00:02:08] if the subdivision is approved is
[00:02:08 - 00:02:10] for single family residential use,
[00:02:10 - 00:02:13] even with the T2 zoning.
[00:02:13 - 00:02:17] A use permit for a trailer Parker camping district
[00:02:17 - 00:02:19] has not been applied for.
[00:02:19 - 00:02:22] And if the attendant map is approved
[00:02:22 - 00:02:23] up to two single family dwellings
[00:02:23 - 00:02:26] would be allowed per parcel for a proposed total
[00:02:26 - 00:02:29] or a potential total of six single family dwellings.
[00:02:29 - 00:02:31] And today we are revealing the application
[00:02:31 - 00:02:35] for completeness.
[00:02:35 - 00:02:37] Discussion items from the committee
[00:02:37 - 00:02:48] regarding the completeness of the application.
[00:02:48 - 00:02:51] Are they sticking with the existing driveway?
[00:02:53 - 00:02:56] I may refer to Toma the representative,
[00:02:56 - 00:02:57] but is my understanding they are using
[00:02:57 - 00:03:01] the existing driveway.
[00:03:01 - 00:03:02] Good afternoon, Matt Toma with Toman Associates.
[00:03:02 - 00:03:05] Yes, Wheat Road was built from up.
[00:03:05 - 00:03:08] There was a parcel map done on the west side
[00:03:08 - 00:03:10] of Wheat Road just a few years ago.
[00:03:10 - 00:03:12] So that's a newly constructed road.
[00:03:12 - 00:03:16] Existing parcel one and proposed, excuse me,
[00:03:16 - 00:03:18] existing parcel one with an existing home
[00:03:18 - 00:03:20] off it takes access off that now.
[00:03:22 - 00:03:25] Their proposed parcel three with an existing home on it
[00:03:25 - 00:03:28] will come off of Sunset Drive
[00:03:28 - 00:03:30] that the old highway basically
[00:03:30 - 00:03:32] that the access is down in there.
[00:03:32 - 00:03:35] And the proposed parcel two will also take off
[00:03:35 - 00:03:50] of that Wheat Road that newly constructed road.
[00:03:50 - 00:04:00] Discussion on completeness of the application.
[00:04:00 - 00:04:05] Committee for either find the application complete
[00:04:05 - 00:04:15] or in motion a second to find the application complete.
[00:04:15 - 00:04:16] All in favor?
[00:04:16 - 00:04:17] Aye.
[00:04:17 - 00:04:18] Aye.

[00:04:18 - 00:04:20] All opposed?
[00:04:20 - 00:04:21] It's complete.
[00:04:21 - 00:04:22] And we'll move on with environmental review.
[00:04:22 - 00:04:28] Thanks.
[00:04:28 - 00:04:31] Go on to item two, which is a request for a youth permit
[00:04:31 - 00:04:33] for gardens of Norris Cemetery proposing
[00:04:33 - 00:04:36] a hunt 1,832 graves sites divided
[00:04:36 - 00:04:39] among seven blocks on the north end of the property,
[00:04:39 - 00:04:42] which is a 46 acre parcel zone,
[00:04:42 - 00:04:43] single family residential and ag
[00:04:43 - 00:04:47] has a minimal resources and our plan designation.
[00:04:47 - 00:04:50] The proposed improvements included driveway parking
[00:04:50 - 00:04:51] for up to 100 areas of parking lot
[00:04:51 - 00:04:55] with 64 permanent spaces and permanent restrooms.
[00:04:55 - 00:04:58] Proposed number of funeral 60 per month
[00:04:58 - 00:05:00] with a limit of 50 attendees per event.
[00:05:00 - 00:05:03] The application is Munir Kedira.
[00:05:03 - 00:05:07] The parcel was located in Supervisorial District Fry
[00:05:07 - 00:05:08] specifically at eight five seven
[00:05:08 - 00:05:11] Carpondale Road outside of I own.
[00:05:11 - 00:05:13] Today, the technical advisory committee
[00:05:13 - 00:05:15] will review the project application,
[00:05:15 - 00:05:17] the sequel initial study and make recommendations
[00:05:17 - 00:05:19] regarding the environmental document
[00:05:19 - 00:05:26] and conditions of approval to the planning commission.
[00:05:26 - 00:05:28] So I mean, as far as the environmental,
[00:05:28 - 00:05:30] we have two documents before us
[00:05:30 - 00:05:32] is the draft conditions of approval
[00:05:32 - 00:05:34] and which include mitigation monitoring
[00:05:34 - 00:05:37] and program and those mitigations are taken
[00:05:37 - 00:05:40] from the process that staff took to go through
[00:05:40 - 00:05:42] the initial study where we went chapter by chapter,
[00:05:42 - 00:05:47] essentially looking at the standard categories
[00:05:47 - 00:05:50] that projects are reviewed for environmental.
[00:05:50 - 00:05:53] So we can start I would say with the conditions of approval,
[00:05:53 - 00:05:54] we can review those.
[00:05:54 - 00:05:57] And then if anyone has any questions about those conditions,
[00:05:57 - 00:06:00] we can defer back to the initial study.
[00:06:01 - 00:06:06] And then if there are any, I guess categories
[00:06:06 - 00:06:12] or fields that anyone feels that we're not adequately
[00:06:12 - 00:06:14] mitigated for, we can bring those up as well
[00:06:14 - 00:06:16] and address those separately.
[00:06:16 - 00:06:18] Before we get started on going through those conditions,

[00:06:18 - 00:06:21] though I do see that Munir is here
[00:06:21 - 00:06:22] and he is the applicant for the project.
[00:06:22 - 00:06:25] So I didn't know if you wanted to speak.
[00:06:26 - 00:06:30] If you do, do you want to raise your hand or unmute?
[00:06:30 - 00:06:31] Okay, go ahead.
[00:06:31 - 00:06:37] I see you're unmuted.
[00:06:37 - 00:06:39] I think you're unmuted.
[00:06:39 - 00:06:40] Hello, everyone.
[00:06:40 - 00:06:44] I hope everything is okay with everyone.
[00:06:44 - 00:06:45] I hope everyone is doing well.
[00:06:45 - 00:06:48] I am just so anxious to hear your feedback
[00:06:48 - 00:06:50] so we can proceed with this.
[00:06:50 - 00:06:52] That's the only thing I have.
[00:06:52 - 00:06:54] Thank you.
[00:06:54 - 00:06:55] Well, thank you.
[00:06:56 - 00:06:57] If we have any questions,
[00:06:57 - 00:06:59] we can direct them to Munir as well.
[00:06:59 - 00:07:00] Okay, thank you.
[00:07:00 - 00:07:01] I guess, yeah.
[00:07:01 - 00:07:04] So I believe this is the first time
[00:07:04 - 00:07:05] you may be seeing this document too,
[00:07:05 - 00:07:07] because this is a draft.
[00:07:07 - 00:07:10] So customarily this meeting is for us
[00:07:10 - 00:07:12] to determine what kind of conditions
[00:07:12 - 00:07:13] would be adequate for the project.
[00:07:13 - 00:07:16] In general, planning does put together
[00:07:16 - 00:07:21] a draft document that has a lot of boilerplate language
[00:07:22 - 00:07:25] standard mitigations that are determined necessary
[00:07:25 - 00:07:28] for pretty much any discretionary project.
[00:07:28 - 00:07:31] And then there are a few specific to this project
[00:07:31 - 00:07:32] that I can highlight.
[00:07:32 - 00:07:37] Let me first figure out how to share this screen
[00:07:37 - 00:07:38] so that you have it.
[00:07:38 - 00:07:41] And you have the screen in front of you, right Munir?
[00:07:41 - 00:07:42] Sorry, I'm muted again.
[00:07:42 - 00:07:44] I will assume that you do.
[00:07:44 - 00:07:45] You are able to see the screen.
[00:07:45 - 00:07:47] Yes, I can see it.
[00:07:47 - 00:07:50] All right, so there we are.
[00:07:50 - 00:07:53] Obviously this is the wrong project.
[00:07:54 - 00:08:11] For your patience.
[00:08:11 - 00:08:13] The primary, the first conditions of approval,
[00:08:13 - 00:08:14] these are standard.

[00:08:14 - 00:08:16] This is the FISH and GAME fee.
[00:08:16 - 00:08:19] That's a fee that's required from FISH and Wildlife
[00:08:19 - 00:08:20] upon approval of any permit.
[00:08:20 - 00:08:24] So that would need to be met upon approval.
[00:08:24 - 00:08:27] Submit conditions that is standard.
[00:08:27 - 00:08:29] And then of course that the use permit
[00:08:29 - 00:08:32] is limited to those uses that are applied for
[00:08:32 - 00:08:33] through this application.
[00:08:34 - 00:08:39] And obviously it is contingent on the continued compliance
[00:08:39 - 00:08:41] with all the provisions of the conditions of approval
[00:08:41 - 00:08:45] and any other applicable codes or regulations
[00:08:45 - 00:08:47] from any applicable agencies.
[00:08:49 - 00:08:51] Building permits, this is standard.
[00:08:51 - 00:08:54] There is no building aside from a single storage building
[00:08:54 - 00:08:56] proposed through this application.
[00:08:56 - 00:08:58] Obviously you would need to obtain building permits
[00:08:58 - 00:08:59] for that.
[00:08:59 - 00:09:01] Any additional buildings that are proposed through this project
[00:09:01 - 00:09:03] would require an amendment to the use permit.
[00:09:03 - 00:09:06] So it is only limited to that one building
[00:09:06 - 00:09:08] that's proposed.
[00:09:08 - 00:09:10] Waste disposal, so this is standard,
[00:09:10 - 00:09:13] a will serve statement from the solid waste disposal
[00:09:13 - 00:09:16] service that is a standard condition
[00:09:16 - 00:09:20] just for any trash service be taken care of.
[00:09:20 - 00:09:21] And that would be on the responsibility
[00:09:21 - 00:09:22] of the property owner.
[00:09:24 - 00:09:26] Oh, so public access to the property
[00:09:26 - 00:09:28] shall be limited sunrise to sundown.
[00:09:28 - 00:09:32] That was a proposed days and hours of operation.
[00:09:32 - 00:09:35] I believe it was seven days a week.
[00:09:35 - 00:09:39] But again, obviously that is in response to any need
[00:09:39 - 00:09:42] but the maximum would be, I think I didn't include it here
[00:09:42 - 00:09:45] but it's included in the description.
[00:09:45 - 00:09:50] So it's up to two events daily with up to 50 attendees per.
[00:09:51 - 00:09:52] So that would be a maximum attendance
[00:09:52 - 00:09:54] of 100 guests on site.
[00:09:54 - 00:09:56] So that would be a hard limit
[00:09:57 - 00:09:59] just to limit the intensity of those events
[00:09:59 - 00:10:02] that take place on site.
[00:10:02 - 00:10:04] Temporary storage of human remains.
[00:10:04 - 00:10:08] So because this is a cemetery consistent with the application
[00:10:08 - 00:10:10] that no human remains will be stored on site

[00:10:10 - 00:10:12] and no preparation of human remains will take place
[00:10:12 - 00:10:15] on site, hermains shall be transported directly
[00:10:15 - 00:10:17] to the site for internment on the same day.
[00:10:17 - 00:10:19] So that means if people are being brought in
[00:10:19 - 00:10:21] for a funeral, they would need to be buried the same day
[00:10:21 - 00:10:24] because there's no accommodation for storage of anybody.
[00:10:25 - 00:10:29] Overnight, that's the internment of human remains.
[00:10:29 - 00:10:33] This is an additional kind of expansion on that basically
[00:10:33 - 00:10:36] as proposed by the applicant.
[00:10:36 - 00:10:37] It's considered a green burial
[00:10:37 - 00:10:40] which means that there's no embalming fluid
[00:10:40 - 00:10:42] and that the fully decomposable materials
[00:10:42 - 00:10:44] be utilized with the exception.
[00:10:44 - 00:10:47] I noticed that they did have allowance for caskets
[00:10:47 - 00:10:48] in some specific cases.
[00:10:50 - 00:10:54] The burial sites shall consist of the vaulted chambers
[00:10:54 - 00:10:56] as proposed with the bodies laid and as exhibited
[00:10:56 - 00:10:58] in the project application.
[00:10:58 - 00:11:00] So no embalming fluids may be used
[00:11:00 - 00:11:02] in the preparation of the bodies intern on the site.
[00:11:02 - 00:11:06] The reason for that is because primary,
[00:11:06 - 00:11:11] a lot of I guess environmental concerns from cemeteries
[00:11:11 - 00:11:14] are based around embalming fluid
[00:11:14 - 00:11:16] and potential contamination of embalming fluid.
[00:11:16 - 00:11:20] In this case, because this condition is present,
[00:11:20 - 00:11:21] that would limit that use.
[00:11:21 - 00:11:25] So we would not need to evaluate the presence
[00:11:25 - 00:11:28] of embalming fluids and potential contamination
[00:11:28 - 00:11:29] from those fluids.
[00:11:30 - 00:11:33] Thus simplifying the environmental in that sense.
[00:11:34 - 00:11:37] Obviously, if this were to be proposed to be changed
[00:11:37 - 00:11:40] or if at some point the applicant wanted
[00:11:40 - 00:11:42] to expand those uses,
[00:11:44 - 00:11:46] they would need an amendment to the use permit.
[00:11:46 - 00:11:48] I do see your hand is raised, Vanir.
[00:11:48 - 00:11:51] You can go ahead and unmute and go ahead.
[00:11:51 - 00:11:54] Yes, in a few cases,
[00:11:54 - 00:11:59] we would get some cases where the bodies is embalmed
[00:11:59 - 00:12:04] at the facilities used by the Air Force or the Army.
[00:12:06 - 00:12:11] Would we be able to bury in that space
[00:12:11 - 00:12:14] in case that happens?
[00:12:14 - 00:12:16] Because we have a concern.
[00:12:16 - 00:12:17] Not with the way that the conditions

[00:12:17 - 00:12:19] are currently created.
[00:12:19 - 00:12:21] Because I think from what I understand again,
[00:12:21 - 00:12:23] I mean I'm not the environmental health specialist
[00:12:23 - 00:12:26] or the water quality control board,
[00:12:26 - 00:12:28] but I believe that special accommodations
[00:12:28 - 00:12:30] would need to be made in the case
[00:12:30 - 00:12:33] that embalming fluid be at onsite.
[00:12:33 - 00:12:35] So if that is a need,
[00:12:37 - 00:12:41] we would need to have some time to evaluate that
[00:12:41 - 00:12:45] as far as increased environmental.
[00:12:45 - 00:12:46] Okay.
[00:12:46 - 00:12:50] And nowadays most, if not all,
[00:12:51 - 00:12:56] embalming places, they use environment-friendly
[00:12:56 - 00:12:59] substances because they're aware of the formaldehyde
[00:12:59 - 00:13:03] as well as the mercury that seeps into the soil.
[00:13:03 - 00:13:08] So do I need to talk to you about it later on
[00:13:09 - 00:13:12] or how is that gonna be taken care of?
[00:13:12 - 00:13:13] I mean, we can talk about it now
[00:13:13 - 00:13:14] because it's on record.
[00:13:14 - 00:13:17] That way we kind of know what to do going forward.
[00:13:17 - 00:13:19] I mean, because from what I was aware
[00:13:19 - 00:13:20] of the application it specified
[00:13:20 - 00:13:22] that there wasn't going to be any embalming fluid.
[00:13:22 - 00:13:25] So if that needs to be changed in the project description,
[00:13:27 - 00:13:30] I mean, so that's pretty solid
[00:13:30 - 00:13:32] that you do want to have that as an option
[00:13:32 - 00:13:34] as far as the project goes?
[00:13:34 - 00:13:39] Well, no, I would deter people from that.
[00:13:39 - 00:13:41] But again, there are some special cases
[00:13:41 - 00:13:43] where people from the Air Force,
[00:13:43 - 00:13:48] from the Army, they would want to come to that.
[00:13:49 - 00:13:50] That's a matter of course,
[00:13:50 - 00:13:55] but then we, I don't know if we can reject it
[00:13:55 - 00:13:57] or we can send them somewhere else.
[00:13:57 - 00:14:01] So I need your feedback on that.
[00:14:01 - 00:14:05] Sounds like Edward Casca is in a sealed vault in that case.
[00:14:05 - 00:14:09] Uh-huh, that's interesting, beautiful.
[00:14:09 - 00:14:11] Thank you.
[00:14:11 - 00:14:14] I mean, we can definitely look into adding that
[00:14:14 - 00:14:19] as a condition that if, you know,
[00:14:19 - 00:14:21] that is to take place on site.
[00:14:21 - 00:14:23] But I mean, I would be more comfortable
[00:14:24 - 00:14:29] reviewing that with environmental health.

[00:14:29 - 00:14:30] The Cemetery Board,
[00:14:30 - 00:14:33] because here before the Cemetery Board had no comment.
[00:14:33 - 00:14:35] Yeah, but that was with the understanding
[00:14:35 - 00:14:37] that there wasn't going to be this aspect.
[00:14:37 - 00:14:42] So we can all mark that on mine,
[00:14:43 - 00:14:45] that we will follow up,
[00:14:45 - 00:14:47] which means that this may come back to tack.
[00:14:48 - 00:14:50] I would assume it would for environmental
[00:14:50 - 00:14:53] to address specifically that aspect.
[00:14:55 - 00:14:58] And then, Muneer, I would say, I mean,
[00:14:58 - 00:15:00] as far as your options, I mean,
[00:15:00 - 00:15:03] basically it's either you decide
[00:15:03 - 00:15:05] you don't want to include that in the application
[00:15:05 - 00:15:07] and then we don't have to evaluate it.
[00:15:07 - 00:15:09] You want to include it in a certain capacity
[00:15:09 - 00:15:10] and then we would want to, I guess,
[00:15:10 - 00:15:14] understand what steps you would take
[00:15:14 - 00:15:17] and if what Chuck presented, you know,
[00:15:17 - 00:15:21] if that would be what you would want to do in that case.
[00:15:21 - 00:15:22] And then on our end,
[00:15:22 - 00:15:24] we would see if that would adequately address
[00:15:24 - 00:15:26] potential environmental from that.
[00:15:30 - 00:15:33] So I mean, I'll just highlight that for now, I guess.
[00:15:33 - 00:15:35] In the meantime, we can move forward
[00:15:35 - 00:15:37] to reviewing the other conditions.
[00:15:38 - 00:15:40] And then I guess.
[00:15:40 - 00:15:45] Again, we can just simply reject any kind of case
[00:15:46 - 00:15:49] with embalming and then have them go somewhere else
[00:15:49 - 00:15:51] to other cemeteries.
[00:15:51 - 00:15:53] I mean, it's really up to you.
[00:15:54 - 00:15:58] Now, if later on the demand is too persistent
[00:15:58 - 00:16:01] on using our cemeteries, can we go ahead
[00:16:01 - 00:16:06] and proceed with an amendment or no?
[00:16:06 - 00:16:08] I mean, it would require an amendment
[00:16:08 - 00:16:12] to the use permit conditions if that were the case.
[00:16:12 - 00:16:16] But obviously, I mean, that's a fairly lengthy process.
[00:16:16 - 00:16:19] So I mean.
[00:16:19 - 00:16:22] It would delay moving the application forward
[00:16:22 - 00:16:23] to the planning commission
[00:16:23 - 00:16:27] because we'll have to evaluate that with,
[00:16:27 - 00:16:28] that ought to be part of the environmental review
[00:16:28 - 00:16:29] and then hasn't been.
[00:16:29 - 00:16:30] Yeah.

[00:16:30 - 00:16:34] And there's no way we couldn't defer that.
[00:16:34 - 00:16:35] Yeah.
[00:16:35 - 00:16:36] Okay.
[00:16:36 - 00:16:41] And based on the suggestion with a sealed steel casket,
[00:16:41 - 00:16:44] can that be a solution or still have to go
[00:16:44 - 00:16:48] through the environmental review for that?
[00:16:48 - 00:16:50] Well, us evaluating that as an option
[00:16:50 - 00:16:52] really part of that environmental review.
[00:16:52 - 00:16:53] So.
[00:16:53 - 00:16:54] Okay.
[00:16:54 - 00:16:55] Yeah.
[00:16:55 - 00:16:58] So either you want to put a hold on this
[00:16:58 - 00:17:00] and figure out if you want to include that
[00:17:00 - 00:17:02] and then we will do our environmental to determine
[00:17:02 - 00:17:04] what you would need to do
[00:17:05 - 00:17:10] if you wanted to have involved bodies on site
[00:17:10 - 00:17:12] or you go forward with the application as stated with
[00:17:12 - 00:17:14] and you would just not be able to take any bodies
[00:17:14 - 00:17:17] that have that are involved.
[00:17:17 - 00:17:18] Not on the amended use permit.
[00:17:18 - 00:17:20] Right.
[00:17:20 - 00:17:21] Yeah.
[00:17:21 - 00:17:26] We'll just go without it.
[00:17:26 - 00:17:27] Yeah.
[00:17:27 - 00:17:29] And I can put a note too in the condition
[00:17:29 - 00:17:31] that if this future needs changed,
[00:17:31 - 00:17:33] it would require an amendment from the use permit.
[00:17:33 - 00:17:34] All right.
[00:17:34 - 00:17:35] Thank you.
[00:17:35 - 00:17:38] So again, moving forward then,
[00:17:38 - 00:17:40] we got landscape materials and maintenance.
[00:17:40 - 00:17:42] So this is just in,
[00:17:42 - 00:17:44] it's consistent with your application.
[00:17:44 - 00:17:45] Basically, you said that you were going to be
[00:17:45 - 00:17:48] keeping it natural and that's with the natural plants
[00:17:48 - 00:17:51] and this is consistent with the biological,
[00:17:51 - 00:17:54] I guess resources that were mapped on site.
[00:17:54 - 00:17:57] So basically just if you were going to be
[00:17:57 - 00:17:58] changing landscaping,
[00:18:00 - 00:18:02] then you would just need to amend the use permit
[00:18:02 - 00:18:03] to allow for that.
[00:18:03 - 00:18:07] And then another condition is the Eagle's Nest
[00:18:07 - 00:18:08] airport overlay zone.

[00:18:08 - 00:18:10] So this property is located within the Eagle's Nest
[00:18:10 - 00:18:11] airport overlay zone,
[00:18:11 - 00:18:13] which limits developmental densities,
[00:18:13 - 00:18:16] building heights and incompatible uses.
[00:18:16 - 00:18:18] And then this project is located
[00:18:18 - 00:18:20] like about half a mile from the actual airport runway.
[00:18:20 - 00:18:24] Therefore, it's very much in that zone.
[00:18:24 - 00:18:27] So the owner would be required to obtain
[00:18:27 - 00:18:29] an navigation easement for the right to flight,
[00:18:29 - 00:18:31] exhaust noise, fumes, lights, vibrations,
[00:18:31 - 00:18:34] essentially letting any guests know anyone on site
[00:18:34 - 00:18:35] know that there is an active airport
[00:18:35 - 00:18:40] within the vicinity of the property.
[00:18:40 - 00:18:41] Basically a disclaimer.
[00:18:41 - 00:18:45] And then it does say that places of assembly
[00:18:45 - 00:18:47] are prohibited meaning that you would not be able
[00:18:47 - 00:18:50] to have any building or gatherings inside of a building.
[00:18:50 - 00:18:53] Yeah, so as such any funeral events associated
[00:18:53 - 00:18:56] with the property must take place outside of a building.
[00:18:57 - 00:18:58] So then these are the mitigation measures.
[00:18:58 - 00:19:00] So the way that they're written,
[00:19:00 - 00:19:02] that's the mitigation and then the chapter
[00:19:03 - 00:19:05] that's corresponding to the initial study.
[00:19:05 - 00:19:06] So if we have any questions on these ones,
[00:19:06 - 00:19:08] we can defer back to that greater document.
[00:19:09 - 00:19:12] The first being the commercial light and glare.
[00:19:12 - 00:19:15] This is an aesthetic mitigation.
[00:19:15 - 00:19:17] So this is just for lighting installations,
[00:19:17 - 00:19:19] basically saying that they need to be down when we're
[00:19:19 - 00:19:22] facing and then any nighttime lighting should be
[00:19:22 - 00:19:25] on motion sensor or automatic shutoffs.
[00:19:25 - 00:19:28] So you're not having too many lights going on
[00:19:28 - 00:19:30] after the facility is closed to the public
[00:19:30 - 00:19:32] or after 10 p.m.
[00:19:32 - 00:19:35] Whichever is later.
[00:19:35 - 00:19:39] Visual impact is another aesthetic mitigation.
[00:19:39 - 00:19:43] This is basically landscape buffers or some sort of screening
[00:19:43 - 00:19:46] along the residential bordering property lines.
[00:19:47 - 00:19:50] So I know that you did propose fencing along
[00:19:50 - 00:19:52] or I guess around the grave sites.
[00:19:52 - 00:19:55] So that would be consistent as long as they are opaque
[00:19:55 - 00:19:57] and actual colored, that kind of thing
[00:19:57 - 00:20:00] just to screen activities and any of the gatherings,

[00:20:01 - 00:20:05] movement of human remains, that kind of thing.
[00:20:05 - 00:20:10] So that it's not overtly visible to the property line.
[00:20:10 - 00:20:11] People from the property line.
[00:20:13 - 00:20:16] And then air quality best management practices moving on.
[00:20:16 - 00:20:19] That is an air quality best mitigation.
[00:20:19 - 00:20:22] This is a boilerplate just basically saying
[00:20:22 - 00:20:24] if you're going to be using heavily equipment
[00:20:24 - 00:20:26] or having people idling vehicles
[00:20:28 - 00:20:30] that they're limited to maximum of five minutes
[00:20:30 - 00:20:35] so that you're not exhaust fuming everybody.
[00:20:38 - 00:20:41] Moving on, this is the biological mitigation.
[00:20:41 - 00:20:44] So when we do the environmental,
[00:20:44 - 00:20:48] we do review for special status species onsite.
[00:20:48 - 00:20:52] And we use the Fish and Wildlife website
[00:20:52 - 00:20:54] to determine if there's habitats
[00:20:54 - 00:20:57] for any specific special status species.
[00:20:57 - 00:20:59] There were some in general,
[00:20:59 - 00:21:01] these mitigations are fairly standard.
[00:21:02 - 00:21:03] If you encounter the animals,
[00:21:03 - 00:21:09] not to disturb them and then avoid those animals when possible.
[00:21:10 - 00:21:13] So that's included as the biological mitigation.
[00:21:13 - 00:21:14] So that's one.
[00:21:14 - 00:21:19] And then for nesting birds and plants
[00:21:19 - 00:21:24] and then a plant survey depending on when
[00:21:24 - 00:21:28] and where the ground disturbing activity is taking place.
[00:21:28 - 00:21:30] And then there was a seasonal creek
[00:21:30 - 00:21:35] or I guess rivering habitat along the center of the property.
[00:21:36 - 00:21:40] That's outside of the area that's proposed to be disturbed.
[00:21:40 - 00:21:44] But just if any of the disturbance does end up nearing that,
[00:21:44 - 00:21:48] obviously you'd be subject to Fish and Wildlife regulation.
[00:21:48 - 00:21:51] Cultural resources, mitigations are standard.
[00:21:51 - 00:21:53] Obviously they do apply to if bodies are found
[00:21:53 - 00:21:55] that are not expected.
[00:21:56 - 00:21:58] And these are standard from our general plan.
[00:21:59 - 00:22:01] There is a restroom proposed on site.
[00:22:01 - 00:22:03] So I guess the restroom and the storage building
[00:22:03 - 00:22:06] are the only two structures proposed.
[00:22:07 - 00:22:10] And then this is just requiring that the sewage disposal
[00:22:10 - 00:22:13] for the restroom be permitted with environmental health.
[00:22:13 - 00:22:15] And that is sufficient capacity
[00:22:15 - 00:22:20] to deal with any of the effluent.
[00:22:20 - 00:22:21] Hazardous materials, upside and release.
[00:22:21 - 00:22:26] This is a standard commercial mitigation measure

[00:22:26 - 00:22:27] from our environmental health department.
[00:22:27 - 00:22:29] Basically, if you're going to be storing
[00:22:29 - 00:22:31] any sort of hazardous materials,
[00:22:31 - 00:22:35] including like gasoline, flammable fuels, that kind of thing,
[00:22:35 - 00:22:37] you just need to make sure you register with them
[00:22:37 - 00:22:39] and establish a hazardous materials business plan.
[00:22:39 - 00:22:41] Just, I believe it just lists
[00:22:41 - 00:22:43] where you're storing everything
[00:22:43 - 00:22:45] and then what the protocol is
[00:22:45 - 00:22:49] if there is a spill or something.
[00:22:49 - 00:22:51] Grading permits and erosion control,
[00:22:51 - 00:22:53] this is a standard mitigation requiring
[00:22:53 - 00:22:55] grading permits from our building department
[00:22:55 - 00:22:59] if you are going to be doing a ground-disturbing activity
[00:22:59 - 00:23:02] and then they will determine
[00:23:02 - 00:23:04] if an erosion control plan is needed
[00:23:04 - 00:23:08] based on the grading plans that are submitted to them.
[00:23:11 - 00:23:15] So this is kind of an overall condition,
[00:23:15 - 00:23:19] best management practices for internment of human remains.
[00:23:19 - 00:23:24] Again, I'm not an expert on burials,
[00:23:24 - 00:23:26] but this is basically saying that you will defer
[00:23:26 - 00:23:29] to the regulations of people who are experts.
[00:23:29 - 00:23:33] So that would be making sure you follow any regulations
[00:23:33 - 00:23:35] with the regional water quality control board
[00:23:35 - 00:23:38] regarding groundwater, distance from groundwater,
[00:23:38 - 00:23:41] distance from the water table for those burials
[00:23:41 - 00:23:46] and then environmental health too.
[00:23:46 - 00:23:48] But just, oh, and the state cemetery board.
[00:23:48 - 00:23:50] So making sure that you just adhere
[00:23:50 - 00:23:51] to any of those standard regulations
[00:23:51 - 00:23:53] regarding cemetery operations.
[00:23:53 - 00:23:55] And from what I understand, a lot of that is more
[00:23:55 - 00:23:58] of the administrative side of understanding
[00:23:59 - 00:24:01] who's where and making sure that all
[00:24:01 - 00:24:02] that documentation is taking place.
[00:24:02 - 00:24:05] And that's on the operator side, obviously.
[00:24:07 - 00:24:08] Moving on, noise buffers.
[00:24:08 - 00:24:10] So this kind of goes with the aesthetic buffer,
[00:24:10 - 00:24:13] basically saying that you're not gonna have
[00:24:13 - 00:24:14] that parking right near the property line.
[00:24:14 - 00:24:16] You're not gonna be having people gathering
[00:24:16 - 00:24:17] near the property line.
[00:24:17 - 00:24:20] That's going to be causing undue noise impacts

[00:24:20 - 00:24:23] to the property's adjacent.
[00:24:23 - 00:24:24] And from what I understand site plan,
[00:24:24 - 00:24:27] the parking is located set back
[00:24:27 - 00:24:30] with actually the grave sites between the property line
[00:24:30 - 00:24:31] and the parking area.
[00:24:31 - 00:24:33] So that wouldn't be a concern really,
[00:24:33 - 00:24:38] as far as cars impacting the property owner
[00:24:38 - 00:24:40] or properties nearby property owners.
[00:24:42 - 00:24:44] But gatherings too, you would wanna just make sure
[00:24:44 - 00:24:46] that everything is separated out
[00:24:46 - 00:24:48] and that there are efficient buffers
[00:24:48 - 00:24:52] to break up that noise if it is taking place.
[00:24:52 - 00:24:53] Fire protection services.
[00:24:53 - 00:24:55] This is a standard mitigation.
[00:24:55 - 00:24:57] It's the annexation to the community facilities
[00:24:57 - 00:25:00] district number 2006-1.
[00:25:00 - 00:25:01] This is something that you would have to follow up
[00:25:01 - 00:25:05] upon approval with AFPD.
[00:25:05 - 00:25:07] And it's just a different fire tax rate, I believe.
[00:25:10 - 00:25:11] Access and encroachments.
[00:25:11 - 00:25:15] This is, must maintain a primary access
[00:25:15 - 00:25:17] onto a county road and obtain
[00:25:17 - 00:25:19] all necessary encroachment permits.
[00:25:19 - 00:25:20] So, from what I understand,
[00:25:20 - 00:25:22] there is an existing encroachment
[00:25:22 - 00:25:24] onto the property from Lambert Road.
[00:25:24 - 00:25:27] That is, I know that a lot
[00:25:27 - 00:25:29] of the nearby property owners had concerns of that.
[00:25:29 - 00:25:32] This approval of project would be contingent
[00:25:32 - 00:25:35] on making sure that is improved to the standard
[00:25:35 - 00:25:36] that's acceptable to public works
[00:25:36 - 00:25:39] and you would obtain a commercial encroachment.
[00:25:39 - 00:25:42] So there would be required improvements made to that
[00:25:42 - 00:25:44] to make sure it's ready to accommodate
[00:25:44 - 00:25:46] the proposed traffic.
[00:25:46 - 00:25:49] In addition, there's a payment of traffic mitigation fees
[00:25:49 - 00:25:51] that were determined by the public works department
[00:25:51 - 00:25:56] to offset any road maintenance costs.
[00:25:56 - 00:25:57] And fire and life safety.
[00:25:57 - 00:25:59] So this one actually,
[00:25:59 - 00:26:00] I had a question for this one
[00:26:00 - 00:26:02] and unfortunately Ashley couldn't make it today
[00:26:02 - 00:26:04] but she did have comments that she submitted

[00:26:04 - 00:26:07] basically that are included as mitigation.
[00:26:07 - 00:26:11] Basically, fire and life safety ordinance,
[00:26:11 - 00:26:13] the applicant will be required to have all roads,
[00:26:13 - 00:26:15] gates and access ways on the property
[00:26:15 - 00:26:17] meet the 1530 standards.
[00:26:17 - 00:26:19] And any future buildings would require
[00:26:19 - 00:26:20] a fire water supply.
[00:26:20 - 00:26:24] So I did notice in the site plan that you proposed,
[00:26:24 - 00:26:27] Muneer, there's not sufficient,
[00:26:27 - 00:26:30] I guess room on the northern end of the property
[00:26:30 - 00:26:33] as it's shown for that road to meet 1530
[00:26:33 - 00:26:37] and then also for it to accommodate any road parking.
[00:26:37 - 00:26:39] Again, this is the internal road.
[00:26:41 - 00:26:45] So I think you'll probably want to review
[00:26:45 - 00:26:47] and revise that site plan
[00:26:47 - 00:26:49] because it would be required to be changed anyways
[00:26:49 - 00:26:52] to accommodate for 1530 standards.
[00:26:57 - 00:26:59] So as far as that goes,
[00:26:59 - 00:27:01] I mean, you'll definitely want to follow up
[00:27:01 - 00:27:04] with AFPD and determine exactly the distance
[00:27:04 - 00:27:07] that you need to depict on the plans
[00:27:07 - 00:27:11] and that would be required for when you actually start,
[00:27:11 - 00:27:13] if you were to actually start developing
[00:27:13 - 00:27:15] the property for this use,
[00:27:15 - 00:27:17] because the way that is shown,
[00:27:17 - 00:27:19] it looks like everything just needs to be shifted south
[00:27:19 - 00:27:21] to accommodate for that.
[00:27:21 - 00:27:26] I think that can be done based on what I saw
[00:27:26 - 00:27:27] of the property and what we evaluated
[00:27:27 - 00:27:30] for the areas that are already disturbed,
[00:27:30 - 00:27:33] there should be adequate room to do so.
[00:27:33 - 00:27:39] But we would want to see that before we move forward
[00:27:39 - 00:27:40] just to make sure that everything's consistent
[00:27:40 - 00:27:42] as far as you having an application
[00:27:42 - 00:27:45] that is adequately addressing the mitigations
[00:27:45 - 00:27:46] that are proposed.
[00:27:51 - 00:27:54] I guess we can move forward property access restrictions.
[00:27:54 - 00:27:57] So this is a specific condition for this property
[00:27:58 - 00:28:00] to minimize traffic impacts to nearby properties.
[00:28:00 - 00:28:03] The property owner and operator shall provide assurances
[00:28:03 - 00:28:05] that the Lambert Road entrance to the property
[00:28:05 - 00:28:08] only be accessed from Carbondale Road.
[00:28:08 - 00:28:10] So this includes notifying all guests

[00:28:10 - 00:28:12] that they will be required to navigate to the property
[00:28:12 - 00:28:14] along routes to avoid utilization of Maxwell Road,
[00:28:14 - 00:28:16] Clay Pit Road, and Mustang Alley.
[00:28:16 - 00:28:20] So those three roads are in the essentially
[00:28:20 - 00:28:22] Northern subdivision, the subdivision north
[00:28:22 - 00:28:24] of the property.
[00:28:24 - 00:28:26] So you want to avoid using those
[00:28:26 - 00:28:28] so that you are not impacting those roads
[00:28:28 - 00:28:32] through this use and thus negatively impacting
[00:28:32 - 00:28:33] surrounding property owners.
[00:28:33 - 00:28:36] So this is specific to this property
[00:28:36 - 00:28:37] just because of its location
[00:28:39 - 00:28:41] because I know that's a concern.
[00:28:43 - 00:28:46] So that means anytime you're publishing this property
[00:28:46 - 00:28:49] or I guess advertising it, you would want to make sure
[00:28:49 - 00:28:52] that people attending would know to not,
[00:28:52 - 00:28:54] to what to access the road specifically
[00:28:54 - 00:28:59] along Carbondale to Lambert.
[00:28:59 - 00:29:02] And then the sewage disposal and wastewater systems,
[00:29:02 - 00:29:06] that's standard because you have a restroom proposed
[00:29:06 - 00:29:08] and then the well water quality.
[00:29:08 - 00:29:09] This may need to be changed
[00:29:09 - 00:29:12] because if I want to understand there's AWA water service
[00:29:12 - 00:29:14] I don't think this is actually accurate.
[00:29:14 - 00:29:17] It might need to be rephrased today
[00:29:17 - 00:29:21] in the case that AWA services not.
[00:29:21 - 00:29:25] But anyways, so that's the conditions.
[00:29:25 - 00:29:29] I don't know if anyone has any questions or concerns
[00:29:29 - 00:29:33] but we can defer back to the Seguin initial study too.
[00:29:33 - 00:29:35] If anyone has comments.
[00:29:35 - 00:29:39] It sounds like the only potential condition
[00:29:39 - 00:29:42] will be the one for water service.
[00:29:42 - 00:29:45] AWA Environmental Health word of that lately
[00:29:45 - 00:29:58] it's either or they have a will serve lever from.
[00:29:58 - 00:30:02] So I'll note that and I will revise that subject
[00:30:02 - 00:30:05] to environmental standard language.
[00:30:05 - 00:30:07] And then I know that there was the other one
[00:30:07 - 00:30:11] where we were noting that if there's proposed changes
[00:30:11 - 00:30:14] to the method of I guess preserving bodies
[00:30:14 - 00:30:17] as in if there's embalming fluid
[00:30:17 - 00:30:18] or embalmed bodies proposed
[00:30:18 - 00:30:31] that would require an amendment.
[00:30:31 - 00:30:31] Thank you.

[00:30:31 - 00:30:38] There any questions?
[00:30:38 - 00:30:40] None from public then will fit.
[00:30:40 - 00:30:55] There are any questions from the public?
[00:30:55 - 00:30:55] Good morning.
[00:30:55 - 00:30:56] I'm sorry.
[00:30:56 - 00:30:57] Good afternoon.
[00:30:59 - 00:31:01] I appreciate the opportunity to comment.
[00:31:01 - 00:31:03] And I know it's been a lot of hard work
[00:31:03 - 00:31:05] for everybody in the planning department
[00:31:05 - 00:31:09] and appreciate the requirement for navigation easement.
[00:31:09 - 00:31:13] I think that's very fair if the project goes forward.
[00:31:13 - 00:31:14] We all know who you are
[00:31:14 - 00:31:15] but if you'd state your name.
[00:31:16 - 00:31:17] My name is David Wardall
[00:31:17 - 00:31:20] and I'm the airport manager and founder
[00:31:20 - 00:31:22] of the Eagles Nest Airport.
[00:31:22 - 00:31:25] And I sat on the planning commission for 12 years.
[00:31:25 - 00:31:30] So anyway, I have a lot of comments.
[00:31:32 - 00:31:37] I think overall looking at this project, it doesn't fit.
[00:31:37 - 00:31:39] It doesn't work and it will not work
[00:31:39 - 00:31:42] because it's a commercial operation
[00:31:42 - 00:31:44] and a rural ranch area.
[00:31:44 - 00:31:48] If you look at the major cemeteries in the county,
[00:31:48 - 00:31:50] they're all on state highways.
[00:31:50 - 00:31:55] For example, look at Sunset View Cemetery Highway 88.
[00:31:55 - 00:31:58] Look at the Catholic cemetery, it's on 104.
[00:31:58 - 00:32:01] All of the major cemeteries in this county,
[00:32:01 - 00:32:04] to the best of my knowledge, are on major state highways,
[00:32:04 - 00:32:08] not secondary, very minimal roads.
[00:32:08 - 00:32:10] We'll get to that a little bit later.
[00:32:11 - 00:32:14] The change in the property use and everything
[00:32:14 - 00:32:17] and a zoning change for commercial operation
[00:32:17 - 00:32:22] is unrealistic, unreasonable and hugely impacts
[00:32:22 - 00:32:27] the neighborhood well-being and the community atmosphere
[00:32:28 - 00:32:30] of the local community.
[00:32:30 - 00:32:32] And those are all things in the county code
[00:32:32 - 00:32:36] that are not acceptable for this project.
[00:32:36 - 00:32:38] We'll get to that later.
[00:32:40 - 00:32:45] Traffic, has anybody calculated how many cars a day
[00:32:45 - 00:32:49] or a month are gonna be at the funerals?
[00:32:49 - 00:32:53] It's between 6,000 trips in and 12,000 trips in
[00:32:53 - 00:32:58] and 6,000 trips out to 12,000 trips out per month.
[00:32:58 - 00:33:02] My observation here, these roads cannot handle it.

[00:33:02 - 00:33:07] The intersection at Carbondale and Lambert Road
[00:33:07 - 00:33:08] is a blind intersection.
[00:33:08 - 00:33:10] I slow down to 20 miles an hour
[00:33:10 - 00:33:12] going through that intersection.
[00:33:12 - 00:33:16] It is that and the safety
[00:33:17 - 00:33:21] they're gonna get property approval
[00:33:21 - 00:33:24] from the landowner on that corner to clear land
[00:33:24 - 00:33:27] and or put in a traffic signal.
[00:33:28 - 00:33:31] It's just very unsafe.
[00:33:31 - 00:33:33] How do you enforce this?
[00:33:33 - 00:33:38] Can local residents go observe the graveyard
[00:33:38 - 00:33:40] and count the number of parking cars?
[00:33:40 - 00:33:44] Park cars, I think you're gonna see 100 to 150 cars
[00:33:44 - 00:33:49] for a funeral with this type of religious activity, not 50.
[00:33:51 - 00:33:57] So I wanna see a condition or request a condition
[00:33:57 - 00:34:01] and the use permit that the local neighbors
[00:34:01 - 00:34:05] can enter the property during a funeral
[00:34:05 - 00:34:08] to count the cars and count the number of people
[00:34:08 - 00:34:10] because I know the planning department's
[00:34:10 - 00:34:11] not gonna be out there.
[00:34:11 - 00:34:13] We can videotape or whatever else,
[00:34:13 - 00:34:17] but my question is how are we gonna enforce it?
[00:34:17 - 00:34:18] And the second question,
[00:34:18 - 00:34:20] what happens if these limits are exceeded?
[00:34:20 - 00:34:32] Are we gonna revoke the use permit?
[00:34:32 - 00:34:35] It's very, very concerned.
[00:34:35 - 00:34:37] It's already been advised
[00:34:37 - 00:34:40] that the applicant wants to have amendments.
[00:34:40 - 00:34:41] And where does this end?
[00:34:41 - 00:34:43] Is this gonna be a mega operation?
[00:34:43 - 00:34:48] The original application had a 20,000 square foot mosque.
[00:34:49 - 00:34:52] Then it was revised to a 10,000 square foot mosque
[00:34:52 - 00:34:57] and it advised it'd be 1200 people for a mosque meeting.
[00:34:58 - 00:35:00] Okay, now the mosque is gone,
[00:35:00 - 00:35:02] but I'm looking out on the horizon.
[00:35:02 - 00:35:05] When is this gonna resurface?
[00:35:05 - 00:35:07] And it is a concern.
[00:35:07 - 00:35:11] This whole thing is a change in the character
[00:35:11 - 00:35:14] and lay of the land and use in this community.
[00:35:14 - 00:35:17] Commercial operation does not fit.
[00:35:17 - 00:35:22] The office was not listed in your discussion.
[00:35:22 - 00:35:25] You had a storage building and bathrooms,
[00:35:25 - 00:35:30] but I think the application also includes an office.

[00:35:30 - 00:35:32] Okay, a question is,
[00:35:32 - 00:35:36] are there will be outdoor speakers or prayers
[00:35:36 - 00:35:39] that will hit our neighborhood?
[00:35:39 - 00:35:40] I don't think so,
[00:35:40 - 00:35:48] but is that gonna be allowed in the future?
[00:35:48 - 00:35:51] The AWA, Amateur Water Agency has sent a letter
[00:35:51 - 00:35:53] that the, and I put in the pipeline.
[00:35:53 - 00:35:55] I had to get all the right away.
[00:35:55 - 00:35:57] I had to buy all the pipe.
[00:35:57 - 00:36:00] I had to dig all the trench and put it all in.
[00:36:00 - 00:36:03] That pipeline is a six inch line and it's limited to,
[00:36:05 - 00:36:10] I'd have to go, I think it's 35 connections on there
[00:36:11 - 00:36:15] because they figure two gallons per minute per connection,
[00:36:15 - 00:36:17] which is 70 gallons.
[00:36:17 - 00:36:22] And we have to have a residual of 500 GPM for fire flow.
[00:36:22 - 00:36:27] So when they added a mining operation
[00:36:27 - 00:36:30] in the granules plant out there,
[00:36:30 - 00:36:32] they went from a three quarter,
[00:36:32 - 00:36:35] five H by three quarters for the office,
[00:36:35 - 00:36:36] for office water.
[00:36:36 - 00:36:39] Now they're using water for their processing
[00:36:39 - 00:36:42] and what an inch and a half water meter in.
[00:36:42 - 00:36:46] And so we have a automatic cutoff on that.
[00:36:46 - 00:36:49] If the water level drops below a certain PSI,
[00:36:49 - 00:36:51] it shuts down and cuts off.
[00:36:51 - 00:36:53] We aren't even willing to do that here.
[00:36:53 - 00:36:56] The pipeline is at capacity.
[00:36:56 - 00:36:58] Now we spent a lot of money.
[00:36:58 - 00:37:04] We've drilled either eight or 10 wells on the property.
[00:37:04 - 00:37:07] Everything east of Lambert Road,
[00:37:07 - 00:37:10] the best well we got down to 700 feet
[00:37:10 - 00:37:13] was three quarter gallon a minute of water.
[00:37:13 - 00:37:16] Heavy concentration of iron and other minerals
[00:37:16 - 00:37:19] and it's not fit for human consumption.
[00:37:19 - 00:37:21] So go ahead and drill the well
[00:37:21 - 00:37:23] and have them spend the money,
[00:37:23 - 00:37:24] but they aren't gonna get water.
[00:37:24 - 00:37:26] You're with the fire department?
[00:37:27 - 00:37:29] Okay, I have a question for the fire department
[00:37:29 - 00:37:32] is typically if you don't have water,
[00:37:33 - 00:37:36] a source of supply of water are very limited,
[00:37:36 - 00:37:39] you have to have fire protection water
[00:37:39 - 00:37:42] of 1500 to 3000 gallons.

[00:37:42 - 00:37:45] Is that gonna be a requirement on this property?
[00:37:45 - 00:37:48] You have a garden hose if you have a fire,
[00:37:48 - 00:37:51] what's the fire department gonna do when they respond?
[00:38:05 - 00:38:08] And in reading the data submitted by the applicant,
[00:38:08 - 00:38:11] you can have up to three persons per grave,
[00:38:11 - 00:38:15] two adults and a child.
[00:38:15 - 00:38:17] Okay, I'm gonna go through a few things.
[00:38:17 - 00:38:20] I sent a letter, I'm gonna refer to my letter
[00:38:20 - 00:38:25] to the Amador County Planning Department dated May 3rd
[00:38:26 - 00:38:29] and a lot of these things.
[00:38:29 - 00:38:32] If you go to page one, item 17,
[00:38:32 - 00:38:37] on the questions of the assessment by the applicant,
[00:38:37 - 00:38:41] the change in existing features of lakes and land,
[00:38:41 - 00:38:45] they've removed a lot of protected oak trees.
[00:38:45 - 00:38:48] And if you look at that,
[00:38:50 - 00:38:54] that's a violation of California Public Resources Code,
[00:38:54 - 00:38:59] 21083.4 in California Fish and Game Section 1360 to 1372.
[00:39:03 - 00:39:07] Now, I sent data to the Planning Department
[00:39:07 - 00:39:10] and they have clear cut and graded and removed
[00:39:10 - 00:39:12] a lot of oak trees.
[00:39:12 - 00:39:15] Not a word said about it, nothing done
[00:39:15 - 00:39:20] and no action pertaining to the applicant
[00:39:21 - 00:39:23] for violation of those codes.
[00:39:23 - 00:39:24] And if you look at it in there,
[00:39:24 - 00:39:29] very carefully and study the Google Earth photo
[00:39:29 - 00:39:33] that the applicant supplied in the application package,
[00:39:33 - 00:39:37] the bottom three quarters of that land has oak trees.
[00:39:37 - 00:39:40] Yet his map that he had, the color map
[00:39:40 - 00:39:42] that's shown the bottom three quarters of that
[00:39:43 - 00:39:48] had only maybe the bottom third showing oak trees
[00:39:49 - 00:39:51] is what's there on the property.
[00:39:51 - 00:39:56] So again, it's in me, bogus data, bogus information
[00:39:57 - 00:40:00] being presented that is not true and correct
[00:40:00 - 00:40:14] of what's on the property.
[00:40:14 - 00:40:18] Item 19 on your checklist is the change in pattern,
[00:40:18 - 00:40:22] scale, character and general area of the project.
[00:40:22 - 00:40:26] This area is open ranch land and rural agriculture
[00:40:26 - 00:40:29] and it has MRZ mining with some mining operations.
[00:40:29 - 00:40:32] A commercial cemetery does not fit
[00:40:32 - 00:40:37] in the rural cattle area and the ag and MRZ zoning.
[00:40:38 - 00:40:53] And this has been ignored by the Planning Department.
[00:40:53 - 00:40:57] And I can send you a photo to the,
[00:40:58 - 00:41:01] to the planning commission.

[00:41:01 - 00:41:03] We have photos of flooding of that property,
[00:41:03 - 00:41:08] extreme flooding that show a huge water course
[00:41:09 - 00:41:12] and we have a concern of with only 18 inches
[00:41:12 - 00:41:16] of ground cover of grave washout and it is a concern.
[00:41:28 - 00:41:30] We've talked about that and the mitigation.
[00:41:30 - 00:41:33] I don't know how the county,
[00:41:33 - 00:41:37] when they put in a mega operation for the casino
[00:41:37 - 00:41:40] in the south of Wayne of Vista,
[00:41:40 - 00:41:43] the applicant had to repave the roads, stop lights
[00:41:43 - 00:41:44] and everything else.
[00:41:44 - 00:41:46] This won't be that big an operation.
[00:41:46 - 00:41:51] But I think that the county needs to look at very seriously
[00:41:51 - 00:41:53] of having the roads widened and repaved
[00:41:54 - 00:41:59] with designated ingress egress to either iron road
[00:42:00 - 00:42:06] or Jackson Highway because you can get a mitigation fee
[00:42:06 - 00:42:07] but it's not gonna fix anything.
[00:42:07 - 00:42:10] It'll go into the county budget and maybe fix a road
[00:42:10 - 00:42:12] and up country or somewhere else.
[00:42:12 - 00:42:16] But the mitigation fee is not gonna be enough
[00:42:16 - 00:42:19] to repave or widen these roads.
[00:42:19 - 00:42:35] And that's what's needed that this project goes through.
[00:42:35 - 00:42:37] I think that's about it for now.
[00:42:37 - 00:42:41] Let me look at my notes here.
[00:42:41 - 00:42:47] Yeah, we'd like to have an answer how to enforce that
[00:42:47 - 00:42:50] just to beginning of a mega operation.
[00:42:50 - 00:42:58] It'll be amendments requested in the future.
[00:42:58 - 00:43:00] Thank you for the opportunity to comment.
[00:43:00 - 00:43:03] I just want to ask your question about the enforcement.
[00:43:03 - 00:43:06] I mean, the public is certainly welcome to count cars
[00:43:06 - 00:43:08] as long as they're offsite and not trespassing
[00:43:08 - 00:43:09] and not blocking the road.
[00:43:09 - 00:43:14] And then if they're allowed by the youth permit
[00:43:14 - 00:43:16] or exceeded, then there is a revocation process
[00:43:16 - 00:43:18] or process to make sure that it stays in line
[00:43:18 - 00:43:22] with what's within the condition to the youth permit.
[00:43:22 - 00:43:23] So we can't go into the property
[00:43:23 - 00:43:27] and look at the parking spaces and everything else?
[00:43:27 - 00:43:30] I think you could observe that from
[00:43:30 - 00:43:31] side of the property lines.
[00:43:31 - 00:43:33] Okay.
[00:43:33 - 00:43:34] Thank you.
[00:43:34 - 00:43:40] You're welcome.
[00:43:40 - 00:43:42] Any comment?

[00:43:42 - 00:43:44] When your turn was raised.
[00:43:44 - 00:43:50] So go ahead, when you're, if you want to unmute yourself.
[00:43:50 - 00:43:57] Actually, that was from the previous time.
[00:43:57 - 00:43:58] Hello?
[00:43:58 - 00:43:59] Thank you.
[00:43:59 - 00:43:59] Yeah, sorry.
[00:43:59 - 00:44:02] Okay, you don't have any comments currently then?
[00:44:02 - 00:44:03] No, no comments.
[00:44:03 - 00:44:04] Okay.
[00:44:04 - 00:44:06] Thank you.
[00:44:06 - 00:44:08] Any other public comment?
[00:44:08 - 00:44:25] My name's Ron Woodhouse.
[00:44:25 - 00:44:27] I live on Lambert Road.
[00:44:27 - 00:44:30] I own a ranch between Carbondale and Lambert
[00:44:30 - 00:44:33] about a mile from this property.
[00:44:33 - 00:44:41] And I agree with everything Dave has said
[00:44:41 - 00:44:44] to the County Planning Commission,
[00:44:44 - 00:44:46] showing water running off that property.
[00:44:46 - 00:44:49] I don't know if they were received.
[00:44:49 - 00:44:54] There were videos that I took in March of 2023.
[00:44:56 - 00:44:59] Water is literally pouring out of that property
[00:44:59 - 00:45:02] on the Carbondale that goes down Carbondale
[00:45:02 - 00:45:05] to the Y with Lambert and washes out the road.
[00:45:05 - 00:45:08] Literally the pavement has been washed.
[00:45:08 - 00:45:14] And when it rains, the county puts up
[00:45:14 - 00:45:16] saw horses, flooded.
[00:45:16 - 00:45:19] So there's a lot of water coming out of that property.
[00:45:19 - 00:45:21] And my concern is, I don't know,
[00:45:21 - 00:45:25] about these green burials.
[00:45:25 - 00:45:26] I'm not so sure that was the idea
[00:45:26 - 00:45:31] behind a green burial on the grandpa
[00:45:31 - 00:45:38] under the Oaks, not 55,000 burials of people in cloths
[00:45:38 - 00:45:40] on a flood plain.
[00:45:40 - 00:45:42] I think that really needs to be looked at.
[00:45:45 - 00:45:49] As far as the impact on myself and the neighbors,
[00:45:49 - 00:45:55] it's a beautiful corner of Amador County,
[00:45:55 - 00:46:03] cow-calf operation, race cutting horses.
[00:46:03 - 00:46:10] I can't imagine coming out there with a minimum of 25 cars
[00:46:10 - 00:46:15] twice a day, seven days a week, 365 days a year.
[00:46:15 - 00:46:19] The impact on that community is gonna be enormous.
[00:46:19 - 00:46:20] We don't want it.
[00:46:20 - 00:46:22] I've talked to all of my neighbors.
[00:46:22 - 00:46:30] They're furious about, we haven't really organized yet.

[00:46:30 - 00:46:33] Be a lot of people upset.
[00:46:33 - 00:46:34] I mean, I don't know what the next step is.
[00:46:34 - 00:46:36] I guess go to the Planning Commission.
[00:46:36 - 00:46:39] I've seen how these things operate.
[00:46:39 - 00:46:41] This is just a slap in the face
[00:46:41 - 00:46:44] of the rural community of Amador County.
[00:46:44 - 00:46:48] And it's supposedly serving,
[00:46:48 - 00:46:50] I think he says in this application,
[00:46:50 - 00:46:54] he says it's serving the growing Muslim population
[00:46:54 - 00:46:55] in Amador County.
[00:46:55 - 00:46:57] It's in the first sentence.
[00:46:57 - 00:47:00] Well, I'd like to see him.
[00:47:00 - 00:47:04] He also mentions El Dorado County, Sacramento County,
[00:47:04 - 00:47:06] Sacramento County.
[00:47:06 - 00:47:21] These people are becoming from Stockton into Amador County.
[00:47:21 - 00:47:26] It's not gonna be generated by 55,000 graves
[00:47:26 - 00:47:28] of Muslims in Amador County.
[00:47:28 - 00:47:30] They're not coming from Amador County.
[00:47:30 - 00:47:34] They're coming from outside our County
[00:47:34 - 00:47:39] and evidently at the thousands.
[00:47:39 - 00:47:43] This is one of those I think build them and they will come.
[00:47:43 - 00:47:45] His original proposal was turned down
[00:47:45 - 00:47:48] by Sacramento County.
[00:47:48 - 00:47:50] He wanted a 20,000 square foot mosque
[00:47:50 - 00:47:53] with 55,000 graves sites.
[00:47:53 - 00:47:55] That was turned down by Sacramento County.
[00:47:55 - 00:47:56] He moved over to Amador County,
[00:47:56 - 00:47:58] bought property near the airport.
[00:47:58 - 00:48:01] It was the same exact thing,
[00:48:01 - 00:48:04] a 20,000 square foot mosque.
[00:48:04 - 00:48:06] If you visualize that,
[00:48:06 - 00:48:09] that is half the size of a football field.
[00:48:09 - 00:48:11] From the goal line to the 50 yard line
[00:48:12 - 00:48:15] and 55,000 graves sites.
[00:48:15 - 00:48:16] That was original.
[00:48:16 - 00:48:19] Now what he's doing is he's backing off,
[00:48:19 - 00:48:22] in my opinion, to get his foot in the door.
[00:48:22 - 00:48:24] And then we're gonna see this huge expansion,
[00:48:24 - 00:48:28] one addition after another,
[00:48:28 - 00:48:35] whole mosque, cemetery, every single one of my neighbors.
[00:48:35 - 00:48:41] And I know most of them are vehemently opposed to the MI.
[00:48:41 - 00:48:44] And one of the qualifications
[00:48:44 - 00:48:48] that the original checklist where he said

[00:48:48 - 00:48:51] it didn't have any impact was on the neighborhood.
[00:48:51 - 00:48:55] And he said, no, this is a huge impact on this neighborhood.
[00:48:55 - 00:48:57] This is a ranching community.
[00:48:57 - 00:48:58] There are people that, you know,
[00:48:58 - 00:48:59] there's mining out here.
[00:48:59 - 00:49:05] Most people are running cattle.
[00:49:05 - 00:49:06] Everything Dave has got to say,
[00:49:06 - 00:49:08] but from a personal standpoint,
[00:49:08 - 00:49:12] and its impact on my lifestyle is huge.
[00:49:12 - 00:49:14] I can't imagine.
[00:49:14 - 00:49:16] And imagine yourself,
[00:49:16 - 00:49:21] a 25 car funeral procession coming over La Trobe Road,
[00:49:21 - 00:49:25] twice a day, or coming up Highway 16,
[00:49:25 - 00:49:28] or coming up 88 and going through the city of Ione
[00:49:28 - 00:49:29] and down to Carbondale.
[00:49:29 - 00:49:33] Or coming up 16 and out Ione, Michigan Bar
[00:49:33 - 00:49:36] over Marshall and down to Carbondale.
[00:49:36 - 00:49:37] It's not gonna work.
[00:49:37 - 00:49:39] Unless you wanna build four lane roads
[00:49:39 - 00:49:41] all over your county,
[00:49:41 - 00:49:43] there gonna be people going what,
[00:49:43 - 00:49:46] 20 miles an hour up to Carbondale Road,
[00:49:46 - 00:49:51] twice a day, every single day.
[00:49:51 - 00:49:53] Yeah, I'm opposed to it.
[00:49:53 - 00:49:55] Everybody I know is opposed to it
[00:49:55 - 00:49:58] and thank you for your time.
[00:49:58 - 00:50:03] I appreciate it.
[00:50:03 - 00:50:06] When your hands raised.
[00:50:06 - 00:50:06] Yes.
[00:50:06 - 00:50:07] The point is big.
[00:50:07 - 00:50:08] Yeah.
[00:50:08 - 00:50:11] Commenting on the comment from
[00:50:14 - 00:50:18] saying that I had proposed a 20,000 square foot
[00:50:18 - 00:50:21] mask in Sacramento and it was turned down.
[00:50:21 - 00:50:26] I never owned that size of a land in Sacramento.
[00:50:26 - 00:50:29] I never proposed anything in Sacramento.
[00:50:29 - 00:50:34] That's why I came to Ione.
[00:50:34 - 00:50:40] I didn't have any projects going in Sacramento.
[00:50:40 - 00:50:44] Thank you.
[00:50:44 - 00:50:45] For the public's benefit,
[00:50:45 - 00:50:48] I wanted to point out that cemeteries are allowed
[00:50:48 - 00:50:51] as a use in any zoning district in the county
[00:50:51 - 00:50:54] provided that a use permit is applied for.

[00:50:54 - 00:50:57] So then what happens is tax responsibility then
[00:50:57 - 00:50:59] is to evaluate the environmental impacts of that.
[00:50:59 - 00:51:02] We don't get to be an advocate for or against a project.
[00:51:02 - 00:51:04] We don't put our finger on the scale
[00:51:04 - 00:51:05] because then the integrity of the process
[00:51:05 - 00:51:08] is shot when you do that.
[00:51:08 - 00:51:13] So issues beyond the environmental,
[00:51:13 - 00:51:16] definitely you take those to the planning.
[00:51:16 - 00:51:17] They're the ones that get to make those.
[00:51:17 - 00:51:20] As you know, get to make those tough decisions.
[00:51:20 - 00:51:21] No, I appreciate it.
[00:51:21 - 00:51:22] Sure.
[00:51:22 - 00:51:24] My name is David Wardall.
[00:51:24 - 00:51:27] I've done research with Sacramento County
[00:51:27 - 00:51:31] and the applicant had made an application
[00:51:31 - 00:51:36] for a 20,000 square foot mosque in the barrier plots
[00:51:36 - 00:51:37] on Diller Road.
[00:51:38 - 00:51:40] The cross street there is right across
[00:51:40 - 00:51:42] from all the turkey huts there.
[00:51:42 - 00:51:48] And anyway, the local, the Sacramento County
[00:51:49 - 00:51:54] local planning group that is not the planning commission,
[00:51:54 - 00:52:00] but a local group held a meeting
[00:52:01 - 00:52:03] and this project was voted down
[00:52:03 - 00:52:07] at the first process step in Sacramento County.
[00:52:07 - 00:52:12] All that data is available from Sacramento County.
[00:52:12 - 00:52:25] Thank you.
[00:52:25 - 00:52:26] And I'll bring it back to the committee
[00:52:26 - 00:52:28] for any further discussion or recommendation
[00:52:28 - 00:52:31] to the planning commission.
[00:52:31 - 00:52:36] Of course, through the environmental document.
[00:52:36 - 00:52:42] I just have a small, into the applicant for it.
[00:52:42 - 00:52:44] On the plan for the project,
[00:52:44 - 00:52:48] it shows a parking lot with 64 spaces
[00:52:48 - 00:52:52] and returning to the amount of people
[00:52:52 - 00:52:55] that are gonna be coming to the property at any one time
[00:52:55 - 00:52:58] was limited to 50 people per event.
[00:52:58 - 00:53:01] And then we have a parking lot for 64 spaces.
[00:53:01 - 00:53:09] It doesn't seem to match up with the proposed use.
[00:53:09 - 00:53:10] The only concern I've found with it.
[00:53:10 - 00:53:13] 14 additional spaces.
[00:53:13 - 00:53:16] Well, you mean, even if every person drove
[00:53:16 - 00:53:19] a single car, which no one ever does on a funeral,
[00:53:19 - 00:53:20] it seems like 14 extra spaces,

[00:53:20 - 00:53:23] but it just doesn't match up.
[00:53:23 - 00:53:26] Seems like they're planning for more people
[00:53:26 - 00:53:28] to be there than they're proposing.
[00:53:28 - 00:53:29] That's my only concern.
[00:53:29 - 00:53:32] I can respond from what I understand,
[00:53:32 - 00:53:35] it's the 64 spaces are the permanent spaces in the lot.
[00:53:35 - 00:53:38] And they would be limited to the 50 people per event.
[00:53:38 - 00:53:41] So the maximum they would have on site would be 100 people.
[00:53:41 - 00:53:43] And then they were also proposing parking
[00:53:43 - 00:53:45] along the road to the grave sites.
[00:53:47 - 00:53:49] But I know that that was a question we had currently
[00:53:49 - 00:53:52] is that the road that's shown on the site plan
[00:53:52 - 00:53:54] doesn't accommodate for roadside parking.
[00:53:54 - 00:53:56] So that would need to be adjusted on the site plan
[00:53:56 - 00:54:04] if that's still part of the proposed.
[00:54:04 - 00:54:09] Yeah, if I may, just because we say up to two burials a day,
[00:54:10 - 00:54:13] it doesn't mean it's gonna be two burials a day.
[00:54:13 - 00:54:17] We might go four burials a month
[00:54:17 - 00:54:21] and look in at the history of the existing cemetery
[00:54:21 - 00:54:24] right now, sometimes you have four burials a month,
[00:54:24 - 00:54:26] sometimes you have 10, 15.
[00:54:26 - 00:54:30] But in the plan, I put it that way,
[00:54:30 - 00:54:33] that way we didn't have any problem later on.
[00:54:33 - 00:54:37] God forbid if there is any more situation
[00:54:37 - 00:54:42] that requires more than two burials
[00:54:42 - 00:54:44] or one burial a day.
[00:54:44 - 00:54:49] But on average, I would say it practically speaking
[00:54:49 - 00:54:51] is about 10, 15, maybe a month.
[00:54:51 - 00:54:54] And also about the parking,
[00:54:54 - 00:54:57] the scheduling of the burials could be one in the morning,
[00:54:57 - 00:55:00] one in the afternoon.
[00:55:00 - 00:55:03] And the whole process of the burial,
[00:55:03 - 00:55:08] it does not exceed 45 to 50 minutes at the most.
[00:55:08 - 00:55:11] Most, a lot of them they go in half an hour,
[00:55:11 - 00:55:14] maybe 25 minutes, 20 minutes, depending.
[00:55:14 - 00:55:19] And the attendees also, they're not always full capacity.
[00:55:19 - 00:55:22] Sometimes we have funerals with five people.
[00:55:22 - 00:55:27] I have seen funerals that I have to be,
[00:55:28 - 00:55:30] even though I am the funeral director,
[00:55:30 - 00:55:34] I have to be the person who lowers the body into the grave
[00:55:34 - 00:55:37] because there's nobody there except three people.
[00:55:37 - 00:55:41] So without exaggerating the situation,
[00:55:41 - 00:55:44] I think we will be very good neighbors, God willing.

[00:55:44 - 00:55:48] And we are not there to create problems.
[00:55:48 - 00:55:53] And that's my feedback.
[00:55:53 - 00:55:55] I had a question for you, Muneer.
[00:55:55 - 00:55:58] I mean, you said in general,
[00:55:58 - 00:56:00] 15 per month would be reasonable.
[00:56:00 - 00:56:03] I mean, you can impose that as a limitation
[00:56:03 - 00:56:04] to the use permit as well.
[00:56:04 - 00:56:06] Say like up to two per day
[00:56:06 - 00:56:08] with no more than 15 per month kind of thing,
[00:56:08 - 00:56:10] which would help narrow the scope
[00:56:10 - 00:56:12] as far as what the project scope
[00:56:12 - 00:56:14] that people are looking at.
[00:56:14 - 00:56:16] If that is something you would be interested in doing,
[00:56:16 - 00:56:20] we can add that as condition to further clarify.
[00:56:20 - 00:56:22] Or if there's a different number
[00:56:22 - 00:56:24] that you're more comfortable with,
[00:56:24 - 00:56:26] I just wanted to note that.
[00:56:26 - 00:56:27] Yeah, well thank you.
[00:56:27 - 00:56:32] Again, I'm assuming that this proposal
[00:56:32 - 00:56:35] that will stand for tens of years to come ahead.
[00:56:35 - 00:56:37] And by that time, the whole infrastructure
[00:56:37 - 00:56:39] will be changing.
[00:56:39 - 00:56:42] The freeways will be way different
[00:56:42 - 00:56:44] than what we see right now.
[00:56:44 - 00:56:49] So that's why I was advised to put that as a limit.
[00:56:49 - 00:56:52] That's why also I,
[00:56:52 - 00:56:57] on the suggestion of one of the studies
[00:56:57 - 00:57:00] that was submitted to you said,
[00:57:00 - 00:57:02] go ahead and throw anything at the county
[00:57:02 - 00:57:06] and then whatever you wanna do, you do it.
[00:57:06 - 00:57:08] And then if something you don't wanna do,
[00:57:08 - 00:57:12] but at least it's there and the county is aware of it.
[00:57:12 - 00:57:17] When I was proposing the 220,000 square foot mosque,
[00:57:18 - 00:57:20] it wasn't that I am going to do it right now
[00:57:20 - 00:57:24] because we don't have the resources for it,
[00:57:24 - 00:57:27] nor that I anticipate that there is any resources
[00:57:27 - 00:57:30] gonna be in there, but based again on the suggestion
[00:57:30 - 00:57:33] of the person who has done some of the studies in there,
[00:57:33 - 00:57:36] said, oh, go ahead and throw everything in there.
[00:57:36 - 00:57:39] That way you don't have to explain yourself later.
[00:57:39 - 00:57:44] But it's not, we're not gonna be as noisy.
[00:57:44 - 00:57:45] We're not gonna be noisy at all.
[00:57:45 - 00:57:52] And the future will tell.

[00:57:52 - 00:57:53] Thank you.
[00:57:53 - 00:57:54] Thank you.
[00:57:54 - 00:57:58] Any other public comment?
[00:57:58 - 00:58:01] We were back to the committee.
[00:58:01 - 00:58:03] Since there's no other committee comment,
[00:58:03 - 00:58:09] I would entertain a motion that either mitigated,
[00:58:09 - 00:58:16] excuse me, adequacy of the CEQA initial study,
[00:58:16 - 00:58:17] studies adequate.
[00:58:17 - 00:58:20] Now I see what you guys go through.
[00:58:20 - 00:58:22] Whether or not the CEQA initial study is adequate
[00:58:22 - 00:58:24] for moving it forward to the planning commission
[00:58:24 - 00:58:34] or whether the project needs additional environmental review,
[00:58:34 - 00:58:56] what that is.
[00:58:56 - 00:58:59] I'm okay with moving forward to the planning commission.
[00:58:59 - 00:59:02] I'll put it in motion.
[00:59:02 - 00:59:03] I'm gonna move it forward to the planning commission.
[00:59:03 - 00:59:04] Is there a second?
[00:59:04 - 00:59:05] Yeah, I second.
[00:59:05 - 00:59:12] All in favor for the planning commission?
[00:59:12 - 00:59:13] July.
[00:59:13 - 00:59:15] No, I don't think it would be July,
[00:59:15 - 00:59:18] because it's an MND, so it's gonna take longer.
[00:59:19 - 00:59:26] I'm thinking it probably all gets in the calendar.
[00:59:26 - 00:59:27] Yeah.
[00:59:27 - 00:59:28] So just to confirm,
[00:59:28 - 00:59:31] so the Emondale County Technical Advisory Committee
[00:59:31 - 00:59:33] is recommending move the project forward
[00:59:33 - 00:59:38] with a recommendation of the proposed draft conditions
[00:59:38 - 00:59:43] and initial study and a proposed mitigated negative declaration
[00:59:43 - 00:59:46] as the environmental document to the planning
[00:59:46 - 00:59:53] for Thursday, well, Tuesday, August 11th.
[00:59:56 - 00:59:59] The EDITS on the water resource.
[00:59:59 - 01:00:00] All right.
[01:00:00 - 01:00:01] The EDITS on the water resource.
[01:00:01 - 01:00:05] With the EDITS, yeah, as discussed, correct.
[01:00:05 - 01:00:07] Okay, and then I also wanted to confirm with Munir,
[01:00:07 - 01:00:12] so I will wait to schedule it definitively
[01:00:14 - 01:00:16] for that planning commission meeting
[01:00:16 - 01:00:17] until we have a revised site plan
[01:00:17 - 01:00:23] that shows the adequate space for any roadside parking
[01:00:23 - 01:00:26] you're proposing as well as the meeting
[01:00:26 - 01:00:29] the 1530 requirements for that internal road.
[01:00:29 - 01:00:31] And you'll wanna follow up with AFPD

[01:00:31 - 01:00:33] in the building department for that.
[01:00:33 - 01:00:36] But once we receive that
[01:00:36 - 01:00:41] and amend those conditions, we'll schedule it.
[01:00:41 - 01:00:42] Thank you for that.
[01:00:42 - 01:00:44] We are adjourned.
[01:00:44 - 01:00:45] Well, thank you.

Exhibit 3-C

Excerpt, Technical Advisory Committee Transcript, August 4, 2022 — Amador Water Agency Testimony on Water System Capacity

Submitted in connection with Use Permit UP-22-2-3, County of Amador

The passages below are drawn from the Technical Advisory Committee meeting of August 4, 2022, at which a representative of the Amador Water Agency testified regarding the capacity of the existing water infrastructure serving the project site. The testimony addresses meter size, maximum available flow, and fire-flow capacity — neutral, quantifiable engineering constraints applicable to any use of the parcel requiring a water connection.

Segment 1 — [00:24:38–00:25:56]

> *"Brant Cook, Amador Water [Agency]. There is a water line in the road in front, on Carbondale and Lambert. It is a water line with severely limited capacity."*
>
> *"The parcel currently has a five-eighths-inch meter, which is the largest meter we would permit to be set on that line, which would give them a maximum of 20 gallons a minute and 400 gallons per average day, which is a tiny amount of water."*
>
> *"Expansion of that line to allow more flow than that would be incredibly expensive and is probably cost-prohibitive. Add to that, the fire flow in that area is generally about 400 gallons a minute; increasing that to a standard 1,000 gallons a minute, or standard fire flow, would also be incredibly expensive and is probably cost-prohibitive."*
>
> *… [discussion of the City of Ione treatment plant's capacity limitations and the absence of public sewer service to the area] …*

Segment 2 — [00:50:44–00:51:38]

> *"Brant Cook, Amador Water [Agency]. So the water infrastructure in the area is extremely capacity-limited. The largest size meter we would set is a five-eighths-inch meter, which is the smallest water meter that exists, I think. So this connection would be limited to 20 gallons a minute and 400 gallons per average day."*
>
> *"Up-sizing that meter is not available at this time and would be incredibly cost-prohibitive — probably, to expand that line all the way back to the City of Ione."*
>
> *"In addition, fire flow in the area is extremely limited, 350 to 400 gallons a minute, which is substandard for pretty much everything, and that would be incredibly expensive to fix as well."*

Amador County maintains no written minutes of Technical Advisory Committee proceedings; the County has confirmed that the audio recording is the sole record of what occurred. This excerpt is drawn from a machine transcription of the County's published meeting audio, prepared per the conventions described in

02_TAC_Transcripts/Transcript_Methodology_and_Verification_Note_UP-22-2-3.md (non-lexical fillers and immediate self-corrections removed without changing meaning; an ellipsis marks omitted material; timestamps are measured from the start of the published audio file). The recording remains the authoritative record; readers are invited to verify this excerpt against it at the timestamps cited.

Source: 02_TAC_Transcripts/TAC_2022-08-04_transcript.txt, [00:24:38–00:25:56] and [00:50:44–00:51:38]. Supports Tab A and the Table of Contents and Exhibit Index, Category 3 (Water Supply).

Exhibit 3-E

Excerpt, Technical Advisory Committee Transcript, August 4, 2022 — Environmental Health Septic System Requirements

Submitted in connection with Use Permit UP-22-2-3, County of Amador

The passage below is drawn from the Technical Advisory Committee meeting of August 4, 2022, at which the County's Environmental Health representative addressed the wastewater standard applicable to a use of this size, and specifically whether portable toilets could substitute for a permanent system at capacity. The exchange is a neutral statement of an applicable regulatory standard — wastewater-treatment capacity for a facility serving up to 400 people — and does not turn on who would use the facility.

Excerpt — [00:48:20–00:49:11]

> *"To put in a commercial septic, [it would] have to be designed by a registered engineer."*
>
> *"Okay, it would have to be a commercial structure. They'd have to pull a permit application, and then it would be referred to an engineer for anything that size."*
>
> *Q: "So, would they be able to supplement that with porta-potties for larger events? Or does the installed system just need to be able to accommodate the maximum number of people?"*
>
> *A: "Yes — if they're anticipating 400 people and they want to put a system in, it would have to be designed to handle that many."*
>
> *Q: "So, no porta-potties, then, in that situation."*
>
> *A: "You would be required to have a commercial-grade septic system to eliminate waste for up to 400 people."*

Amador County maintains no written minutes of Technical Advisory Committee proceedings; the County has confirmed that the audio recording is the sole record of what occurred. This excerpt is drawn from a machine transcription of the County's published meeting audio, prepared per the conventions described in 02_TAC_Transcripts/Transcript_Methodology_and_Verification_Note_UP-22-2-3.md (non-lexical fillers and immediate self-corrections removed without changing meaning; an ellipsis marks omitted material; timestamps are measured from the start of the published audio file). The recording remains the authoritative record; readers are invited to verify this excerpt against it at the timestamps cited.

Source: 02_TAC_Transcripts/TAC_2022-08-04_transcript.txt, [00:48:20–00:49:11]. Supports Tab A and the Table of Contents and Exhibit Index, Category 3 (Water Supply / Wastewater).

Exhibit 4-B

Excerpt, Technical Advisory Committee Transcript, March 3, 2022 — Public Works Testimony on Commercial Entrance Standards

Submitted in connection with Use Permit UP-22-2-3, County of Amador

The passage below is drawn from the Technical Advisory Committee meeting of March 3, 2022, at which the County Public Works representative addressed the road-entrance standard that would apply to the project's two access points on Lambert Road and Carbondale Road. The requirement is a neutral, generally applicable roadway-engineering standard tied to the volume and type of traffic the use would generate, not to any characteristic of who would use the site.

Excerpt — [00:20:21–00:20:44]

> *"This is Mark Hopkins with Public Works."*
>
> *"Since they're potentially proposing to ingress and egress — both of them — on County roads,"*
>
> *"both of them are going to need to be commercial entrances."*

Amador County maintains no written minutes of Technical Advisory Committee proceedings; the County has confirmed that the audio recording is the sole record of what occurred. This excerpt is drawn from a machine transcription of the County's published meeting audio, prepared per the conventions described in 02_TAC_Transcripts/Transcript_Methodology_and_Verification_Note_UP-22-2-3.md (non-lexical fillers and immediate self-corrections removed without changing meaning; an ellipsis marks omitted material; timestamps are measured from the start of the published audio file). The recording remains the authoritative record; readers are invited to verify this excerpt against it at the timestamps cited.

Source: 02_TAC_Transcripts/TAC_2022-03-03_transcript.txt, [00:20:21–00:20:44]. Supports Tab A and the Table of Contents and Exhibit Index, Category 4 (Roadway and Access Safety).

Exhibit 4-C

Excerpt, Technical Advisory Committee Transcript, August 4, 2022 — Public Works Testimony on Entrance Standards and Fire-Access Parking

Submitted in connection with Use Permit UP-22-2-3, County of Amador

The passage below is drawn from the Technical Advisory Committee meeting of August 4, 2022, at which the County Public Works representative reiterated that both project entrances would require improvement to commercial standards, and separately addressed the prohibition on roadside parking where it would impede fire and emergency access. Both points are neutral roadway-engineering and fire-access requirements tied to road geometry and emergency-vehicle clearance.

Excerpt — [00:28:10–00:29:30]

> *"And then both the entrances on Lambert and on Carbondale will have to be improved for commercial standards."*
>
> *Q: "Because they're currently residential encroachments?"*
>
> *A: "At least one."*
>
> *"And then I do believe that parking along the road is not going to be — if you have any type of fire issue, that's going to be a no-no. And then parking along any of those roads is also going to be a no-no. So they're going to have to provide some place in their area — a parking lot, or show it — that way, at least, fire and emergency access can be granted without any impingement of vehicles."*

Amador County maintains no written minutes of Technical Advisory Committee proceedings; the County has confirmed that the audio recording is the sole record of what occurred. This excerpt is drawn from a machine transcription of the County's published meeting audio, prepared per the conventions described in 02_TAC_Transcripts/Transcript_Methodology_and_Verification_Note_UP-22-2-3.md (non-lexical fillers and immediate self-corrections removed without changing meaning; an ellipsis marks omitted material; timestamps are measured from the start of the published audio file). The recording remains the authoritative record; readers are invited to verify this excerpt against it at the timestamps cited.

Source: 02_TAC_Transcripts/TAC_2022-08-04_transcript.txt, [00:28:10–00:29:30]. Supports Tab A and the Table of Contents and Exhibit Index, Category 4 (Roadway and Access Safety).

Exhibit 4-E

Roadway Safety Baseline — Documented Collision History on the Project Access Corridor

Submitted in connection with Use Permit UP-22-2-3, County of Amador

Every element of this exhibit is tied to neutral land-use and roadway-safety criteria — road geometry, collision history, the County's own safety findings at Tab A, and the mandatory CEQA checklist item (Appendix G, Transportation, item (a) and Amador County Code § 19.56.040) that the Initial Study left blank. Nothing in this exhibit refers to who attends the facility or to any religious characteristic of the applicant or its patrons; that discipline is deliberate.

The table below documents fatal collisions reported on the roads that provide the only vehicular access to the project site — Carbondale Road, Irish Hill Road, and the connecting state highways — compiled from published news and law-enforcement sources.

Documented fatal collisions on the access corridor

> *March 2, 2023 — Irish Hill Road at/near the Carbondale Road junction: three killed (driver, age 40, and sons ages 7 and 5). Cause: single vehicle lost control and struck an oak tree; alcohol was not a factor per the California Highway Patrol. (Ledger Dispatch; KCRA)*
>
> *January 24, 2026 — State Route 16, east of Carbondale Road: one killed (a one-year-old passenger). Cause: heavy fog, oncoming collision. (myMotherLode.com)*
>
> *July 22, 2026 — State Route 104, north of Five Mile Drive, west of Ione: one killed, one child passenger injured (age 3). Cause: vehicle crossed into the oncoming lane, sideswipe followed by head-on collision. (CBS Sacramento; CHP Fatal Accident Feed)*

These are not the only collisions on record for this corridor; they are the fatal incidents identified through public reporting as of this filing. The Amador County Regional Transportation Plan separately documents this corridor's collision and roadway-deficiency history at a planning level.

Sources: Ledger Dispatch, https://www.ledger.news/news/community-rallies-to-support-grieving-ione-family/article_0b1729e2-bec9-11ed-8a25-9be9cc962265.html; KCRA/YouTube, https://www.youtube.com/watch?v=eH97vH3gkOQ; myMotherLode.com, https://mymotherlode.com/news/local/10489868/baby-passes-away-following-amador-county-crash.html; CBS Sacramento, https://www.cbsnews.com/sacramento/news/ione-highway-104-deadly-crash/; CHP Fatal Accident Feed, https://chpfatal.com/; 2024 Amador County Regional Transportation Plan, https://actc-amador.org/wp-content/uploads/2024/08/2024_Final-Adopted-RTP.pdf; CEQA Guidelines Appendix G / § 15064, https://govt.westlaw.com/calregs/Document/I5D739C10D45211DEB97CF67CD0B99467; Amador County Code § 19.56.040, https://www.codepublishing.com/CA/AmadorCounty/html/AmadorCounty19/AmadorCounty1956.html. Supports Tab A, § 2.7, and the Table of Contents and Exhibit Index, Category 4 (Roadway and Access Safety).

Exhibit 5-D

Excerpt, Technical Advisory Committee Transcript, March 3, 2022 — Airport Land Use Commission Safety-Zone Referral Discussion

Submitted in connection with Use Permit UP-22-2-3, County of Amador

This excerpt concerns a different application on the same Committee agenda — Use Permit 22-2-2, a proposed food-service use in the Martel/Amador Shopping Center — discussed immediately before this project's own item on March 3, 2022. It is included as a comparator because the Committee's discussion illustrates how the County treats Airport Land Use Commission Safety Zone referrals for uses involving public gathering, and because the Chair's characterization of the stakes of that referral (see below) is directly relevant to how a Safety Zone referral could affect this project. See Exhibit 5-E for the corresponding treatment of this project's own item.

Excerpt — [00:01:18–00:05:58]

> *"So item number one is the request for a use permit … 22-2-2. It's for a food truck … APN 044-010-012, in the Martel Amador Shopping Center."*
>
> *"The current 1990 Airport Land Use Plan identifies the site in Safety Zone 2, which … considers retail food, [including] takeouts, … as being non-compatible with that Safety Zone. But the proposed update from 2018 … puts it in proposed Safety Zone 4, [and] both of those types of uses are compatible with [Zone 4] … This might be an item that needs to be referred to the Airport Land Use Commission before it goes to the Planning Commission."*
>
> *Chair: "If we kept it at the current zone, that could potentially kill the project, correct? … If we use the 1990 [plan]."*
>
> *Staff: "Yeah, the 1990 [plan] defines it as Safety Zone 2, and those uses [are] not compatible with Safety Zone 2."*

Amador County maintains no written minutes of Technical Advisory Committee proceedings; the County has confirmed that the audio recording is the sole record of what occurred. This excerpt is drawn from a machine transcription of the County's published meeting audio, prepared per the conventions described in 02_TAC_Transcripts/Transcript_Methodology_and_Verification_Note_UP-22-2-3.md (non-lexical fillers and immediate self-corrections removed without changing meaning; an ellipsis marks omitted material; timestamps are measured from the start of the published audio file). The recording remains the authoritative record; readers are invited to verify this excerpt against it at the timestamps cited.

Source: 02_TAC_Transcripts/TAC_2022-03-03_transcript.txt, [00:01:18–00:05:58]. Comparator to Exhibit 5-E. Supports Tab A and the Table of Contents and Exhibit Index, Category 5 (Airport Land Use Commission / Safety Zone).

Exhibit 5-H

Excerpt, Technical Advisory Committee Transcript, August 4, 2022 — Aerial-Firefighting Safety Testimony and Resulting Amended Conditions

Submitted in connection with Use Permit UP-22-2-3, County of Amador

The passage below is drawn from Agenda Item 1 of the Technical Advisory Committee meeting of August 4, 2022, at which a representative of an aerial-firefighting nonprofit organization testified regarding obstruction-marking requirements for a proposed monopine cell tower near the project site. The testimony addresses aviation and wildfire-suppression safety — nighttime visibility to firefighting aircraft — and resulted in the amended conditions of approval referenced in the motion below.

Excerpt — [00:11:15–00:14:46]

> *"Okay, I'm Dave Wardall. I'm the chairman of the board of directors of the Associated Aerial Firefighters, [a] nonprofit 501(c)(3) …"*
>
> *"Our concern is [that] this tower, or any other cell tower, needs to be visible so a pilot can see [it]. Especially now, at night — Cal Fire is now going with night-vision goggles on their new UH-60 Black Hawks and the new C-130s. So it's important that this have an obstruction light at the top. It's also important that it be painted bright gloss white [on] everything so the pilot can … identify that tower."*
>
> *… [discussion of monopine tower height, 15 feet above canopy per ordinance, and fire-damage contingency] …*
>
> *"If the canopy is diminished through fire or whatever, then anything over, say, 20 feet above what's left needs to be painted bright white and [have] an obstruction light."*
>
> *Motion: "I move that we recommend to the Planning Commission that the appropriate environmental document be a Mitigated Negative Declaration, along with the amended conditions of approval as discussed."*

Amador County maintains no written minutes of Technical Advisory Committee proceedings; the County has confirmed that the audio recording is the sole record of what occurred. This excerpt is drawn from a machine transcription of the County's published meeting audio, prepared per the conventions described in 02_TAC_Transcripts/Transcript_Methodology_and_Verification_Note_UP-22-2-3.md (non-lexical fillers and immediate self-corrections removed without changing meaning; an ellipsis marks omitted material; timestamps are measured from the start of the published audio file). The recording remains the authoritative record; readers are invited to verify this excerpt against it at the timestamps cited.

Source: 02_TAC_Transcripts/TAC_2022-08-04_transcript.txt, [00:11:15–00:14:46]. Supports Tab A and the Table of Contents and Exhibit Index, Category 5 (Airport Land Use Commission / Aviation Safety).

Exhibit 7-E

Photographs, Feral Swine Trap Enclosure

Submitted in connection with Use Permit UP-22;2-3, County of Amador

The photographs behind this sheet depict a feral swine trap enclosure on land in the vicinity of Assessor's Parcel Number 001-220-013. No declarant is identified in connection with these photographs. No representation is made as to who constructed or operates the enclosure, its exact distance from the project parcel, when the photographs were taken, the number or size of animals taken in it, or what permits, if any, apply to its operation. The photographs are offered solely to show that active feral swine trapping activity exists on land near the project site, consistent with the regional prevalence of feral swine documented in the sources cited at Tab A, §5.3.

Ten photographs follow. Several carry a camera-generated overlay (temperature/pressure readout, camera-brand label, or a device timestamp) burned into the image itself by the recording device; these overlays are reproduced as they appear on the original images and are not independently verified. No chain-of-custody or metadata claim is made for any image.



Exhibit 7-E, Photograph 1 of 10



Exhibit 7-E, Photograph 2 of 10



Exhibit 7-E, Photograph 3 of 10



Exhibit 7-E, Photograph 4 of 10



Exhibit 7-E, Photograph 5 of 10



Exhibit 7-E, Photograph 6 of 10



Exhibit 7-E, Photograph 7 of 10



Exhibit 7-E, Photograph 8 of 10



Exhibit 7-E, Photograph 9 of 10



Exhibit 7-E, Photograph 10 of 10

Exhibit 7-F

Amador County Internal Correspondence, June 2023 - Groundwater-Contamination Review

Submitted in connection with Use Permit UP-22;2-3, County of Amador

The pages behind this sheet are native email exports of two County staff email threads from June 2023, concerning the 2022 filing on this same parcel: (1) a June 1-5, 2023 exchange between Deputy County Counsel Glenn Spitzer and Amador County Planning Department Planner Krista Ruesel, in which Mr. Spitzer identifies water contamination as "the most significant impact" and specifies three minimum data items, and Ms. Ruesel confirms the County was drafting a deficiency letter addressing those items; and (2) a June 16-22, 2023 email exchange between Amador County Environmental Health (Debra Larson) and Amador County Public Health Officer Dr. Rita Huspen Kerr, discussing groundwater-contamination and pathogen-leaching concerns specific to this project's proposed unembalmed, shroud-only burial method.

Per the client, these emails were obtained by Ron Woodhouse, a member of the Eagles Nest Association, through his own Public Records Act request to Amador County, and provided to the client. Verbatim transcriptions of both items are on file at 08_County_Source_Documents/Spitzer_email_2023-06-01_transcription.md and 08_County_Source_Documents/Larson_Kerr_email_2023-06-16-22_transcription.md. Supports Tab A, §5.2 (groundwater contamination from shallow green burials).

Exhibit 7-F, Item 1 of 2 - Deputy County Counsel Glenn Spitzer / Planner Krista Ruesel email exchange, June 1-5, 2023 (native email export)

Outlook

Re: Cemetery Project

From Krista Ruesel <kruesel@amadorgov.org>
Date Mon 6/5/2023 9:40 PM
To Glenn Spitzer <gspitzer@amadorgov.org>
Cc Debra Larson <dlarson@amadorgov.org>

Received, thank you. I am currently working on the draft deficiency letter so I'll touch bases with yall later this week before I send anything out to the applicant. I also talked with Debbie today, so I have a bit more of an idea of what to address overall.

Thanks,

Krista Ruesel
Planner|Amador County Planning Department
(209)223-6803|kruesel@amadorgov.org

The information transmitted by this email is intended only for the person or entity to which it is addressed. This email may contain proprietary, confidential and/or privileged material. If you are not the intended recipient of this message, be aware that any use, review, retransmission, distribution, reproduction or any action taken in reliance upon this message is strictly prohibited. If you received this in error, please contact the sender and delete the material.

On Thu, Jun 1, 2023 at 3:33 PM Glenn Spitzer <gspitzer@amadorgov.org> wrote:

> Hi Krista,
> Regarding the letter going out to the applicant:
>
> The most significant impact I see is water contamination. This is our opportunity (and our obligation) to ask for all the studies/data that would help us analyze those impacts in the environmental review process. I don't think we should deem the application complete until we have this. At a minimum, I think we need the following:
>
> 1. a detailed, to-scale site plan showing grave sites (including depths), all proposed hardscape and landscape, fencing, walkways, proposed structures, etc.
>
> 2. hydrological data showing potential flood areas and water table depths in the areas of the potential grave sites.
>
> 3. a study showing basic soil profiles for the grave site areas.
>
> You should work with Debbie to formulate some of these requests. Please include me in the circulation of the draft.

Thank you! ~Glenn

Glenn Spitzer
Deputy County Counsel
County of Amador
810 Court Street
Jackson, CA 95642-2132
Phone: 209-223-6366
Fax: 209-223-4286
gspitzer@amadorgov.org

PLEASE NOTE: This email is for the sole use of the intended recipient(s) and may contain information protected by the ATTORNEY-CLIENT PRIVILEGE and/or by the ATTORNEY WORK PRODUCT DOCTRINE. The contents of this email may include confidential and/or inside information and may be legally privileged or protected and should not be communicated to or relied upon by any person without express consent of the sender. If you are not the intended recipient of this communication, you are hereby notified that any unauthorized review, use, dissemination, distribution, downloading, or copying of this communication is strictly prohibited and may be unlawful. If you have received this email in error, please immediately notify the sender by reply email, delete the original communication, and destroy all copies.

Exhibit 7-F, Item 2 of 2 - Amador County Environmental Health (Debra Larson) / Public Health Officer Dr. Rita Huspen Kerr email exchange, June 16-22, 2023 (native email export)

Outlook

Re: Graveyard project questions

From Debra Larson <dlarson@amadorgov.org>
Date Thu 6/22/2023 11:45 AM
To hofficer <hofficer@amadorgov.org>
Cc Planning Department <planning@amadorgov.org>

Thanks for the input!

On Thu, Jun 22, 2023 at 11:29 AM Health Officer <hofficer@amadorgov.org> wrote:

> One more link, that references the pdf attachment already shared:
> https://www.naccho.org/blog/articles/greener-guidance-green-burials
>
> *Rita Huspen Kerr, M.D.*
> Amador County Public Health Officer
> 10877 Conductor Blvd., Suite 400
> Sutter Creek, CA 95685-9682
> 209 223-6407 (office)
> 209 223-1562 (fax)
>
> On Thu, Jun 22, 2023 at 11:25 AM Health Officer <hofficer@amadorgov.org> wrote:
>> Thank you for the additional information about the proposed cemetery, Debbie.
>>
>> This FAQ page from the CA Cemetery and Funeral Bureau broadly addresses Embalming and Natural Burial:
>> https://www.cfb.ca.gov/consumer/funeral.shtml
>>
>> Please review the attached document that discusses the topic of "Green Burial" more comprehensively.
>>
>> I am aware of some new legislation in CA (AB 351) that does not take effect until Jan 1, 2027 regarding hydrolyzed human remains and "human composting." This bill would require the State Department of Public Health to adopt rules and regulations prescribing the standards for reduction chambers to preserve the public health and safety and to ensure the destruction of pathogenic microorganisms. Those guidelines are not yet available.
>> https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220AB351
>>
>> Let me know if you would like to arrange a meeting to confer on this topic.
>>
>> Regards,
>> Dr. Kerr
>>
>> *Rita Huspen Kerr, M.D.*
>> Amador County Public Health Officer
>> 10877 Conductor Blvd., Suite 400

Sutter Creek, CA 95685-9682
209 223-6407 (office)
209 223-1562 (fax)

On Thu, Jun 22, 2023 at 10:43 AM Debra Larson <dlarson@amadorgov.org> wrote:

Yes. This is new territory for us. We are evaluating groundwater contamination potential from burials. The overriding burial method at this proposed facility is that the bodies would be wrapped in cloth, buried with a concrete surround (open at the bottom), no embalming, and no caskets. We are wondering about disease and disease treatment pathogens or chemicals that could leach to groundwater or that are persistent.

On Wed, Jun 21, 2023 at 6:02 PM Health Officer <hofficer@amadorgov.org> wrote:

Hello Debra,

Are there any issues of concern regarding this proposed site from the Environmental Health or Planning Department perspective?
I would be happy to meet with you to discuss if needed.

Regards,
Dr. Kerr

Rita Huspen Kerr, M.D.
Amador County Public Health Officer
10877 Conductor Blvd., Suite 400
Sutter Creek, CA 95685-9682
209 223-6407 (office)
209 223-1562 (fax)

On Fri, Jun 16, 2023 at 12:21 PM Debra Larson <dlarson@amadorgov.org> wrote:

Hello Dr. Kerr,

We are performing our due diligence research that relates to a new proposed graveyard site in Ione and are checking in with you as you might have some thoughts on the project.

Best,

--
Debbie Larson, Director
Amador County Environmental Health
(209) 223-6536 desk
(831) 293-3887 mobile

Exhibit 8-A

Cemetery and Funeral Bureau Certificate of Authority and Endowment Care Fund Requirements

Submitted in connection with Use Permit UP-22-2-3, County of Amador

This exhibit compiles the statutory and regulatory requirements the California Cemetery and Funeral Bureau applies to a private cemetery, an issue first raised at the Technical Advisory Committee meeting of March 3, 2022 and never resolved in the administrative record. The requirements below are neutral, generally applicable state licensing and consumer-protection standards that attach to the operation of any private cemetery in California, regardless of the character of the operator.

The issue as raised at the Technical Advisory Committee — [00:22:21–00:22:51]

> *Environmental Health representative: "And can I add one more thing I forgot — it's unrelated to Environmental Health, but … there is some state oversight for private cemeteries."*
>
> *"Cemetery and Funeral Bureau … this is my first cemetery, so I'm not sure where … we fit into making sure that they achieve their certificate of authority."*
>
> *"There's various steps they have to go through to make sure they're … regulated by the state as well."*
>
> *"And, again, I don't know how that works yet, but we may want to be aware — there's another agency that might need to know."*

Certificate of Authority requirement

A private cemetery may not operate in California without first obtaining a Certificate of Authority from the Cemetery and Funeral Bureau. Health and Safety Code Division 8, Part 3 (Private Cemeteries) establishes the licensing scheme; Business and Professions Code § 7652.8 sets the Certificate of Authority application and fee requirement. The Bureau's published application instructions require, among other items: a completed application and fee; a corporate resolution; Articles of Incorporation; a statement regarding a securities permit or exemption; a cemetery use permit or zoning certification from the local land-use authority; a declaration of dedication; a deed or other instrument establishing title to the cemetery property; an endowment care trust agreement (see below); and a director's statement disclosing the names and relevant experience of incorporators, directors, officers, trustees, the securities broker, and the cemetery manager.

Endowment care fund requirement

Health and Safety Code § 8725 authorizes a cemetery authority to place a cemetery under endowment care. Where a cemetery is operated as an endowment care cemetery — defined at § 8738 — the statute fixes minimum deposit amounts into an endowment care fund tied to the net price of interment rights sold, and § 8738.1 imposes an additional minimum deposit

requirement (currently $25,000 to $35,000, depending on cemetery type) for newly established endowment care cemeteries. The endowment care fund exists to guarantee perpetual maintenance of the cemetery independent of the continued solvency of the operator — a consumer-protection measure that applies regardless of the nature of the cemetery's operator or clientele.

As of the date of this filing, the administrative record does not reflect that a Certificate of Authority has been obtained, that an endowment care trust agreement has been executed, or that the applicant has otherwise resolved the licensing question Environmental Health raised on March 3, 2022 and which no subsequent Technical Advisory Committee proceeding revisited.

Sources: 02_TAC_Transcripts/TAC_2022-03-03_transcript.txt, [00:22:21–00:22:51]; Cal. Health & Saf. Code Div. 8, Pt. 3; Cal. Bus. & Prof. Code § 7652.8; Cal. Health & Saf. Code § 8725, https://law.justia.com/codes/california/code-hsc/division-8/part-3/chapter-5/article-2/section-8725/; § 8738, https://law.justia.com/codes/california/code-hsc/division-8/part-3/chapter-5/article-2/section-8738/; § 8738.1, https://law.justia.com/codes/california/code-hsc/division-8/part-3/chapter-5/article-2/section-8738-1/; Cemetery and Funeral Bureau, Certificate of Authority, https://www.cfb.ca.gov/licensee/certauth.shtml; CFB Certificate of Authority application instructions, https://www.cfb.ca.gov/licensee/coa_app_2016.pdf; CFB endowment care fund explainer, https://www.cfb.ca.gov/forms_pubs/2017endowcarefund.pdf; CFB FAQs, https://cfb.ca.gov/about_us/faqs.shtml. Supports the Table of Contents and Exhibit Index, Category 8.

Exhibit 8-C

Amador County General Plan Land Use Designation and Zoning for APN 001-220-013

Submitted in connection with Use Permit UP-22-2-3, County of Amador

This exhibit compiles the General Plan land-use designation and zoning classification applicable to the project parcel, Assessor's Parcel Number 001-220-013, and the applicable Amador County Code provisions governing each. The classifications below are the County's own generally applicable land-use and mineral-resource designations, unrelated to the character of any proposed use.

General Plan designation: Mineral Resource Zone (MRZ)

The parcel carries a General Plan land-use designation of Mineral Resource Zone (MRZ). As stated in the Technical Advisory Committee proceeding of June 1, 2023 (quoted at length in Tab A of this submittal), County staff identified this designation as creating a technical inconsistency with the proposed cemetery use: "… the whole mineral resources zone general plan designation — so a cemetery would definitely … have impact potential … it is consistent with the zoning, but it is inconsistent with the general plan designation … the issue with the general plan not being consistent is definitely a technical objection that [the Technical Advisory Committee] would have at this point." The applicant was directed to file a General Plan Amendment; the record does not reflect that one was ever filed. This objection was later characterized as resolved on September 18, 2025 by a Committee member who is not a licensed engineer, citing a geotechnical report, a point addressed further in Tab E of this submittal.

Mineral Resource Zones are a state classification system administered under the Surface Mining and Reclamation Act (SMARA), Public Resources Code §§ 2710–2796, which requires California counties to incorporate State Mining and Geology Board mineral-resource classifications into their general plans. The classification categories are: MRZ-1, areas where adequate information indicates no significant mineral deposits are present or where little likelihood exists for their presence; MRZ-2, areas where adequate information indicates significant mineral deposits are present or a high likelihood of their presence exists; MRZ-3, areas containing mineral deposits whose significance cannot be evaluated from available data; and MRZ-4, areas where available information is inadequate for assignment to any other category.

Zoning designation: R1-A (Single-Family Residential-Agricultural District)

The parcel is zoned R1-A under Amador County Code § 19.24.045. The ordinance states the district's intent and applicability as follows:

> *"This district classification is intended to be applied to areas presently zoned as U, unclassified district, and suited to residential and agricultural land uses, subject to such regulations as necessary to protect the public health, safety, convenience, and general welfare within the district and adjacent districts." (Amador County Code § 19.24.045(A))*

R1-A is the County's largest zoning district by acreage, applied broadly across unincorporated Amador County. Its stated purpose is residential and agricultural land use, general-welfare-based, and it does not reference or contemplate cemetery use.

For comparison: the County's MR (Mineral Resources) zoning district

Amador County Code § 19.24.039 separately defines an MR zoning district, distinct from the R1-A zoning that actually applies to this parcel, for land where mineral extraction is the intended use:

> *"The purposes of the MR district are: 1. To provide a proper zoning designation for the extraction, protection, production and preservation of mineral resources; 2. To provide for adequate protection and regulation of mining and related industries for the long-term welfare of the county; 3. To provide for the continued utilization and conservation of minerals; 4. To help provide control of surface mining in order to protect the environment, public health, safety, welfare, and value of property sufficiently close to surface mining operations to be affected thereby; and 5. To establish uses for MR land other than extraction of minerals thereon." (Amador County Code § 19.24.039(A))*

The parcel is zoned R1-A, not MR — underscoring that the General Plan's MRZ designation and the parcel's actual R1-A zoning are two distinct classifications that TAC staff found to be in tension with one another, as reflected in the June 1, 2023 transcript excerpt above.

Sources: TAC_2023-06-01_transcript.txt (quoted in Tab A, § on General Plan consistency); Cal. Pub. Resources Code §§ 2710–2796 (SMARA); California Geological Survey / State Mining and Geology Board MRZ classification criteria, e.g., https://www.slc.ca.gov/wp-content/uploads/sites/355/2018/09/3.11-2.pdf; Amador County Code § 19.24.045, https://www.codepublishing.com/CA/AmadorCounty/html/AmadorCounty19/AmadorCounty1924.html; Amador County Code § 19.24.039, https://www.codepublishing.com/CA/AmadorCounty/html/AmadorCounty19/AmadorCounty1924.html; Amador County General Plan, https://www.amadorcounty.gov/departments/planning/general-plan-update-draft-environmental-impact-report-and-draft-general-plan; Amador County Public Parcel Viewer, https://www.amadorgov.org/departments/planning/gis-and-mapping/public-parcel-viewer. Supports Tab A and the Table of Contents and Exhibit Index, Category 8.

Exhibit 9-A

Environmental Information Form, Page 3 — Referral Packet of September 4, 2025

Submitted in connection with Use Permit UP-22-2-3, County of Amador

The image behind this sheet reproduces page 3 of the Environmental Information Form as circulated in the County's Early Consultation Application Referral packet transmitted September 4, 2025, for the September 18, 2025 Technical Advisory Committee meeting. It is the applicant's certified answer to the printed question listing related permits and other public approvals required for the project: "well Permit and Sanitart Tank Permits have been acquired" (sic).

This document is already in the County's own file and requires no production; it is reproduced here for the Department's convenience in connection with the collateral-permits discussion at Tab D. No representation beyond the applicant's own certification on the form is made.

Source: 08_County_Source_Documents/2025-09-04_Referral_Packet_UP-22-2-3_client-scan_29pp.pdf, page 3. Supports Tab D and the Table of Contents and Exhibit Index, Category 9 (Collateral Permits and Project Segmentation), Exhibit 9-A.

ENVIRONMENTAL INFORMATION FORM

To be completed by applicant; use additional sheets as necessary.
Attach plans, diagrams, etc. as appropriate.

GENERAL INFORMATION

Project Name: Gardens of Noor Cemetery

Date Filed: _____ File No. _____

Applicant/

Developer Mounir Kaddoura

Address 3550 Watt Ave #140, Sacramento, CA 95821

Phone No. (209) 429-1543

Landowner Mounir Kaddoura

Address 3550 Watt Ave #140, Sacramento, CA 95821

Phone No. (209) 429-1543

Assessor Parcel Number(s) 001220013000

Existing Zoning District RIA, Single Family Residential and Agriculture

Existing General Plan MRZ Mineral Resource Zone

List and describe any other related permits and other public approvals required for this project, including those required by city, regional, state, and federal agencies

well Permit and Sanitart Tank Permits have been acquired.

WRITTEN PROJECT DESCRIPTION (Include the following information where applicable, as well as any other pertinent information to describe the proposed project):

1. Site Size
2. Square Footage of Existing/Proposed Structures
3. Number of Floors of Construction
4. Amount of Off-street Parking Provided (provide accurate detailed parking plan)
5. Source of Water
6. Method of Sewage Disposal
7. Attach Plans
8. Proposed Scheduling of Project Construction
9. If project to be developed in phases, describe anticipated incremental development.
10. Associated Projects
11. Subdivision/Land Division Projects: Tentative map will be sufficient unless you feel additional information is needed or the County requests further details.
12. Residential Projects: Include the number of units, schedule of unit sizes, range of sale prices or rents and type of household size expected.
13. Commercial Projects: Indicate the type of business, number of employees, whether neighborhood, city or regionally oriented, square footage of sales area, and loading facilities.
14. Industrial Projects: Indicate type, estimated employment per shift, and loading facilities.
15. Institutional Projects: Indicate the major function, estimated employment per shift, estimated occupancy, loading facilities, and community benefits to be derived from the project.
16. If the project involves a variance, conditional use permit, or rezoning application, state this and indicate clearly why the application is required.

Exhibit 9-B

Environmental Information Form, Page 4 — Referral Packet of September 4, 2025

Submitted in connection with Use Permit UP-22-2-3, County of Amador

The image behind this sheet reproduces page 4 of the same Environmental Information Form referenced at Exhibit 9-A, containing the applicant's twelve consecutive certified "No" responses to items 17 through 28 — including item 22 (change in lake, stream, or ground water quality or quantity, or alteration of existing drainage patterns), item 26 (substantial change in demand for municipal services, including water, fire, and sewage), and item 28 (whether the project has a relationship to a larger project or series of projects).

This exhibit is offered to show the face of the certified form as part of the neutral, checklist-based record; it does not characterize any party or any characteristic of who would use the site.

Source: 08_County_Source_Documents/2025-09-04_Referral_Packet_UP-22-2-3_client-scan_29pp.pdf, page 4. Supports Tab D and the Table of Contents and Exhibit Index, Category 9 (Collateral Permits and Project Segmentation), Exhibit 9-B.

ADDITIONAL INFORMATION Are the following items applicable to the project or its effects? Discuss below all items checked "yes" (attach additional sheets as necessary).

YES	NO	
☐	☑	17. Change in existing features or any lakes or hills, or substantial alteration of ground contours.
☐	☑	18. Change in scenic views or vistas from existing residential areas, public lands, or roads.
☐	☑	19. Change in pattern, scale, or character of general area of project.
☐	☑	20. Significant amounts of solid waste or litter.
☐	☑	21. Change in dust, ash, smoke, fumes, or odors in the vicinity.
☐	☑	22. Change in lake, stream, or ground water quality or quantity, or alteration of existing drainage patterns.
☐	☑	23. Substantial change in existing noise or vibration levels in the vicinity.
☐	☑	24. Site on filled land or has slopes of 10 percent or more.
☐	☑	25. Use or disposal of potentially hazardous materials, such as toxic substances, flammables, or explosives.
☐	☑	26. Substantial change in demand for municipal services (police, fire, water, sewage, etc.).
☐	☑	27. Substantially increase fossil fuel consumption (electricity, oil, natural gas, etc.).
☐	☑	28. Does this project have a relationship to a larger project or series of projects?

ENVIRONMENTAL SETTING

29. Describe the project site as it exists before the project, including information on topography, soil stability, plants and animals, and any cultural, historical or scenic aspects. Describe any existing structures on the site, and the use of the structures. Attach photographs of the site (cannot be returned).
30. Describe the surrounding properties, including information on plants and animals and any cultural, historical, or scenic aspects. Indicate the type of land use (residential, commercial, etc.), intensity of land use (one family, apartment houses, shops, department stores, etc.), and scale of development (height, frontage, setback, rear yard, etc.). Attach photographs of the vicinity (cannot be returned).
31. Describe any known mine shafts, tunnels, air shafts, open hazardous excavations, etc. Attach photographs of any of these known features (cannot be returned).

Certification: I hereby certify that the statements furnished above and in the attached exhibits present the data and information required for this initial evaluation to the best of my ability, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief.

Date 08/27/2025

Mohammad
(Signature)

For _____

Exhibit 9-D

Cemetery Plan, Page 2, Section 2.2 — Two Non-Identical Copies of the Same Page

Submitted in connection with Use Permit UP-22-2-3, County of Amador

The two images behind this sheet reproduce page 2, Section 2.2, of the applicant's Cemetery Plan in two versions found in the record.

9-D-1 — Referral-packet copy (transmitted September 4, 2025, page 10 of that packet)

States: "A permit is applied for a well on the property by Rumsey Lang Well Drilling and Pump Inc." States that the site "will have parking to fit 35 cars."

9-D-2 — Application-file copy

Repeats the same well statement and adds a paragraph headed "Sewage Disposal System," stating that the applicant's engineer "has submitted the permit and plans to the ACEH for approval." States that "the gravel parking lot can accommodate 64 car parking spots."

The two copies of the same page, both in the County's own file, are not identical as to the well-permit status and the number of parking spaces. This exhibit is offered to show that discrepancy on the face of the two documents; no inference beyond the discrepancy itself is drawn.

Source: 08_County_Source_Documents/2025-09-04_Referral_Packet_UP-22-2-3_client-scan_29pp.pdf, page 10 (9-D-1); application file copy of the Cemetery Plan, page 2 (9-D-2). Supports Tab D and the Table of Contents and Exhibit Index, Category 9 (Collateral Permits and Project Segmentation), Exhibit 9-D.

1. EXECUTIVE SUMMARY

The proposed cemetery site is at 16630 Lambert Rd, Ione Ca 95640. The land will be developed as "Gardens of Noor Cemetery". This Plan is for the development of 46 acres for the proposed cemetery. This Plan is required for the application for a use permit. The purpose of this Plan is to illustrate development of the Gardens of Noor Cemetery over a 100-year timeframe.

2. INTRODUCTION

2.1 Background

Gardens of Noor Cemetery is interested in developing a cemetery on the 16630 Lambert Rd, Ione Ca 95640. The plan includes different areas for burials, parking lot with special need individuals parking, and restrooms.

2.2 Physical Settings and Constraints

Located on 16630 Lambert Rd Carbondale Rd, Ione Ca 95640, and APN: 001220013000, the Gardens of Noor Cemetery is a 46 acre site. The site has a 1500 SqFt. steel building. The gravel road can accommodate 100 car parking and the site will have parking to fit 35 cars. Figures 1 through 3 show Property Location, Perimeter and Vicinity Map.

The anticipated group size attending funerals is 50 people per funeral event. The anticipated funeral events will be about 60 per month. The site is connected to Amador Water Agency water and electricity which will be sufficient for funeral services. A permit is applied for a well on the property by Rumsey Lang Well Drilling and Pump Inc.-Their address is 4241 Business Drive, Suite A, Cameron Park, CA 95682 and Phone number is 530-677-5361.

1. EXECUTIVE SUMMARY

The proposed cemetery site is at 16630 Lambert Rd, Ione Ca 95640. The land will be developed as "Gardens of Noor Cemetery". This Plan is for the development of 46 acres for the proposed cemetery. This Plan is required for the application for a use permit. The purpose of this Plan is to illustrate development of the Gardens of Noor Cemetery over a 100-year timeframe.

2. INTRODUCTION

2.1 Background

Gardens of Noor Cemetery is interested in developing a cemetery on the 16630 Lambert Rd, Ione Ca 95640. The plan includes different areas for burials, parking lot with special need individuals parking, and restrooms.

2.2 Physical Settings and Constraints

Located on 16630 Lambert Rd and 857 Carbondale Rd, Ione Ca 95640, and APN: 001220013000 , the Gardens of Noor Cemetery is a 46 acre site. The site has a 1500 sqft steel building . The gravel parking lot can accommodate 64 car parking spots. Figures 1 through 3 show Property Location, Perimeter and Vicinity Map.
The anticipated group size attending funerals is 50 people per funeral event. The anticipated funeral events will be about 60 per month. The site is connected to Amador Water Agency water and electricity which will be sufficient for funeral services. A permit is applied for a well on the property by Rumsey Lang Well Drilling and Pump Inc.-Their address is 4241 Business Drive, Suite A, Cameron Park, CA 95682 and Phone number is 530-677-5361.

Sewage Disposal System:

Delta Engineering Inc. has been contracted and designed the sewage disposal system and has submitted the permit and plans to the ACEH for approval. Their address is:

Delta Engineering, Inc. 41 Main Street Jackson, CA 95642 Engineering Land Development Planning Environmental Permitting 209-223-1441 info@deltaengineeringinc.com.

Exhibit 9-D-3

Cemetery Plan, Page 5 — Excavate-Vault-Backfill Lot-Development Method and Two-Foot Ground-Profile Rise

Submitted in connection with Use Permit UP-22-2-3, County of Amador

The image behind this sheet reproduces page 5 of the applicant's Cemetery Plan, cover-dated August 2025, as circulated at page 13 of the referral packet transmitted September 4, 2025 for the September 18, 2025 Technical Advisory Committee meeting — the same source document excerpted at Exhibits 9-D-1 and 9-D-2.

Under the heading "3.1 Site Design," the Plan states the grading method used "[w]hen a lot is developed": the lot is excavated to two feet below the surface, concrete liners are placed, and the excavated soil is then used to cover the liners, so that, in the Plan's own words, "the new ground profile will be two feet higher." The Plan describes this method as the general procedure followed whenever a lot is developed — it is not stated to be limited to the acreage now before the County.

This exhibit is offered to support the Tab A discussion of the CEQA Initial Study's Hydrology and Water Quality checklist item, which the Initial Study does not analyze at any scale: a permanent, engineered two-foot rise in ground elevation across the burial footprint is a hydrologic and drainage modification of the site, independent of and in addition to the groundwater-contamination pathway the Initial Study does address. No representation beyond the Plan's own stated language is made.

Source: 08_County_Source_Documents/2025-09-04_Referral_Packet_UP-22-2-3_client-scan_29pp.pdf, page 13 (Cemetery Plan page 5). Supports Tab A, Hydrology and Water Quality discussion, and the Table of Contents and Exhibit Index, Category 9 (Collateral Permits and Project Segmentation), Exhibit 9-D-3.

- 2 caskets containing human remains; or
- Two (2) still-born remains in addition to a casket containing adult human remains; or
- 24" x 12" infant container may be buried at the head end of a single grave in which a casket containing human remains has been buried, provided space is available.
- Excavated soil will either go to low spots on the land or stay on the lot. When a lot is developed, the lot will be excavated to two feet below the surface. Concrete liners are laid then. The excavated soil will be covering the concrete liners. Thus the new ground profile will be two feet higher.
- An open storage equipment shed will be constructed. The size will be 25'x50'.

3.2 Planting and Irrigation

Ground Cover

The cemetery will have a natural cover. The burial sections with an area approximately 1.7 acres will be developed. ≤ 50,000 PLOTS?

Climate based strategy

According to US Climate Data, Amador County's climate accounts for 35.4 inches of precipitation annually. The planting design of the Gardens of Noor Cemetery utilizes native low water use plants as well some adapted non-invasive trees, shrubs, groundcovers, and perennials. These plants reflect the character of Amador County and meet the necessary demand of low water usage.

4. SITE CHARACTERISTICS

Landscape Lighting

Due to the operational hours of the cemetery, exterior landscape Lighting is limited. Lighting for other features throughout the site including the main building, cemetery entrance and decorative accent lighting are optional.

Security

The perimeter of developed area of the cemetery will bordered by a 5 foot fence along Carbondale Rd and Lambert Rd or inside the land. The cemetery visitor entrances will be controlled by a manual swing gate and lock. The maintenance entrance of the sections in the cemetery will be controlled by a manual rolling gate and lock. Options for automatic gates or Automatic Number Plate Recognition Camera opening electric gates are available.

Tab H — Table of Authorities

Gardens of Noor Cemetery — Use Permit UP-22;2-3 (APN 001-220-013)

Amador County, California

August 13, 2026

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association.

Statutes, guidelines, regulations, case law, and code provisions cited across Tabs A through F, with a working citation link for each. Items marked *ibid.* refer to the source cited immediately above them.

CEQA statutes and guidelines

- **CEQA Guidelines (2023 edition)** — California Natural Resources Agency
- **CEQA Statute and Guidelines Handbook (2024)** — AEP
- **Pub. Resources Code § 21083.4 (oak woodlands)** — Justia
- **CEQA Guidelines § 15126.4(a)(1)(B) — "Formulation of mitigation measures shall not be deferred until some future time"; the three-part proviso is conjunctive** — Cornell LII
- **CEQA Guidelines § 15004(b)(4) — an agency shall not, as a practical matter, commit itself to a project before completing CEQA review; "an agency shall not grant any vested development entitlements prior to compliance with CEQA"** — Cornell LII. *(Subdivision (b)(2) and its subparts (A)–(B), which use the "forecloses alternatives or mitigation measures" formulation, are by their terms addressed to a "proposed public project"; subdivision (b)(4) is the provision that governs pre-approval commitments generally, and subdivision (b)(3) addresses private projects. The controlling case authority for premature commitment on a private project is* Save Tara v. City of West Hollywood *(2008) 45 Cal.4th 116.)*
- **CEQA Guidelines § 15064.3 — vehicle miles traveled is generally the most appropriate measure of transportation impact; "except as provided in subdivision (b)(2)..., a project's effect on automobile delay shall not constitute a significant environmental impact" (subd. (a)); applies statewide beginning July 1, 2020 (subd. (c))** — Cornell LII
- **Pub. Resources Code § 21099(b)(2) — "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any" (applies upon certification of the implementing guidelines)** — Justia
- **CEQA Guidelines Appendix G, transportation checklist (OAL-approved Dec. 28, 2018; effective Jan. 3, 2019; prospective application date Apr. 27, 2019)** — the 2019

amendments removed the level-of-service and congestion-management items and substituted the § 15064.3(b) criterion — adopted text · pre-2019 form

- **CEQA Guidelines § 15165 — single environmental document required for the ultimate phased project** — Cornell LII
- **CEQA Guidelines § 15357 — definition of "discretionary project"** — Cornell LII
- **Pub. Resources Code § 21082.1(a) — studies must be prepared directly by or under contract to a public agency; the lead agency must independently review and reflect its own judgment (subd. (c))** — Justia

Case law

- ***Laurel Heights Improvement Assn. v. Regents* (1988) 47 Cal.3d 376** — Future expansion must be analyzed where it is a reasonably foreseeable consequence and would change the scope or nature of the project. Justia · Casetext analysis

- ***Berkeley Keep Jets Over the Bay Com. v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344** — EIR-adequacy / abuse-of-discretion (not the "fair argument" standard); EIR held inadequate for failing to analyze cumulative impacts of reasonably foreseeable future development. Justia · CEQA Portal summary

- ***Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296** — Deferred environmental assessment is unlawful; "[a] study conducted after approval of a project will inevitably have a diminished influence on decisionmaking"; **"Deficiencies in the record may actually enlarge the scope of fair argument"**; "[t]he agency should not be allowed to hide behind its own failure to gather relevant data". Justia

- ***POWER v. County of Stanislaus* (2020) 10 Cal.5th 479** — A county "may not categorically classify all these projects as ministerial"; Bulletin 74 Standard 8.A confers discretion where a contamination source is near a proposed well. Official opinion PDF, California Courts

- ***County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193** — A CEQA project description must be "accurate, stable and finite". Justia

- ***Bozung v. Local Agency Formation Com.* (1975) 13 Cal.3d 263** — CEQA forbids segmenting a project to avoid disclosing the impacts of the whole. Justia

- ***Save Tara v. City of West Hollywood* (2008) 45 Cal.4th 116** — An agency may not commit itself to a definite course of action before completing environmental review. Stanford SCOCAL, full opinion

- ***Aptos Council v. County of Santa Cruz* (2017) 10 Cal.App.5th 266** — Piecemeal doctrine; the foreseeability threshold for treating related actions as one project. Justia

- ***Lincoln Place Tenants Assn. v. City of Los Angeles* (2005) 130 Cal.App.4th 1491** — An agency may not disregard a previously adopted mitigation condition without stating a legitimate reason, supporting it with substantial evidence, and conducting supplemental CEQA review. CEQA Portal case entry

- ***Old Golden Oaks LLC v. County of Amador* (2025) 111 Cal.App.5th 794** — Third Appellate District No. C099948, filed May 30, 2025; **review denied September 17, 2025 (Cal. Supreme Court No. S291821)**. Published and citable. An agency may condition a determination of application completeness on additional information needed to evaluate the project under CEQA, where its submittal checklist and code provisions inform the applicant that CEQA compliance is required. **Amador County was the prevailing respondent on that holding**, and advanced the position that it may require environmental information beyond the face of a checklist before deeming an application complete. Justia · Burke, Williams & Sorensen analysis · Supreme Court minutes, September 17, 2025, review denied

- ***Keys v. Romley* (1966) 64 Cal.2d 396** — California's "modified civil law rule" for surface waters: an upper landowner altering natural drainage must act with reasonable necessity and reasonable care to avoid unnecessary injury to the land below, and the lower landowner must take reasonable precautions in turn; the opinion separately describes, without adopting, a four-factor "reasonable use" test followed by a minority of other states; cited at Tab A §5.7 regarding the Cemetery Plan's two-foot grade-raise. Justia

Secondary sources and practice materials

- **Current California CEQA appellate developments (2025)** — Fair-argument and mitigated-negative-declaration adequacy. Perkins Coie, 2025 Land Use and Development Law Case Summaries · Brownstein Hyatt Farber Schreck, CEQA News You Can Use, August 2025
- **Commentary on negative declarations upheld on review** — Contrasting authority, noted for completeness. Holland & Knight

Well permits, on-site wastewater, and county code

- **Amador County Code Chapter 14.06 — Water Supply Wells (Ord. 1730 § 2, 2013; § 14.06.055 am. Ord. 1800 § 3, 2020)** — Code Publishing
- **§ 14.06.010 — adopts DWR Bulletins 74-81 and 74-90 by reference** — *ibid.*
- **§ 14.06.040 — application contents; plot plan within a 200-foot radius; subsection (D) proposed use of the well; subsection (F) "[o]ther information as may be necessary to determine if the underground water will be adequately protected"** — *ibid.*
- **§ 14.06.050 — "an on-site sewage disposal permit shall be issued prior to the issuance of a well permit"** — *ibid.*
- **§ 14.06.055(E)–(F) — nonresidential/mixed use requires a registered professional engineer's proposal describing water demand** — *ibid.*
- **§ 14.06.080 — "any other conditions or requirements found by the department to be necessary to protect public health"** — *ibid.*
- **§ 14.06.090(B) — the department "may refuse to issue a permit" where the work would create or aggravate a health hazard or violate the chapter's standards** — *ibid.*
- **§ 14.06.110 — one-year permit life (A); one free one-year extension (B); driller's report within 30 days (C), per Water Code § 13751** — *ibid.*
- **§ 14.06.170 — standards per Chapter II of Bulletins 74-81 and 74-90 (incorporates Standard 8.A)** — *ibid.*

- **§ 14.06.180 — wells minimum 10 feet from property lines; 50 feet on parcels created after October 14, 1987** — *ibid.*
- **Amador County Code § 7.42.110 — water supply well permit fee ($300, 2020)** — Code Publishing
- **DWR Bulletin 74 — California Well Standards** — Department of Water Resources

Records, process, and public access

- **Gov. Code § 7922.535(a) — 10 calendar days to determine whether a request seeks disclosable records, with notice and reasons** — Justia
- **Gov. Code § 7922.535(b) — one written extension for unusual circumstances, no more than 14 additional days (24 maximum)** — *ibid.*
- **Gov. Code § 7922.530(a) — records to be produced "promptly"; the 10-day window is a determination deadline, not a production deadline** — Justia
- **Gov. Code § 7922.600(a) — agency duty to assist in identifying responsive records, describe its information systems, and suggest means of overcoming any practical basis for denial** — FindLaw
- **California Public Records Act practice guide** — First Amendment Coalition
- **Permit Streamlining Act, Gov. Code § 65920 et seq. — completeness determination timelines and the single deficiency-list opportunity** — California Legislative Information
- **Pub. Resources Code § 21177 — exhaustion of administrative remedies** — Justia

Airport and aviation

- **Pub. Utilities Code § 21675 — ALUC airport land use compatibility plans; referral of general plan/zoning actions to the ALUC is required separately under §§ 21676–21676.5** — Justia
- **Caltrans Division of Aeronautics — airport land use planning** — Caltrans
- **Caltrans — school and state building site evaluations near airports** — Caltrans
- **CDE — school siting near airport runways** — California Department of Education
- **14 C.F.R. § 91.119 — minimum safe altitudes** — Cornell LII · eCFR

Fire safety and water supply

- **14 CCR § 1270.01 et seq. — State Minimum Fire Safe Regulations** — Cornell LII · § 1273.05 · § 1273.09 · Westlaw CalRegs
- **Amador County Code Chapter 15.30 — Fire and Life Safety Ordinance (roadway radius § 15.30.160; turnarounds § 15.30.170)** — Code Publishing
- **SRA Fire Safe Regulations (2020)** — CAL FIRE SLO
- **CAL FIRE Standard 1 — Water Supply** — CAL FIRE SLO
- **California Fire Code Ch. 5 — fire service features** — UpCodes
- **California Fire Code App. B — fire flow requirements** — UpCodes
- **California Fire Code App. D — fire apparatus access roads** — UpCodes

Transportation and VMT

- **OPR Technical Advisory on Evaluating Transportation Impacts (SB 743)** — LCI / OPR · November 2017 edition

- **MTC VMT methodology memorandum** — MTC
- **Alameda County transportation appendix (methodology reference)** — ACGov
- **Amador County Regional Transportation Plan (2024 Final Adopted)** — ACTC
- **Transportation Injury Mapping System (collision data)** — TIMS, UC Berkeley
- **California Crash Reporting System / SWITRS data** — California Open Data
- **California Highway Patrol fatal collision data** — CHP

Roadway safety incident record (§2.7)

- **Ione Highway 104 fatal crash** — CBS Sacramento
- **Amador County crash — infant fatality** — MyMotherLode
- **Community response, Ione family** — Amador Ledger Dispatch

Biological resources

- **Ione manzanita — USFWS species profile** — USFWS
- **Ione manzanita — five-year review** — USFWS ECOS
- **Ione buckwheat — CDFW** — CDFW
- **CDFW project correspondence** — CDFW NRM 203586 · CDFW NRM 96009
- **Feral swine — The Wildlife Society position statement** — TWS
- **Feral swine impacts — press coverage** — Los Angeles Times · NBC Bay Area
- **Feral swine exclusion fencing — U.S. Department of Agriculture** — USDA/APHIS, *Fencing out Feral Swine*
- **Wild pig trap enclosure construction — panel height and anchoring** — Mississippi State University, *Wild Pig Info*
- **Oak woodland mitigation — model ordinance** — Butte County

Other

- **Green burial — environmental health implications** — NACCHO
- **Amador County Code Title 19** — Code Publishing
- **Sacramento County PLNP2017-00124 project record** — Sacramento County
- **Groundwater / soils reference material** — SJSU course materials · USDA / GPO
- **Judicial reference material** — UC Davis School of Law
- **Cost reference** — LatestCost
- **Video reference in the record** — YouTube

Client-provided materials, cited throughout as "(provided by client; on file)": Amador County Public Works Road Specification PW-7; State Minimum Fire Safe Regulations (April 1, 2023 ADA edition); the Mitigation Monitoring and Reporting Program for UP-22;2-3; the Amador Water Agency letter footer-dated April 10, 2023; site photographs; and the Wardall et al. examinations at Tabs B and C.

Prepared by Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association.

8/27/2026:

To: Amador County, CA, Planning Commissioners and Board of Supervisors.

Statement of objection to: Amador County Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery.

I am in receipt of your NOTICE OF PUBLIC HEARING document since I live on Lambert Rd. which is in the immediate vicinity of the proposed project and would be severely negatively impacted by its approval. Let me dissect the first paragraph of your notice.

1) 1832 grave sites: The applicant's original request was for 55,000 grave sites, and a 20,000 square foot mosque (this is the total project). I believe to comply with CEQA a project must be evaluated in its totality, not piecemeal. This is no more than a RUSE to make it less impactful than it is. Who would start a business which would terminate in 2.54 years; 60 funerals / month x 12 = 720 funerals / year, 1832/720=2.54 years? 55,000/720=76 years at one body/grave, at 3 bodies/grave, 165,000/720= 229 years for project buildout.
2) Why would the applicant have parking for 100 cars if the use permit limits use to 50 cars per event, and who will be there to monitor and turn back the 51st car? This makes NO sense and is again, just another RUSE to slip the project through. There could be many more then 50 cars per event, at 50 / event = 100 local road transits / day x 30 = 3,000 new cars per month. Our research show as many as 225 people and 150 cars per funeral are not uncommon, resulting in 18,000 vehicle transits per month. The roads in this community are in some area's single lane gravel, or at best narrow potholed disasters, which Amador County obviously lacks funds to repair. This massive increase in traffic will compound by many orders of magnitude the deterioration of our already distressed local roads. How will the road and traffic issues be mitigated? Who pays for road upgrades and ongoing maintenance, the taxpayers? Who directs the traffic flow?

   In-and-above the road disrepair, there is the matter of our local residents having to deal with this absurd increase in local traffic with time delays, safety issues and perhaps most importantly the mental anguish brought down upon us by being forced to live next to a cemetery, and if we decided to sell, our property values would be negatively impacted due to the close proximity of this cemetery (yet another source of mental anguish).

In some recent research I've done reference "Groundsure" an article by Rachel Marten 10/24/2019, titled "Grave danger – Cemeteries as a source of groundwater pollution". Three

issues standout. 1), “A burial, or any activity related to burials, must not cause pollution of surface water, or groundwater”. This proposed site is subject to yearly flooding and heavy surface water runoff. Local neighbors have video evidence of this fact. 2), “A burial must not be undertaken directly into ground water”. In winter the ground water here can be at, or just below the surface. We have had several pieces of heavy equipment buried up to their axles and left until Spring for removal. 3), “There must not be more than 2,500 burials per hectare (2.47 acres)”. Therefore; 55,000 burials at one body / grave would need 54.34 acres (46-acre site). At 3 bodies per grave, he would need 163 acres. What percent of the site would be actual grave sites, 50%? This burial density greatly exceeds that recommended for a low impact cemetery, with its effect on the groundwater and aquafers being undeterminable.

The proposed site lies within the Cosumnes Subbasin. The “Sustainable Groundwater Management Act (SGMA) of 2014 requires local controlling Groundwater Sustainability Agencies, GSAs (there are 7 within this Subbasin) to develop a Groundwater Sustainability Plan (GSP), Amador County Groundwater Management Authority is the GSA for this area. Have they done a complete EIR for this project and addressed the effect of 720 un-embalmed open casket green burials per year on the quality of local groundwater (which they are obligated to do per SGMA)?

It would seem reasonable to expect the issuance of a use permit to be of some benefit to the local community, or at least to Amador County. The applicant stated his response to a question asked on the special use permit application of “what is the need for the project”, his response was “to meet the growing needs of the Muslim community of Amador County”. A Google search revealed the Muslim population of California to be less than 1%: Extrapolated to Amador County the Muslim population is 400 persons, assuming all 400 are not on the verge of death, that leaves the proposed use at 2 burials / day from Amador Counties “need”, as absurd from a business perspective. We must assume the applicant plans this project to be a “Destination Cemetery”, drawing from the general population of California and perhaps the western United States. As I understand a religious organization and property are exempt from state and local taxes, this leaves no financial benefit for Amador County and more than likely would require more than usual precious resources from the county that they don’t have. The only benefit of this project is a financial gain for the applicant.

Then there is the issue of water. The site is served by Amador Water Agency with a 5/8-inch domestic meter. Water wells in this area are notorious for lack of production, and it would seem ludicrous to issue a use permit without the proof of a productive well capable of the

water flow needs for firefighting, a septic system capable of hundreds of uses per day, landscape irrigation and other domestic uses.

Also, of note here, there are wild pigs in the area which have roamed freely on many, if not all the properties in the neighborhood. They root up the topsoil and can devastate an area. They can root up the ground to a depth of 1 meter, which makes an 18-inch burial (which is allowed in CA) very problematic, even considering a concrete lid to the burial crypt. How does the applicant mitigate the pig problem?

Reference county code 19.56.040 Action by planning commission, pp3: to paraphrase: In order to grant any use permit the planning commission must find that the project will not under the circumstances be DETRIMENTAL to health (surface and ground water contamination), safety (increased traffic), peace (this is so obvious, traffic, noise, pollution, reduction in property values, reduction in neighborhood morale, anxiety and depression), comfort (traffic delays), general welfare (all the above) of persons residing or working in the neighborhood … This issue is NOT MITIGABLE by any means!

In addition, "if proposed use may cause injury, or damage beyond normal wear and tear to any county road, or may impair the public's use thereof, or may endanger persons or property on or adjacent to any county road … an agreement may require applicant to pay for any injury, damage, special maintenance, or improvements to said roads" … There are 12 miles of subpar decaying roads leading into the project site.

In summation, this DESTINATION CEMETERY is proposed by a single non-resident of Amador County for his own enrichment, to the DETRIMENT of the local residents for all reasons listed above and for other unforeseen issues that may arise. And MOST importantly, this cemetery will disturb and disrupt the peace, harmony, and tranquility of our quiet rural neighborhood and our daily lives and will do so for all residents of the area, and those yet to be born, for the next 100+ years.

This cemetery does not fit this neighborhood. As planning commissioners, you have a grave responsibility (pun intended) to county residents and the county at large to adjudicate projects based on their need and the benefit to our local Amador community, since both are negative and even detrimental to our health and wellbeing, I would posit this use permit should be denied.

Respectfully,

Michael H. Preskar

17901 Lambert Rd. Ione, CA 95640, (916) 425-6439, mhpres@icloud.com

Outlook

Letter to planning & 3 videos

From Michael Preskar <mhpres@icloud.com>
Date Fri 8/28/2026 4:59 PM
To Plan-Planning <planning@amadorcounty.gov>
Cc BOS-Clerk of the Board <clerkoftheboard@amadorcounty.gov>

2 attachments (16 MB)
letter to planning commission.docx; IMG_0406 (1).MOV;

You don't often get email from mhpres@icloud.com. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To all Amador Co. planning commissioners & supervisors,

I am submitting this letter and 3 videos to be added to the administrative record as a formal public comment in opposition of the project UP-22; 2-3 Gardens of Noor, submitted during the public comment period.
I ask that it be forwarded to all members of the Planning Commission and Board of Supervisors.
Respectfully,
Michael H Preskar

IMG_3552.MOV
drive.google.com

IMG_3523.MOV
drive.google.com

Outlook

Gardens of Noor proposal for a site near Carbondale and Lambert roads

From DAVID WEST <invenit@aol.com>
Date Wed 8/12/2026 12:02 AM
To Plan-Planning <planning@amadorcounty.gov>

[You don't often get email from invenit@aol.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Amador Planning Department,

My wife and I reside on a parcel that abuts Carbondale and Barney Roads. We wish to voice our strenuous opposition to a proposal to construct a shallow grave cemetery with support structures near the intersection of Carbondale and Lambert roads.

Our specific concerns are:

- A significant imposition of traffic in a rural area.

- A detrimental impact to existing good water resources, both demand and possible contamination of groundwater.

- More noise introduced into an area where it is universally unwanted. We moved to our current location to evade traffic and noise.

-The introduction of a land use proposal fundamentally at odds with the nature of land use in this surrounding area.

-The likely introduction of a Place of Worship in the future which would further amplify the issues mentioned heretofore.

- The introduction of such a land use in the area would likely have negative impact on property values.

- I regret to mention the possibility of vandalism and potential violence due to a clash of cultures and religious practices. We should strive to tolerate and honor diversity within our communities, but stark cultural contrast often invites malicious intent which is unfortunate.

- Increased activity of this type can result in wildfire hazards that currently do not exist.

Please disallow this proposed land use . Keep this portion of the County rural in character .

An acknowledgment of the delivery of these comments would be appreciated.

Regards,

David and Mary West

Outlook

Re: Correction to Submittal for the Administrative Record-UP-22;2-3, Gardens on Noor

From Plan-Planning <planning@amadorcounty.gov>

Date Fri 8/21/2026 1:50 PM

To PJ Patrick Flynn <pjpatrickflynnbooks@gmail.com>; Chuck Beatty <CBeatty@amadorcounty.gov>; Krista Ruesel <kruesel@amadorcounty.gov>; Greg Gillott <GGillott@amadorcounty.gov>; BOS-Clerk of the Board <clerkoftheboard@amadorcounty.gov>; Sabrina L. Pierce <spierce@amadorcounty.gov>; Plan-Planning <planning@amadorcounty.gov>

Cc Ron Woodhouse <ronwoodhouse33@gmail.com>; davidwardall@gmail.com <davidwardall@gmail.com>

8 attachments (11 MB)

Summary of Flynn PRA2 responses.xlsx; Building permit records.001-220-13.pdf; Design Plan 1 Rev 02.pdf; Design Plan 2 Rev 02.pdf; Design Plan 3 Rev 02.pdf; Design Plan 4 -Tire Load Disperesion Rev 02.pdf; 8.11.26 AFPD Comments.pdf; 2022-03-03 13-03 181.mp3;

Good afternoon, Ms. Flynn.
Attached are the documents responsive to your public records act request dated August 13, 2026, excluding those documents produced by the Amador County Environmental Health Department via email dated August 19, 2026, and excluding those documents already produced for your public records act request dated July 20, 2026. Any new documents responsive to the July 20, 2026, PRA request are included for item #35.
Thank you,
Chuck Beatty
Planning Director

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorcounty.gov

From: PJ Patrick Flynn <pjpatrickflynnbooks@gmail.com>
Sent: Sunday, August 16, 2026 7:09 PM
To: Chuck Beatty <CBeatty@amadorcounty.gov>; Plan-Planning <planning@amadorcounty.gov>; Krista Ruesel <kruesel@amadorcounty.gov>; Greg Gillott <GGillott@amadorcounty.gov>; BOS-Clerk of the Board <clerkoftheboard@amadorcounty.gov>
Cc: Ron Woodhouse <ronwoodhouse33@gmail.com>; davidwardall@gmail.com <davidwardall@gmail.com>
Subject: Correction to Submittal for the Administrative Record-UP-22;2-3, Gardens on Noor

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

To: County of Amador Administrative Staff:

The attached submission supersedes the prior transmission under cover letter dated August 13, 2026, emailed on August 14, 2026. A small number of citations that were imprecisely stated have been

corrected and are detailed on the attached errata sheet. None of the corrections changes any conclusions or requested action in the original submittal.

I will hand-deliver a hard copy and a flash drive containing the same corrected package to the Planning Department on Monday, August 17, 2026.

Sincerely,

Peggy Flynn
530 368 6434

1 Does not exist
2 Does not exist
3 Does not exist
4 Does not exist
5 Does not exist
6 Does not exist
7 Does not exist
8 Does not exist
9 Does not exist
10 Does not exist
11 Does not exist
12 Does not exist
13 Does not exist
14 Does not exist
15 Supplied by Environmental Health Department email dated August 18, 2026
16 Supplied by Environmental Health Department email dated August 18, 2026
17 Supplied by Environmental Health Department email dated August 18, 2026
18 Supplied by Environmental Health Department email dated August 18, 2026
19 Supplied by Environmental Health Department email dated August 18, 2026
20 Supplied by Environmental Health Department email dated August 18, 2026
21 Permit records attached
22 Does not exist
23 Does not exist
24 Does not exist
25 Does not exist
26 Does not exist
27 Does not exist
28 Does not exist
29 Does not exist
30 Does not exist
31 The requested documents were provided in the response to the PRA request submitted 7-20-2026
32 Does not exist
33 The requested documents were provided in the response to the PRA request submitted 7-20-2026 with the exception of the audio file from the March 3, 2022, which is included herein.
34 Written TAC minutes haven't been produced since 2004. There is no retention schedule for TAC minutes.
35 The requested documents were provided in the response to the PRA request submitted 7-20-2026, with the exception of attached correspondence between the applicant and AFPD regarding the revised internal roadway design.
36 Does not exist
37 The geotechnical study was provided in the response to the PRA request submitted 7-20-2026
38 Does not exist.

From: Barbi Boyle <barbiboyle@icloud.com>

Date: Tue, Sep 1, 2026 at 11:51 AM

Subject: Gardens of Noor Cemetery

To: Barbi Boyle <boyleranch@icloud.com>

To the Board of Supervisors and County Planners,

Dear Amador County Planning Department, Planning Commissioners, and Members of the Board of Supervisors,

I am writing regarding Use Permit UP-22;2-3, Gardens of Noor Cemetery, proposed for 857 Carbondale Road / 16630 Lambert Road in Ione.

I want to make clear that my concerns are not based on the religious affiliation of the proposed cemetery. My concerns are strictly about land use, environmental impacts, public safety, infrastructure, traffic, groundwater, fire protection, and whether the County has enough reliable information to make the findings required for a use permit.

After reviewing the County record and the Gardens of Noor Master Submittal Package, I believe the County should not approve the use permit or adopt the proposed Mitigated Negative Declaration until these issues are fully resolved.

1. Groundwater and burial method are my greatest concern.

The applicant's own geotechnical information reportedly found groundwater actively seeping and pooling on the property. The proposed burial method has also been described as shallow, shroud-only/green burial at approximately 18 inches.

County Counsel previously identified groundwater contamination as a significant concern and indicated that additional information was needed regarding grave locations, groundwater levels, and soils. County Environmental Health and Public Health also discussed the potential for groundwater contamination and pathogen leaching from the proposed burial method.

This is not a theoretical concern. The proposed use involves placing human remains in shallow graves on a property where groundwater has reportedly been encountered. Before approval, I believe the County should have site-specific evidence establishing adequate separation from groundwater, appropriate soil conditions, drainage and flood protection, and a monitoring program capable of detecting contamination.

2. The project description does not appear to be stable or finite.

The current application describes 1,832 grave sites on approximately 1.7 acres of a 46-acre parcel, with approximately 60 funeral events per month and up to 50 attendees per event.

However, the applicant's earlier 2022 proposal contemplated as many as 50,000 burial sites and a large assembly building. The current Cemetery Plan describes development over a 100-year timeframe. At 60 interments per month, 1,832 graves would be filled in approximately 2½ years at one interment per grave. The Master Submittal also points out that the density of the currently proposed burial area, if extended across the 46-acre parcel, produces approximately 49,572 graves—remarkably close to the earlier 50,000-grave proposal.

The applicant has also reportedly stated that he intends to apply for another addition.

I therefore believe the County needs to evaluate the reasonably foreseeable ultimate project rather than approving the first phase and addressing expansion later.

3. Traffic and road safety need a real analysis.

The application proposes approximately 60 funerals per month with up to 50 attendees per event, while also stating an increase of only an average of 20 vehicles per day. Those numbers do not appear internally consistent. The Master Submittal calculates that 50 attendees could represent approximately 17–25 vehicles for a single funeral.

The Initial Study reportedly did not perform a quantified trip-generation or VMT analysis, nor did it adequately analyze funeral-procession traffic, peak traffic, roadway safety, or emergency access on the surrounding rural roads.

These are not simply questions of traffic inconvenience. They concern narrow rural roads, sight distance, emergency access, road condition, and the safety of residents and funeral attendees.

4. Water supply and fire protection have not been adequately demonstrated.

The County record indicates that the Amador Water Agency has limited service at this location to approximately 400 gallons per average day. Fire-flow information cited in the record is approximately 350–400 gallons per minute compared with a 1,000-gpm standard. The County's fire officer also indicated that fire-water tanks may be necessary, yet those tanks do not appear to be clearly incorporated into the project description.

Before approval, the County should establish exactly where the project's domestic water and fire-suppression water will come from and whether that supply is adequate for the proposed use.

5. Septic and wastewater capacity need to be established.

This is a destination cemetery with potentially hundreds of visitors over the course of a month and significant numbers of people attending individual funerals. The County previously required an engineered septic system designed for maximum visitation.

The County should not rely on future approvals or assumptions. The wastewater system should be demonstrated to be adequate for the actual maximum use being approved.

6. Biological resources deserve additional review.

The County's earlier review identified concerns regarding federally protected Ione buckwheat and Ione manzanita on or immediately adjacent to the property. The Master Submittal states that the Initial Study does not adequately address whether federal consultation or permits may be required.

Those issues should be resolved before the County approves grading, grave excavation, roads, parking, or future expansion.

7. The use permit findings matter independently of CEQA

Amador County Code §19.56.040 requires the Planning Commission to affirmatively find that the proposed use will not be detrimental to the health, safety, peace, comfort, general welfare of neighborhood residents or workers, or injurious to neighboring property.

Given the unresolved questions involving groundwater, traffic, fire protection, water supply, wastewater, biological resources, and the ultimate scale of the project, I do not believe the County currently has enough information to confidently make those findings.

8. Applicant compliance history should be considered when establishing safeguards.

I also ask the County to consider documented public records concerning the applicant identified as Mounir A. Kaddoura. Yuba County records document a 2021 Notice and Order to Abate Public Nuisance involving Mounir A. Kaddoura at a property in Olivehurst. The documented conditions included an unsafe/substandard dwelling, junk and debris, overgrown vegetation, an illicit sewage discharge to the ground surface, illegal camping, inoperable vehicles and visual blight. In 2024, the Yuba County Board of Supervisors considered administrative/abatement costs and penalties and authorization of an abatement lien in connection with that matter.

I am not suggesting that a prior, unrelated code-enforcement matter is by itself grounds to deny this application. Rather, I believe it is relevant when the County is determining whether this particular project needs strong, enforceable conditions, inspections, monitoring, financial assurances, and consequences for noncompliance—particularly because this project involves groundwater, human remains, wastewater, fire safety, and a proposed 100-year operating horizon.

My request to the County is straightforward:

Please do not approve this use permit based on the current record.

At minimum, I respectfully request that the County:

1. Require additional site-specific groundwater, soil, drainage, and burial-depth analysis;
2. Establish a verifiable and adequate water and fire-flow supply;
3. Require a fully engineered wastewater/septic solution based on maximum anticipated use;
4. Obtain a comprehensive traffic and roadway-safety analysis;
5. Resolve the biological-resource and airport-safety questions;
6. Establish a clear, enforceable maximum number of funerals, attendees, vehicles, and interments;
7. Address the reasonably foreseeable expansion of the cemetery and the remaining acreage;
8. Require meaningful ongoing monitoring and enforcement of all mitigation measures; and
9. Determine whether the current environmental review is adequate or whether an Environmental Impact Report is necessary.

Most importantly, I ask the County to make sure that the project ultimately approved is the project that has actually been analyzed, rather than approving a small first phase and dealing with foreseeable expansion, increased traffic, additional burials, and additional infrastructure impacts later.

This is a large, long-term land-use decision that could affect neighboring properties and the surrounding rural community for generations. I believe the County owes the residents of Amador County a complete, site-specific, and enforceable analysis before granting this use permit.

Thank you for taking these concerns seriously and for including this correspondence in the administrative record for UP-22;2-3.

Sincerely,

Barbi Boyle

Amador County Resident

Barbi Boyle
CELL 209-610-3860
boyleranch@icloud.com
barbiboyle@icloud.com
www.boyleranch.com
Ranch address:
7105 Martin Lane, Ione Ca 95640
Real Estate address:
Vista Sotheby's International Real Estate
54 Main Street, Sutter Creek 95685
BRE# 01390446

Outlook

Re: Notice of Public Hearing for Use Permit UP-22;2-3 Gardens of Noor Cemetery for Planning Commission Review September 8, 2026

From PJ Patrick Flynn <pjpatrickflynnbooks@gmail.com>
Date Tue 9/1/2026 2:30 PM
To Plan-Planning <planning@amadorcounty.gov>; Chuck Beatty <CBeatty@amadorcounty.gov>; Krista Ruesel <kruesel@amadorcounty.gov>; BOS-Clerk of the Board <clerkoftheboard@amadorcounty.gov>; Greg Gillott <GGillott@amadorcounty.gov>

1 attachment (1 MB)
Gardens of Noor - Supplemental Public Comments Sept 1 2026.pdf;

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

RE: SUPPLEMENTAL PUBLIC COMMENT ON THE INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION — Use Permit UP-22;2-3

Attached please find the supplemental public comment for inclusion in the Administrative Record during the public comment period to be made part of the prior submission of August 19, 2026 sent via email and acknowledged as received by the Planning Department.

PLEASE CONFIRM RECEIPT.

On Wed, Aug 19, 2026 at 6:16 PM PJ Patrick Flynn <pjpatrickflynnbooks@gmail.com> wrote:

> **RE: PUBLIC COMMENT ON THE INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION — Use Permit UP-22;2-3**
>
> **Peggy Flynn**
>
> Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association
> PO Box 35
> Rail Road Flat, CA 95248
> pjpatrickflynnbooks@gmail.com
> (530) 368-6434
>
> August 19, 2026
>
> Via Email

Chuck Beatty, Planning Director
Amador County Planning Department
810 Court Street
Jackson, CA 95642
cbeatty@amadorcounty.gov
cc: Amador County Planning Department, for distribution to the Planning Commission — planning@amadorcounty.gov
cc: Krista Ruesel, Project Planner — kruesel@amadorcounty.gov
cc: Greg Gillott, Amador County Counsel — ggillott@amadorcounty.gov
cc: Heather Peek, Clerk of the Board, Amador County Board of Supervisors — clerkoftheboard@amadorgov.org

RE: PUBLIC COMMENT ON THE INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION — Use Permit UP-22;2-3, Gardens of Noor Cemetery, Applicant Mounir Kaddoura, 857 Carbondale Road / 16630 Lambert Road, Ione, CA, APN 001-220-013 — Confirmation of Prior Submittal as Timely Written Comments Within the Official 20-Day Environmental Review and Comment Period (August 19 – September 8, 2026)

Dear Director Beatty:

This letter confirms, for the record, that the written comments on the Initial Study and the proposed Mitigated Negative Declaration for UP-22;2-3 previously submitted to the Department are, and should be treated as, timely written comments received within the environmental review and comment period established by the Department's Notice of Public Hearing dated August 19, 2026, which commences on August 19, 2026 and ends on September 8, 2026, and within the record for the Planning Commission's public hearing on this matter scheduled for September 8, 2026 at 6:00 p.m.

Those prior submissions are: (1) the original comment package, transmitted under cover letter dated August 13, 2026 and emailed to the Department on August 14, 2026; and (2) the corrected and superseding package — correcting citations in Tabs A, E, and H — transmitted under cover letter dated August 16, 2026, together with an Errata Sheet, and hand-delivered to the Department in hard copy and on a flash drive on August 17, 2026. Because both were transmitted before the Department issued its August 19, 2026 Notice, I want to eliminate any ambiguity about their status in the newly opened comment period: they are not superseded by, or independent of, that period — they are the written comments the Notice invites, and I ask that the Department treat them, together with this letter, as part of the administrative record for UP-22;2-3 and as written correspondence delivered to the Department prior to the September 8, 2026 Public Hearing, consistent with the Notice's own statement that a party may otherwise be limited to issues raised at the hearing or in written correspondence delivered before it.

The Notice states that letters received before publication of the Staff Report — typically the Tuesday preceding the hearing, which for a September 8, 2026 hearing would be September 1, 2026 — are provided to each Commissioner as part of the agenda packet, while letters received afterward are only copied and circulated shortly before the hearing and may not receive as detailed a review. Both of my submissions have been on file with the Department since August 14 and August 17, 2026, respectively — well before that date — and I ask that the Department confirm they will be included in the Staff Report and the agenda packet transmitted to the Commission, with no further action needed on my part.

I renew the two requests made in my original letter: first, that the Department include this letter, the Executive Summary, and all tabbed documents and exhibits — as corrected by the August 16–17, 2026 Errata Sheet and corrected package — in the administrative record for UP-22;2-3, and transmit the documents themselves, not a summary of them, to the Planning Commission in the agenda packet for the September 8, 2026 hearing. **Second, please confirm receipt of this letter in writing.**

I reserve the right to supplement these comments in writing at any point before the close of the comment period on September 8, 2026, and I intend to appear and be heard at the September 8, 2026 public hearing as well. Please let me know if any further clarification would assist the Department's review.

Sincerely,

Peggy Flynn

Land-Use and Environmental Consultant to the Eagle's Nest Estates Owners' Association

Enclosures: https://drive.google.com/file/d/1I3euulT45fNR5b6yI9x8d6AOQmgD96MI/view?usp=sharing

Link to Submittal:
https://drive.google.com/file/d/1I3euulT45fNR5b6yI9x8d6AOQmgD96MI/view?usp=sharing

On Wed, Aug 19, 2026 at 4:13 PM Plan-Planning <planning@amadorcounty.gov> wrote:

> Hello,
>
> Please see the attached notice of public hearing for this item, to be reviewed by the Planning Commission on September 8, 2026 at 6:00 p.m. in the Board of Supervisors' Chambers at 810 Court St., Jackson, CA 95642. The item packet and agenda will be published at a later date, as well as a legal notice published in the Ledger Dispatch, under the Legal Publications Section ten (10) days before the meeting date. Please note, as an additional courtesy, this notice has been sent to those who have commented on the project and provided return emails.
>
> Thank you,
>
> Amador County Planning Department
> 810 Court Street
> Jackson, CA 95642
> (209) 223-6380
> planning@amadorcounty.gov

September 1, 2026

Re: Supplemental CEQA Comment and Signatory Roster
Use Permit UP-22;2-3, Gardens of Noor Cemetery, Applicant Mounir Kaddoura, 857 Carbondale Road / 16630 Lambert Road, Ione, CA, APN 001-220-013
Planning Commission Hearing: September 8, 2026

Dear Planning Commission and Planning Department:

This is a supplemental written CEQA comment submitted on behalf of Eagle's Nest Owners Association and the individuals identified in attached **Exhibit A, Signatory Roster and Adoption of CEQA Objections.**

Eagle's Nest Owners Association previously submitted its 442-page CEQA review, titled **PUBLIC COMMENT ON THE INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION — Use Permit UP-22;2-3, Gardens of Noor Cemetery, Applicant Mounir Kaddoura, 857 Carbondale Road / 16630 Lambert Road, Ione, CA, APN 001-220-013 — Confirmation of Prior Submittal as Timely Written Comments Within the Official 20-Day Environmental Review and Comment Period (August 19 – September 8, 2026),** on August 19, 2026 , regarding the Cemetery Applicant's Initial Study and proposed Mitigated Negative Declaration ("CEQA Review").

Each person identified in Exhibit A objects to approval of the proposed cemetery project and to adoption of the proposed Mitigated Negative Declaration, and joins in, adopts, and incorporates by reference the CEQA objections, evidence, and requested actions in the Eagle's Nest Owners Association CEQA Review submitted to Amador County on August 19, 2026.

The CEQA Review raises, among other matters, deficiencies regarding groundwater and flooding, burial-related environmental risks, fire protection and water supply, road and traffic capacity, funeral-procession effects, emergency access and response, cumulative impacts, piecemealing, and the adequacy and enforceability of proposed mitigation.

Please treat this letter and Exhibit A as timely written comments on the Initial Study and proposed Mitigated Negative Declaration; provide them to the Planning Commission; retain them in the official project file; and include them in the record of proceedings and any CEQA administrative record prepared for this matter.

Respectfully submitted,

Peggy Flynn, Land-Use and Environmental Consultant to the Eagle's Nest Owners Association

pjpatrickflynnbooks@gmail.com
September 1, 2026

1 Name: Print Jim Wirtz Signature:
Address: 941 Eagles Ranch Rd Date: 6-9-26

2 Name: Print CHET BERTELSEN Signature:
Address: 17140 CAMBERT RD Date: 7-10-26

3 Name: Print Michael McCleary Signature:
Address: 945 Eagles Ranch Rd Date: 7/22/26

4 Name: Print Margaret McCleary Signature:
Address: 945 Eagles Ranch Rd, Ione Date: 7/22/26

5 Name: Print Nadine McCleary Signature:
Address: 945 Eagles Ranch Rd, Ione CA Date: 6/22/26

---

6 Name: Print BRIAN K SMALL Signature: 916 201 9770
Address: ~~knuckleheads1500@SBCGLOBAL.NET~~ 18861 CLAYPIT RD, IONE, CA. Date: 7/8/26 CLAYPIT Rd

7 Name: Print Ron Hess Signature:
Address: 18851 CLAYPIT RD, IONE CA Date: 7/8/26

8 Name: Print Tammy Hess Signature:
Address: 18851 Claypit Rd Ione CA 95640 Date: 07/08/2026

9 Name: Print Richy m Grimshaw Signature:
Address: 15908 Oak Park Court Plymouth, Ca Date: 7/8/2026

10 Name: Print Lena Stiward Signature: Lena Stiward
Address: 15933 Muller Rd. Plymouth CA 95669 Date: 7-8-26

11 Name: Print MARK WATT Signature:
Address: 18800 CLAYPIT ROAD, IONE, CA 95640 Date: 7/8/2026

12 Name: Print BRADLEY RONNER Signature: [signature]
Address: 17800 CLAYPIT RD Date: 7/8/26

13 Name: Print Mike Preskar Signature: [signature]
Address: 17901 Lombard Rd. Ione CA 95640 Date: 7-8-26

14 Name: Print Tom McClearey Signature: [signature]
Address: 945 Eagles Ranch Rd, Ione CA 95640 Date: 7/8/'26

Name: Print

15 Name: Print Michelle Stevens Signature: [signature]
Address: 451 Sutter Hill Rd #219 Sutter Creek, CA Date: 7-4-26

16 Name: Print GEORGIA FOX Signature: Georgia Fox
Address: 54 BADGER RD. - SUTTER CREEK CA Date: 7-4-26

17 Name: Print Margaret Bailey Signature: Margaret Bailey
Address: 64 Bryson Dr Sutter Creek Ca Date: 7-18-26

18 Name: Print Jennifer Fox Fritz Signature: [signature]
Address: 111 Wallace St. Jackson, CA 95642 Date: 7-21-26

19 Name: Print Scott A Fritz Signature: [signature]
Address: 111 Wallace St., Jackson, CA 95642 Date: 7-21-2026

20 Name: Print ANNA LAWRENCE Signature: [signature]
Address: 5580 Overlook Court Plymouth 95669 Date: July 22 2026

Name: Print Signature:

21 Name: Print ROBERT L. SLATER Signature: [signature]
Address: 17860 Claypit Rd, Ione CA 95640 Date: 07/21/26

22 Name: Print Peggy Armer Signature: [signature]
Address: 17500 Claypit Rd Ione, CA 95640 Date: 07/24/26

23 Name: Print Donna Pilkington Signature: D Pilkington
Address: 1400 W. Marlette St Date: 7-25-26

24 Name: Print LINDA PORRAZ Signature: Linda Porraz
Address: 304 Policeman Hill St Date: 7-25-26

25 Name: Print MARILYN EVANS Signature: Marilyn R Evans
Address: 292 VARDON CT Date: 7-25-26

26 Name: Print DOLORES SOUZA Signature: Dolores Souza
Address: 526 Tannery Dr. Reno, CA Date: 7-23-26

27 Name: Print ANN OLMSTEAD Signature: Ann Olmstead
Address: 1001 Shakeley Ln Reno Date: 7/23/26

28 Name: Print JENISE MARIE MURPHY Signature: Jenise Marie Murphy
Address: 1400 WEST MARLETTE ST SPACE 58 RENO CA 89503 Date: 7-29-26

29 Name: Print Nick Truitt Signature: Nick Truitt
Address: 1400 W. MARLETTE ST SP 59 Date: 7/29/26

30 Name: Print Joan Truitt Signature: Joan Truitt
Address: 1400 W Marlette St Sp. 59 Date: 7/29/26

31 Name: Print Dorothy Semenoff Signature: Dorothy Semenoff
Address: 1400 W Marlette #41 Date: 7/29/2026

32 Name: Print Paul Semenoff Signature: Paul Semenoff
Address: 1400 W. Marlette #41 Date: 7/29/2026

33 Name: Print MARTHA FINCH Signature: Martha C Finch
Address: 313 W. JACKSON ST. RENO Date: 7-14-26

34 Name: Print Rick Finch Signature: Rick Finch
Address: 313 W. Jackson St Reno. Date: 7-14-26

35 Name: Print Janet Wardell Signature: Janet Wardell
Address: 17069 Lambert Rd, Reno Date: 7-21-26

36 Name: Print Dawn Hollman Signature: D Holl

Address: 813 Shakeley Ln Date: 7-22-26

37 Name: Print Shirley Furr Signature: Shirley Furr

Address: 340 Cottonwood Ct Date: 7/22/26

38 Name: Print Funderburg, Veronica Signature: Veronica Funderburg

Address: 1208 Fairway Dr Ione, Ca 95640 Date: 7/22-26

39 Name: Print Funderburk, Jerry Signature: Jerry Funderburk

Address: 1208 Fairway Dr Ione Date: 7-22-26

---

40 Name: Print Carson Yager Signature:

Address: 10250 Hwy 124 - POBox 553, Ione, Ca 95640 Date: 7-24-2026

41 Name: Print Lewis Yager Signature: Lewis Yager

Address: 10250 Hwy 124 - POBox 553, Ione, Ca 95640 Date: 7-24-2026

42 Name: Print Christina Hart Signature: Christina Hart

Address: 10250 Hwy 124 - POBox 553, Ione, Ca 95640 Date: 7-24-2026

43 Name: Print Dan Hoyle Signature:

Address: 6080 Jackson Valley Rd Ione Date: 7-29-26

---

44 **Name: Print** Norma Jean Knaggs **Signature:** Norma Jean Knaggs

Address: 4240 Curran Rd - Ione **Date:** 7/23/26

45 **Name: Print** Susan Senser **Signature:** Susan Senser

Address: 133 OAKRIDGE DR Ione **Date:** 7/23/26

46 **Name: Print** DENNIS CUSTARD **Signature:** DENNIS CUSTARD

Address: 1001 SHAKELEY LN, IONE **Date:** 7/23/26

47 **Name: Print** Robin Karnitz **Signature:** Robin Karnitz

Address: 172 Ashworth Dr, Ione **Date:** 7-24-2026

48 **Name: Print** Phil Karnitz **Signature:** Phil Karnitz 7-24-26

Address: 172 Ashworth Dr. **Date:**

49 Name: Print LINDA MATULICH Signature: Linda Matulich
Address: 143 Springcreek Dr Ione Date: 7-14-26

50 Name: Print ROBERT DURDEVICH Signature: Robert Durdevich
Address: 143 SPRINGCREEK DR IONE 95640 Date: 7-15-26

51 Name: Print Anna Moon Signature: Anna Moon
Address: 321 S. Sacramento st. Ione Date: 7-16-26

52 Name: Print Klina Koehler Signature: Klina Koehler
Address: 819 Shakeley Ln. Date: 7-15-26

53 Name: Print Cynthia Easterwood Signature: Cynthia Easterwood
Address: 626 Brookview Ct Ione CA 95640 Date: 7-15-26

---

54 Name: Print KEITH McCALLUM Signature: Keith McCallum
Address: 233 StonyBrook DR Date: 7-15-26

55 Name: Print JAN Mueller Signature: Jan Mueller
Address: 113 Violet Lane Ione Date: 7-15-26

56 Name: Print JULIA MATHIS Signature: Julia Mathis
Address: 85 KARSAN Rd Sutter Ca 95685 Date: 7/15/26

57 Name: Print Gerri Windsor Signature: Gerri Windsor
Address: 14074 Irishtown Rd Pine Grove Date: 7/15/26

58 Name: Print Louise A. Nunn Signature: Louise A. Nunn
Address: P.O. Box 4, Sutter Creek, Ca. 95685 Ridge Rd Date: 7-15-2026

---

59 Name: Print Carol Glatheler Signature: Carol Glatheler
Address: 1422 St. Andrews Lane Ione Date: 7/20/2026

60 Name: Print Emily Glatheler Signature: Emily Glatheler
Address: 1422 St. Andrews Lane Ione CA 95640 Date: 7/20/2026

61 Name: Print DAVID MURRAY Signature: David Murray
Address: 1422 ST ANDREWS DR IONE CA Date: 7/20/26

62 Name: Print MIKE KRISMER Signature: [signature]
Address: 5501 BUENA VISTA Ione Date: 7/21/26

63 Name: Print JUDY NURISID Signature: Judy Nurisid
Address: 1010 Shakeley Lane Ione Date: 7/23/26

64 Name: Print MARLENE Signature: Marlene Lee
Address: 112 INVERNESS COURT IONE CA Date: 7/23/26

65 Name: Print CAROLYN Sanders Signature: Carolyn Sanders
Address: 5745 Red Oak DR. Ione, CA Date: 1/23/26

66 Name: Print Maria De La Torre Signature: Maria De La Torre
Address: 571 Foothill Blvd. Ione Date: 7/23/2026

67 Name: Print PAT PORTO Signature: Pat Porto
Address: 210 KERN ST. JACKSON, Ca. Date: 7-15-2026

68 Name: Print Sally Morris Signature: Sally Morris
Address: 149 Spring Creek dr Ione Date: 7-15-26

69 Name: Print Nancy Vieira Signature: Nancy Vieira
Address: 1640C Martin Ln. Ione CA 95640 Date: 7/15/26

70 Name: Print Debbie Cowan Signature: Rebecca Cowan
Address: 11190 Shenandoah Rd Plymouth Date: 7/15/26

71 Name: Print Donna Jackson Signature: Donna Lee Jackson
Address: 18908 Wheelerway Plymouth Date: 7/15/26

72 Name: Print William CONNOR Signature: William Connor
Address: 24120 GOLD CIRCLE DR. PIONEER CA Date: 7/21/26

73 Name: Print Darlene Collins Signature: Darlene Collins
Address: 10461 Mariposa Ave, Jackson CA Date: 7/21/26

74 Name: Print Robyn Ormsby Signature: Robyn Ormsby
Address: 2095 Camanche rd Ione 95640 Date: 7-16-26

75 Name: Print Shelly Rohrer Signature: Shelly Rohrer
Address: 17800 Clay Pit Rd Ione Calif 95640 Date: 7-16-26

76 Name: Print Denise Emery Signature: Denise Emery
Address: 729 Fairway Dr. Ione, CA 95640 Date: 7/16/26

77 Name: Print Janis Fonseca Signature: Janis Fonseca
Address: 154 N Arroyo Seco St #214 Ione, CA Date: 7-16-26

78 Name: Print Michael Schmidt Signature:
Address: 3740 Camanche Rd Ione CA Date: 7/17/2026

79 Name: Print Mary Ann Yost Signature: Mary Ann Yost
Address: 377 Eagle Dr. Ione, Ca 95640 Date: 7.18.26

80 Name: Print KIRK Goodman Signature:
Address: 400 Castle OAKS Ione Date: 7/18/26

81 Name: Print Tia Meyers Signature:
Address: 1400 W. Marlette St. #5 Ione Date: 7/19/26

82 Name: Print Phillip J. Jones Signature:
Address: 12345 Silver Creek Road Ione Date: 7.19.26

83 Name: Print Barbara Ellen Ormsby Signature: Barbara E. Ormsby
Address: 2445 Quiver Dr. Ione, Ca 95640 Date: 7-19-26

84 Name: Print Rosemary Hoyt Signature:
Address: 31 Pinehurst Ct Ione Date: 8/8/26

85 Name: Print Alice Curran Signature: Alice G. Curran
Address: 4790 Spyglass Dr. Ione, Date: 8/8/26

86 Name: Print Babbi Rissling Signature: Babbi L Rissling
Address: 1434 St. Andrews Ln Ione, CA Date: 8/8/26

87 Name: Print Tanya Vela Signature: Tanya Vela
Address: 615 Pleasant Valley Dr Date: 8/8/26

88 Name: Print Shannon Swager Signature: Shannon Swager
Address: 200 Mustang Alley Ione CA 95640 Date: 7-17-2026

89 Name: Print Joel Swager Signature:
Address: 200 Mustang Alley Ione CA 95640 Date: 7-17-2026

90 Name: Print Dennis Sanders Signature:
Address: 17149 Lambert Rd, Ione CA 95640 Date: 7/17/2026

91 Name: Print Marcia Sanders Signature:
Address: 17149 Lambert Rd Ione CA 95640 Date: 7/17/2026

---

92 Name: Print Elizabeth Touhy Signature: Elizabeth Touhy
Address: 800 Edgebrook Dr Ione Date: 3/21/26

93 Name: Print KATHY SHAW Signature: Kathryn A. Shaw
Address: 608 Fairway Dr Ione, CA Date: 7-20-26

94 Name: Print Alice Yancy Signature: Alice Yancy
Address: 710 Fairway Dr, Ione CA 95640 Date: 7-20-26

95 Name: Print Patti Page Signature: Patti Page
Address: 101 Poppy Lane Ione Date: 7-21-26

96 Name: Print Helen Stanley Signature: Helen Stanley
Address: 4012 Lewis Ct, Ione 95640 Date: 7/21/26

97 Name: Print [redacted] Temple Signature: Dawn Temple
Address: 12551 Burnt Cross Lane Pine Grove Date: 7-21-2026

98 Name: Print Dolores Larrigan Signature: Dolores Larrigan
Address: PO Box 727 Ione Date: 7-21-26

99 Name: Print Marie Muse Signature: Marie Muse
Address: 725 Shakeley Lane Ione Date: 7-21-26

100 Name: Print Janet Thompson Signature: Janet Thompson
Address: 608 Avalon Drive Date: 7-21-26

101 Name: Print Joan Rogers Signature: Joan Rogers
Address: 1609 Shakeley Lane Ione 95640 Date: 7-23-26

102 Name: Print Erin Looney Signature: [signature]
Address: 21795 Allan Rd Volcano 95689 Date: 7/18/26

103 Name: Print Chris Looney Signature: Chris Looney
Address: 21795 Allan Rd, Volcano, CA Date: 7/18/26

104 Name: Print Julianne van Leeuwen Signature: [signature]
Address: 705 Fairway Drive Ione CA Date: 7/18/2026

105 Name: Print Elizabeth Fisher Signature: Elizabeth J Fisher
Address: 402 CALLAWAY LANE Date: 07/16/26

106 Name: Print Kristine Caputo Signature: Kristine Caputo
Address: 707 Shakeley Ln. Ione Date: 7/16/26

---

107 Name: Print Stephanie Ward Signature: Stephanie Ward
Address: SAW ~~16500~~ Irish Hill Road, Ione, CA. Date: 7/16/2026

108 Name: Print Heather Mae Thomp~~son~~ Signature: Heather M Thomp
Address: 1400 Cook Rd. Ione, CA. 95640 Date: 7-16-2026

109 Name: Print Patricia A. Fisher-Misura Signature: Patricia A. Fisher-Misura
Address: 13241 Mount Echo Drive Ione, CA 95640 Date: 7/16/2026

110 Name: Print LAWRENCE BEARDSLEY Signature: Lawrence R Beardsley
Address: 139 SPRINGCREEK DR. IONE, CA. 95640 Date: 7-18-2026

111 Name: Print Karen D'Imperio Signature: Karen D'Imperio
Address: 1021 N MAIN ST Jackson CA Date: 7-18-26

---

112 Name: Print Melissa Sanders Signature: Melissa Sanders
Address: 15575 Muller Rd, Plymouth CA 95669 Date: 8-9-26
Name: Print DAVID SANDERS Signature: David Sanders
Address: 15575 MULLER ROAD PLYMOUTH Date: 8/9/26

113 Name: Print GLORYANN POTTS Signature: GloryAnn Potts
Address: PO Box 868 IONE CA Date: 95640

114 Name: Print Theresa Wynn Signature: Theresa Lewynn
Address: 1011 W. Marlette St, Ione CA Date: 7-19-26

115 Name: Print Doug Hawkins Signature: Doug Hawkins
Address: 5355 CARBONDALE, Plymouth, CA. 95669 Date: 7/19/26

116 Name: Print Deanna Hawkins Signature:
Address: 5355 Carbondale, Plymouth 95669 Date: 7/19/26

117 Name: Print WILMA HAWKINS Signature: Wilma Hawkins
Address: 30 VILLA LANE IONE, CA 95640 Date: 7-19-2026

---

118 Name: Print Marla Mcloon Signature: Marla Mcloon
Address: 940 W. Marlette St Ione Date: 7-22-26

119 Name: Print Roy Robles Signature: Roy Robles
Address: 2520 QUIVER DR IONE CA Date: 7-22-26

120 Name: Print Maresa Davidson Signature: MDavidson
Address: PO BOX 24 Plymouth CA Date: 95669

121 Name: Print Ronald Matulich Signature: Ron Matulich
Address: PO Box 217 Drytown CA Date: 95699

122 Name: Print THOMAS E REED Signature: Thomas E Reed
Address: 2480 QUIVER DR IONE, CA. 95640 Date: 7-29-26

123 Name: Print Stacy Rhoades Signature:
Address: 138 N. ARROYO SECO IONE Date: 7-29-26

104 Name: Print Connie Inczewski Signature Connie Inczewski
Address: 13170 Mt. Echo Dr Ione, CA Date: 7/23/2026

105 Name: Print ROSEMARY JORDAN Signature: Rosemary Jordan
Address: 318 S. Mill St, IONE, CA 95640 Date: 7/29/26

106 Name: Print Norma Allen Signature: Norma Allen
Address: 12851 Old Spring Rd, Pine Grove, CA 95665 Date: 30 July 2026

107 Name: Print TONYA DUFFY Signature: Tonya Duffy
Address: 11140 Sutter Creek Ranchos Rd Date: 8-4-26

108 Name: Print SHERYL LEARY Signature: Sheryl Leary
Address: PO BOX 93 IONE, CA 95640 Date: 8-6-26

109 Name: Print Billy L. Sullivan Signature: Billy L Sullivan
Address: 4357 Comanche Rd Ione CA 95640 Date: 8-6-26

---

110 Name: Print [illegible] CLARK Signature: [illegible]
Address: 12026 FAIRWAY DR. Date: 7-31-26

111 Name: Print Wayne Barcus Signature: Wayne Barcus
Address: 140 W. Marlette Spc 79 Ione Date: 7-31-26

112 Name: Print LAWRENCE [illegible] Signature: [illegible]
Address: 707 SHANLEY LN IONE, CA 95 Date: [illegible]

113 Name: Print Regina Schaengold Signature: [illegible]
Address: 2095 Comanche Rd Ione Date: 8/7/26

114 Name: Print AUSTIN CURRAN Signature: [illegible]
Address: 1500 Cook Rd Ione, CA 95640 Date: 8/8/26

115 Name: Print DAVID FOYIL Signature: [illegible]
Address: 130 Poppy Ln IONE CA 95640 Date: 8/11/26

116 Name: Print Dianne McCleery Signature: Dianne McCleery
Address: 13525 Mt. Echo Dr. Ione CA 95640 Date: 7/29/26

117 Name: Print Kristina Hoover Signature: Kristina Hoover
Address: 13551 Mount Echo Drive, Ione, CA 95640 Date: 7/29/26

118 Name: Print Renae Hoover Signature: Renae Hoover
Address: 13551 Mt echo drive, Ione CA, 95640 Date: 7/29/26

119 Name: Print Nicholas Nuricio Signature: Nicholas Nuricio
Address: 1010 SHARKEY LN. Ione CA. Date: 7-29-26

120 Name: Print RAMONA L. Wells Signature: Ramona Wells
Address: 20 Rollingwood DR SPC 153 Jackson CA Date: 8/3/2026

121 Name: Print Fedor Khramtsov Signature: Khramtsov
Address: 18400 Claypit RD Ione CA Date: 7/31/26

122 Name: Print DIANA KHRAMTSOV Signature: Diana Khramtsov
Address: 18400 Claypit Rd Ione CA Date: 7/31/26

123 Name: Print MAYA Khramtsov Signature: Maya Khramtsov
Address: 18400 Claypit RD Ione CA Date: 7/31/26

124 Name: Print Shelly Rohrer Signature: Shelly Rohrer
Address: 17800 Clay Pit Date: May 15 2026

125 Name: Print Brad Rohrer Signature: Brad Rohrer
Address: 17800 Clay Pit Date: May 17 2026

126 Name: Print Gary Cunningham Signature: Gary Cunningham
Address: 15160 Clinton Rd Jackson Date: 8-19-26

127 Name: Print Robert Chang Signature: Robert Chang
Address: 15100 Clinton Rd Jackson Date: 8/19/26

128 Name: Print C Beghtm Signature: Carolyn Beghtm
Address: 550 Castle Oaks Dr. Date: 7/16/26

129 Name: Print Andrea Karr Signature: Andrea Karr
Address: 607 Hwy 124 Ione Date: 7-16-26

130 Name: Print Marianne Pantle Signature: Marianne Pantle
Address: 402 Creekside Ct Ione Date: 7-16-26

131 Name: Print Sharon May Signature: Sharon May
Address: ~~#~~ 2141 Jackson Valley Rd, Ione Date: 7-16-26

132 Name: Print Jane Fowler Signature: Jane Fowler
Address: 402 Pleasant Valley Ione CA Date: 7-16-26

133 Name: Print Paula Bibby Signature: Paula A Bibby
Address: 18420 Shake Ridge Rd, Sutter Creek Date: 7/25/26

134 Name: Print DAVID Bibby Signature: David Bibby
Address: P.O. BOX 752, SUTTER CREEK CA 95685 Date: 7-25-26

135 Name: Print Lori Mote Signature: Lori Mote
Address: 9401 Brook Ranch Rd Ione, CA Date: 7/26/26

136 Name: Print David R. Moon Signature: David R. Moon
Address: P.O. Box 321 So. Sacramento St. Date: 7/26/26

137 Name: Print Barbara Gilroy Signature: B P Gilroy
Address: 604 Avalon Dr, Ione, Ca. Date: 7/27/26

138 Name: Print Louise Nunn Signature: Louise Nunn
Address: P.O Box 4 15561 Ridge Rd Sutter Creek Date: 8-19-2026

140 Name: Print Sandy Dwyer Signature: Sandy Dwyer
Address: 295 Meadowcrest Sutter Creek ca Date: 8-19-26

141 Name: Print CAROLE PUGH Signature: Carole Pugh
Address: 5574 N. PARK DR., IONE, CA Date: 8-16-26

142 Name: Print Ashley John Signature: Ashley John
Address: 624 Preston Ave. Ione CA Date: 8.16.26

143 Name: Print Marty Groves Signature: Marty Groves
Address: 624 Preston Ave Ione Date: 8 16 26

144 Name: Print JULIA MATHIS Signature: Julia Mathis
Address: 85 Hanson Rd Sutter Ck Date: 8/19/26

145 Name: Print Gerri Windsor Signature: Gerri Windsor
Address: 14074 Inshtown Rd #8 PINE GROVE Date: 8/19/26

146 Name: Print Marilyn Dalbeck Signature: Marilyn Dalbeck
Address: 18930 Golden Way Plymouth Date: 8/3/26

147 Name: Print Judy Upton Signature: Judy Upton
Address: 1400 West Marlette #66 Ione Date: 8-3-26

148 Name: Print Angela Lundgren Signature: Angela K. Lundgren
Address: 13600 Tony Court, Pine Grove, CA 95665 Date: 8-4-26

149 Name: Print Sharon Lundgren Signature: Sharon J. Lundgren
Address: 19665 Hooper Dr Pine Grove CA 95665 Date: 8/4/26

150 Name: Print Linda Cutler Signature: Linda Cutler
Address: 26268 Space Ridge Rd - Volcano 95689 Date: 8/4/26

151 Name: Print Martha Smith Signature: Martha Smith
Address: 706 Heath Dr Ione Ca 95640 Date: 8-6-2026

152 Name: Print Rachel M Aguilera Signature: Rachel M Aguilera
Address: 279 Springcreek Dr. Date: 8/6/2026

153 Name: Print Margaret Gardner Signature: Margaret Gardner
Address: 12885 Quartz Mt Rd Sutter Creek Date: 8/6/26

154 Name: Print Judy Weyhe Signature: Judy Weyhe
Address: 8203 Underwood Dr. Ione Date: 8-6-26

155 Name: Print Laura Swett Signature: Laura Swett
Address: 361 Sutter Crest & Sutter Creek Date: 8/7/26

156 Name: Print Adrienne Jensen Signature: [signature]
Address: 16400 Irish Hill Rd Ione Date: 8-14-26

157 Name: Print JAMES JENSEN Signature: [signature]
Address: 16100 IRISH HILL RD IONE Date: 8/14/26

158 Name: Print GEORGE WARD Signature: George Ward
Address: 16500 IRISH HILL RD IONE Date: 8/16/26

159 Name: Print Terri DuFrene Signature: Terri DuFrene
Address: 616 W. Marlette St, Ione Date: 8/17/26

160 Name: Print Don DuFrene Signature: [signature]
Address: 616 W. Marlette St, Ione Date: 8/17/26

161 Name: Print LOVELL SMITH Signature: Lovell C. Smith
Address: 20 Rollingwood Dr. Date: 8-3-26

162 Name: Print Karen Grady Signature: Karen M Grady
Address: 185 Hillside Pl, Jackson, Ca. Date: 8-3-26

163 Name: Print LOIS SANBORN Signature: Lois Sanborn
Address: 10519 Ridgecrest DR., Jackson CA Date: 8-3-26

164 Name: Print Cindy Burke Signature: Cindy Burke
Address: 1505 Lahanton Way Ione Date: 8/9/26

165 Name: Print COLLEEN CLARKE Signature: Colleen Clarke
Address: 408 Laurel Dr. Ione 95640 Date: 8/14/26

166 Name: Print GARY V. HANKINS Signature: Gary V. Hankins
Address: 11261 TABEAUD RD. PINE GROVE Date: 8/9/26

167 Name: Print Christina Openshaw Signature: [signature]
Address: PO Box 1825 Jutter Creek Ca Date: 8/9/26

168 Name: Print Kerrie Kreischer Signature: Kerrie Kreischer
Address: 19865 Fallen Leaf Dr. Pioneer ca Date: 8/9/26

169 Name: Print Tim Fecher Signature: Tim Fecher
Address: 18915 Ponderosa Way Date: 8/9/26

170 Name: Print CHARLES TIVE Signature: [signature]
Address: 25969 LUPIN RD. VOLCANO Date: 8-9-26

171 Name: Print Sylvia Martine Signature: Sylvia Martine
Address: 10 Sybil Beach Ct. Date: 8-6-26

172 Name: Print Aileen Briley Signature: Aileen Briley
Address: 10796 Sutter Circle Sutter Creek Date: 8/6/26

173 Name: Print Keary Colwell Signature:
Address: 9120 Lauren Ln, Jackson, CA Date: 8/6/26

174 Name: Print Rita Dahl Signature: Rita Dahl
Address: 320 W. Marlette St. Ione, CA 95640 Date: 8-6-26

175 Name: Print Marie Nutting Signature: Marie Nutting
Address: 615 Oakshire Dr Ione, CA Date: 8/6/26

---

176 Name: Print Vicki Wagner Signature: Vicki Wagner
Address: 154 Albatross Dr. Ione Date: 8/6/2026

177 Name: Print JUDY HUDOCK Signature: Judy Hudock
Address: 142 ALBATROSS DR IONE Date: 8-6-2026

178 Name: Print Marianne Duncan Signature: Marianne Duncan
Address: 908 Avalon Dr, Ione Date: 8-6-26

179 Name: Print MERRY SMITH Signature: Merry Smith
Address: Po Box 52, Ione, CA 95640 Date: 8/6/26

180 Name: Print Sammie Belden Signature: Sammie B. Belden
Address: 1115 Oak View Dr, Ione, CA Date: 8/6/26

---

181 Name: Print Bradley Smith Signature: Bradley Smith
Address: 1400 W. Marlette St. Ione Date: 8/9/2026

182 Name: Print Irene Smith Signature: Irene Smith
Address: 11560 Gold Strike Rd, P.G. Date: 8/10/26

183 Name: Print Sandy Creach Signature: Sandra Creach
Address: 14365 E Quartz Mt Rd Sutter Creek Date: 8/11/26

184 Name: Print Julie Griffin Signature:
Address: POBox 1595, Sutter Creek, CA 95685 Date: 8/11/26

185 Name: Print Sharon Cassella Signature: Sharon Cassella
Address: 210 Hillside Place Jackson 95642 Date: 8/13/26

186 Name: Print Veronica Bonilla Signature: Veronica Bonilla
Address: P.O. Box 1005 Date: 8/4/26

187 Name: Print Dixie Gold Signature: Dixie Gold
Address: 11006 Shakeley Lane Ione Date: 8-4-26

188 Name: Print Debbie Bryan Signature: Deborah Bryan
Address: 713 Albatross Dr. Ione Date: 8-4-26

189 Name: Print Polly Luy Signature: Polly Luy
Address: PO Box 845 Sutter Creek Date: 8/4/26

190 Name: Print Donna Miller Signature: Donna Miller
Address: 10207 Buena Vista dr. Date: 8-5-26

191 Name: Print Nick Gray Signature:
Address: 26508 South CT Pioneer Date: 8/9/26

192 Name: Print SHEA CORSALETTI Signature: Shea Corsaletti
Address: 727 W. MARIETTE ST IONE CA 95640 Date: 8/9/26

193 Name: Print LINDY LINCOLN Signature:
Address: 201 SPRINGCREEK DR. IONE, Date: 8-9-26

194 Name: Print Judy Clemens Signature: Judy Clemens
Address: Date: 8-9-26

195 Name: Print Rebecca R Dozet Signature: Rebecca R Dozet
Address: 19300 Gold Creek Tr Volcano, CA Date: 8/9/26

196 Name: Print JAN L FRITZ Signature:
Address: 15190 Barney Road, Plymouth Date: 8-9-26

197 Name: Print James Hollabaugh Signature: James Hollabaugh
Address: 11051 Clinton Bar Rd Date: 9 Aug 2026

198 Name: Print Angela Shidnoff Signature:
Address: 2070 Thomas DR. Date: 8/9/26

199 Name: Print Steve Moore Signature: Steven G. Moore
Address: 14210 Williams Rd. Pioneer, CA 95666 Date: 8/9/2026

200 Name: Print George Dozet Signature:
Address: 19300 Gold Creek Trl. Volcano, CA 95689 Date: 8/9/26

201 Name: Print Janet Wilson Signature: Janet Wilson
Address: 709 Pleasant Valley Dr. Ione Date: 7/27/26

202 Name: Print BARBARA DONATACCHE Signature: Barbara Donatacche
Address: 1216 JACKSON GATE RD JACKSON Date: 7-28-26

203 Name: Print Regina Saling Signature: Regina Saling
Address: 19970 Dawn Ridge Jackson Date: 8-29-26

204 Name: Print Carol Lynn Nichols Signature: Carol Nichols
Address: 120 David Drive Sutter Creek Date: 8/29/26

205 Name: Print Aurora Fitch Signature: Aurora Hicks
Address: 511 Clinton Rd Jackson, CA Date: 7-29-26

206 Name: Print DONNA SILVA Signature: Donna Silva
Address: 14020 Primrose Ln Pine Grove Date: 07-29-2026

207 Name: Print LINDA SMITH Signature: Linda Smith
Address: 20551 Ostrom Rd Fiddletown CA Date: 07-29-2026

208 Name: Print Debra Mathia Signature: Debra Mathia
Address: 717 Fairway dr, Ione Date: 209-268-8274

209 Name: Print Barbara King Signature: Barbara King
Address: 14420 Walnut Pine Grove Date:

210 Name: Print Gerald McCarthy Signature:
Address: 114 W. Marlette St Ione Date: 7/29/26

211 Name: Print Herb Peoples Signature: H. Peoples
Address: 407 Callaway Ln. Ione, CA. 95640 Date: 25 July 2026

212 Name: Print Haidee Peoples Signature: Haidee Peoples
Address: 407 Callaway Ln. Ione 95640 Date: July 27, 2026

213 Name: Print Elizabeth Smith Signature: Elabeth Smith
Address: 501 Avalon Dr Ione, Ca 95640 Date: 08-10-2026

214 Name: Print Donald R SMITH Signature: Donald R Smith
Address: 501 Avalon Drive Ione CA 95640 Date: 8/10/2026

215 Name: Print Robert Rankin Signature: Robert Rankin
Address: 503 Avalon DR Ione CA 95640 Date: 8/23/2026

216 Name: Print JoAnn Ramsey Signature: JoAnn Ramsey
Address: 162 North Main Jackson CA 95642 Date: 7/26/26

217 Name: Print Christy Jo White Miser Signature: Christy Jo White Miser
Address: 111 Inverness Court, Ione, CA 95640 Date: 07/26/2026

218 Name: Print Brian Miser Signature: Brian Miser
Address: 111 Inverness Ct. Ione CA 95640 Date: 7/26/26

219 Name: Print Cheryl Beck Signature: Cheryl Beck
Address: 397 Fairway Dr, Ione, CA 95640 Date: 7/26/26

220 Name: Print Wayne A Beck Signature: Wayne A Beck
Address: 397 Fairway Dr, Ione, CA 95640 Date: 7/26/26

221 Janell B. Ramos
26240 Golf Links Dr.
Pioneer, CA 95666
09 Aug. 2026

222 Kathy Krshul
14050 Hooper Ct
Pine Grove CA 95665
8-9-2026

223 Laurie Doss
21151 Shakeridge Rd
Volcano, CA 95689
8-9-2026

224 Preston Sandus
15731 Happie Lou Lane
Pioneer CA 95666
8-7-26

225 Walt Openshaw
16028 Hwy 49
Drytown CA 95699

226 Adler Simmons
6027 Oakshire Dr
Ione, CA 95640
8-9-26

227 Leona Dauthery
12002 New York Ranch Road
Jackson, CA 95642
Leona Dauthery 8-9-26

228 Daniel Cantrell
27174 Carson St. Pioneer, CA 95666
8/9/26

229 Marcia Cabral
21411 Aqueduct Cir 8-9-2026
Pine Grove Cal 95665

230 Noel Tennet - 18700 Vista Ln 95666

231 Steve Nevarez
398 Avalon Drive Ione, CA 95640

232 Jim Mattimoe
P.O. Box 156
Amador City, CA 95601

233 Dorothy Trebes
P.O. Box 958
Sutter Creek, Ca 95685
Dorothy Trebes 8/9/2026

	Point name	Phone	email	
224	BRIAN SMALL	916 201 9770	✓ knuckleheads5150@sbcgloba	ne
225	Linda Woodhouse	916 765-8485		
226	Cheryl Clark	209 217-4230	✓ clarkoneto77@yahoo.com	
227	Tom McCleary	916-705-4517	✓ tmacmc@aol.com	
228	Peggy Flynn	530 368 6434	pjpatrickflynnbooks@	

Contacts list yes/no

	Point name	Phone	email	
230	MARK WATT	209 332-0159	✓ MWWATT@YAHOO.COM	YES
231	MARK CAREY	(916) 223 3928	✓ markacarey@msn.com	
232	Georgiana Preskar	916-425-7446	✓ gleepres@gmail.com	
233	RON HESS	916 806-2450	✓ HESS3X@SBCGLOBAL.NET	
234	Tammy Hess	916 718-4896	✓ TLCHESS57X@sbcglobal.	
235	CRAIG LAMBERT	(209) 481-0901	✓ seateslambert@hotmail.com	
236	Ron Woodhouse	916 791 0333	✓ ronwoodhorse33@gmail.c	
237	Mike Preskar	916-425-6439	✓ mhpres2@gmail.com	
238	BRAD ROHAR	9165332371	BSROHAR@GMAIL.COM 17800 CASTLE PK	
			mhpres@icloud.com	

From: **Kasie** <xxmissmagazinexx@gmail.com>
Date: Tue, Sep 1, 2026 at 9:06 AM
Subject: Cemetary concerns
To: <jerry.friendsrealestate@gmail.com>

The proposed cemetery should be evaluated not only on whether it can be built, but on whether it is appropriate for our rural community and whether its long-term impacts and benefits are consistent with the needs and wishes of the people who actually live here.

The residents of this area have chosen to live in the country for a reason. We value our open land, agricultural heritage, quiet roads, small-town atmosphere, and distance from the density and development associated with larger cities. These qualities are not obstacles to progress—they are part of the identity of our community and deserve to be protected.

If this cemetery is expected to primarily serve individuals and families from outside the county or surrounding area, there is a legitimate question about what meaningful benefit the project provides to local residents. Our community should not be expected to permanently dedicate its land and accept the impacts of a large regional project simply because there is demand for that service elsewhere.

Unlike many other forms of development, a cemetery represents an exceptionally permanent land-use decision. Once burials begin, that land cannot realistically be returned to agriculture, housing, open space, recreation, or another use that future generations of local residents may need.

There are several important concerns that should be addressed before such a project is approved:

- **Limited local benefit:** If the majority of burial plots are intended or marketed for people outside our community, local residents may receive very little direct benefit from the project.
- **Permanent loss of future land-use options:** Cemetery development permanently commits land to one specialized purpose and removes opportunities for future agricultural, residential, recreational, conservation, or other locally beneficial uses.
- **Traffic and infrastructure impacts:** Funeral processions, visitors, employees, maintenance vehicles, road access, drainage, emergency services, and other activities can create ongoing impacts for nearby residents and local infrastructure.
- **Preservation of rural character:** Large projects should be evaluated for whether they are genuinely compatible with the agricultural, rural, and small-town character residents have worked to preserve.
- **Long-term responsibility:** Cemeteries require perpetual maintenance. There should be clear financial protections ensuring that local residents or county government are never left responsible for maintaining a financially distressed or abandoned cemetery decades from now.
- **Scale and regional demand:** If the cemetery is substantially larger than what is necessary to serve local burial needs, county officials should ask whether our rural community is effectively being asked to absorb the permanent impacts of a regional facility designed primarily to satisfy demand from elsewhere.
- **Community involvement:** Residents who live near a proposed project and will experience its consequences should have a meaningful voice in decisions capable of permanently changing the character of their community.

This concern extends beyond one cemetery proposal. Residents should not continually watch their rural communities transformed project by project without meaningful consideration of whether those changes are

actually wanted or beneficial to the people who live here.
We are not asking our community to remain frozen in time, nor are we saying that people from outside the area should be unwelcome. We are asking for responsible planning, appropriate development, and respect for the people who chose to make their lives here.
Please stop treating our rural communities as available space for projects designed primarily to meet the needs of larger population centers. Listen to the residents who live here. Protect our agricultural land, open space, rural character, and small-town way of life. Before approving permanent and transformative projects, require clear evidence that they are appropriate for the area, provide meaningful local benefit, and have meaningful support from the community that will live with their consequences.

Planning commission,

Please please do not allow the Muslims build a cemetary or anything in our county.
I looked up the sharea law they do not believe in using caskets. Which I believe would contaminate the ground.
They are burning the Catholic Churches, I saw I clip where they said they are going to take over the United States.
The Muslims are already in government they have been elected in. The Muslims took over Dearborn, Michigan.
I saw in the news wear they blocked traffic to pray.
They already own gas stations in our county.
Please do not let our county be taken over by the Muslims.

RECEIVED
SEP 01 2026
AMADOR COUNTY
PLANNING DEPARTMENT

PBS
https://www.pbs.org

The rise of anti-Muslim policies and rhetoric in Texas

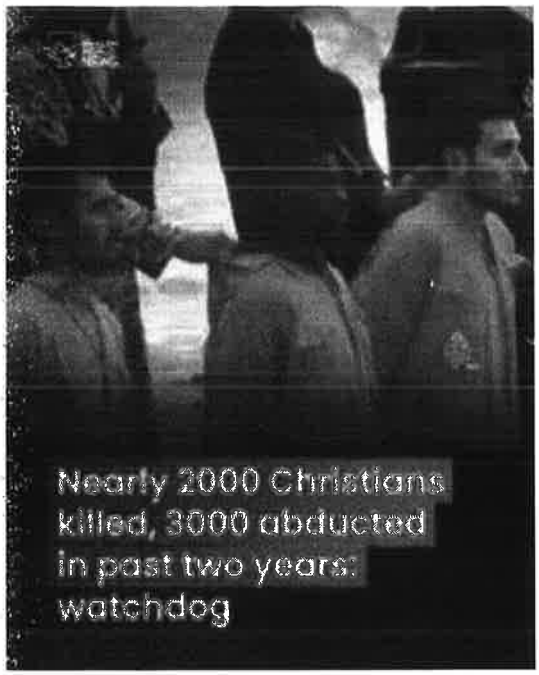
May 6, 2026 — Political rhetoric that many of Texas' half-a-million Muslims say doesn't match their reality, like Ahmed Osman, an 11th grader at Brighter ...
a ...

Homeland Security Today
https://www.hstoday.us

ISIS Calls on Muslims to 'Set Fire to Churches and Synagogues' Around the World at Easter

Apr 9, 2026 — ISIS has called on Muslims to set fire to churches and synagogues around the world on Easter weekend in a horrific threat.

TURN OVER



Please do not allow Muslims to take over our county. Do not allow them to bury 50,000 people in Plymouth.

Robert Sept

AMADOR COUNTY COMMUNITY DEVELOPMENT AGENCY
PLANNING DEPARTMENT

PHONE: (209) 223-6380
FAX: (209) 223-6254
WEBSITE: www.amadorgov.org
E-MAIL: planning@amadorcounty.gov

COUNTY ADMINISTRATION CENTER • 810 COURT STREET • JACKSON, CA 95642-2132

September 29, 2025

Mounir Kaddoura
3550 Watt Ave. #140
Sacramento, CA 95821
Cc: mounirkad@yahoo.com; alikaddoura1@gmail.com; aceh@amadorgov.org; building@amadorcounty.gov; amadorfire@amadorcounty.gov;
RE: UP-22;2-3 Gardens of Noor Cemetery; Deficiencies following September 18, 2025 Technical Advisory Committee Meeting

Dear Project Applicant(s),

The Amador County Technical Advisory Committee (TAC), during the September 18, 2025 meeting, reviewed this project and found the application to be incomplete. The Community Development Agency has prepared a list of requirements needed for the project application to be properly evaluated for completeness. This is the minimum required information required in order to move the project forward. Please note, receipt of the below mentioned items does not constitute a finding of completion, but is necessary to schedule the next evaluative meeting. It is possible that during the evaluation process, additional studies will be needed.

1. Site Plan: The site plan submitted with the project application lacked sufficient information to determine the full nature of the project. We will require a detailed site plan, to scale, including annotations describing the various components of the applied-for project. You will be required to have a site plan prepared by an engineer or surveyor with these details at the time of application with the County for any final permits to be issued. In order to find the application complete, the minimum requirements for the preliminary site plan should include:
    a. Roads and road widths with dimensions
    b. Encroachment dimensions and locations
    c. Location and dimensions of parking area(s)
    d. Location of restroom building
    e. Number of graves in each block
    f. Topographic contours with any necessary existing or proposed grading or drainage improvements.
2. Sewage Disposal System: Please complete and submit an on-site sewage disposal system application with the soil profile site investigation fee to the Amador County Environmental Health Department (ACEH). We would ask that you schedule and conduct the site investigation and soil profiles in the proposed onsite sewage disposal area with ACEH Staff and with your qualified consultant. This will allow you to determine what method of sewage disposal is feasible on-site. You will need to submit a preliminary plan and design to the ACEH for review to determine if more information or plan revisions will be required in order to have a complete application.
3. Equipment and/or Fuel Storage: The equipment storage building has been removed from the project description. Please provide information where the equipment is proposed to be stored instead, and method of storage for any equipment, hazardous materials, or fuels on-site.

4. Operational Information: Please provide a statement of proposed days and hours of operation (sunrise to sunset is fine) as well as a statement that the bodies will be prepared off site and only the burial will take place on-site.
5. Application Consistency: Please remove references to the previous proposal for the building which has since been removed from the project. Please make sure all project descriptions are consistent to avoid confusion.

Upon receipt of the above enumerated item(s) we will schedule another TAC meeting to continue the processing of your application.

If you have any questions concerning this matter, feel free to contact this office.

Sincerely,
Krista Ruesel
Amador County Planning Department
(209)223-6380 | planning@amadorcounty.gov

Krista Ruesel <kruesel@amadorgov.org>

Fwd: Gardens of Noor Cemetery

5 messages

Scott Meyer <smeyer@amadorgov.org> Tue, Feb 7, 2023 at 7:19 AM
To: Debra Larson <dlarson@amadorgov.org>
Cc: Krista Ruesel <kruesel@amadorgov.org>, Chuck Beatty <CBeatty@amadorgov.org>

This project will be coming up again at a future TAC meeting. I thought I would send it to you to keep you in the loop. Scott

---------- Forwarded message ---------
From: **Mounir** <mounirkad@yahoo.com>
Date: Mon, Feb 6, 2023 at 5:24 PM
Subject: Gardens of Noor Cemetery
To: Scott Meyer <smeyer@amadorgov.org>, Abdikarim Ali <timir2@gmail.com>, Mounir <mounirkad@yahoo.com>

Please m

MOUNIR KADDOURA
Bachelor of Science Degree in Civil Engineering
NOOR MORTUARY AND A. ARTS AND MONUMENTS

(925) 584-1664

On Friday, August 5, 2022 at 10:19:57 AM PDT, Amador County Planning Department <planning@amadorgov.org> wrote:

Hi Mounir,

To summarize yesterday's meeting, you will be resubmitting the project application with a revised scope. This will require you supply the following items:

1. Revised proposal with building removed
2. Site plan showing the location of the parking area, and proposed number of spaces.
3. In light of the comments by AWA, I would recommend not suggesting turf due to the water constraints of the property. If you choose to include it, you will need to calculate how many sq. ft. of irrigated turf you would need so that we can gauge the water requirements to irrigate it.
4. Number of guests maximum at any event at one time, and number of events per week/month/year. This may be phrased as "___ scheduled events (funerals) with up to __[50]__ guests per week/month, and up to ___ scheduled events with up to ___[400]__ guests per year--" or something of the like. Please be specific and set parameters so we may get a reasonable idea of what the proposed visitation schedule and events schedule would be like. We are looking for maximums and averages regarding visitation.
5. Please show bathroom locations on the site plan.
6. In the resubmitted application, please remove references to "city water." The water service provider in the area is Amador Water Agency. It has been verified that the existing services are not sufficient to supply to the property and you will be required to provide well service to supply water or supplement AWA systems.
7. There is no sewer service and you will need to have engineered septic to accommodate for sewage disposal. In order to move forward, you will need to supply a preliminary septic system design capable of treating waste for maximum proposed visitors. This needs to be prepared by an engineer qualified to design such systems.
8. Please revise and recalculate the number of gravesites relative to the number of funerals and capacity. 50,000 is not realistic with the amount of funerals you proposed, unless there will be graves occupied without funerary services. If that is the case, please state so.
9. Please give a more thorough narrative regarding everyday operations. When and what types of work would be performed, and we would like to know hours of operation of heavy machinery and number of on-site employees.

Please make these revisions and resubmit at which point we may reschedule a TAC meeting to review the application for completeness.

Thank you,

Krista Ruesel, Planner

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorgov.org

Abdikarim Ali <timir2@gmail.com> Tue, Feb 7, 2023 at 10:27 PM
To: Scott Meyer <smeyer@amadorgov.org>
Cc: Mounir <mounirkad@yahoo.com>, Krista Ruesel <kruesel@amadorgov.org>

Hi Krista,
just to follow up on our phone conversation today, Scott Meyers of the Environmental Health Department told me not to continue the Septic System Design of the project until we get approved for the use permit.

In the email below that you sent to Mounir on August 5, 2022, you listed all of the items Mounir needs to submit with the use permit application to the Amador County Planning office (Your office). Item number 7 of the list in your email was to provide a Preliminary Septic System Design but since Scott told us not to proceed with the Septic System Design before we obtain the use permit and I understand that you are okay with it from what you told me today.

I will work with Mounir to put together the application package with the remaining items on the list and submit it to your office as soon as possible.

Scott: Could you please confirm to Krista that our phone conversation yesterday and follow-up email that you want us to put on hold the Septic System Design of the planned Gardens of Noor Cemetery?

Thank you Krista and Scott for your assistance and help.

[Quoted text hidden]
--
Best Regards,
Abdikarim Ali

Scott Meyer <smeyer@amadorgov.org> Wed, Feb 8, 2023 at 7:07 AM
To: Abdikarim Ali <timir2@gmail.com>
Cc: Mounir <mounirkad@yahoo.com>, Krista Ruesel <kruesel@amadorgov.org>

Hi Abdikarim,

Good morning to all of you.

My new Director here in Environmental Health will now be helping you through the Use Permit and TAC process.

I will still be your contact regarding any and all sewage disposal plan reviews and questions.

I hope everyone has a great day today.

Thank you.
Scott
[Quoted text hidden]

Scott Meyer <smeyer@amadorgov.org> Wed, Feb 8, 2023 at 7:24 AM
To: Abdikarim Ali <timir2@gmail.com>, Chuck Beatty <CBeatty@amadorgov.org>
Cc: Mounir <mounirkad@yahoo.com>, Krista Ruesel <kruesel@amadorgov.org>

Scott: Could you please confirm to Krista that our phone conversation yesterday and follow-up email that you want us to put on hold the Septic System Design of the planned Gardens of Noor Cemetery?

Hello Again Everyone,

I would like to confirm with all parties involved, that my office would like to put a hold on any Septic System Design Submittal for the planned Gardens of Noor Cemetery?

Once the Use Permit process is complete and a Use Permit for the proposed project has been approved you can then submit your proposed sewage disposal design for the approved project to this office for review.

Soil profiles on the parcel have recently been conducted. The soil logs and records are on file with this office.

Thank you.
Scott

[Quoted text hidden]

Krista Ruesel <kruesel@amadorgov.org> Wed, Feb 8, 2023 at 9:42 AM
To: Scott Meyer <smeyer@amadorgov.org>
Cc: Abdikarim Ali <timir2@gmail.com>, Chuck Beatty <CBeatty@amadorgov.org>, Mounir <mounirkad@yahoo.com>

Sounds good everyone, thank you.

Looking forward to seeing the resubmission,

Krista Ruesel
Planner|Amador County Planning Department
(209)223-6803|kruesel@amadorgov.org

The information transmitted by this email is intended only for the person or entity to which it is addressed. This email may contain proprietary, confidential and/or privileged material. If you are not the intended recipient of this message, be aware that any use, review, retransmission, distribution, reproduction or any action taken in reliance upon this message is strictly prohibited. If you received this in error, please contact the sender and delete the material.

[Quoted text hidden]

Planning Department <planning@amadorgov.org>

RE: Amador Water Agency Response to Early Consultation Application Referral for Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery

2 messages

Lucas Carthew <lcarthew@amadorwater.org> Fri, Feb 18, 2022 at 4:17 PM
To: "planning@amadorgov.org" <planning@amadorgov.org>
Cc: Rick Ferriera <RFerriera@amadorwater.org>, Brandt Cook <bcook@amadorwater.org>

Planning Department,

Please accept this corrected letter. APN correction was made. If you have any further questions or concerns, please feel free to contact the Agency at your discretion.

Kind Regards,

Lucas Carthew

Assistant Engineer

Amador Water Agency

*** This is not a quote or an estimate. Rates and fees subject to change by future Board action. ***

From: Lucas Carthew
Sent: Friday, February 18, 2022 15:20
To: 'planning@amadorgov.org' <planning@amadorgov.org>
Cc: Rick Ferriera <RFerriera@amadorwater.org>; Brandt Cook (bcook@amadorwater.org) <bcook@amadorwater.org>
Subject: Amador Water Agency Response to Early Consultation Application Referral for Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery

Hello Amador County Planning Department,

Please see the attached document for AWA's response to the Early Consultation Application Referral for Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery. If you have any further questions or concerns, please feel free to contact the Agency at your discretion.

Kind Regards,

Lucas Carthew

Assistant Engineer

Amador Water Agency

*** This is not a quote or an estimate. Rates and fees subject to change by future Board action. ***

CONFIDENTIALITY NOTICE: This e-mail and any attachments are for the sole use of the addressee(s) and may be privileged, confidential and protected from disclosure. If you have received this message in error or are not the intended recipient, then we (1) advise you that any disclosure, copying, distribution, saving or use of this information is strictly prohibited, and (2) request that you delete this e-mail and any attachments and notify us by reply e-mail or telephone 209-223-3018.
Thank You,
Amador Water Agency 12800 Ridge Road, Sutter Creek, California 95685 www.amadorwater.org

Early Consultation Application Referral AWA Response 021822.pdf
132K

Amador County Planning Department <planning@amadorgov.org> Tue, Feb 22, 2022 at 8:44 AM
To: Lucas Carthew <lcarthew@amadorwater.org>
Cc: Rick Ferriera <RFerriera@amadorwater.org>, Brandt Cook <bcook@amadorwater.org>

Received, thank you.

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorgov.org

[Quoted text hidden]

A Public Agency

AMADOR WATER AGENCY AWA SAFE • RELIABLE • WATER SERVICE

12800 Ridge Road, Sutter Creek, CA 95685-9630 • www.amadorwater.org • Office: (209) 223-3018

February 18, 2022

Amador County Planning Department
c/o Krista Ruesel
810 Court Street
Jackson, CA 95642

RE: Early Consultation Application Referral for Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery
APN: 001-220-013

To Whom It May Concern:

On February 17, 2022, the Amador Water Agency (Agency, AWA) received an early consultation application referral for the Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery (Development) located 857 Carbondale Road, Ione, being APN 001-220-013, having been submitted to the County of Amador by Mounir Kaddoura on behalf of Brett L. Carlsen. The Agency has been informed that the County of Amador (County) is considering a Use Permit for the Development.

The Development is planned to be within the AWA operated Amador Water System (AWS), Ione Service Area (System). The Agency has the following comments regarding the Development:

1) The Development may apply for a "Determination of Water Availability" from the Amador Water Agency at any time.
2) Upon receipt of an approved Tentative Map/Use Permit approval from the County, the Development shall apply for a Conditional Will Serve from AWA. AWA will then advise the Development of the requirements to serve the Development and other specific facilities to be constructed prior to initiation of water service for the Development. Upon compliance with all of the terms of the Conditional Will Serve Commitment, the Development may apply for a Will Serve Commitment from AWA.
3) The Development will be required to obtain a "Water Certificate of Acceptance, Transfer and Will Serve Commitment" from the Agency, prior to recordation of the Development's Final Map or initiation of service to the Development.
4) The Development will be responsible to design and construct all on and off site improvements deemed necessary by the State, City, County, Fire Department and AWA to adequately serve the Development, subject to AWA review and approval, without negatively impacting existing customers and rate payers. The Development will be responsible to obtain and pay for all permits, environmental reviews and certifications, licenses, acceptances, pay all associated fees, design,

A Public Agency

12800 Ridge Road, Sutter Creek, CA 95685-9630 • www.amadorwater.org • Office: (209) 223-3018

construct, and make acceptable to the State, County, Fire Department and AWA all transmission, treatment, storage and distribution improvements needed to serve the Development, prior to initiation of service to the Development, as determined by AWA.

5) AWA has determined that currently reliable water treatment and storage capacity to serve the Development, and AWA's existing customers and commitments is severely limited in this System. AWA has fully allocated all treatment and storage capacity at the Ione Water Treatment Plant (WTP) and is currently developing a plan to expand the existing WTP or to construct a new WTP. Water service to this Development may be contingent upon one of these options being implemented with sufficient capacity to serve the Development.

6) This parcel has one 5/8" meter providing service to it currently. Water meters off of the Eagles Nest distribution line are restricted to a maximum size of 5/8", being a capacity allotment of 400 gallons per day (gpd) at a maximum instantaneous flow rate of 20 gallons per minute (gpm). Future connections to this line may be subject to reimbursement agreement fee(s) for the Eagles Nest Estates Water Transmission Line. All other Agency fees would apply according to Agency rules, regulations and Water Code.

A "Developer Packet" with additional information and requirements may be downloaded from https://amadorwater.org/connection-installation/ for your convenience. Please be aware that the contents of this packet are subject to change from time to time and are intended only as a guideline for Developers.

Please feel free to contact the Agency with any questions, comments, or concerns regarding the contents of this letter.

Kind Regards,

Lucas Carthew
Assistant Engineer
This is not a quote or estimate.
CC: File

Planning Department <planning@amadorgov.org>

TAC Project Referral - UP-22;2-3 Gardens of Noor Cemetery

Richard Vela <rvela@amadorgov.org> Fri, Feb 18, 2022 at 10:36 AM
To: Amador County Planning Department <planning@amadorgov.org>

The Department of Transportation and Public Works has reviewed the submittal for Use Permit Application UP -22; 2-3 Kaddoura Cemetery and has the following comments:

1. If necessary, proposed encroachments onto Carbondale Road and Lambert Road will require encroachment permits and will need to be constructed per Standard Plans PW-3, PW-5B and PW-6A. These encroachments will need to be commercial driveway encroachments. The existing encroachments are most likely residential driveway encroachments but will be evaluated to see if they meet commercial driveway encroachment standards.
2. Traffic mitigation fees are to be collected for the proposed use. Currently, there is no classification for cemeteries in the current traffic mitigation fees table. However, the proposed land use will generate traffic. An appropriate traffic mitigation fee will be calculated for the proposed cemetery use. A traffic mitigation fee will be collected for the proposed 20,000 SF religious building at the time of building permit application.

On Thu, Feb 17, 2022 at 4:45 PM Amador County Planning Department <planning@amadorgov.org> wrote:
[Quoted text hidden]

--
Richard R. Vela, P.E.
Director
Amador County Department of Transportation and Public Works
810 Court Street
Jackson, CA 95642
209-223-6429 Main
209-223-6457 Direct
rvela@amadorgov.org

Krista Ruesel <kruesel@amadorgov.org>

AMA-104-PM 1.07 Early Consultation Application Referral Gardens of Noor Cemetery

Bauldry, Paul@DOT <paul.bauldry@dot.ca.gov> Tue, Mar 1, 2022 at 1:28 PM
To: Krista Ruesel <kruesel@amadorgov.org>
Cc: "Ponce, Gregoria@DOT" <gregoria.ponce@dot.ca.gov>

Hello Krista,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Early Consultation Application Referral for the Gardens of Noor Cemetery.

The property is located approximately 3.92 miles from State Route (SR) 104 near the town of Ione. The Assessor's Parcel Number is 001-220-013.

Caltrans has no additional comments at this time. However, Caltrans requests for all future development at this location to be included in the review process.

Thank you,

Paul Bauldry

Caltrans District 10

Office of Rural Planning

Division of Planning, Local Assistance, and Environmental

1976 E. Dr. Martin Luther King Jr Blvd.

Stockton CA 95205

Telework # 209.670.9488

Planning Department <planning@amadorgov.org>

RE: TAC Project Referral - UP-22;2-3 Gardens of Noor Cemetery

Tran, Harvey@Wildlife <Harvey.Tran@wildlife.ca.gov> Thu, Mar 3, 2022 at 11:51 AM
To: "planning@amadorgov.org" <planning@amadorgov.org>
Cc: Wildlife R2 CEQA <R2CEQA@wildlife.ca.gov>, "Wilson, Billie@Wildlife" <Billie.Wilson@wildlife.ca.gov>, "Barker, Kelley@Wildlife" <Kelley.Barker@wildlife.ca.gov>, "Thomas, Kevin@Wildlife" <Kevin.Thomas@wildlife.ca.gov>

To Whom It May Concern:

The California Department of Fish and Wildlife (CDFW) appreciates the opportunity to comment during the Early Consultation for the Gardens of Noor Cemetery (Project). CDFW is responding to the Early Consultation as a Trustee Agency for fish and wildlife resources (Fish & G. Code, §§ 711.7 & 1802, and CEQA Guidelines, §§ 15386), and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines Section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code Sections 1600 et seq.) and/or a California Endangered Species Act (CESA) Permit for incidental take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code Sections 2080 and 2080.1).

The Project would construct a cemetery located on 857 Carbondale Rd., Ione in Amador County. The 46-acre parcel will have parking for up to 100 cars, a proposed 20,000 sq. ft. religious building and 50,000 gravesites at the maximum build-out in 2122. Th Project will remove at least 2 acres of oak woodland habitat and an unknown acreage of chapparal and ruderal grassland habitat.

CDFW recommends the following items be addressed in the planning of the Project:

Comment 1: Nesting birds

Aerial imagery (Google Earth) of the Project area shows mature trees located on the site. There are multiple trees located in the south portion of the parcel in the oak woodland. These trees can provide potential nest habitat to migratory birds and raptors during the avian nesting season of February 1 to August 31. CDFW recommends the applicant review and consider Fish and Game Code sections 3503, 3503.5, 3515, 4150 and 4152, which provide protection to nongame birds, migratory birds, birds of prey, their nests and eggs. Because potential habitat for nesting birds and birds of prey may be present within the Project area, the proposed Project should disclose all future potential activities that may incur a direct or indirect take to nongame nesting birds within the Project footprint and its close vicinity. Appropriate avoidance, minimization, and/or mitigation measures to avoid take should be included in the future project planning. Measures to avoid the impacts should include species specific work windows, biological monitoring, installation of noise attenuation barriers, etc.

Comment 2: Ione manzanita

A review of the California Natural Diversity Database (CNNDB) revealed that the chaparral habitat 0.2 mile north of the parcel and 0.4 mile east of the parcel are within the presumed extant of the Ione manzanita (*Arctostaphylos myrtifolia*). The occurrence dates for the nearby Ione manzanita are 2019. Ione manzanita is listed as threatened under the federal Endangered Species Act (ESA) and is listed as 1B.2 by the California Native Plant Society. CDFW recommends the lead agency evaluate the potentially suitable chaparral habitat located on the north portion of the Project area and discuss how the development of the parcel would or would not impact suitable habitat for any threatened, endangered, candidate, sensitive, or special-status species. Early consultation with CDFW is recommended, since modification of the Project may avoid or reduce impacts to fish and wildlife resources.

To confirm the presence of rare plants, CDFW recommends conducting floristic surveys as described in CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (DFG 2009). These guidelines suggest rare plant surveys be conducted at the proper time of year when rare or listed species are both "evident" and identifiable. Our website provides additional information: http://www.dfg.ca.gov/wildlife/nongame/survey_monitor.html

Comment 3: Oak woodland

Significant oak tree and oak woodland habitats exist within the Project area. These woodland associations are increasingly rare in California. In recognizing both the importance of oak woodlands and their continuing statewide loss, the California Legislature in 2002, passed the Oak Woodlands Conservation Act (Oak Act) Fish and Game Code §1360-1375. The legislative intent of this act is to support and encourage the voluntary, long-term, private stewardship and conservation of California's oak woodlands. The Oak Act encourages local land use planning that is consistent with the preservation of oak woodlands and provides incentives to protect and encourage farming and ranching that promotes healthy oak woodlands.

Any future environmental document for the Project should include a thorough discussion of the oak woodland habitats in the area and their distribution within the vicinity. This distribution data should be compared against the Project's proposed design plan to analyze the potential for adverse impacts on oak woodland resources. The Project's environmental document should analyze the potential direct, indirect, and cumulative impacts on wildlife and its habitat which may result from the Project's proposed removal of oak woodlands.

The Project's environmental document should also analyze the ways in which the Project can serve to provide protection to oak woodlands. CDFW recommends that a framework for compliance with the Oak Act to guide CEQA compliance for future development be analyzed by the environmental document for incorporation into the Project.

Please note that when acting as a responsible agency, CEQA guidelines section 15096, subdivision (f) requires CDFW to consider the CEQA environmental document prepared by the lead agency prior to reaching a decision on the Project. Addressing CDFW's comments and disclosing potential Project impacts on CESA-listed species and any river, lake, or stream; and providing adequate avoidance, minimization, mitigation, monitoring and reporting measures; will assist CDFW with the Early Consultation.

Thank you.

Harvey Tran

Environmental Scientist

California Department of Fish and Wildlife

Region 2 - North Central Region

Habitat Conservation Program

(916) 358-4035

From: Amador County Planning Department <planning@amadorgov.org>
Sent: Thursday, February 17, 2022 4:45 PM
Subject: TAC Project Referral - UP-22;2-3 Gardens of Noor Cemetery

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Greetings,

Please see attached submittal of Use Permit Application UP-22;2-3 Kaddoura Cemetary, to be reviewed by the Technical Advisory Committee on **Thursday, March 3, 2022 at 1:00 PM** in the Board of Supervisors Chambers in the Amador County Administration Center, located at 810 Court St., Jackson, CA 95642. The Technical Advisory Committee will review the project for completeness.

Thank you,

Krista Ruesel, Planner

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorgov.org

Planning Department <planning@amadorgov.org>

AB52 - TAC Project Referral - UP-22;2-3 Gardens of Noor Cemetery

Anna Starkey <astarkey@auburnrancheria.com> Fri, Mar 4, 2022 at 10:38 AM
To: Amador County Planning Department <planning@amadorgov.org>

Thank you for providing the cultural study. The results are in line with what we show.

We have no further questions or concerns. Please include the previously attached mitigation measures for the TCR chapter and consider consultation to be closed.

[Quoted text hidden]
[Quoted text hidden]

RECEIVED

APR 14 2022

AMADOR COUNTY
PLANNING DEPARTMENT

Amador County Planning and Environmental Health,

After review of the Gardens of Noor Cemetery application and biological review, for APN 044-040-012 at 857 Carbondale Road in Ione, some items of concern come up. The applicant has certified the information in the application to be true and correct, yet a cursory review finds some of the applicant's and the applicant's biologist's responses factually inaccurate.

In the project's certified and signed environmental information form question 29 and 30 they are required to describe plants and animals on the property and adjacent properties. Other than an oak woodland review, information about the areas plants and animals are neglected, even though required.

The federally registered endangered plant Eriogonum Apricum (Ione Buckwheat) and threatened plant Arctostaphylos Myrtifolia (Ione Manzanita) are documented to occur in the area and immediately adjacent properties. They very likely occur on this project's property.

Regarding, A. myrtifolia, Ione manzanita is restricted to Amador and Calaveras Counties. Its center of distribution is the large exposure of the Ione Formation in western Amador County around the City of Ione. Per the Ione buckwheat and manzanita 5-Yr Review listed below, "The most robust population at the time of listing occurred in an area along Lambert Road. Currently the plants in the area between Lambert and Carbondale Roads are extremely unhealthy, but it is uncertain if it is due to disease or herbicide use associated with adjacent development (Swiecki et al. 2005, p. 10)." This project appears to be located in the center of the most robust population of this threatened species.

This project proposes to remove acres of chaparral on the site, including manzanita, as documented, pictured and requested in the Moore Biological report included in the application. They include the removal of acres of manzanita and grasses, likely including the species listed above, as part of their project description. How a professional biologist could review vegetation on the site and fail to include this very pertinent information is confounding. The removal or take of plants that are listed as threatened or endangered species is a federal crime under the Endangered Species Act.

As described, significant and unavoidable impacts to known and documented, threatened and endangered species are not only likely, but are likely specifically being requested by the applicant. County approval of the applicant's project as described would likely bring significant liability to all involved.

Consultation with and permits from the US Fish and Wildlife are likely required for this project, or any project on this site to proceed. Significant and detailed environmental review should be required of any project on this property.

Additional Resources:

Species Profile for Ione manzanita(Arctostaphylos myrtifolia)

https://ecos.fws.gov/ecp/species/1806

Species Profile for Ione (incl. Irish Hill) buckwheat(Eriogonum apricum (incl. var. prostratum)) (fws.gov)

https://ecos.fws.gov/ecp/species/8301

Ione buckwheat and manzanita 5-Yr Review.doc (fws.gov)

https://ecos.fws.gov/docs/tess/species_nonpublish/1674.pdf

Planning Department <planning@amadorgov.org>

use permit for 857 Carbondale Rd Ione ca

2 messages

Mounir <mounirkad@yahoo.com> Wed, May 18, 2022 at 9:54 AM
Reply-To: Mounir <mounirkad@yahoo.com>
To: Amador County Planning Department <planning@amadorgov.org>

Hello Christa
Please see letter bellow from Amador County Water.

Good Afternoon,

Thank you for taking the time to speak with me this afternoon. This email to summarize what we discussed during that phone call per your request. The water line that supplies the Eagles Nest area is undersized and susceptible to low pressure dips when demand is high, and as such, AWA has limited the size of meters which can be installed per parcel. This will limit APN 001-220-013 to a 5/8" meter, with one (1) Equivalent Dwelling Unit (EDU) of capacity. 1 EDU is approximately 400 gallons per average day. Each parcel in the Eagles Nest area is also required to have a backflow assembly installed consistent with AWA standards at owner expense to prevent backflow into the water main during times of low pressure. A list of approved backflow devices can be found in our Standard Design And Construction Specifications For Water Systems. You stated you also have plans to install a well on site to supplement water needs which would supply ~2gpm. Additionally, any fire protection needs required by the fire protection authority having jurisdiction will be required to be installed – this may be either City of Ione Fire Department or Amador Fire Protection District.

In order to move forward with water service to this parcel, the following items will be required prior to initiation of service:
1. Completed application to start water service.
2. Installation and certification of backflow preventer – certification to be provided to AWA.
3. Remitted Time and Materials deposit for installation of fire service line or for a hydrant(s) installation at this parcel and subsequent installation of said fire protection service line or hydrant(s), if required by fire authority having jurisdiction (City of Ione or Amador Fire Protection District).

Our Customer Service Department can quote prices for any items, fees, or deposits listed above. If you have further questions, please feel free to contact the Agency at your convenience.

Kind Regards,

Lucas Carthew
Assistant Engineer
Amador Water Agency

MOUNIR KADDOURA
Bachelor of Science Degree in Civil Engineering
NOOR MORTUARY AND A. ARTS AND MONUMENTS

(925) 584-1664

Amador County Planning Department <planning@amadorgov.org> Wed, May 18, 2022 at 2:07 PM
To: Michelle Opalenik <mopalenik@amadorgov.org>

Hi Michelle,

By any chance, has Mounir gotten this to you as well? I advised him to contact you regarding the water and sewage requirements for the project.

Thanks,

Krista
Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorgov.org

[Quoted text hidden]

Planning Department <planning@amadorgov.org>

Dear Mosque, I visited with you yesterday regarding the

Ron Woodhouse <ronwoodhouse33@gmail.com> Thu, Jul 7, 2022 at 11:13 AM
To: planning@amadorgov.org

Krista, my name is Ron Woodhouse, I live on Lambert Rd near the proposed Mosque and would like to be notified on any developments regarding the Mosque/Cemetary. I am against it. It does not serve this community and significantly will change the character of our rural environment. . The application for approval gives no details on the "religious building" other than a huge 20,000 sq ft building (why don't they call it a Mosque?), by far the largest in this corner of the county. How high will it be? Wlll it be lit up. How about noise (call to prayer), how about water and sewage, the negative impact of hundreds of people coming into our neighborhood, The impact on the roads, they claim only 50 cars a week will be using a 20,000 sq ft, 50 yd square bldg. They claim no impact on water drainage. That corner of Carbondale-Lambert floods and is closed every winter due to flooding. I have may more concerns, as do every neighbor I have talked to.. Again I am absolutely opposed to this project which does nothing but negatively impact the lives of the locals for a community of people that do not exist in this neighborhood, nor for miles around here. They mention serving the Muslim communities of Sacramento, El Dorado and Placer Counties. Build it there.. Thank you, Ron Woodhouse 19500 Lambert Rd, Ione, Ca ronwoodhouse33@gmail.com

Planning Department <planning@amadorgov.org>

TAC Project Referral - UP-22;2-3 Gardens of Noor Cemetery and Religious Building

AFPD Headquarters <afpdhdq@amadorgov.org> Wed, Jul 27, 2022 at 1:01 PM
To: Amador County Planning Department <planning@amadorgov.org>
Cc: Stacy Powrozek <spowrozek@amadorgov.org>

CFD annexation condition applies.

Thank you,
Nicole
Amador Fire Protection District
810 Court Street
Jackson, CA 95642
209-223-6391-phone
209-223-6646-fax

This communication may contain legally privileged and confidential information sent solely for the use of the intended recipient, and the privilege is not waived by the receipt of this communication by an unintended and unauthorized recipient. If you are not the intended recipient of this communication you are not authorized to use it in any manner, and must either immediately destroy it or return it to the sender. Please notify the sender immediately be telephone at (209) 223-6391 if you received this communication in error."

[Quoted text hidden]

Planning Department <planning@amadorgov.org>

AMA-104-PM 1.07 Gardens of Noor Cemetery

2 messages

Bauldry, Paul@DOT <paul.bauldry@dot.ca.gov> Mon, Aug 1, 2022 at 3:32 PM
To: Amador County Planning Department <planning@amadorgov.org>
Cc: "Ponce, Gregoria@DOT" <gregoria.ponce@dot.ca.gov>

Hello Krista,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Use Permit (UP) for the Gardens of Noor Cemetery.

The property is located approximately 3.92 miles from State Route (SR) 104 near the town of Ione. The Assessor's Parcel Number is 001-220-013.

Caltrans previously commented on this project on March 1, 2022.

Based on the current project description, Caltrans has no additional comments at this time. However, Caltrans requests to be included in the review process for the commercial driveway improvements for the encroachment to State Route 104.

Thank you,

Paul Bauldry

Caltrans District 10

Office of Rural Planning

Division of Planning, Local Assistance, and Environmental

1976 E. Dr. Martin Luther King Jr Blvd.

Stockton CA 95205

From:	Bauldry, Paul@DOT
To:	Krista Ruesel
Cc:	Ponce, Gregoria@DOT
Subject:	AMA-104-PM 1.07 Early Consultation Application Referral Gardens of Noor Cemetery
Date:	Tuesday, March 1, 2022 1:29:01 PM

Hello Krista,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Early Consultation Application Referral for the Gardens of Noor Cemetery.

The property is located approximately 3.92 miles from State Route (SR) 104 near the town of Ione. The Assessor's Parcel Number is 001-220-013.

Caltrans has no additional comments at this time. However, Caltrans requests for all future development at this location to be included in the review process.

Thank you,

Paul Bauldry
Caltrans District 10
Office of Rural Planning
Division of Planning, Local Assistance, and Environmental
1976 E. Dr. Martin Luther King Jr Blvd.
Stockton CA 95205
Telework # 209.670.9488

Krista Ruesel <kruesel@amadorgov.org>

Garden of Noor Cemetery at 857 Carbondale Rd (APN:001220013000)

1 message

Abdikarim Ali <timir2@gmail.com> Mon, Dec 19, 2022 at 12:31 PM
To: "kruesel@amadorgov.org" <kruesel@amadorgov.org>, "smeyer@amadorgov.org" <smeyer@amadorgov.org>, "planning@amadorgov.org" <planning@amadorgov.org>
Cc: Mounir <mounirkad@yahoo.com>, Abdikarim Ali <timir2@gmail.com>

Hi Krista and Scott,
My name is Abdikarim Ali and I am a licensed Civil Engineer in the state of California. I got hired by Mr. Kaddoura to work on the subject project. I met with you and Scott last Friday at the county office. I met with Mr. Kadddoura (the new property owner) over the weekend to find out what he plans to build on the land.

At the present, he only wants a bathroom that will accommodate 50-75 people who might be present during the burial ceremony. Therefore, I would like to move forward to get done all of the requirements of building one to two bathrooms on the property.

Scott, Could you please make an appointment to do the profile as soon as possible?

Please let us know if you need anything from us.

Thanks,

--
Best Regards,
Abdikarim Ali

Krista Ruesel <kruesel@amadorgov.org>

Garden of Noor Cemetery at 857 Carbondale Rd (APN:001220013000)

5 messages

Abdikarim Ali <timir2@gmail.com> Mon, Dec 19, 2022 at 12:31 PM
To: "kruesel@amadorgov.org" <kruesel@amadorgov.org>, "smeyer@amadorgov.org" <smeyer@amadorgov.org>, "planning@amadorgov.org" <planning@amadorgov.org>
Cc: Mounir <mounirkad@yahoo.com>, Abdikarim Ali <timir2@gmail.com>

Hi Krista and Scott,
My name is Abdikarim Ali and I am a licensed Civil Engineer in the state of California. I got hired by Mr. Kaddoura to work on the subject project. I met with you and Scott last Friday at the county office. I met with Mr. Kadddoura (the new property owner) over the weekend to find out what he plans to build on the land.

At the present, he only wants a bathroom that will accommodate 50-75 people who might be present during the burial ceremony. Therefore, I would like to move forward to get done all of the requirements of building one to two bathrooms on the property.

Scott, Could you please make an appointment to do the profile as soon as possible?

Please let us know if you need anything from us.

Thanks,

--
Best Regards,
Abdikarim Ali

Amador County Planning Department <planning@amadorgov.org> Tue, Dec 20, 2022 at 4:27 PM
To: Abdikarim Ali <timir2@gmail.com>
Cc: "kruesel@amadorgov.org" <kruesel@amadorgov.org>, "smeyer@amadorgov.org" <smeyer@amadorgov.org>, Mounir <mounirkad@yahoo.com>

I added this inquiry to our project file. I'll be present at the EH inspection as well if you have any questions for me planning-wise.

Thanks,

Krista

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorgov.org

[Quoted text hidden]

Abdikarim Ali <timir2@gmail.com> Wed, Dec 21, 2022 at 11:50 AM
To: Amador County Planning Department <planning@amadorgov.org>
Cc: kruesel@amadorgov.org, smeyer@amadorgov.org, Mounir <mounirkad@yahoo.com>

Thank you Krista

Sent from my iPhone

> On Dec 20, 2022, at 4:27 PM, Amador County Planning Department <planning@amadorgov.org> wrote:
>
> [Quoted text hidden]

Amador County Planning Department <planning@amadorgov.org> Wed, Dec 21, 2022 at 4:20 PM
To: Abdikarim Ali <timir2@gmail.com>
Cc: "kruesel@amadorgov.org" <kruesel@amadorgov.org>, "smeyer@amadorgov.org" <smeyer@amadorgov.org>, Mounir <mounirkad@yahoo.com>

To clarify, a prerequisite for any building, well, septic, or encroachment permits on the subject parcel for anything other than a single-family dwelling, is a Conditional Use Permit issued by the Amador County Planning Commission following adequate environmental review, public notice, and a public hearing.

The application for a Conditional Use Permit for the Garden of Noor Cemetery remains incomplete (deficiencies list attached), has not been through environmental review, and has not been approved by the Planning Commission. As such, permits for portions of the project cannot be approved.

Thanks,
Chuck Beatty
Planning Director

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorgov.org

[Quoted text hidden]

Scott Meyer <smeyer@amadorgov.org> Wed, Dec 21, 2022 at 7:29 PM
To: Amador County Planning Department <planning@amadorgov.org>
Cc: Abdikarim Ali <timir2@gmail.com>, "kruesel@amadorgov.org" <kruesel@amadorgov.org>, Mounir <mounirkad@yahoo.com>

Hello to all concerned parties,

I agree with the Planning Director, Mr. Beatty. To be perfectly clear. No onsite sewage disposal design approvals or on-site sewage disposal permits will be issued until the Conditional Use Permit for the proposed Garden of Noor Cemetery has been approved and completed.

Thank you all.

Scott Meyer
R.E.H.S.
[Quoted text hidden]

Planning Department <planning@amadorgov.org>

Religious Center and 50,000 burial sites

1 message

Stacy Rhoades <srhoades@ione-ca.com> Tue, Mar 28, 2023 at 11:17 AM
To: "planning@amadorgov.org" <planning@amadorgov.org>

County of Amador,

I support the Airport ordnance of no schools, no church's or commercial public gatherings near airports.

The proposed use permit for the 20,000 sq.ft Religious center with 50,000 burial plots at the corner of Lambert and Carbondale does not fit in our community.

I strongly appose this.

Thank you for your consideration.

Stacy Rhoades

Mayor of Ione



Sent from Mail for Windows

Planning Department <planning@amadorgov.org>

Religious Center and 50,000 burial sites

1 message

Stacy Rhoades <srhoades@ione-ca.com> Tue, Mar 28, 2023 at 11:17 AM
To: "planning@amadorgov.org" <planning@amadorgov.org>

County of Amador,

I support the Airport ordnance of no schools, no church's or commercial public gatherings near airports.

The proposed use permit for the 20,000 sq.ft Religious center with 50,000 burial plots at the corner of Lambert and Carbondale does not fit in our community.

I strongly appose this.

Thank you for your consideration.

Stacy Rhoades

Mayor of Ione



Sent from Mail for Windows

Planning Department <planning@amadorgov.org>

Use Permit Application - Mosque

Stephanie H Anderson <stephani@icloud.com> Tue, Apr 11, 2023 at 9:56 AM
To: planning@amadorgov.org

MAJOR CONCERN for Changes to Ione

Have just learned that the Amador County Planning Department has received a Use Permit application for a 20,000 sq. ft. mosque and 50,000 burial plots at the corner of Carbondale and Lambert Roads. The current zoning is MRZ, mineral resource zone (mining) and AG-40 (agriculture).
Many problems:

- no water
- poor secondary county roads cannot handle the vast increased in traffic
- inappropriate land use conversion, impacts Eagle's Nest Airport.

The current Eagle's Nest Airport land use Ordinance that restricts schools, churches and the commercial assembly of persons within 1 mile of the airport.

I hope that our County Planning Department will deny this Use Permit as it will have a major negative impact to the town of Ione where I am a resident.

Regards,
Stephanie Anderson

Planning Department <planning@amadorgov.org>

Eagle Nest Airport

1 message

Dorothy Cleveland <dcleveland95640@gmail.com> Tue, Apr 11, 2023 at 11:14 AM
To: "planning@amadorgov.org" <planning@amadorgov.org>

First off the Eagle Nest Airport has been in operation longer and no one should be allowed to encroach on their area.
The planning commission should automatically refuse any applications that encroaches on this airport .
Secondly but so very important. The roads through out the area are INCAPABLE of handling the traffic that would follow if you allow the permit.
Also the land already zoned shouldn't be up for a zoning change for a cemetery. As well as the Mosque.
Our planning commission can definitely protect our community. I ask you to take a stand for our community please. Depending on your support,
cordially yours,
Dorothy Cleveland

Planning Department <planning@amadorgov.org>

I want to let you know that I do not want to see a mosque or the cemetery come to our community. I would certainly bring in way more traffic than our already not so good roads can handle. Please vote not on the permit.

1 message

Janice Foyil <janfoyil@gmail.com> Tue, Apr 11, 2023 at 11:42 AM
To: "planning@amadorgov.org" <planning@amadorgov.org>

Planning Department <planning@amadorgov.org>

Use Permit for Carbondale and Lambert Roads

1 message

Stacy Rhoades <stacy@hollapenosauce.com> Tue, Apr 11, 2023 at 11:24 AM
To: planning@amadorgov.org

I will not be able to attend tonight's meeting but if you could read this for the record I would much appreciate it.

Planning Commissioners, staff and attendees:

Although I am the Mayor of Ione, I come to you as a private citizen and not as the mayor.

Before I get started, we need to level the field and bring everybody up to speed.

The Amador County Planning Department has received a Use Permit application for a 20,000 sq. ft. mosque and 50,000 burial plots at the corner of Carbondale and Lambert Roads.

The current zoning is MRZ, mineral resource zone (mining) and AG-40 (agriculture).

As you know, I am a huge advocate for protecting mining and agricultural properties.

Many problems: no water, poor secondary county roads that cannot handle the vast increase in traffic, and inappropriate land use conversion all impact Eagle's Nest Airport.

We need to support the current Eagle's Nest Airport land use Ordinance that restricts schools, churches and the commercial assembly of persons within 1 mile of the airport.

Thank for the opportunity to comment.

Stacy Rhoades

Planning Department <planning@amadorgov.org>

I want to let you know that I do not want to see a mosque or the cemetery come to our community. I would certainly bring in way more traffic than our already not so good roads can handle. Please vote not on the permit.

2 messages

Janice Foyil <janfoyil@gmail.com> Tue, Apr 11, 2023 at 11:42 AM
To: "planning@amadorgov.org" <planning@amadorgov.org>

Amador County Planning Department <planning@amadorgov.org> Tue, Apr 11, 2023 at 11:55 AM
To: Janice Foyil <janfoyil@gmail.com>

Thank you for your comments, Janice! They are part of the public record.

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorgov.org

On Tue, Apr 11, 2023 at 11:42 AM Janice Foyil <janfoyil@gmail.com> wrote:

Planning Department <planning@amadorgov.org>

Please deny use permit affecting Eagle's nest and Ione

4 messages

Alicia Forberg <aliciaforberg@hotmail.com> Wed, Apr 12, 2023 at 8:55 AM
To: "planning@amadorgov.org" <planning@amadorgov.org>

Ione has fought to stay small. We've made huge sacrifices to keep Ione small. We're losing a school. We've done without traffic signals and we put up with the extra cars. We have plenty of churches in our town and nearby in Martel and Jackson. Sacramento's problems are their own. Don't bring them here. Eagle's Nest has been minding their own business for decades. The best place to get clay for kilns is Ione. Look at all the aggregate that comes out of Ione. That is our contribution. We provide minerals and livestock. Ranches and hard work. FOOD. Leave us as we are!
Alicia Forberg

Amador County Planning Department <planning@amadorgov.org> Wed, Apr 12, 2023 at 11:19 AM
To: Alicia Forberg <aliciaforberg@hotmail.com>

Hello,

What project is this regarding? Please specify so we may add the comments to the project record.

Thank you,

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorgov.org

[Quoted text hidden]

Alicia Forberg <aliciaforberg@hotmail.com> Wed, Apr 12, 2023 at 11:42 AM
To: Amador County Planning Department <planning@amadorgov.org>

Thank you! It's a use permit in ione to change the zoning to accommodate a 20,000 sq foot church and 50,000 burial plots.

Sent from my iPhone

> On Apr 12, 2023, at 11:20 AM, Amador County Planning Department <planning@amadorgov.org> wrote:
>
> [Quoted text hidden]

Amador County Planning Department <planning@amadorgov.org> Wed, Apr 12, 2023 at 12:03 PM
To: Alicia Forberg <aliciaforberg@hotmail.com>

That project (Cemetery Use Permit) is currently withdrawn and is in the process of being resubmitted, but I will add your comments to the project record going forward.

Thanks,

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorgov.org

[Quoted text hidden]

Garden of Noor Cemetery

2 messages

Abdikarim Ali <timir2@gmail.com> Wed, May 3, 2023 at 8:45 PM
To: Krista Ruesel <kruesel@amadorgov.org>

Hi Krista,
I want to let you know that I no longer work for Mounir Kadduoura and his project. Please make a note of it.

Thank you and it was nice working with you and environmental folks.

Sent from my iPhone

Krista Ruesel <kruesel@amadorgov.org> Thu, May 4, 2023 at 8:13 AM
To: Abdikarim Ali <timir2@gmail.com>

Alright thank you,

I'll remove your name from the project list.

Take care,

Krista Ruesel
Planner|Amador County Planning Department
(209)223-6803|kruesel@amadorgov.org

The information transmitted by this email is intended only for the person or entity to which it is addressed. This email may contain proprietary, confidential and/or privileged material. If you are not the intended recipient of this message, be aware that any use, review, retransmission, distribution, reproduction or any action taken in reliance upon this message is strictly prohibited. If you received this in error, please contact the sender and delete the material.

[Quoted text hidden]

DEPARTMENT OF FORESTRY AND FIRE PROTECTION
Amador – El Dorado Unit
Camino, CA 95709
(530) 644-2345
Website: www.fire.ca.gov

May 22, 2023

Project: UP - 22;2-3 Gardens of Noor Cemetery

APN: 001-220-013

Subject: CAL FIRE comments

The project listed above is within lands identified as SRA (State Response Area). CAL FIRE has prevention and suppression responsibilities in these areas including enforcement of development standards in accordance with the SRA Minimum Fire Safe Regulations. Below are comments related to this project and are the minimum standards for this project within the SRA. Local fire jurisdictions and county planning departments may have more restrictive requirements.

Addresses for Buildings.
All buildings shall be issued an address by the local jurisdiction which conforms to that jurisdiction's overall address system. Utility and miscellaneous Group U buildings are not required to have a separate address; however, each residential unit within a building shall be separately identified.

The size of letters, numbers, and symbols for addresses shall conform to the standards in the California Fire Code, California Code of Regulations title 24, part 9.

Gate Access
Gate entrances shall be at least two (2) feet wider than the width of the traffic lane(s) serving that gate and a minimum width of fourteen (14) feet unobstructed horizontal clearance and unobstructed vertical clearance of thirteen feet, six inches (13′ 6″).

All gates providing access from a Road to a Driveway shall be located at least thirty (30) feet from the roadway and shall open to allow a vehicle to stop without obstructing traffic on that Road.

Jeff Hoag
Battalion Chief - Amador El Dorado Unit
Wildfire Resiliency Program
2840 Mt. Danaher Rd Camino 95709
Cell: (530) 708-2725

Planning Department <planning@amadorgov.org>

AMA-104-PM 1.07 Gardens of Noor Cemetery

Bauldry, Paul@DOT <paul.bauldry@dot.ca.gov> Tue, May 30, 2023 at 3:27 PM
To: Amador County Planning Department <planning@amadorgov.org>

Hello Krista,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Early Consultation Application Referral for the Gardens of Noor Cemetery.

The property is located approximately 3.92 miles from State Route (SR) 104 near the town of Ione. The Assessor's Parcel Number is 001-220-013.

The proposed project will not impact the SR based on the project description and distance to the nearest SR. Our comments on 3/01/2022 still stand.

Caltrans has no additional comments at this time. However, Caltrans requests for all future development at this location to be included in the review process.

Thank you,

Paul Bauldry

Caltrans District 10

Office of Rural Planning

Division of Planning, Local Assistance, and Environmental

1976 E. Dr. Martin Luther King Jr Blvd.

Stockton CA 95205

Telework # 209.670.9488

The Science Behind Green and Conventional Burial

Excerpt on Soil and Water

Soil

The two greatest concerns regarding green burial are around soil and water contamination. The two are intrinsically intertwined, both in their ability to encourage natural decomposition and to inhibit it. Site selection is almost entirely dependent upon both the presence of optimum soil and the location of water sources. This section is devoted to exploring how soil affects the location and operation of green burial cemeteries, not the other way around.

Specific characteristics of soil affect its ability to act as a filter for natural body waste or any product buried within it. These include biodegradable materials in green cemeteries as well as heavy metals and wood finishes that may leach from coffins and urns, and chemicals and byproducts from concrete vaults in conventional cemeteries.

Optimum soil conditions include sandy, loamy soils, with permeability coefficients of more than 10^{-3} m/s. Soils that are waterlogged and impervious, such as clay, impede decomposition and redirect water in ways that may not be conducive to cemetery health or efficient decomposition. Additionally, clay and organic matter may bind decomposition byproducts, slowing decay and creating an anaerobic situation.

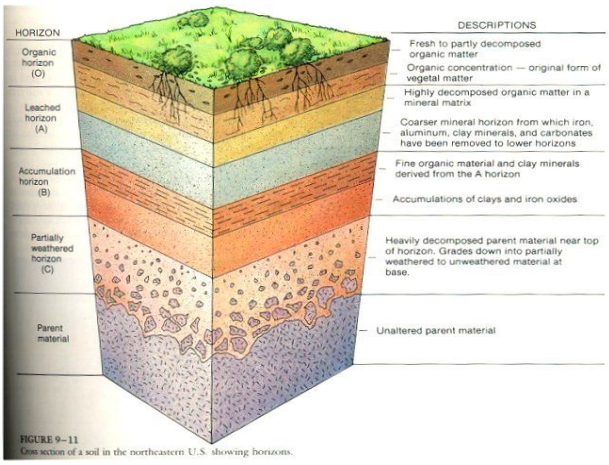


FIGURE 9–11
Cross section of a soil in the northeastern U.S. showing horizons.

Decomposition of organic matter in soils is accomplished largely by microorganisms. The rate and course of decomposition is influenced by climate, organic matter composition, and nutrient availability from the environment. Over 90% of the microbial activity in soil is in the upper foot; most plant roots are also quite shallow. Shallow burial is aerobic, accommodating rapid decomposition due to warmer temperatures in the summer.

Rather than being an inert material, soil contains a dynamic living ecosystem. This organic soil is thought to actually have the most bio-diverse ecosystems; only about 1 % of the organisms have been identified. One cup of undisturbed native organic soil may contain:

Organism	Number
Bacteria	200 billion
Protozoa	20 million
Fungi	100,000 meters
Nematodes	100,000
Arthropods	50,000

Humus, or the top organic soil layer improves soil structure by binding particles together into larger aggregates, creating pore space and improving air and water filtration. It also slowly releases nitrogen, phosphorus, and sulfur which over time is used by plants for growth and development. Humus buffers soil pH and can bind metals in soil, preventing heavy metal toxicities.

These unique and important qualities on the top organic soil layer highlight the importance of carefully removing soil strata when digging the grave and replacing it in the order it was removed.

Due diligence in choosing a site with appropriate soil is key. Soils maps ensure that a site is viable. Town or city

Copyright © 2016 by Lee Webster · Used by permission of the author · www.nhfuneral.org

engineers are resource personnel who can provide and help interpret local and US government soil overlay maps. Digging test pits and having them professionally analyzed prior to initiating cemetery status is advised.

It should also be noted that certain infectious agents survive in the soil such as hepatitis C survive in the soil, but are less infectious than when carried by a live person. Anthrax and botulism are endemic in most soils. There is no evidence for travel of these biologic agents in soils.

Other considerations are equally important criteria for ideal soil for green burial, including amount of organic matter present, alkalinity, salt levels, texture of the soil (large and loose to dense and impermeable), depth to bedrock, slope, presence of fractured or cavernous bedrock, and more.

Water

"There is little evidence of microbiological contamination of groundwater from burial…Microorganisms involved in the decay process (putrefaction) are not pathogenic." —PAHO

The potential for contamination of drinking water due to body decomposition, though possible and frankly expected if best management practices are not followed, is not definitively substantiated by studies at this time. Areas adjacent to conventional cemeteries, especially historical cemeteries, have been reported to have elevated results when core soil and water specimens were tested for contaminants in a handful of cases.

But there is no evidence that these findings are attributable to body decomposition processes. Due to the types of contaminants found, it is highly likely that the problems were caused by leachate from casket, vault, or embalming fluid or other incidental materials. No contamination has been reported from or near any green cemeteries in the US, Canada, Great Britain or Australia since their inception in 2003.

In areas near cemeteries where ground water has been found to have elevated organic compounds such as dissolved organic carbon concentrations, there has been discoloration, unpleasant odor, and changes in taste when chlorinated, but these compounds are not harmful in and of themselves.

Arsenic is still being found in water near cemeteries where Civil War soldiers who were embalmed and transported were buried. This finding, unfortunately, does not help us understand the contaminant properties of bodies on water sources below the grave separate from the casket, vault, and embalming leachate, either then or now.

In 1998, the World Health Organization published recommended guidelines for burying disaster victims in relation to water sources, suggesting that humans and animals be buried at least 250 meters from any well, borehole, or spring from which potable water supply is drawn, 30 meters away from any other spring or watercourse, and at least 10 meters from any field drain. While helpful in a disaster scenario, these figures are not particularly useful for determining water safety in a variety of potential green burial sites in the US.

Many states provide setback parameters for water, buildings and roads for home burial that may give some guidance for best practices in green cemeteries. Each region has unique conditions that must be taken into account.

When attempting to determine cemetery impact on water, it is important to acknowledge the differences between acceptable levels of nutrients and minerals in aquifers, lakes, streams, and rivers, and the levels that are considered polluting, contaminating, or toxic in each specific context.

This guide was prepared by Lee Webster for the GBC with assistance from Carl Anderson, M.S.; Kirsten Bass, MD, PhD; John Meagher, Executive Director, RESET; Lindsay Soyer, licensed FD; Merilynne Rush; and Steven Whitman, M.A., AIC. For the complete downloadable version, go to www.nhfuneral.org>GreenBurial

Copyright © 2016 by Lee Webster · Used by permission of the author · www.nhfuneral.org

Original Publications

Grave Science Soil and Water

by Lee Webster, *excerpt from* The Science Behind Green and Conventional Burial *for lay people*

Soil

The two greatest concerns regarding green burial are around soil and water contamination. The two are intrinsically intertwined, both in their ability to encourage natural decomposition and to inhibit it. Site selection is almost entirely dependent upon both the presence of optimum soil and the location of water sources. This section is devoted to exploring how soil affects the location and operation of green burial cemeteries, not the other way around.

Specific characteristics of soil affect its ability to act as a filter for natural body waste or any product buried within it. These include biodegradable materials in green cemeteries as well as heavy metals and wood finishes that may leach from coffins and urns, and chemicals and byproducts from concrete vaults in conventional cemeteries.

Optimum soil conditions include sandy, loamy soils, with permeability coefficients of more than 10–3 m/s. Soils that are waterlogged and impervious, such as clay, impede decomposition and redirect water in ways that may not be conducive to cemetery health or efficient decomposition. Additionally, clay and organic matter may bind decomposition byproducts, slowing decay and creating an anaerobic situation.

Decomposition of organic matter in soils is accomplished largely by microorganisms. The rate and course of decomposition is influenced by climate, organic matter composition, and nutrient availability from the environment. Over 90% of the microbial activity in soil is in the upper foot; most plant roots are also quite shallow. Shallow burial is aerobic, accommodating rapid decomposition due to warmer temperatures in the summer.

Rather than being an inert material, soil contains a dynamic living ecosystem. This organic soil is thought to actually have the most bio-diverse ecosystems; only about 1% of the organisms have been identified. One cup of undisturbed native organic soil may contain: 200B bacteria, 20 million

aggregates, creating pore space and improving air and water filtration. It also slowly releases nitrogen, phosphorus, and sulfur which over time is used by plants for growth and development. Humus buffers soil pH and can bind metals in soil, preventing heavy metal toxicities.

These unique and important qualities on the top organic soil layer highlight the importance of carefully removing soil strata when digging the grave and replacing it in the order it was removed.

Due diligence in choosing a site with appropriate soil is key. Soils maps ensure that a site is viable. Town or city engineers are resource personnel who can provide and help interpret local and US government soil overlay maps. Digging test pits and having them professionally analyzed prior to initiating cemetery status is advised.

It should also be noted that certain infectious agents survive in the soil such as hepatitis C survive in the soil, but are less infectious than when carried by a live person. Anthrax and botulism are endemic in most soils. There is no evidence for travel of these biologic agents in soils.

Other considerations are equally important criteria for ideal soil for green burial, including amount of organic matter present, alkalinity, salt levels, texture of the soil (large and loose to dense and impermeable), depth to bedrock, slope, presence of fractured or cavernous bedrock, and more.

Water

"There is little evidence of microbiological contamination of groundwater from burial… Microorganisms involved in the decay process (putrefaction) are not pathogenic." —PAHO

The potential for contamination of drinking water due to body decomposition, though possible and frankly expected if best management practices are not followed, is not definitively substantiated by studies at this time. Areas adjacent to conventional cemeteries, especially historical cemeteries, have been reported to have elevated results when core soil and water specimens were tested for contaminants in a handful of cases.

But there is no evidence that these findings are attributable to body decomposition processes. Due to the types of contaminants found, it is highly likely that the problems were caused by leachate from casket, vault, or embalming fluid or other incidental materials. No contamination has been reported from or near any green cemeteries in the US, Canada, Great Britain or Australia since their inception in 2003.

In areas near cemeteries where ground water has been found to have elevated organic compounds such as dissolved organic carbon concentrations, there has been discoloration, unpleasant odor, and changes in taste when chlorinated, but these compounds are not harmful in and of themselves.

and embalming leachate, either then or now.

In 1998, the World Health Organization published recommended guidelines for burying disaster victims in relation to water sources, suggesting that humans and animals be buried at least 250 meters from any well, borehole, or spring from which potable water supply is drawn, 30 meters away from any other spring or water source, and at least 10 meters from any field drain. While helpful in a disaster scenario, these figures are not particularly useful for determining water safety in a variety of potential green burial sites in the US.

Many states provide setback parameters for water, buildings and roads for home burial that may give some guidance for best practices in green cemeteries. Each region has unique conditions that must be taken into account.

Due to the lack of specific data regarding single body burial at 3-4 feet in a certified cemetery without use of a vault, casket or embalming, we should proceed with caution and common sense, follow established parameters regarding distance from known water sources, pay attention to seasonal high water tables, and recognize that aquifers are often located several hundreds of feet below ground. Ground water would have to filter through at least 80 to 100 types of soil to reach an aquifer, naturally making it potable.

When attempting to determine cemetery impact on water, it is important to acknowledge the differences between acceptable levels of nutrients and minerals in aquifers, lakes, streams, and rivers, and the levels that are considered polluting, contaminating, or toxic in each specific context.

Click to print PDF with illustrations

Click to view full Science Behind Green Burial

Copyright © 2016 by Lee Webster · Used by permission of the author · www.nhfuneral.org

Connect
Friends
Newsletters
Conferences
Peer-to-Peer Forum

Learn More
GBC publications
Media articles
Research
Funeral course
Advocacy tools
FAQ

Get Certified
Our standards
Why it matters
How to certify

Meet Providers
Provider Maps
Find a cemetery
Products
Funeral Homes A-N
Funeral Homes O-Z

Green Burial Council
2720 Cold Springs Road
Placerville, CA 95667
888-966-3330
info@greenburialcouncil.org

Contact Us



Give Today

Gold
Transparency
2022

Candid.

Proudly powered by Weebly

Website originally designed by Lee Webster

©2022 Green Burial Council

Outlook

Gardens of Noor Cemetery UP-22;2-3

From Cultural Preservation Department Inbox <cpd@wiltonrancheria-nsn.gov>
Date Thu 9/11/2025 8:45 AM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from cpd@wiltonrancheria-nsn.gov. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

Thank you for your letter dated September 4, 2025, regarding the proposed project. Wilton Rancheria ("Tribe") is a federally recognized Tribe as listed in the Federal Register, Vol. 74, No. 132, p. 33468-33469, as "Wilton Rancheria of Wilton, California". The Tribe's Service Delivery Area ("SDA") as listed in the Federal Register, Vol. 78, No. 176, p. 55731, is Sacramento County. The Tribe's Trust Lands are in Sacramento County however, the Tribe's ancestral territory spans from Sacramento County to portions of the surrounding Counties.

Although your project is within the ancestral territory of the Wilton Rancheria, we do not have any comments and do not wish to open consultation at this time. We appreciate your continued outreach and/ or consultation for future projects and respectfully request that you contact us if there are any project updates or changes.

Thank you,

Wilton Rancheria
Department of Cultural Preservation
Front Desk: 916-313-4493
cpd@wiltonrancheria-nsn.gov

Nicole Cook

Plan-Planning

Hello. They will need to have the CFD annexation condition met prior to final unless the parcel is protected under the Williamson act.

Thank you,

NICOLE COOK - ADMINISTRATIVE OFFICER
AMADOR FIRE PROTECTION DISTRICT
810 COURT STREET JACKSON CA 95642
DIRECT LINE: 209-223-6632
www.amadorfire.org

As of 4/29/25 my email has been updated to **ncook@amadorcounty.gov**, please USE this email address moving forward.

"This communication may contain legally privileged, non-public and confidential information including HIPAA-protected PHI sent solely for the use of the intended recipient, and the privilege is not waived by the receipt of this communication by an unintended and unauthorized recipient. If you are not the intended recipient of this communication you are not authorized to use it in any manner and must either immediately destroy it or return it to the sender without reading, saving or further distributing them. Please notify the sender immediately by telephone at (209) 223-6632 or email if you received this communication in error."

Certificate of Authority

*A cemetery is a place for disposition of human remains. Generally, private cemeteries are required to obtain and maintain a state license, referred to as a **Certificate of Authority**.*

To obtain a **Certificate of Authority** for operation of a cemetery, a corporation must submit the following:

1. Completed Certificate of Authority application with the required filing fee.
2. A corporate resolution delegating authority to submit the application on behalf of the corporation.
3. A certified copy of your Articles of incorporation, (may be obtained from the Secretary of State's web site located at www.sos.ca.gov/business-programs.
4. Application for permit to sell and issue securities or permit to sell and issue securities. If not applicable, submit a statement that securities will not be sold or issued.
5. Application to the city or county planning commission for a cemetery use permit or rezoning for cemetery purposes, or a certified copy of a land use or zoning permit.
6. Declaration of dedication for cemetery purposes certified by the county recorder.
7. Deed to the property, contract of purchase or any other instrument which provides the applicant with merchantable title thereto.
8. Endowment care trust agreement executed by the board of directors of the cemetery authority.
9. **A statement signed by a majority and verified by one of the directors of the applicant, which statement shall set forth the following eleven requirements:**
    - Names and addresses of the incorporators, directors, officers, trustees of the endowment care fund, the cemetery broker and the designated cemetery manager, together with a statement of their experience and fitness to engage in the cemetery business.
    - Statement of compensation received or to be received by the officers, directors and sales agents and/or manager.
    - A complete and detailed financial statement showing assets, liabilities and reserve.
    - If the applicant is a new corporation, the statement shall designate the amount of stock subscribed, the consideration paid for all stock issued and the amount of promotional stock involved.
    - If the applicant has engaged in business for a period of time, the statements shall include complete operating profit and loss statements for the preceding three (3) years, or such period of time as the applicant has been in business if less than three years.
    - An itemized statement of estimated receipts, (from all sources, capitalization, sales, loans, etc.), and expenditures of the applicant for at least five (5) years or such other period as the Bureau may require by written notice to the applicant.
    - A statement setting forth the size, location and topography of, and water available for, the property to be used for cemetery purposes.
    - A statement of the applicant's proposed plan of operation, which shall include type of selling, approximate size of sales department, along with number of acres initially developed.
    - A statement of the amount deposited to the Endowment Care Fund, type of investment made or to be made and the proposed rate of contribution for the future.
    - An independent confirmation from the depository or other such proof of deposit of the initial contribution of $35,000.00 to the endowment care fund as required by Health and Safety Code (HSC) § 8738.1.
    - A $50,000.00 Fidelity bond coverage for Endowment and Special Care Fund Trustees, HSC § 8734.
10. Submit Certification Affidavit's for all officers and trustees.
11. Verification of publication of change of ownership, (if applicable).
12. Once all required documents have been submitted and approved by the Bureau, a field representative will inspect your cemetery before final approval is given and a Certificate of Authority license issued. As part of the inspection process, the field representative will review your cemetery maps. Please have available for inspection a copy of the map(s) that have been filed with the county recorder for retention by the field representative. Upon completion of a satisfactory inspection, the field representative will submit the maps to the Cemetery and Funeral Bureau in accordance with the licensing requirement.

If you have any questions or need clarification about any of the documents that need to be submitted to complete the COA application, please contact the Cemetery and Funeral Bureau Licensing Unit at (916) 574-7870.

Contact Us

Cemetery & Funeral Bureau
1625 North Market Blvd.,
Suite S208
Sacramento, CA 95834
(916) 574-7870

Small Business/DVBE Advocate

- General inquiry emailcfb@dca.ca.gov
- Annual/Quarterly reporting and Audit Unit inquiries auditcfb@dca.ca.gov
- Unitrust inquiries and submission unitrust@dca.ca.gov

Join Our Email List at https://www.cfb.ca.gov/webapplications/apps/subscribe/index.shtml

Copyright © 2025 State of California

This web site contains PDF documents that require the most current version of Adobe Reader to view. To download click on the icon below.

Get Adobe Reader

Outlook

RE: TAC Referral for UP-22;2-3 Gardens of Noor Cemetery for September 18, 2025 - Completeness

From Jereme Dutschke <jereme@ionemiwok.net>
Date Mon 9/15/2025 4:23 PM
To Plan-Planning <planning@amadorcounty.gov>
Cc Consultation <consultation@ionemiwok.net>

You don't often get email from jereme@ionemiwok.net. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

The Ione Band of Miwok Indians would like to consult on this project. Please send a copy of the Cultural Resources Report.

Thank you,

Ione Band of Miwok Indians

Jereme Dutschke
Cultural Resources Coordinator
Ione Band of Miwok Indians
9252 Bush Street
Plymouth, CA 95669-0699
Direct: 209-249-5104
Cell: 209-781-3325
Email: jereme@ionemiwok.net

CONFIDENTIALITY NOTICE: The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

From: Plan-Planning <planning@amadorcounty.gov>
Sent: Monday, September 15, 2025 1:23 PM

To: Plan-Planning <planning@amadorcounty.gov>
Subject: Re: TAC Referral for UP-22;2-3 Gardens of Noor Cemetery for September 18, 2025 - Completeness

Hello,

Please see the revised memo for this item and replace it in your packets. Please note, the application has not changed but the project description of the memo has been revised to reflect the proposed 60 events per month, as requested by the applicant.

Thank you,

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorcounty.gov

From: Plan-Planning <planning@amadorcounty.gov>
Sent: Wednesday, September 3, 2025 3:12 PM
Subject: TAC Referral for UP-22;2-3 Gardens of Noor Cemetery for September 18, 2025 - Completeness

Good Afternoon,
Please see the attached resubmittal of UP-22;2-3 Gardens of Noor Cemetery Use Permit Application, to be reviewed by the Technical Advisory Committee on **Thursday, September 18, 2025, at 1:00 PM** in the Board of Supervisors Chambers in the Amador County Administration Center, located at 810 Court St., Jackson, CA 95642. The Technical Advisory Committee will review application for completeness. Please note, this application was previously reviewed by TAC, found incomplete, and has since been updated and resubmitted. Comments regarding the previous application are on-file with the Planning Department.
Thank you,

Krista Ruesel, Planner

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorcounty.gov

RE: Amador Water Agency Response to Early Consultation Application Referral for Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery

2 messages

Lucas Carthew <lcarthew@amadorwater.org> Fri, Feb 18, 2022 at 4:17 PM
To: "planning@amadorgov.org" <planning@amadorgov.org>
Cc: Rick Ferriera <RFerriera@amadorwater.org>, Brandt Cook <bcook@amadorwater.org>

Planning Department,

Please accept this corrected letter. APN correction was made. If you have any further questions or concerns, please feel free to contact the Agency at your discretion.

Kind Regards,

Lucas Carthew

Assistant Engineer

Amador Water Agency

*** This is not a quote or an estimate. Rates and fees subject to change by future Board action. ***

From: Lucas Carthew
Sent: Friday, February 18, 2022 15:20
To: 'planning@amadorgov.org' <planning@amadorgov.org>
Cc: Rick Ferriera <RFerriera@amadorwater.org>; Brandt Cook (bcook@amadorwater.org) <bcook@amadorwater.org>
Subject: Amador Water Agency Response to Early Consultation Application Referral for Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery

Hello Amador County Planning Department,

Please see the attached document for AWA's response to the Early Consultation Application Referral for Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery. If you have any further questions or concerns, please feel free to contact the Agency at your discretion.

Kind Regards,

Lucas Carthew

Assistant Engineer

Amador Water Agency

*** This is not a quote or an estimate. Rates and fees subject to change by future Board action. ***

CONFIDENTIALITY NOTICE: This e-mail and any attachments are for the sole use of the addressee(s) and may be privileged, confidential and protected from disclosure. If you have received this message in error or are not the intended recipient, then we (1) advise you that any disclosure, copying, distribution, saving or use of this information is strictly prohibited, and (2) request that you delete this e-mail and any attachments and notify us by reply e-mail or telephone 209-223-3018.
Thank You,
Amador Water Agency 12800 Ridge Road, Sutter Creek, California 95685 www.amadorwater.org

Early Consultation Application Referral AWA Response 021822.pdf
132K

Amador County Planning Department <planning@amadorgov.org> Tue, Feb 22, 2022 at 8:44 AM
To: Lucas Carthew <lcarthew@amadorwater.org>
Cc: Rick Ferriera <RFerriera@amadorwater.org>, Brandt Cook <bcook@amadorwater.org>

Received, thank you.

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorgov.org

[Quoted text hidden]

A Public Agency

AMADOR WATER AGENCY AWA SAFE • RELIABLE • WATER SERVICE

12800 Ridge Road, Sutter Creek, CA 95685-9630 • www.amadorwater.org • Office: (209) 223-3018

February 18, 2022

Amador County Planning Department
c/o Krista Ruesel
810 Court Street
Jackson, CA 95642

RE: Early Consultation Application Referral for Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery
APN: 001-220-013

To Whom It May Concern:

On February 17, 2022, the Amador Water Agency (Agency, AWA) received an early consultation application referral for the Use Permit Application UP-22; 2-3 for Gardens of Noor Cemetery (Development) located 857 Carbondale Road, Ione, being APN 001-220-013, having been submitted to the County of Amador by Mounir Kaddoura on behalf of Brett L. Carlsen. The Agency has been informed that the County of Amador (County) is considering a Use Permit for the Development.

The Development is planned to be within the AWA operated Amador Water System (AWS), Ione Service Area (System). The Agency has the following comments regarding the Development:

1) The Development may apply for a "Determination of Water Availability" from the Amador Water Agency at any time.
2) Upon receipt of an approved Tentative Map/Use Permit approval from the County, the Development shall apply for a Conditional Will Serve from AWA. AWA will then advise the Development of the requirements to serve the Development and other specific facilities to be constructed prior to initiation of water service for the Development. Upon compliance with all of the terms of the Conditional Will Serve Commitment, the Development may apply for a Will Serve Commitment from AWA.
3) The Development will be required to obtain a "Water Certificate of Acceptance, Transfer and Will Serve Commitment" from the Agency, prior to recordation of the Development's Final Map or initiation of service to the Development.
4) The Development will be responsible to design and construct all on and off site improvements deemed necessary by the State, City, County, Fire Department and AWA to adequately serve the Development, subject to AWA review and approval, without negatively impacting existing customers and rate payers. The Development will be responsible to obtain and pay for all permits, environmental reviews and certifications, licenses, acceptances, pay all associated fees, design,

A Public Agency

12800 Ridge Road, Sutter Creek, CA 95685-9630 • www.amadorwater.org • Office: (209) 223-3018

construct, and make acceptable to the State, County, Fire Department and AWA all transmission, treatment, storage and distribution improvements needed to serve the Development, prior to initiation of service to the Development, as determined by AWA.

5) AWA has determined that currently reliable water treatment and storage capacity to serve the Development, and AWA's existing customers and commitments is severely limited in this System. AWA has fully allocated all treatment and storage capacity at the Ione Water Treatment Plant (WTP) and is currently developing a plan to expand the existing WTP or to construct a new WTP. Water service to this Development may be contingent upon one of these options being implemented with sufficient capacity to serve the Development.

6) This parcel has one 5/8" meter providing service to it currently. Water meters off of the Eagles Nest distribution line are restricted to a maximum size of 5/8", being a capacity allotment of 400 gallons per day (gpd) at a maximum instantaneous flow rate of 20 gallons per minute (gpm). Future connections to this line may be subject to reimbursement agreement fee(s) for the Eagles Nest Estates Water Transmission Line. All other Agency fees would apply according to Agency rules, regulations and Water Code.

A "Developer Packet" with additional information and requirements may be downloaded from https://amadorwater.org/connection-installation/ for your convenience. Please be aware that the contents of this packet are subject to change from time to time and are intended only as a guideline for Developers.

Please feel free to contact the Agency with any questions, comments, or concerns regarding the contents of this letter.

Kind Regards,

Lucas Carthew
Assistant Engineer
This is not a quote or estimate.
CC: File

Planning Department <planning@amadorgov.org>

TAC Project Referral - UP-22;2-3 Gardens of Noor Cemetery

Richard Vela <rvela@amadorgov.org> Fri, Feb 18, 2022 at 10:36 AM
To: Amador County Planning Department <planning@amadorgov.org>

The Department of Transportation and Public Works has reviewed the submittal for Use Permit Application UP -22; 2-3 Kaddoura Cemetery and has the following comments:

1. If necessary, proposed encroachments onto Carbondale Road and Lambert Road will require encroachment permits and will need to be constructed per Standard Plans PW-3, PW-5B and PW-6A. These encroachments will need to be commercial driveway encroachments. The existing encroachments are most likely residential driveway encroachments but will be evaluated to see if they meet commercial driveway encroachment standards.
2. Traffic mitigation fees are to be collected for the proposed use. Currently, there is no classification for cemeteries in the current traffic mitigation fees table. However, the proposed land use will generate traffic. An appropriate traffic mitigation fee will be calculated for the proposed cemetery use. A traffic mitigation fee will be collected for the proposed 20,000 SF religious building at the time of building permit application.

On Thu, Feb 17, 2022 at 4:45 PM Amador County Planning Department <planning@amadorgov.org> wrote:
[Quoted text hidden]

--
Richard R. Vela, P.E.
Director
Amador County Department of Transportation and Public Works
810 Court Street
Jackson, CA 95642
209-223-6429 Main
209-223-6457 Direct
rvela@amadorgov.org

Krista Ruesel <kruesel@amadorgov.org>

AMA-104-PM 1.07 Early Consultation Application Referral Gardens of Noor Cemetery

Bauldry, Paul@DOT <paul.bauldry@dot.ca.gov> Tue, Mar 1, 2022 at 1:28 PM
To: Krista Ruesel <kruesel@amadorgov.org>
Cc: "Ponce, Gregoria@DOT" <gregoria.ponce@dot.ca.gov>

Hello Krista,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Early Consultation Application Referral for the Gardens of Noor Cemetery.

The property is located approximately 3.92 miles from State Route (SR) 104 near the town of Ione. The Assessor's Parcel Number is 001-220-013.

Caltrans has no additional comments at this time. However, Caltrans requests for all future development at this location to be included in the review process.

Thank you,

Paul Bauldry

Caltrans District 10

Office of Rural Planning

Division of Planning, Local Assistance, and Environmental

1976 E. Dr. Martin Luther King Jr Blvd.

Stockton CA 95205

Telework # 209.670.9488

Planning Department <planning@amadorgov.org>

RE: TAC Project Referral - UP-22;2-3 Gardens of Noor Cemetery

Tran, Harvey@Wildlife <Harvey.Tran@wildlife.ca.gov> Thu, Mar 3, 2022 at 11:51 AM
To: "planning@amadorgov.org" <planning@amadorgov.org>
Cc: Wildlife R2 CEQA <R2CEQA@wildlife.ca.gov>, "Wilson, Billie@Wildlife" <Billie.Wilson@wildlife.ca.gov>, "Barker, Kelley@Wildlife" <Kelley.Barker@wildlife.ca.gov>, "Thomas, Kevin@Wildlife" <Kevin.Thomas@wildlife.ca.gov>

To Whom It May Concern:

The California Department of Fish and Wildlife (CDFW) appreciates the opportunity to comment during the Early Consultation for the Gardens of Noor Cemetery (Project). CDFW is responding to the Early Consultation as a Trustee Agency for fish and wildlife resources (Fish & G. Code, §§ 711.7 & 1802, and CEQA Guidelines, §§ 15386), and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines Section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code Sections 1600 et seq.) and/or a California Endangered Species Act (CESA) Permit for incidental take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code Sections 2080 and 2080.1).

The Project would construct a cemetery located on 857 Carbondale Rd., Ione in Amador County. The 46-acre parcel will have parking for up to 100 cars, a proposed 20,000 sq. ft. religious building and 50,000 gravesites at the maximum build-out in 2122. Th Project will remove at least 2 acres of oak woodland habitat and an unknown acreage of chapparal and ruderal grassland habitat.

CDFW recommends the following items be addressed in the planning of the Project:

Comment 1: Nesting birds

Aerial imagery (Google Earth) of the Project area shows mature trees located on the site. There are multiple trees located in the south portion of the parcel in the oak woodland. These trees can provide potential nest habitat to migratory birds and raptors during the avian nesting season of February 1 to August 31. CDFW recommends the applicant review and consider Fish and Game Code sections 3503, 3503.5, 3515, 4150 and 4152, which provide protection to nongame birds, migratory birds, birds of prey, their nests and eggs. Because potential habitat for nesting birds and birds of prey may be present within the Project area, the proposed Project should disclose all future potential activities that may incur a direct or indirect take to nongame nesting birds within the Project footprint and its close vicinity. Appropriate avoidance, minimization, and/or mitigation measures to avoid take should be included in the future project planning. Measures to avoid the impacts should include species specific work windows, biological monitoring, installation of noise attenuation barriers, etc.

Comment 2: Ione manzanita

A review of the California Natural Diversity Database (CNNDB) revealed that the chaparral habitat 0.2 mile north of the parcel and 0.4 mile east of the parcel are within the presumed extant of the Ione manzanita (*Arctostaphylos myrtifolia*). The occurrence dates for the nearby Ione manzanita are 2019. Ione manzanita is listed as threatened under the federal Endangered Species Act (ESA) and is listed as 1B.2 by the California Native Plant Society. CDFW recommends the lead agency evaluate the potentially suitable chaparral habitat located on the north portion of the Project area and discuss how the development of the parcel would or would not impact suitable habitat for any threatened, endangered, candidate, sensitive, or special-status species. Early consultation with CDFW is recommended, since modification of the Project may avoid or reduce impacts to fish and wildlife resources.

To confirm the presence of rare plants, CDFW recommends conducting floristic surveys as described in CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (DFG 2009). These guidelines suggest rare plant surveys be conducted at the proper time of year when rare or listed species are both "evident" and identifiable. Our website provides additional information: http://www.dfg.ca.gov/wildlife/nongame/survey_monitor.html

Comment 3: Oak woodland

Significant oak tree and oak woodland habitats exist within the Project area. These woodland associations are increasingly rare in California. In recognizing both the importance of oak woodlands and their continuing statewide loss, the California Legislature in 2002, passed the Oak Woodlands Conservation Act (Oak Act) Fish and Game Code §1360-1375. The legislative intent of this act is to support and encourage the voluntary, long-term, private stewardship and conservation of California's oak woodlands. The Oak Act encourages local land use planning that is consistent with the preservation of oak woodlands and provides incentives to protect and encourage farming and ranching that promotes healthy oak woodlands.

Any future environmental document for the Project should include a thorough discussion of the oak woodland habitats in the area and their distribution within the vicinity. This distribution data should be compared against the Project's proposed design plan to analyze the potential for adverse impacts on oak woodland resources. The Project's environmental document should analyze the potential direct, indirect, and cumulative impacts on wildlife and its habitat which may result from the Project's proposed removal of oak woodlands.

The Project's environmental document should also analyze the ways in which the Project can serve to provide protection to oak woodlands. CDFW recommends that a framework for compliance with the Oak Act to guide CEQA compliance for future development be analyzed by the environmental document for incorporation into the Project.

Please note that when acting as a responsible agency, CEQA guidelines section 15096, subdivision (f) requires CDFW to consider the CEQA environmental document prepared by the lead agency prior to reaching a decision on the Project. Addressing CDFW's comments and disclosing potential Project impacts on CESA-listed species and any river, lake, or stream; and providing adequate avoidance, minimization, mitigation, monitoring and reporting measures; will assist CDFW with the Early Consultation.

Thank you.

Harvey Tran

Environmental Scientist

California Department of Fish and Wildlife

Region 2 - North Central Region

Habitat Conservation Program

(916) 358-4035

From: Amador County Planning Department <planning@amadorgov.org>
Sent: Thursday, February 17, 2022 4:45 PM
Subject: TAC Project Referral - UP-22;2-3 Gardens of Noor Cemetery

WARNING: This message is from an external source. Verify the sender and exercise caution when clicking links or opening attachments.

Greetings,

Please see attached submittal of Use Permit Application UP-22;2-3 Kaddoura Cemetary, to be reviewed by the Technical Advisory Committee on **Thursday, March 3, 2022 at 1:00 PM** in the Board of Supervisors Chambers in the Amador County Administration Center, located at 810 Court St., Jackson, CA 95642. The Technical Advisory Committee will review the project for completeness.

Thank you,

Krista Ruesel, Planner

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorgov.org

AB52 - TAC Project Referral - UP-22;2-3 Gardens of Noor Cemetery

Anna Starkey <astarkey@auburnrancheria.com> Fri, Mar 4, 2022 at 10:38 AM
To: Amador County Planning Department <planning@amadorgov.org>

Thank you for providing the cultural study. The results are in line with what we show.

We have no further questions or concerns. Please include the previously attached mitigation measures for the TCR chapter and consider consultation to be closed.

[Quoted text hidden]
[Quoted text hidden]

Planning Department <planning@amadorgov.org>

use permit for 857 Carbondale Rd Ione ca

2 messages

Mounir <mounirkad@yahoo.com> Wed, May 18, 2022 at 9:54 AM
Reply-To: Mounir <mounirkad@yahoo.com>
To: Amador County Planning Department <planning@amadorgov.org>

Hello Christa
Please see letter bellow from Amador County Water.

Good Afternoon,

Thank you for taking the time to speak with me this afternoon. This email to summarize what we discussed during that phone call per your request. The water line that supplies the Eagles Nest area is undersized and susceptible to low pressure dips when demand is high, and as such, AWA has limited the size of meters which can be installed per parcel. This will limit APN 001-220-013 to a 5/8" meter, with one (1) Equivalent Dwelling Unit (EDU) of capacity. 1 EDU is approximately 400 gallons per average day. Each parcel in the Eagles Nest area is also required to have a backflow assembly installed consistent with AWA standards at owner expense to prevent backflow into the water main during times of low pressure. A list of approved backflow devices can be found in our Standard Design And Construction Specifications For Water Systems. You stated you also have plans to install a well on site to supplement water needs which would supply ~2gpm. Additionally, any fire protection needs required by the fire protection authority having jurisdiction will be required to be installed – this may be either City of Ione Fire Department or Amador Fire Protection District.

In order to move forward with water service to this parcel, the following items will be required prior to initiation of service:
1. Completed application to start water service.
2. Installation and certification of backflow preventer – certification to be provided to AWA.
3. Remitted Time and Materials deposit for installation of fire service line or for a hydrant(s) installation at this parcel and subsequent installation of said fire protection service line or hydrant(s), if required by fire authority having jurisdiction (City of Ione or Amador Fire Protection District).

Our Customer Service Department can quote prices for any items, fees, or deposits listed above. If you have further questions, please feel free to contact the Agency at your convenience.

Kind Regards,

Lucas Carthew
Assistant Engineer
Amador Water Agency

MOUNIR KADDOURA
Bachelor of Science Degree in Civil Engineering
NOOR MORTUARY AND A. ARTS AND MONUMENTS

(925) 584-1664

Amador County Planning Department <planning@amadorgov.org> Wed, May 18, 2022 at 2:07 PM
To: Michelle Opalenik <mopalenik@amadorgov.org>

Hi Michelle,

By any chance, has Mounir gotten this to you as well? I advised him to contact you regarding the water and sewage requirements for the project.

Thanks,

Krista
Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorgov.org

[Quoted text hidden]

Planning Department <planning@amadorgov.org>

TAC Project Referral - UP-22;2-3 Gardens of Noor Cemetery and Religious Building

AFPD Headquarters <afpdhdq@amadorgov.org> Wed, Jul 27, 2022 at 1:01 PM
To: Amador County Planning Department <planning@amadorgov.org>
Cc: Stacy Powrozek <spowrozek@amadorgov.org>

CFD annexation condition applies.

Thank you,
Nicole
Amador Fire Protection District
810 Court Street
Jackson, CA 95642
209-223-6391-phone
209-223-6646-fax

This communication may contain legally privileged and confidential information sent solely for the use of the intended recipient, and the privilege is not waived by the receipt of this communication by an unintended and unauthorized recipient. If you are not the intended recipient of this communication you are not authorized to use it in any manner, and must either immediately destroy it or return it to the sender. Please notify the sender immediately be telephone at (209) 223-6391 if you received this communication in error."

[Quoted text hidden]

Planning Department <planning@amadorgov.org>

AMA-104-PM 1.07 Gardens of Noor Cemetery

2 messages

Bauldry, Paul@DOT <paul.bauldry@dot.ca.gov> Mon, Aug 1, 2022 at 3:32 PM
To: Amador County Planning Department <planning@amadorgov.org>
Cc: "Ponce, Gregoria@DOT" <gregoria.ponce@dot.ca.gov>

Hello Krista,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Use Permit (UP) for the Gardens of Noor Cemetery.

The property is located approximately 3.92 miles from State Route (SR) 104 near the town of Ione. The Assessor's Parcel Number is 001-220-013.

Caltrans previously commented on this project on March 1, 2022.

Based on the current project description, Caltrans has no additional comments at this time. However, Caltrans requests to be included in the review process for the commercial driveway improvements for the encroachment to State Route 104.

Thank you,

Paul Bauldry

Caltrans District 10

Office of Rural Planning

Division of Planning, Local Assistance, and Environmental

1976 E. Dr. Martin Luther King Jr Blvd.

Stockton CA 95205

From:	Bauldry, Paul@DOT
To:	Krista Ruesel
Cc:	Ponce, Gregoria@DOT
Subject:	AMA-104-PM 1.07 Early Consultation Application Referral Gardens of Noor Cemetery
Date:	Tuesday, March 1, 2022 1:29:01 PM

Hello Krista,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Early Consultation Application Referral for the Gardens of Noor Cemetery.

The property is located approximately 3.92 miles from State Route (SR) 104 near the town of Ione. The Assessor's Parcel Number is 001-220-013.

Caltrans has no additional comments at this time. However, Caltrans requests for all future development at this location to be included in the review process.

Thank you,

Paul Bauldry
Caltrans District 10
Office of Rural Planning
Division of Planning, Local Assistance, and Environmental
1976 E. Dr. Martin Luther King Jr Blvd.
Stockton CA 95205
Telework # 209.670.9488

Krista Ruesel <kruesel@amadorgov.org>

Garden of Noor Cemetery at 857 Carbondale Rd (APN:001220013000)

1 message

Abdikarim Ali <timir2@gmail.com> Mon, Dec 19, 2022 at 12:31 PM
To: "kruesel@amadorgov.org" <kruesel@amadorgov.org>, "smeyer@amadorgov.org" <smeyer@amadorgov.org>, "planning@amadorgov.org" <planning@amadorgov.org>
Cc: Mounir <mounirkad@yahoo.com>, Abdikarim Ali <timir2@gmail.com>

Hi Krista and Scott,
My name is Abdikarim Ali and I am a licensed Civil Engineer in the state of California. I got hired by Mr. Kaddoura to work on the subject project. I met with you and Scott last Friday at the county office. I met with Mr. Kadddoura (the new property owner) over the weekend to find out what he plans to build on the land.

At the present, he only wants a bathroom that will accommodate 50-75 people who might be present during the burial ceremony. Therefore, I would like to move forward to get done all of the requirements of building one to two bathrooms on the property.

Scott, Could you please make an appointment to do the profile as soon as possible?

Please let us know if you need anything from us.

Thanks,

--
Best Regards,
Abdikarim Ali

Krista Ruesel <kruesel@amadorgov.org>

Garden of Noor Cemetery at 857 Carbondale Rd (APN:001220013000)

5 messages

Abdikarim Ali <timir2@gmail.com> Mon, Dec 19, 2022 at 12:31 PM
To: "kruesel@amadorgov.org" <kruesel@amadorgov.org>, "smeyer@amadorgov.org" <smeyer@amadorgov.org>, "planning@amadorgov.org" <planning@amadorgov.org>
Cc: Mounir <mounirkad@yahoo.com>, Abdikarim Ali <timir2@gmail.com>

Hi Krista and Scott,
My name is Abdikarim Ali and I am a licensed Civil Engineer in the state of California. I got hired by Mr. Kaddoura to work on the subject project. I met with you and Scott last Friday at the county office. I met with Mr. Kadddoura (the new property owner) over the weekend to find out what he plans to build on the land.

At the present, he only wants a bathroom that will accommodate 50-75 people who might be present during the burial ceremony. Therefore, I would like to move forward to get done all of the requirements of building one to two bathrooms on the property.

Scott, Could you please make an appointment to do the profile as soon as possible?

Please let us know if you need anything from us.

Thanks,

--
Best Regards,
Abdikarim Ali

Amador County Planning Department <planning@amadorgov.org> Tue, Dec 20, 2022 at 4:27 PM
To: Abdikarim Ali <timir2@gmail.com>
Cc: "kruesel@amadorgov.org" <kruesel@amadorgov.org>, "smeyer@amadorgov.org" <smeyer@amadorgov.org>, Mounir <mounirkad@yahoo.com>

I added this inquiry to our project file. I'll be present at the EH inspection as well if you have any questions for me planning-wise.

Thanks,

Krista

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorgov.org

[Quoted text hidden]

Abdikarim Ali <timir2@gmail.com> Wed, Dec 21, 2022 at 11:50 AM
To: Amador County Planning Department <planning@amadorgov.org>
Cc: kruesel@amadorgov.org, smeyer@amadorgov.org, Mounir <mounirkad@yahoo.com>

Thank you Krista

Sent from my iPhone

> On Dec 20, 2022, at 4:27 PM, Amador County Planning Department <planning@amadorgov.org> wrote:
>
> [Quoted text hidden]

Amador County Planning Department <planning@amadorgov.org> Wed, Dec 21, 2022 at 4:20 PM
To: Abdikarim Ali <timir2@gmail.com>
Cc: "kruesel@amadorgov.org" <kruesel@amadorgov.org>, "smeyer@amadorgov.org" <smeyer@amadorgov.org>, Mounir <mounirkad@yahoo.com>

To clarify, a prerequisite for any building, well, septic, or encroachment permits on the subject parcel for anything other than a single-family dwelling, is a Conditional Use Permit issued by the Amador County Planning Commission following adequate environmental review, public notice, and a public hearing.

The application for a Conditional Use Permit for the Garden of Noor Cemetery remains incomplete (deficiencies list attached), has not been through environmental review, and has not been approved by the Planning Commission. As such, permits for portions of the project cannot be approved.

Thanks,
Chuck Beatty
Planning Director

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorgov.org

[Quoted text hidden]

Scott Meyer <smeyer@amadorgov.org> Wed, Dec 21, 2022 at 7:29 PM
To: Amador County Planning Department <planning@amadorgov.org>
Cc: Abdikarim Ali <timir2@gmail.com>, "kruesel@amadorgov.org" <kruesel@amadorgov.org>, Mounir <mounirkad@yahoo.com>

Hello to all concerned parties,

I agree with the Planning Director, Mr. Beatty. To be perfectly clear. No onsite sewage disposal design approvals or on-site sewage disposal permits will be issued until the Conditional Use Permit for the proposed Garden of Noor Cemetery has been approved and completed.

Thank you all.

Scott Meyer
R.E.H.S.
[Quoted text hidden]

DEPARTMENT OF FORESTRY AND FIRE PROTECTION
Amador – El Dorado Unit
Camino, CA 95709
(530) 644-2345
Website: www.fire.ca.gov

May 22, 2023

Project: UP - 22;2-3 Gardens of Noor Cemetery

APN: 001-220-013

Subject: CAL FIRE comments

The project listed above is within lands identified as SRA (State Response Area). CAL FIRE has prevention and suppression responsibilities in these areas including enforcement of development standards in accordance with the SRA Minimum Fire Safe Regulations. Below are comments related to this project and are the minimum standards for this project within the SRA. Local fire jurisdictions and county planning departments may have more restrictive requirements.

Addresses for Buildings.
All buildings shall be issued an address by the local jurisdiction which conforms to that jurisdiction's overall address system. Utility and miscellaneous Group U buildings are not required to have a separate address; however, each residential unit within a building shall be separately identified.

The size of letters, numbers, and symbols for addresses shall conform to the standards in the California Fire Code, California Code of Regulations title 24, part 9.

Gate Access
Gate entrances shall be at least two (2) feet wider than the width of the traffic lane(s) serving that gate and a minimum width of fourteen (14) feet unobstructed horizontal clearance and unobstructed vertical clearance of thirteen feet, six inches (13′ 6″).

All gates providing access from a Road to a Driveway shall be located at least thirty (30) feet from the roadway and shall open to allow a vehicle to stop without obstructing traffic on that Road.

Jeff Hoag
Battalion Chief - Amador El Dorado Unit
Wildfire Resiliency Program
2840 Mt. Danaher Rd Camino 95709
Cell: (530) 708-2725

Planning Department <planning@amadorgov.org>

AMA-104-PM 1.07 Gardens of Noor Cemetery

Bauldry, Paul@DOT <paul.bauldry@dot.ca.gov> Tue, May 30, 2023 at 3:27 PM
To: Amador County Planning Department <planning@amadorgov.org>

Hello Krista,

The California Department of Transportation (Caltrans) appreciates the opportunity to review and comment on the Early Consultation Application Referral for the Gardens of Noor Cemetery.

The property is located approximately 3.92 miles from State Route (SR) 104 near the town of Ione. The Assessor's Parcel Number is 001-220-013.

The proposed project will not impact the SR based on the project description and distance to the nearest SR. Our comments on 3/01/2022 still stand.

Caltrans has no additional comments at this time. However, Caltrans requests for all future development at this location to be included in the review process.

Thank you,

Paul Bauldry

Caltrans District 10

Office of Rural Planning

Division of Planning, Local Assistance, and Environmental

1976 E. Dr. Martin Luther King Jr Blvd.

Stockton CA 95205

Telework # 209.670.9488

Outlook

Gardens of Noor Cemetery UP-22;2-3

From Cultural Preservation Department Inbox <cpd@wiltonrancheria-nsn.gov>
Date Thu 9/11/2025 8:45 AM
To Plan-Planning <planning@amadorcounty.gov>

You don't often get email from cpd@wiltonrancheria-nsn.gov. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good morning,

Thank you for your letter dated September 4, 2025, regarding the proposed project. Wilton Rancheria ("Tribe") is a federally recognized Tribe as listed in the Federal Register, Vol. 74, No. 132, p. 33468-33469, as "Wilton Rancheria of Wilton, California". The Tribe's Service Delivery Area ("SDA") as listed in the Federal Register, Vol. 78, No. 176, p. 55731, is Sacramento County. The Tribe's Trust Lands are in Sacramento County however, the Tribe's ancestral territory spans from Sacramento County to portions of the surrounding Counties.

Although your project is within the ancestral territory of the Wilton Rancheria, we do not have any comments and do not wish to open consultation at this time. We appreciate your continued outreach and/ or consultation for future projects and respectfully request that you contact us if there are any project updates or changes.

Thank you,

Wilton Rancheria
Department of Cultural Preservation
Front Desk: 916-313-4493
cpd@wiltonrancheria-nsn.gov

Nicole Cook

Plan-Planning

Hello. They will need to have the CFD annexation condition met prior to final unless the parcel is protected under the Williamson act.

Thank you,

NICOLE COOK - ADMINISTRATIVE OFFICER
AMADOR FIRE PROTECTION DISTRICT
810 COURT STREET JACKSON CA 95642
DIRECT LINE: 209-223-6632
www.amadorfire.org

As of 4/29/25 my email has been updated to **ncook@amadorcounty.gov**, please USE this email address moving forward.

"This communication may contain legally privileged, non-public and confidential information including HIPAA-protected PHI sent solely for the use of the intended recipient, and the privilege is not waived by the receipt of this communication by an unintended and unauthorized recipient. If you are not the intended recipient of this communication you are not authorized to use it in any manner and must either immediately destroy it or return it to the sender without reading, saving or further distributing them. Please notify the sender immediately by telephone at (209) 223-6632 or email if you received this communication in error."

Outlook

RE: TAC Referral for UP-22;2-3 Gardens of Noor Cemetery for September 18, 2025 - Completeness

From Jereme Dutschke <jereme@ionemiwok.net>
Date Mon 9/15/2025 4:23 PM
To Plan-Planning <planning@amadorcounty.gov>
Cc Consultation <consultation@ionemiwok.net>

You don't often get email from jereme@ionemiwok.net. Learn why this is important

CAUTION: This email originated from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello,

The Ione Band of Miwok Indians would like to consult on this project. Please send a copy of the Cultural Resources Report.

Thank you,

Ione Band of Miwok Indians

Jereme Dutschke
Cultural Resources Coordinator
Ione Band of Miwok Indians
9252 Bush Street
Plymouth, CA 95669-0699
Direct: 209-249-5104
Cell: 209-781-3325
Email: jereme@ionemiwok.net

CONFIDENTIALITY NOTICE: The contents of this email message and any attachments are intended solely for the addressee(s) and may contain confidential and/or privileged information and may be legally protected from disclosure. If you are not the intended recipient of this message or their agent, or if this message has been addressed to you in error, please immediately alert the sender by reply email and then delete this message and any attachments. If you are not the intended recipient, you are hereby notified that any use, dissemination, copying, or storage of this message or its attachments is strictly prohibited.

From: Plan-Planning <planning@amadorcounty.gov>
Sent: Monday, September 15, 2025 1:23 PM

To: Plan-Planning <planning@amadorcounty.gov>
Subject: Re: TAC Referral for UP-22;2-3 Gardens of Noor Cemetery for September 18, 2025 - Completeness

Hello,

Please see the revised memo for this item and replace it in your packets. Please note, the application has not changed but the project description of the memo has been revised to reflect the proposed 60 events per month, as requested by the applicant.

Thank you,

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorcounty.gov

From: Plan-Planning <planning@amadorcounty.gov>
Sent: Wednesday, September 3, 2025 3:12 PM
Subject: TAC Referral for UP-22;2-3 Gardens of Noor Cemetery for September 18, 2025 - Completeness

Good Afternoon,
Please see the attached resubmittal of UP-22;2-3 Gardens of Noor Cemetery Use Permit Application, to be reviewed by the Technical Advisory Committee on **Thursday, September 18, 2025, at 1:00 PM** in the Board of Supervisors Chambers in the Amador County Administration Center, located at 810 Court St., Jackson, CA 95642. The Technical Advisory Committee will review application for completeness. Please note, this application was previously reviewed by TAC, found incomplete, and has since been updated and resubmitted. Comments regarding the previous application are on-file with the Planning Department.
Thank you,

Krista Ruesel, Planner

Amador County Planning Department
810 Court Street
Jackson, CA 95642
(209) 223-6380
planning@amadorcounty.gov

SOLURI MESERVE
a law corporation

tel: 916.455.7300 · fax: 916.244.7300
510 8th Street · Sacramento, CA 95814

November 4, 2026

SENT VIA EMAIL
(boardofsupervisors@amadorcounty.gov;
clerkoftheboard@amadorcounty.gov)

Patrick Crew, Chairman
Amador County Board of Supervisors
810 Court Street
Jackson, California 95642

RE: Comments on the Appeal of Denial of a Use Permit UP-22;2-3 for the Gardens of Noor Cemetery

Dear Chair Crew and Members of the Amador County Board of Supervisors:

On behalf of the Carbondale Action Group, this letter provides comments regarding Use Permit Application UP-22;2-3 for the Gardens of Noor Cemetery (the "project"). The Amador County Planning Commission's determination at its September 8, 2026 meeting[1] that the project's Initial Study ("IS") were inadequate, as well as its subsequent denial of the Use Permit was correct. Similarly, the Amador County Board of Supervisors ("Board") should deny the appeal of the Use Permit for the project because substantial evidence demonstrates that the project may result in significant impacts to the environment, and therefore an environmental impact report ("EIR") is required by law. In addition, the proposed mitigation fails to meet the legal requirements of the California Environmental Quality Act (Pub. Resources Code, § 21000 et seq. ["CEQA"]). Further, the IS fails to undertake an adequate fact-based investigation necessary to consider and weigh all potential impacts. For these reasons, the IS is not legally sufficient to support project approval at this time.

[1] A transcript of this meeting from the Amador County Planning Commission is not currently available online. The web page, Amador Transparency Project, provides an uncertified transcript of the September 8, 2026, Planning Commission meeting re: the project, which is available at this link: https://amadorproject.org/archives/gardens-of-noor/hearings/2026-09-08-planning-commission.html#transcript (Permit Denied and IS disapproved at 2:58:22).

These comments, which focus on potentially significant impacts to biological resources,[2] are supported by the expert opinion provided by Mr. Scott Cashen, a wildlife biologist. Mr. Cashen's October 26, 2026, Comments on the IS for the Gardens of Noor Cemetery Project ("Cashen Letter") and curriculum vitae are attached to this letter as Exhibit 1. Mr. Cashen's Letter, supported by the facts identified in his letter, constitute substantial evidence regarding the project's potentially significant impacts on biological resources. (*Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 339; Pub. Resources Code, § 21080, subd. (c)(1); CEQA Guidelines, § 15064, subd. (f)(5).)

Substantial Evidence Demonstrates a Fair Argument the Project Would Result in Significant Environmental Effects

The fundamental purpose of CEQA is environmental protection. "The foremost principle under CEQA is that the Legislature intended the act to be interpreted in such a manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language." (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 511 [*County of Fresno*].) Under CEQA, an EIR is required whenever substantial evidence supports a "fair argument" that a proposed project may have a significant effect on the environment. (See, e.g., *No Oil*, *Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 74 [test later clarified by statute in Pub. Resources Code, § 21082.2] [*No Oil*].) This "fair argument" standard creates a "low threshold" for requiring the preparation of an EIR. (*Citizens Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 754.) Thus, a project need not have an "important or momentous effect of semi-permanent duration" to require an EIR. (*No Oil*, *supra*, 13 Cal.3d at 87.) Rather, CEQA "reflects a preference for resolving doubts in favor of environmental review [(i.e., an EIR)] . . . . " (*Taxpayers for Accountable School Bond Spending v. San Diego Unified School Dist*. (2013) 215 Cal.App.4th 1013, 1034 [quoting *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1316-17 (*Sierra Club*)].)

Once substantial evidence is presented, "evidence to the contrary is not sufficient to support a decision to dispense with preparation of an EIR and adopt a negative declaration, because it could be 'fairly argued' that the project might have significant environmental impact." (*Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296 at 310 [*Sundstrom*].) Where experts have presented conflicting evidence on the environmental effects, the lead agency must consider the effects to be significant and prepare an EIR. (*Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 935 [*Pocket Protectors*]; *Sierra Club*, *supra*, 6 Cal.App.4th at 1317-18; CEQA Guidelines, § 15064, subd. (g).) "It is the function of an EIR, not a negative declaration,

[2] The project may also result in other potentially significant impacts that are not adequately addressed in the IS.

to resolve conflicting claims, based on substantial evidence, as to the environmental effects of a project." (*Pocket Protectors*, *supra*, 124 Cal.App.4th at 935.)

The project proposes to place a cemetery consisting of 1,832 burial plots in an undeveloped 46-acre parcel in rural Amador County.[3] The project occurs in a sensitive environmental location consisting of a natural landscape in a larger block of largely undisturbed land, with the exception of nearby roads.[4] The parcel contains a mixture of oak woodland, chamise, and manzanita.[5]

The project would remove up to 2 acres of oak trees.[6] The IS concludes that impacts to remaining oak trees would be less than significant with the "recommended" condition that no excavation occur less than five feet from the trunk of any oak with a diameter at breast height greater than 12 inches.[7] Mr. Cashen notes that many oak trees on the project site have drip lines (i.e., the outer edge of foliage) that extends well beyond five feet from the trunk of the tree.[8] The roots of oak trees typically extend to the edge of, or beyond the drip line of the tree.[9] This recommendation alone, is thus insufficient to ensure remaining oak trees are not damaged because it will not ensure adequate protection of oak tree root systems. Further, the recommendation is not reflected in any binding mitigation measure.[10] The recommendation is thus not sufficient to avoid impacts to oak trees and a fair argument exists that the project would result in significant impacts to oak trees remaining on site. (*Pocket Protectors*, *supra*, 124 Cal.App.4th at 935; *Sierra Club*, *supra*, 6 Cal.App.4th at 1317-18.) An EIR is legally required.

Mr. Cashen notes that existing data sets show that Ione manzanita chaparral occurs on the project site and Ione manzanita chaparral has a NatureServe rank of G1 S1, which means it is "critically imperiled and at very high risk of extinction within the state and globally."[11] Further, Ione manzanita is listed as threatened under the federal Endangered

---

[3] Staff Report to the Amador County Planning Commission, September 8, 2026, PDF p. 1 ("Planning Commission Staff Report").

[4] Amador County. Planning Department. 2026. *CEQA Initial Study: Use Permit: UP-22;2-3 Gardens of Noor Cemetery, APN: 001-220-013*, p. 15 (aerial photo of project) ("IS").

[5] IS, p. 5.

[6] IS, p. 25.

[7] IS, p. 25.

[8] Cashen Letter, p. 9.

[9] *Id*. at 9-10.

[10] IS, pp. 27-28 (the proposed mitigation measures do not adopt this recommendation or enforce it in any way).

[11] Cashen Letter, pp. 4-5.

Species Act.[12] (16 U.S.C. § 1531 et seq.) The IS identifies the potential for Ione manzanita to occur but no surveys were conducted.[13] Mr. Cashen notes multiple observations of the species in the vicinity and a high-probability for Ione manzanita to occur in the project area. The project involves ground-disturbing work consisting of excavation of burial plots and other sub-surface work. Because these activities may disturb Ione manzanita, they would result in a significant impact requiring an EIR.[14] (*Pocket Protectors*, *supra*, 124 Cal.App.4th at 935; *Sierra Club*, *supra*, 6 Cal.App.4th at 1317-18.) While the County proposes mitigation for special status plants, transplanting and preservation of offsite populations is unlikely to be effective as explained below.

Mr. Cashen notes that a pathogen of Ione manzanita, *Phytophthora cinnamomi (P. cinnamomi*), has been documented in multiple locations near the project site (1,700 and 1,500 feet away respectively).[15] Once *P. cinnamomi* colonizes a site, it effectively removes the habitat value for Ione manzanita.[16] The ground disturbance associated with the project has the potential to introduce and spread *P. cinnamomi*, thus creating a fair argument the project will result in significant impacts to Ione manzanita, even if the species were not present on site, because the project would facilitate the further spread of this pathogen across the landscape. Further, the recommended mitigation if special status plant species are found is relocation.[17] Mr. Cashen notes that relocation could facilitate the spread of *P. cinnamomi* to previously unaffected parcels remote from the project area, thus generating an additional significant impact. The IS does not consider or mitigate for this issue.[18] For these reasons, an EIR is required. (*Pocket Protectors*, *supra*, 124 Cal.App.4th at 935; *Sierra Club*, *supra*, 6 Cal.App.4th at 1317-18.)

The project would require perimeter security fencing.[19] Mr. Cashen notes that fencing is a barrier to wildlife movement and that fences may injure wildlife, thus resulting in a potentially significant impact.[20] The project occurs in an area of relatively pristine undeveloped natural habitat, and is bordered by roads to the south and west.[21] The presence of fences may divert terrestrial wildlife onto nearby roads which are a

---

12 Listing status for the Ione manzanita (*Arctostaphylos myrtifolia*) is available here: https://ecos.fws.gov/ecp/species/1806.
13 IS, p. 25.
14 Planning Commission Staff Report, p. 1.
15 Cashen Letter, p. 10.
16 *Ibid*.
17 IS, p. 28 (Mitigation Measure BIO-4).
18 IS, pp. 24-28 (Biological Resources).
19 IS, p. 5.
20 Cashen Letter, p. 9.
21 IS, p. 15 (aerial photo of project).

documented mechanism for wildlife mortality.[22] The IS does not examine or provide mitigation for this issue.[23] Absent mitigation, there is thus a fair argument the project would create significant impacts due to collisions for avian species and through diversion of terrestrial wildlife onto roads. For these reasons, an EIR is required. (*Pocket Protectors*, *supra*, 124 Cal.App.4th at 935; *Sierra Club*, *supra*, 6 Cal.App.4th at 1317-18.)

The proposed findings that biological resources are less than significant or less than significant with mitigation incorporated thus are contradicted by substantial evidence, and an EIR is required.[24]

California tiger salamander is also documented near the project site and is likely to occur on the site given the similarity of the site to locations of known occurrence.[25] Approximately 4 acres of creek occurs in the project site that could create isolated ponds or pools appropriate for California tiger salamander.[26] California tiger salamander is a semi-aquatic species that makes use of pools and ponds and estivates (hibernates) in nearby uplands.[27] The species is listed as threatened under the California Endangered Species Act.[28] (Fish & G. Code, § 2050 et seq. ["CESA"].) The project involves excavation of graves on the project site, which could cause take of the species, particularly if excavation occurs while the species is estivating and cannot evade harm or be detected above ground.[29] (Fish & G. Code, § 2080 et seq. [prohibition on take].) The IS does not analyze this potentially significant impact.[30] Additional sources of information confirm nearby detection of the species. The California Department of Transportation required an incidental take permit under CESA for work 2.75 miles away

---

22 Federal Highway Administration. 2008. "Chapter 4. Impacts to Wildlife." In *Wildlife-Vehicle Collision Reduction Study: Report to Congress*, Publication No. FHWA-HRT-08-034. Washington, DC: U.S. Department of Transportation. https://www.fhwa.dot.gov/publications/research/safety/08034/04.cfm.

23 IS, pp. 24-28 (Biological Resources).

24 IS, p. 24.

25 Cashen Letter, p. 6.

26 IS, p. 25.

27 United States Fish and Wildlife Service. 2026. Ambystoma californiense. Available at https://www.fws.gov/species/california-tiger-salamander-ambystoma-californiense

28 California Department of Fish & Wildlife. 2026. State and Federally Listed Endangered and Threatened Animals of California. https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109405&inline

29 IS, p. 5.

30 IS pp. 24-28.

on the nearby Willow Creek Bridge, a location that is generally similar to conditions on site.[31] The permit lists excavation in uplands and burrow collapse as impact mechanisms.[32] Even if the species is not detected on the site, as required by surveys in Mitigation Measure BIO-1[33], the species may occupy the site in the future and be subject to take. For these reasons, an EIR is required. (*Pocket Protectors*, *supra*, 124 Cal.App.4th at 935; *Sierra Club*, *supra*, 6 Cal.App.4th at 1317-18.)

The IS Fails to Undertake the Fact-Based Investigation CEQA Requires

Under CEQA "[t]he negative declaration is inappropriate where the agency has failed either to provide an accurate project description or to gather information and undertake an adequate environmental analysis. (*City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398, 406 [*City of Redlands*]; Kostka & Zischke, Practice Under the California Environmental Quality Act (2026) § 6.75, p. 6-79 [Kostka & Zischke].) An agency will not be allowed to hide behind its own failure to gather relevant data. (*Sundstrom*, *supra*, 202 Cal.App.3d at 31.) A deficient record may enlarge the scope of fair argument. (*Ibid.*)

Mitigation for special status plants is impermissibly deferred in the IS by relying on future surveys in Mitigation Measure BIO-4; if special status plants are found, the IS states that "project impacts will need to be quantified and mitigation developed to reduce the impacts to a less-than-significant level" in Mitigation Measure BIO-3.[34]

While the IS proposes transplanting species or offsite preservation if special status plants are found in Mitigation Measure BIO-4,[35] as Mr. Cashen notes, this is unlikely to be effective. First, there is no evidence that sites for preservation of certain highly rare plants that may occur on site such as Ione manzanita, Ione buckwheat, Irish Hill buckwheat, and pincushion navarretia are available or feasible as mitigation.[36] Further, transplantation efforts are typically unsuccessful.[37]

---

31 California Department of Fish & Wildlife. September 10, 2024. California Endangered Species Act Incidental Take Permit No. 2081-2018-073-02, Willow Creek Bridge on Carbondale Road Replacement Project., p. 1 (CDFW ITP). Available: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=225633

32 ITP, p. 4.

33 IS, p. 27.

34 IS, p. 28.

35 IS, p. 28.

36 Cashen Letter, p. 8.

37 Cashen Letter, p. 8.

Because mitigation cannot ensure future impacts to special status plants are avoided, the IS fails to gather the necessary information to demonstrate whether the project may or may not result in significant impacts in the first instance by conducting adequate surveys to characterize the site and potential impacts. The failure to gather and present adequate information to support a finding is unlawful under CEQA. (*City of Redlands*, *supra*, 96 Cal.App.4th at 406; *County of Fresno*, *supra*, 6 Cal.5th at 514.)

The *Sundstrom* case is illustrative of the legal error caused by failure to gather information. There, the lead agency proposed to approve a motel that would generate significant amounts of sewage sludge absent facts showing an adequate disposal site existed despite a locally severe problem with processing such material. (*Id*. at 310-311.) Here, the IS contains the same type of error by failing to accurately characterize what special status plants occur on site before project approval. This is unlawful when the proposed mitigation cannot ensure that impacts would in fact be reduced to less than significant levels. (*City of Redlands*, *supra*, 96 Cal.App.4th at 406.) Further, the IS does not even rely upon the full suite of typical data sources for a desk-top level review because it omits any search of the California Natural Diversity Database ("CNDDB") maintained by the California Department of Fish & Wildlife ("CDFW").[38] A simple query of CDFW's CNDDB reveals that Ione manzanita is documented on the project site.[39] The County must conduct a lawful fact-based investigation with surveys for special status plants in order to support any lawful finding approving the project.

The nearby documentation and potential presence of California tiger salamander also requires a survey to adequately characterize the baseline conditions given that the ongoing excavation of graves over the course of the project could harm estivating individual salamanders that cannot evade human activity. (*Sundstrom*, *supra*, 202 Cal.App.3d at 31.)

The IS Impermissibly Defers Mitigation

A court evaluating an agency's procedural compliance "determine[s] de novo whether the agency has employed the correct procedures, scrupulously enforcing all legislatively mandated CEQA requirements." (*Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1045.) The existence of supporting evidence is irrelevant when an agency has failed to proceed in the manner required by law. (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 82 [*CBE*].) Examples of such failures include deferral of the development of mitigation (*id*. at 90; *Gray v. County of Madera* (2008) 167 Cal.App.4th

[38] Cashen Letter, p. 3.
[39] Cashen Letter, p. 4.

1099, 1118 [no evidence that provision of bottled water or deepening wells would offset quarry impacts to water supply] [*Gray*].)

As noted above, the proposed mitigation for special status plants is unlikely to be effective.[40] Where there is no evidence mitigation is effective, mitigation is unlawfully deferred. (*Id*. at 1118.) Deferring development of demonstrably effective mitigation constitutes a failure to proceed as required by law. (*CBE*, *supra*, 184 Cal.App.4th at 89-90 [vague palette of greenhouse gas mitigation measures was unlawful].) The County must develop a demonstrably adequate means of mitigating potential impacts to special status plants if it seeks to approve the project.

Conclusion

An EIR is required to address the potentially significant biological impacts described above. The EIR must also gather adequate information to accurately characterize the site and potential impacts, as required by law. As these tasks have not been completed, the Board must deny the appeal of the Use Permit and require preparation of an EIR to fully disclose and mitigate the effects of the project, as required by CEQA.

Should you have questions, please do not hesitate to contact my office. Thank you for your attention to this matter.

Very truly yours,

SOLURI MESERVE
A Law Corporation

By: 
Micah "Mike" Aviña

Attachment: Exhibit 1, Comment Letter from Scott Cashen, M.S.

[40] Cashen Letter, p. 8.

EXHIBIT 1

October 26, 2026

Mr. Michael Avina
Soluri Meserve
510 8th Street
Sacramento, CA 95814

Subject: Comments on the Initial Study and Mitigated Negative Declaration for the Gardens of Noor Cemetery Project

Dear Mr. Avina:

This letter contains my comments on the Initial Study and Mitigated Negative Declaration ("IS/MND") prepared by the County of Amador ("County") for the Gardens of Noor Cemetery Project ("Project"). Mounir Kaddoura ("Applicant") proposes construction of a cemetery with 1,832 grave sites within the north end of a 46-acre parcel located northeast of the intersection of Lambert Road and Carbondale Road in an unincorporated portion of Amador County, California. In addition to the grave sites, the Project involves construction of a gravel access road, a parking lot with 64 permanent spaces, permanent restrooms, security fencing and lighting, and an equipment storage shed. The proposed Project would involve up to 60 funerals a month with a limit of 50 attendees per event.

I am an environmental biologist with 32 years of professional experience in wildlife biology and natural resources management. I have served as a biological resources expert for over 250 projects, the majority of which have been development projects in California. My experience and scope of work in this regard has included assisting various clients with evaluations of biological resource issues; preparation and peer review of environmental compliance documents prepared pursuant to the California Environmental Quality Act ("CEQA") and the National Environmental Policy Act ("NEPA"); and preparation of written comments that address deficiencies with CEQA and NEPA documents. My work has included written and oral testimony for the California Energy Commission, California Public Utilities Commission, and Federal courts. My educational background includes a B.S. in Resource Management from the University of California at Berkeley, and a M.S. in Wildlife and Fisheries Science from the Pennsylvania State University. A copy of my current curriculum vitae is attached hereto.

The comments herein are based on my review of the environmental documents prepared for the Project, a review of scientific literature pertaining to biological resources known to occur in the Project area, and the knowledge and experience I have acquired during my 32-year career in the field of natural resources management.

ENVIRONMENTAL SETTING

Site-specific surveys are essential to a proper understanding of the Project's environmental setting because survey data provide the information needed to understand the presence, distribution, abundance, and seasonality of sensitive biological resources at the Project site. Without survey data, the County can only speculate on the potential for sensitive biological resources to occur at the Project site; whether impacts to a particular resource are potentially significant; and what mitigation measures would be both feasible and effective in reducing the Project's potentially significant impacts to less-than-significant levels.

The surveys needed to establish the Project's environmental setting have not been conducted. Instead, the IS/MND requires surveys as "mitigation"[1] after termination of the CEQA review process. This approach robs the public, resource agencies, and scientific community from understanding the Project's actual environmental impacts (including the nature and magnitude of those impacts), and from being able to meaningfully participate in the CEQA review process.

The IPaC Tool and National Wetlands Inventory Do Not Sufficiently Establish the Project's Environmental Setting

The IS/MND relies on: (1) the U.S. Fish and Wildlife Service's ("USFWS") *Information for Planning and Consultation* ("IPaC") tool to identify special-status species that could occur at the Project site,[2] and (2) the *National Wetlands Inventory* ("NWI") to identify federally protected wetlands at the Project site. There are three fundamental flaws with this approach.

First, IPaC and NWI only provide information on resources under federal jurisdiction. Neither source identifies resources under the State's jurisdiction. Specifically, the IPaC tool does not identify state-listed species that could occur at the Project site, and the NWI does not identify waters of the state that may occur at the Project site. The County's sole reliance on IPaC and NWI makes the IS/MND fundamentally flawed because the thresholds of significance adopted in the IS/MND are not confined to federal resources.[3] For example, the first threshold is:

> "Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in <u>local or regional plans, policies, or regulations, or by the CA Dept. of Fish and Game</u>…"[4]

Because the IS/MND relies solely on the IPaC tool, and because the IPaC tool does not identify special-status species listed by the California Department of Fish and Wildlife ("CDFW"), the IS/MND fails to fully analyze Project impacts in relation to the stated threshold.

Second, IPaC and NWI are two of several sources of information that should be considered when establishing a project's environmental setting and evaluating potential impacts. The California

[1] A survey is not mitigation as defined in the CEQA statutes.
[2] Aside from the species identified through IPaC, the IS/MND discloses one additional special-status plant identified through an incomplete search of the CNPS's Inventory of Rare and Endangered Plants.
[3] *See* IS/MND, p. 24.
[4] *Ibid.* [emphasis added].

Department of Fish and Wildlife's California Natural Diversity Database ("CNDDB") serves as the industry standard for information on special-status species that could occur at a project site. Unlike IPaC, which is a crude screening tool that identifies potentially occurring federal species based on their geographic ranges, the CNDDB identifies documented occurrences of all (i.e., federal and state) special-status species in California. For each occurrence record, the CNDDB provides: (a) the date(s) the special-status species was detected; (b) a detailed description of the species' location (if available); and (c) specific notes about the species' distribution, habitat, associated species, threats, and population size at the reported location. Thus, the CNDDB is unique in that it not only identifies special-status species that occur or could occur at a project site, but it also provides information pertinent to the project's impact assessment. At a minimum, the IS/MND should have incorporated a review of relevant CNDDB records, along with other appropriate biological information sources (e.g., the eBird, CalFlora, and California Consortium of Herbaria databases).

Third, information obtained through a desktop review of IPaC, NWI, and other databases can be used to determine which resources require surveys and what additional analyses are warranted. However, information from a desktop review is not a substitute for project-specific data obtained through field investigations. As stated in the IPaC printout for the Project site: "determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information."[5] As stated on the NWI website: "[t]hese [NWI] data should not be interpreted as representing the presence, absence, or extent of wetlands that may be covered under one or more federal, state, Tribal, or local laws" (USFWS 2026).

Jurisdictional Waters

The State of California's definition of "waters of the state" is much broader than the federal definition of "waters of the United States." Under the Porter-Cologne Water Quality Control Act (California Water Code § 13050(e)), waters of the state include "any surface water or groundwater, including saline waters, within the boundaries of the state." Consequently, wetlands and other aquatic resources that do not satisfy the applicable federal criteria for waters of the United States may nevertheless be subject to state jurisdiction and regulation. Accordingly, a determination that a project would not affect federally jurisdictional waters does not establish that it would also have no impacts on waters of the state.

The NWI does not sufficiently establish the Project's environmental setting because it does not identify waters of the state at the Project site, unless those waters also qualify as waters of the United States. Furthermore, the NWI cannot be used to definitively establish the presence, absence, or extent of waters of the United States at a project site because:

- The data in the NWI are developed using a biological definition of wetlands; these data may not be consistent with the regulatory definition of wetlands under the Clean Water Act (USFWS 2026).
- The NWI data may be outdated. The NWI data for the Project site are based on 1987 imagery and therefore do not account for changes in the landscape since 1987.

[5] *See* Attachment 1, p. 1 (IPaC printout).

- NWI maps do not identify all wetlands. Wetlands may be absent from the inventory because they were too small to map, difficult to distinguish in the imagery, obscured by vegetation, or not present or recognizable when the source imagery was collected.

Sensitive Natural Communities

The classification system for natural communities in California is provided in the *Manual of California Vegetation* ("MCV") (Sawyer et al. 2009). The classification methods presented in the MCV serve as the state's standards and they meet the National Vegetation Classification System standards followed by federal agencies. All natural communities in California are assigned a rarity rank based on NatureServe's heritage methodology. Natural communities with ranks of S1-S3 are considered "sensitive natural communities" that must be addressed in the environmental review processes of CEQA and its equivalents.[6]

To determine whether a given vegetation community qualifies as a sensitive natural community, it first must be classified according to the system prescribed in the MCV.[7] Vegetation communities at the Project site were not classified according to State standards embodied in the MCV. This precludes the ability to analyze the second CEQA significance threshold adopted in the IS/MND:

> Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations or by the CA Dept. of Fish and Game or U.S. Fish and Wildlife Service?[8]

In response to this question the IS/MND states there is a riverine community located within the Project area. "Riverine community" is not synonymous with the riverine wetland mapped in the NWI (and depicted in Figure 4c of the IS/MND), nor is it a natural community type recognized by CDFW. The plants that comprise the "riverine community" at the Project site most likely represent a sensitive natural community, but I am unable to make a definitive conclusion in this regard because the IS/MND does not identify the plants that comprise the "riverine community" at the Project site. This deficiency deprives the public from knowing the specific river community that could be impacted by the Project, and its rarity.

The IS/MND's failure to describe the riverine community is compounded by the IS/MND's failure to: (a) map the riverine community, which may extend well beyond the river banks; and (b) provide actual analysis of potential impacts to the riverine community (the IS/MND's analysis is confined to water quality and the river hydrology; there is no analysis of impacts to the plants that comprise the natural community).[9]

Although vegetation communities were not classified according to the State's standards, there is evidence that at least one sensitive natural community may occur at the Project site. According to the CNDDB, Ione manzanita chaparral occurs in the northern portion of the Project site (CDFW

[6] *See* https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive
[7] *See* https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities
[8] IS/MND, p. 24.
[9] IS/MND, p. 25.

2026). Ione manzanita chaparral has a NatureServe rank of G1 S1, which means it is critically imperiled and at very high risk of extinction within the state and globally.[10] No efforts were made to map Ione manzanita chaparral at the Project site, nor does the IS/MND disclose the potential presence of this sensitive natural community. Given the critically imperiled status of Ione manzanita chaparral (i.e., very high risk of extinction), any Project impacts to the community would be significant and may not be mitigatable to less-than-significant levels.

Special-status Plants

The CDFW *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities* states that it is appropriate to conduct a botanical field survey when natural or naturalized vegetation occurs in an area that may be directly or indirectly affected by a project, and it is unknown whether or not special-status plants or sensitive natural communities occur in the project area (CDFW 2018). The Project site contains natural (and naturalized) vegetation. Contrary to CDFW guidelines, no botanical field survey was conducted to determine presence of special-status plants at the Project site. As a result, the IS/MND fails to establish the Project's environmental setting with respect to special-status plants.

According to the IS/MND:

> "The California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants identified two (2) plants found in Quad 38120d8 (Irish Hill) where the property is located. These plants are shown in Figure 5a, below."[11]

The IS/MND is incorrect: the CNPS Inventory of Rare and Endangered Plants ("CNPS Inventory") identifies nine special-status plant species that have been detected in the Irish Hill quadrangle.[12] Of these nine species, one is listed as threatened under the federal Endangered Species Act ("ESA"), one is listed as endangered under both the ESA and California Endangered Species Act ("CESA"), and four are considered rare or endangered in California and elsewhere, but have not been formally listed under ESA or CESA.

Figure 4b in the IS/MND lists two of the species found in the CNPS Inventory: Ione manzanita and Tuolumne button-celery. The IS/MND fails to disclose that Ione manzanita is a federally threatened species, and that it has been detected on the Project site (CDFW 2026).[13] Whereas surveys to determine presence of Tuolumne button-celery have not been conducted at the Project site,[14] there are numerous records of the species in the immediate area (CDFW 2026), and therefore there is a high probability that the species occurs on the Project site.

[10] *See* https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities#sensitive
[11] IS/MND, p. 25.
[12] *See* https://rareplants.cnps.org/search?QuadCodes=3812048&mode=results&form=advanced
[13] California Natural Diversity Database. 2026. RareFind 5 [Internet]. California Department of Fish and Wildlife [Oct 2, 2026].
[14] Ione manzanita was detected during a study that focused solely on the distribution of *Arctostaphylos myrtifolia* (Ione manzanita) and the associated *Eriogonum apricum* var. *apricum* (Ione buckwheat) and *Eriogonum apricum* var. *prostratum* (Irish Hill Buckwheat) within Amador and Calaveras counties.

CDFW guidelines state that the CNDDB and BIOS should be consulted to develop a list of special-status plants that may occur at a project site (CDFW 2018). The IS/MND did not examine the CNDDB or BIOS, nor did it examine other databases (e.g., California Consortium of Herbaria database, Calflora database) that provide information on special-status plant species that may occur at the Project site. Because the IS/MND relies solely on data in IPaC and an incomplete search of the CNPS Inventory, it vastly underreports the number of special-status plant species that may occur at the Project site.

Special-status plants often occur in spatially discrete populations, and in most regions of the state, they have not been extensively surveyed. As a result, the standard for environmental review is to perform a nine-quadrant (quad) query of the area surrounding the project location.[15] The CNDDB has occurrence records of 27 special-status plants within the nine-quad area surrounding the Project site (CDFW 2026). To properly establish the Project's environmental setting, the County must issue a revised CEQA document that discloses and analyzes the potential for these 27 species to occur at the Project site, and it must incorporate the results of protocol-level rare plant surveys.

Special-status Animals

The IS/MND used the IPaC database to identify 7 special-status animals and 15 migratory bird species with potential habitat at the Project site.[16] No field surveys were conducted, and no other sources of information were used to establish the Project's environmental setting.

The IS/MND states that two of the animals on the IPaC list are endangered species (conservancy fairy shrimp and vernal pool tadpole shrimp). The IS/MND fails to disclose the status of the remaining five species:

- Valley elderberry longhorn beetle is listed as threatened under the ESA.
- Northwestern pond turtle is proposed for listing as threatened under the ESA.
- California tiger salamander is listed as threatened under the ESA and the CESA.
- Western spadefoot is proposed for listing as threatened under the ESA.
- Monarch butterfly is proposed for listing as threatened under the ESA.[17]

Figure 4a in the IS/MND consists of a table that lists 15 migratory bird species with potential habitat at the Project site. The table identifies whether the species is on the USFWS's Birds of Conservation Concern list, and whether the species is on any "other conservation list." According to the table, the bald eagle and golden eagle are protected by the Bald and Golden Eagle Protection Act, but none of the other species are on any other conservation list aside from the USFWS's Birds of Conservation Concern list. The information in the table is incorrect. The IS/MND fails to disclose the following:

- Bald eagle is listed as endangered under the CESA.
- Belding's savannah sparrow is listed as endangered under the CESA.
- Tricolored blackbird is listed as threatened under the CESA.

[15] *See* https://ct.cnps.org/get-involved/conducting-plant-searches/?utm_source=chatgpt.com
[16] IS/MND, pp. 24 through 26.
[17] *See* https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline

- Northern harrier is a California Species of Special Concern.[18]

In addition to these deficiencies, the IS/MND is fundamentally flawed because it only identifies federal trust resources (wildlife) that could occur at the Project site. At a minimum, the following State trust wildlife resources (special-status animals) have the potential to occur at the Project site due to the presence of potential habitat and documented occurrences in the region (CDFW 2026):

- Crotch's bumble bee (candidate for listing as endangered under the CESA).
- Hell Hollow slender salamander (NatureServe Rank S3).
- Swainson's hawk (listed as threatened under the CESA).
- Cooper's hawk (CDFW Watch List).
- Ferruginous hawk (CDFW Watch List).
- White-tailed kite (CDFW Fully Protected species).
- Merlin (CDFW Watch List).
- Burrowing owl (candidate for listing as endangered under the CESA).
- Purple martin (California Species of Special Concern).
- Yellow-breasted chat (California Species of Special Concern).
- Yellow warbler (California Species of Special Concern).
- Loggerhead shrike (California Species of Special Concern).
- Grasshopper sparrow (California Species of Special Concern).
- Pallid bat (California Species of Special Concern).
- Silver-haired bat (NatureServe Rank S3S4)
- Western red bat (NatureServe Rank S3)

To properly establish the Project's environmental setting, the County must issue a revised CEQA document that identifies both federal and trust wildlife resources that have potential to occur at the Project site; it must accurately disclose the conservation status of those species; and it must incorporate the results of protocol-level surveys for species listed under the ESA or CESA.

PROJECT IMPACTS

The IS/MND does not provide any substantive analysis of the Project's impacts on sensitive biological resources. Instead, the IS/MND:

1) Identifies *some* of the sensitive biological resources that could occur at the Project site;
2) Makes the determination that impacts to special-status species, sensitive natural communities, and wetlands are potentially significant.
3) Incorporates mitigation measures that defer the impacts analyses and substantive requirements of the mitigation.
4) Concludes that the IS/MND's mitigation measures would reduce any potentially significant impacts to less-than-significant levels, despite the lack of performance standards (or success criteria) for the mitigation.

[18] *Ibid.*

The IS/MND's approach of simply labeling impacts as "potentially significant" does not satisfy the environmental assessment requirements of CEQA. Among other reasons, the IS/MND's deferral of the impacts analyses precludes the public's ability to understand, evaluate, and meaningfully participate in the CEQA review process.

Under CEQA, mitigation must be roughly proportional to the level of impacts, and under the California Endangered Species Act, impacts to state-listed species must be fully mitigated (offset). Because the County does not have the survey data needed to assess the level of impacts, it does not have the ability to conclude: (a) all potentially significant impacts would be mitigated to less-than-significant levels, and (b) impacts to state-listed species would be fully mitigated.

The County's determination that all potentially significant impacts would be reduced to less-than-significant levels relies on the assumption that implementation of the IS/MND's mitigation measures would be feasible, and that all potentially significant impacts can be mitigated to less-than-significant levels—irrespective of the Project's environmental setting. These assumptions are not valid. For example, because several of the plant species that have the potential to occur at the Project site are restricted to a small geographic range and are exceptionally rare (e.g., *Arctostaphylos myrtifolia* [Ione manzanita], *Eriogonum apricum* vars. *apricum* and *prostratum* [Ione buckwheat and Irish Hill buckwheat], *Navarretia myersii* ssp. *myersii* [pincushion navarretia]), there may not be opportunities to preserve and enhance off-site populations of these species, as stipulated in mitigation measure BIO-3 (i.e., it may be infeasible for the Applicant to acquire and preserve land occupied by the species requiring mitigation). Whereas transplanting plants to a preservation area (also stipulated in BIO-3) might be feasible, it does not ensure impacts would be mitigated to less-than-significant levels because most efforts to transplant rare plants have been unsuccessful (Fiedler 1991). Indeed, of the two federally listed plants that may be impacted by the Project, there is evidence that Ione manzanita can be propagated, but there is no indication that transplanting *E. apricum* is successful (USFWS 2010).

E. apricum provides an example of the flawed assumption that all potentially significant impacts can be mitigated to less-than-significant levels irrespective of the environmental setting (pre-construction survey results). If *E. apricum* is discovered during the pre-construction surveys required under mitigation measure BIO-4, its presence at the Project site would be extremely important to conservation of the species because there are only two known occurrences of *E. apricum* var. *prostratum*, and only five extant occurrences of *E. apricum* var. *apricum* (CDFW 2026). As a result, any impacts to *E. apricum* would jeopardize persistence of the species, and because there is no indication that transplanting *E. apricum* is successful (USFWS 2010), there would be no means of reducing the impact to a less-than-significant level (i.e., the impact would be significant and unavoidable).

Wildlife Movement

The IS/MND provides no analysis of the Project's impacts on wildlife movement; it merely states: "[i]n the event that any of the special-status species are found within the project site, the proper authorities shall be notified and all construction and/or ground disturbing activity halted

so that additional mitigation measures may be prescribed."[19] Despite the lack of analysis, the IS/MND makes the determination that impacts on wildlife movement would be less than significant through implementation of mitigation measures BIO-1, BIO-2, and BIO-5.[20] The IS/MND's determination is unsupported because BIO-1, BIO-2, and BIO-5 do not contain any substantive measures that address impacts on wildlife movement.

The Project includes installation of a security fence.[21] Fences often have negative impacts on wildlife by creating a barrier to essential habitat (e.g., vegetative cover) or habitat elements (e.g., a water source) (Jakes et al. 2018). Fences can also injure or kill animals that collide with the fence or get tangled in the wires (Allen 1990; Booth 2007; Jakes et al. 2018). The IS/MND provides no analysis of, or mitigation for, these potentially significant impacts. As a result, the IS/MND's determination that the Project would have less-than-significant impacts on wildlife movement is unsupported.

Nursery Sites

The IS/MND determined that the Project would have a less-than-significant impact on wildlife nursery sites.[22] The IS/MND provides no analysis to support that determination.

Tree-roosting bat species (e.g., silver-haired bat, western red bat) may use trees at the Project site as maternity roosts. Bat maternity roosts are considered wildlife nursery sites. Tree removal and human activity at the Project site may impact bat maternity roosts. The IS/MND provides no analysis of, or mitigation for, potentially significant impacts to bat maternity roosts. As a result, the IS/MND's determination that the Project's impact on wildlife nursery sites would be less than significant is unsupported.

MITIGATION MEASURES

Impacts to Oak Trees

The IS/MND states:

> "Mitigation measure BIO-6 includes the following recommendation prescribed by Moore Biological Consultants: It is recommended that burial plots in the oak woodlands be situated no closer than 5 feet from the trunk of any oak with a DBH (Diameter at Breast Height) greater than 12 inches. It is also recommended that burial plot development should not involve excavation in excess of 50% of the area under the canopy of any oak tree with a DBH greater than 12 inches. (Moore Biological Consultants, 2022)"[23]

There are three reasons why the proposed mitigation would not prevent significant impacts to oak trees at the Project site. First, although the IS/MND states that mitigation for oak trees has

[19] IS/MND, p. 25.
[20] IS/MND, p. 25.
[21] IS/MND, p. 5.
[22] IS/MND, p. 24.
[23] IS/MND, p. 25.

been included in BIO-6, the mitigation was not incorporated in the Mitigation Monitoring and Reporting Program or in the "mitigation measures" section of the IS/MND (i.e., there is no BIO-6 in the IS/MND).

Second, the proposed 5-foot setback for burial plots is arbitrary and inconsistent with scientific guidelines pertaining to oak preservation. Construction activities can kill trees by causing damage to the root system. Damage to the root system can occur due to grading, soil compaction, paving, trenching, excavations, changes in grade or drainage, or other environmental changes that accompany construction and landscaping activities (Rossi 1980; University of California 2010). The roots of mature oaks grow predominately in the upper three feet of soil, and most of the roots responsible for the uptake of water and minerals are concentrated within 18 inches of the surface (Hagen 1990). Although the roots of oak trees typically radiate well beyond the periphery of foliage (the drip line), much of the active root system is within the drip line (Hagen 1990). Due to these physiological traits, oaks are particularly sensitive to construction activities, especially if those activities damage roots or alter environmental conditions within the drip line.

Google Earth imagery and imagery in Moore's (2022) oak woodland review provide evidence that many of the oaks at the Project site have a drip line radius greater than five feet. Excavation of burial plots within the drip lines of these trees would cause significant damage to the trees through severing of roots, soil compaction, and changes to the water table (Rogers 1980). Although it may take a few years, these trees will likely die (Rogers 1980).

Pathogen Transmission

Phytophthora cinnamomi and at least two other diseases are killing Ione manzanita plants (USFWS 2010). There is no known cure or prevention for *P. cinnamomi,* which is primarily spread to new areas through the movement of infested soil by humans (especially on shoes, vehicle tires, and soil-moving equipment). Once the disease has been introduced into an area, movement of the pathogen is facilitated by water flow. Introduction of *P. cinnamomi* into Ione manzanita habitat represents long-term or permanent destruction of habitat due to its long persistence in the soil, even in the absence of susceptible hosts. As a result, *P. cinnamomi* is considered the greatest threat to Ione manzanita (USFWS 2010).

In 2004, *P. cinnamomi* was detected approximately 1,500 feet northwest of the Project site and *P. cambivora* (another pathogen affecting Ione manzanita) was detected approximately 1,700 feet north of the Project site (Swiecki et al. 2005, Fig. 14). It is unknown whether either pathogen now exists at the Project site. However, the proposed Project could facilitate the spread of *P. cinnamomi* and *P. cambivora* if infested soil or infected root material is present. Potential dispersal mechanisms include the movement of excavated soil; soil adhering to vehicles, shoes, and excavation equipment; and runoff transporting contaminated soil or pathogen propagules into adjacent areas. If either pathogen is present, recurring excavations of individual burial plots and human activity during funeral events would create a recurring mechanism for transferring contaminated soil into previously uninfested areas, both on- an off-site. This constitutes a potentially significant impact that was not analyzed in the IS/MND, and for which the IS/MND provides no mitigation.

Mitigation measure BIO-4 states that the mitigation plan for special-status plants would include "relocation of the affected plants."[24] Relocating plants has the potential to introduce *P. cinnamomi*, *P. cambivora,* and other pathogens into areas that are uninfected. Similarly, if no pathogens exist at the Project site, relocated plants would be subject to infection if they are relocated into an infected area. Under either scenario, relocating special-status plants would not only fail to reduce Project impacts to less-than-significant levels, but it would also cause significant impacts that were not analyzed in the IS/MND.

Transplantation

Mitigation measure BIO-1 states that mitigation may include transplanting individual animals to a preservation area. Mitigation measure BIO-3 states that mitigation may include transplanting individual plants to preservation area, while measure BIO-4 states the mitigation would include relocation of the affected special-status plants. The IS/MND provides no evidence that transplantation (or relocation) is an effective mitigation technique for the special-status plant and animal species that could occur at the Project site.

Most attempts to salvage, propagate, transplant, or relocate special-status plants have been unsuccessful (Fiedler 1991). Similarly, most mitigation-driven wildlife translocations fail because animals exhibit strong site fidelity, maintain established home ranges or territories, depend on specific habitat features, or experience high mortality following translocation (Dodd and Seigel 1991; Dickens et al. 2009; Ruffell et al. 2009; Germano et al. 2015). As a result, transplantation (or relocation) of special-status plants and animals from the Project site would not ensure Project impacts are reduced to less-than-significant levels.

This concludes my comments on the IS/MND.

Sincerely,



Scott Cashen, M.S.
Senior Biologist

[24] IS/MND, p. 28.

Literature cited

Allen GT. 1990. A review of Bird Deaths on Barbed-Wire Fences. Wilson Bulletin 102:553-58.

Booth C. 2007. Barbs and birds. Wingspan 17(4):9-15.

[CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities.

California Department of Fish and Wildlife. 2026. California Natural Diversity Database. RareFind 5 [Internet]. California Department of Fish and Wildlife [Oct 2, 2026]. https://wildlife.ca.gov/Data/CNDDB/Maps-and-Data#rarefind

DeGregorio B, Moody R, Myers H. 2020. Soft release translocation of Texas horned lizards (*Phrynosoma cornutum*) on an urban military installation in Oklahoma, United States. Animals 10(8):1358. https://www.mdpi.com/2076-2615/10/8/1358

Dickens MJ, Delehanty DJ, Romero LM. 2009. Stress and translocation: alterations in the stress physiology of translocated birds. Proceedings of the Royal Society B: Biological Sciences 276:2051-56.

Dodd CK Jr., Seigel RA. 1991. Relocation, repatriation, and translocation of amphibians and reptiles: Are they conservation strategies that work? Herpetologica 47(3):336-350.

Fiedler PL. 1991. Mitigation-related transplantation, relocation and reintroduction projects involving endangered and threatened, and rare plant species in California. Final Report. nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=3173

Fitzner RE. 1975. Owl Mortality on Fences and Utility Lines. Journal of Raptor Research 9(3/4):55-57.

Germano JM, Field KJ, Griffiths RA, Clulow S, Foster J, Harding G, Swaisgood RR. 2015. Mitigation-driven translocations: are we moving wildlife in the right direction? Frontiers in Ecology and the Environment 13(2):100-5.

Hagen BW. 1990 June. Keeping Native California Oaks Healthy. Tree Notes No. 7. California Department of Forestry and Fire Protection.

Jakes AF, Jones PF, Paige LC, Seidler RG, Huijser MP. 2018. A fence runs through it: A call for greater attention to the influence of fences on wildlife and ecosystems. Biological Conservation 227:310-8.

Rogers PA. 1980. Measures That Can Help Offset the Detrimental Effects That Urban Development Has on Oak Trees. In: Plumb TR, technical coordinator. Proceedings of the symposium on the ecology, management and utilization of California oaks; 1979 June 26-28;

Claremont, CA. Gen. Tech. Rep. PSW-44. Berkeley, CA: U.S. Department of Agriculture, Forest Service, Pacific Southwest Forest and Range Experiment Station: 167-170.

Rossi RS. 1980. History of cultural influences on the distribution and reproduction of oaks in California. In: Plumb TR, technical coordinator. Proceedings of the symposium on the ecology, management and utilization of California oaks; 1979 June 26-28; Claremont, CA. Gen. Tech. Rep. PSW-44. Berkeley, CA: U.S. Department of Agriculture, Forest Service, Pacific Southwest Forest and Range Experiment Station: 7-18.

Ruffell J, Guilbert J, Parsons S. 2009. Translocation of bats as a conservation strategy: previous attempts and potential problems. Endangered Species Research 8:25-31.

Sawyer JO, Keeler-Wolf T, J.M. Evens JM. 2009. A Manual of California Vegetation. Second edition. California Native Plant Society, Sacramento. 1300 pp. *Online version available at*: https://vegetation.cnps.org/

Swiecki TJ, Bernhardt E, Garbelotto M. 2005. Distribution of *Phythophthora cinnamomi* within the range of Ione manzanita (*Arctostaphylos myrtifolia*). Phytosphere Research, Vacaville, California.

[USFWS] U.S. Fish and Wildlife Service, Sacramento Fish and Wildlife Office. 2010. *Eriogonum apricum* (inclusive of vars. *apricum* and *prostratum*) (Ione Buckwheat = Irish Hill Buckwheat) *Arctostaphylos myrtifolia* (Ione Manzanita). 5-Year Review: Summary and Evaluation. [accessed 2026 Oct 26]. https://ecosphere-documents-production-public.s3.amazonaws.com/sams/public_docs/species_nonpublish/1674.pdf

U.S. Fish and Wildlife Service. 2026. Wetlands Data Limitations, Exclusions and Precautions [web page]. [Accessed 2026 Oct 14]. https://www.fws.gov/page/wetlands-data-limitations-exclusions-and-precautions

University of California, Integrated Hardwood Range Management Program. 2010. Living Among the Oaks: A Management Guide for Landowners. Division of Agriculture and Natural Resources Publication #21538.

Attachment 1: IPaC report for the Gardens of Noor Cemetery Project site.

IPaC Information for Planning and Consultation

U.S. Fish & Wildlife Service

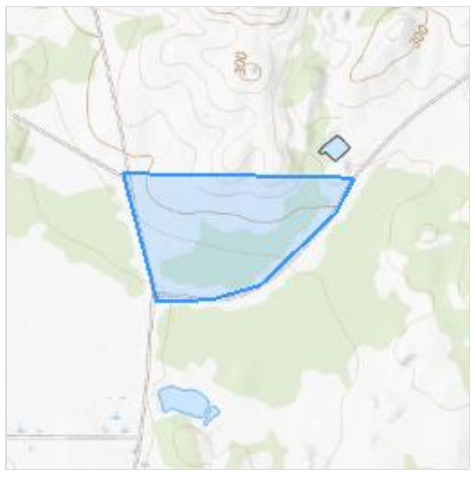
IPaC resource list

This report is an automatically generated list of species and other resources such as critical habitat (collectively referred to as *trust resources*) under the U.S. Fish and Wildlife Service's (USFWS) jurisdiction that are known or expected to be on or near the project area referenced below. The list may also include trust resources that occur outside of the project area, but that could potentially be directly or indirectly affected by activities in the project area. However, determining the likelihood and extent of effects a project may have on trust resources typically requires gathering additional site-specific (e.g., vegetation/species surveys) and project-specific (e.g., magnitude and timing of proposed activities) information.

Below is a summary of the project information you provided and contact information for the USFWS office(s) with jurisdiction in the defined project area. Please read the introduction to each section that follows (Endangered Species, Migratory Birds, USFWS Facilities, and NWI Wetlands) for additional information applicable to the trust resources addressed in that section.

Location

Amador County, California



Local office

Sacramento Fish And Wildlife Office

(916) 414-6600
(916) 414-6713

Federal Building
2800 Cottage Way, Room W-2605
Sacramento, CA 95825-1846

NOT FOR CONSULTATION

Endangered species

This resource list is for informational purposes only and does not constitute an analysis of project level impacts.

The primary information used to generate this list is the known or expected range of each species. Additional areas of influence (AOI) for species are also considered. An AOI includes areas outside of the species range if the species could be indirectly affected by activities in that area (e.g., placing a dam upstream of a fish population even if that fish does not occur at the dam site, may indirectly impact the species by reducing or eliminating water flow downstream). Because species can move, and site conditions can change, the species on this list are not guaranteed to be found on or near the project area. To fully determine any potential effects to species, additional site-specific and project-specific information is often required.

Section 7 of the Endangered Species Act **requires** Federal agencies to "request of the Secretary information whether any species which is listed or proposed to be listed may be present in the area of such proposed action" for any project that is conducted, permitted, funded, or licensed by any Federal agency. A letter from the local office and a species list which fulfills this requirement can **only** be obtained by requesting an official species list from either the Regulatory Review section in IPaC (see directions below) or from the local field office directly.

For project evaluations that require USFWS concurrence/review, please return to the IPaC website and request an official species list by doing the following:

1. Draw the project location and click CONTINUE.
2. Click DEFINE PROJECT.
3. Log in (if directed to do so).
4. Provide a name and description for your project.
5. Click REQUEST SPECIES LIST.

Listed species[1] and their critical habitats are managed by the Ecological Services Program of the U.S. Fish and Wildlife Service (USFWS) and the fisheries division of the National Oceanic and Atmospheric Administration (NOAA Fisheries[2]).

Species and critical habitats under the sole responsibility of NOAA Fisheries are **not** shown on this list. Please contact NOAA Fisheries for species under their jurisdiction.

---

1. Species listed under the Endangered Species Act are threatened or endangered; IPaC also shows species that are candidates, or proposed, for listing. See the listing status page for more information. IPaC only shows species that are regulated by USFWS (see FAQ).
2. NOAA Fisheries, also known as the National Marine Fisheries Service (NMFS), is an office of the National Oceanic and Atmospheric Administration within the Department of Commerce.

The following species are potentially affected by activities in this location:

Reptiles

NAME	STATUS
Northwestern Pond Turtle Actinemys marmorata Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1111	Proposed Threatened

Amphibians

NAME	STATUS
California tiger Salamander Ambystoma californiense There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/2076	Threatened
Western spadefoot Spea hammondii No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/5425	Proposed Threatened

Insects

NAME	STATUS

NOT FOR CONSULTATION

Monarch butterfly Danaus plexippus Wherever found There is **proposed** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/9743	Proposed Threatened
Valley elderberry longhorn beetle Desmocerus californicus dimorphus Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/7850	Threatened

Crustaceans

NAME	STATUS
Conservancy fairy shrimp Branchinecta conservatio Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/8246	Endangered
Vernal pool fairy shrimp Branchinecta lynchi Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/498	Threatened
Vernal pool tadpole shrimp Lepidurus packardi Wherever found There is **final** critical habitat for this species. Your location does not overlap the critical habitat. https://ecos.fws.gov/ecp/species/2246	Endangered

Flowering Plants

NAME	STATUS
Ione (incl. Irish Hill) buckwheat Eriogonum apricum (incl. var. prostratum) Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/8301	Endangered
Ione manzanita Arctostaphylos myrtifolia Wherever found No critical habitat has been designated for this species. https://ecos.fws.gov/ecp/species/1806	Threatened

Critical habitats

Potential effects to critical habitat(s) in this location must be analyzed along with the endangered species themselves.

There are no critical habitats at this location.

You are still required to determine if your project(s) may have effects on all above listed species.

Bald & Golden Eagles

Bald and Golden Eagles are protected under the Bald and Golden Eagle Protection Act [2] and the Migratory Bird Treaty Act (MBTA) [1]. Any person or organization who plans or conducts activities that may result in impacts to Bald or Golden Eagles, or their habitats, should follow appropriate regulations and consider implementing appropriate avoidance and minimization measures, as described

NOT FOR CONSULTATION

in the various links on this page.

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds https://www.fws.gov/sites/default/files/documents/nationwide-standard-conservation-measures.pdf
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

There are Bald Eagles and/or Golden Eagles in your project area.

Measures for Proactively Minimizing Eagle Impacts
For information on how to best avoid and minimize disturbance to nesting bald eagles, please review the National Bald Eagle Management Guidelines. You may employ the timing and activity-specific distance recommendations in this document when designing your project/activity to avoid and minimize eagle impacts. For bald eagle information specific to Alaska, please refer to Bald Eagle Nesting and Sensitivity to Human Activity.

The FWS does not currently have guidelines for avoiding and minimizing disturbance to nesting Golden Eagles. For site-specific recommendations regarding nesting Golden Eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

If disturbance or take of eagles cannot be avoided, an incidental take permit may be available to authorize any take that results from, but is not the purpose of, an otherwise lawful activity. For assistance making this determination for Bald Eagles, visit the Do I Need A Permit Tool. For assistance making this determination for golden eagles, please consult with the appropriate Regional Migratory Bird Office or Ecological Services Field Office.

Ensure Your Eagle List is Accurate and Complete
If your project area is in a poorly surveyed area in IPaC, your list may not be complete and you may need to rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information on Migratory Birds and Eagles, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to bald or golden eagles on your list, see the "Probability of Presence Summary" below to see when these bald or golden eagles are most likely to be present and breeding in your project area.

Review the FAQs
The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
Bald Eagle *Haliaeetus leucocephalus* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Jan 1 to Aug 31
Golden Eagle *Aquila chrysaetos* This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds Jan 1 to Aug 31

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

NOT FOR CONSULTATION

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

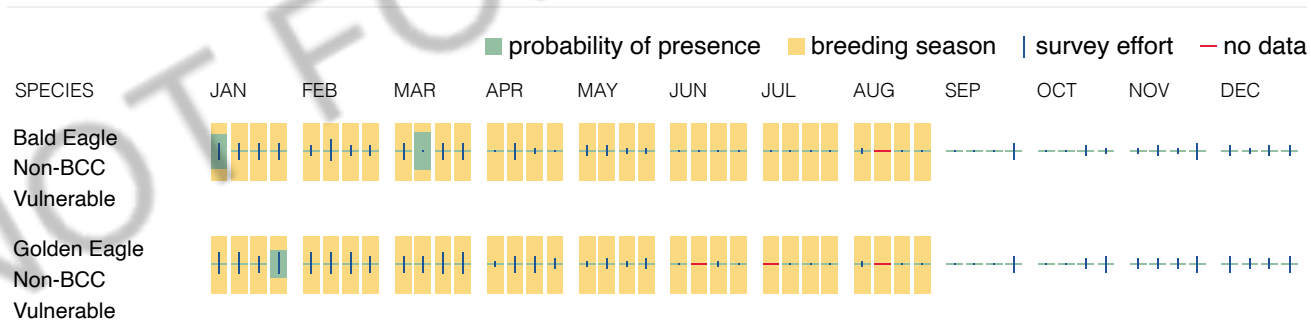
Breeding Season (■)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



NOT FOR CONSULTATION

Bald & Golden Eagles FAQs

What does IPaC use to generate the potential presence of bald and golden eagles in my specified location?

The potential for eagle presence is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) which your project intersects, and that have been identified as warranting special attention because they are an eagle (Bald and Golden Eagle Protection Act requirements may apply).

Proper interpretation and use of your eagle report
On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort line or no data line (red horizontal) means a lack of data and, therefore, a lack of certainty about presence of the species. This list is not perfect; it is simply a starting point for identifying what birds have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide you in knowing when to implement avoidance and minimization measures to eliminate or reduce potential impacts from your project activities or get the appropriate permits should presence be confirmed.

How do I know if eagles are breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or

resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If an eagle on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your “IPaC PROBABILITY OF PRESENCE SUMMARY” at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

Interpreting the Probability of Presence Graphs

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:
The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Migratory birds

The Migratory Bird Treaty Act (MBTA) [1] prohibits the take (including killing, capturing, selling, trading, and transport) of protected migratory bird species without prior authorization by the Department of Interior U.S. Fish and Wildlife Service (Service).

1. The Migratory Birds Treaty Act of 1918.
2. The Bald and Golden Eagle Protection Act of 1940.

Additional information can be found using the following links:

- Eagle Management https://www.fws.gov/program/eagle-management
- Measures for avoiding and minimizing impacts to birds https://www.fws.gov/library/collections/avoiding-and-minimizing-incidental-take-migratory-birds
- Nationwide avoidance and minimization measures for birds
- Supplemental Information for Migratory Birds and Eagles in IPaC https://www.fws.gov/media/supplemental-information-migratory-birds-and-bald-and-golden-eagles-may-occur-project-action

Measures for Proactively Minimizing Migratory Bird Impacts

Your IPaC Migratory Bird list showcases birds of concern, including Birds of Conservation Concern (BCC), in your project location. This is not a comprehensive list of all birds found in your project area. However, you can help proactively minimize significant impacts to all birds at your project location by implementing the measures in the Nationwide avoidance and minimization measures for birds document, and any other project-specific avoidance and minimization measures suggested at the link Measures for avoiding and minimizing impacts to birds for the birds of concern on your list below.

Ensure Your Migratory Bird List is Accurate and Complete

If your project area is in a poorly surveyed area, your list may not be complete and you may need to

NOT FOR CONSULTATION

rely on other resources to determine what species may be present (e.g. your local FWS field office, state surveys, your own surveys). Please review the Supplemental Information on Migratory Birds and Eagles document, to help you properly interpret the report for your specified location, including determining if there is sufficient data to ensure your list is accurate.

For guidance on when to schedule activities or implement avoidance and minimization measures to reduce impacts to migratory birds on your list, see the "Probability of Presence Summary" below to see when these birds are most likely to be present and breeding in your project area.

Review the FAQs

The FAQs below provide important additional information and resources.

NAME	BREEDING SEASON
Bald Eagle Haliaeetus leucocephalus This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1626	Breeds Jan 1 to Aug 31
Belding's Savannah Sparrow Passerculus sandwichensis beldingi This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8	Breeds Apr 1 to Aug 15
Bullock's Oriole Icterus bullockii This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Mar 21 to Jul 25
California Gull Larus californicus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 1 to Jul 31
California Thrasher Toxostoma redivivum This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Jan 1 to Jul 31
Golden Eagle Aquila chrysaetos This is not a Bird of Conservation Concern (BCC) in this area, but warrants attention because of the Eagle Act or for potential susceptibilities in offshore areas from certain types of development or activities. https://ecos.fws.gov/ecp/species/1680	Breeds Jan 1 to Aug 31
Lawrence's Goldfinch Spinus lawrencei This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9464	Breeds Mar 20 to Sep 20
Northern Harrier Circus hudsonius This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/8350	Breeds Apr 1 to Sep 15
Nuttall's Woodpecker Dryobates nuttallii This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/9410	Breeds Apr 1 to Jul 20
Oak Titmouse Baeolophus inornatus This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9656	Breeds Mar 15 to Jul 15
Santa Barbara Song Sparrow Melospiza melodia graminea This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA https://ecos.fws.gov/ecp/species/5513	Breeds Mar 1 to Sep 5

NOT FOR CONSULTATION

Tricolored Blackbird Agelaius tricolor This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/3910	Breeds Mar 15 to Aug 10
Western Screech-Owl Megascops kennicottii cardonensis This is a Bird of Conservation Concern (BCC) only in particular Bird Conservation Regions (BCRs) in the continental USA	Breeds Mar 1 to Jun 30
Wrentit Chamaea fasciata This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska.	Breeds Mar 15 to Aug 10
Yellow-billed Magpie Pica nuttalli This is a Bird of Conservation Concern (BCC) throughout its range in the continental USA and Alaska. https://ecos.fws.gov/ecp/species/9726	Breeds Apr 1 to Jul 31

Probability of Presence Summary

The graphs below provide our best understanding of when birds of concern are most likely to be present in your project area. This information can be used to tailor and schedule your project activities to avoid or minimize impacts to birds. Please make sure you read "Supplemental Information on Migratory Birds and Eagles", specifically the FAQ section titled "Proper Interpretation and Use of Your Migratory Bird Report" before using or attempting to interpret this report.

Probability of Presence (■)

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. (A year is represented as 12 4-week months.) A taller bar indicates a higher probability of species presence. The survey effort (see below) can be used to establish a level of confidence in the presence score. One can have higher confidence in the presence score if the corresponding survey effort is also high.

How is the probability of presence score calculated? The calculation is done in three steps:

1. The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.
2. To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.
3. The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

To see a bar's probability of presence score, simply hover your mouse cursor over the bar.

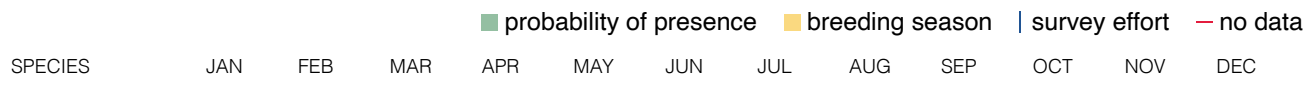
Breeding Season (■)
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort (|)
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps. The number of surveys is expressed as a range, for example, 33 to 64 surveys.

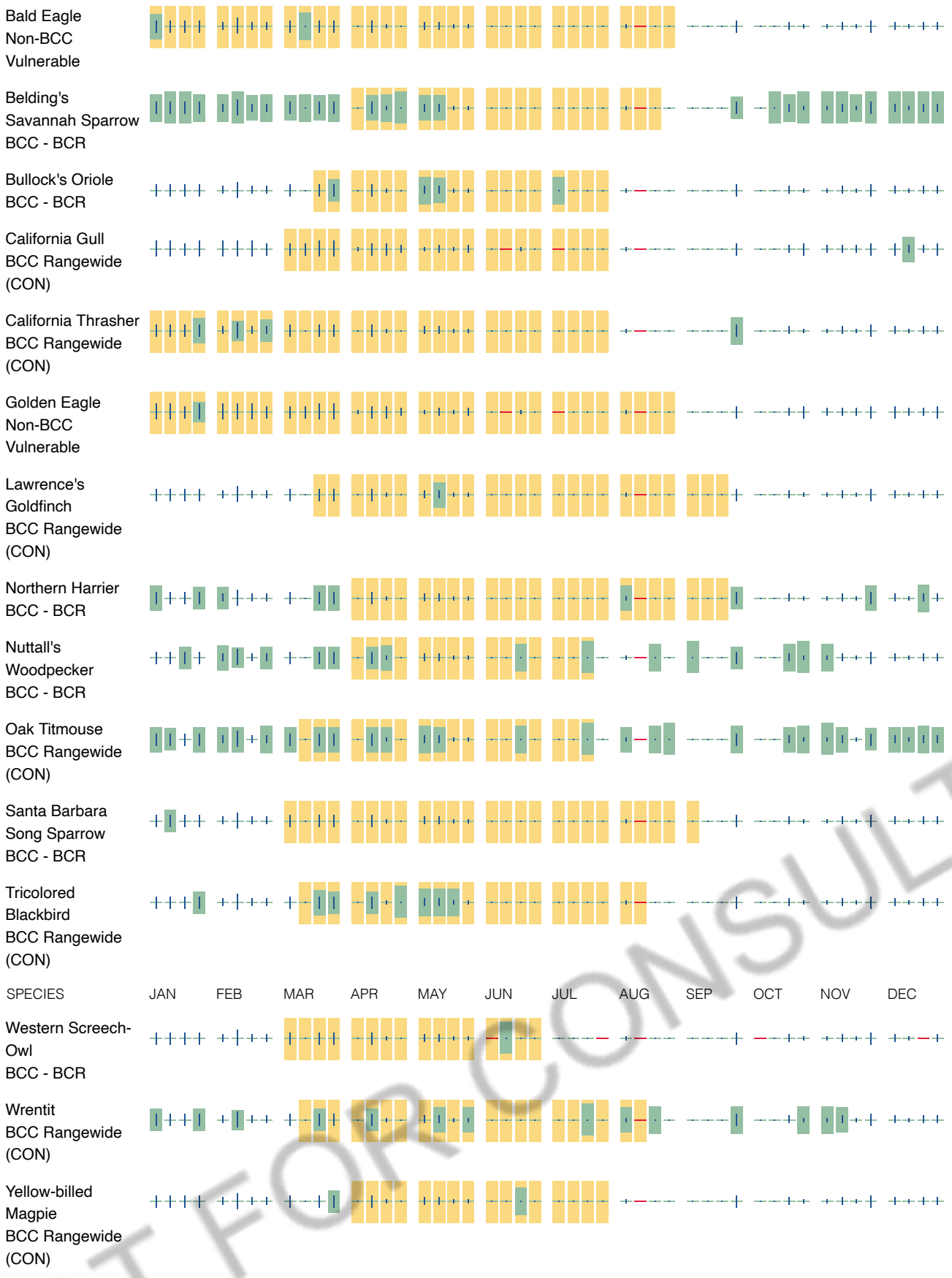
To see a bar's survey effort range, simply hover your mouse cursor over the bar.

No Data (–)
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.



NOT FOR CONSULTATION



Migratory Bird FAQs

Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds.

Nationwide Avoidance & Minimization Measures for Birds describes measures that can help avoid and minimize impacts to all birds at any location year-round. When birds may be breeding in the area, identifying the locations of any active nests and avoiding their destruction is one of the most effective ways to minimize impacts. To see when birds are most likely to occur and breed in your project area, view the Probability of Presence Summary. Additional measures or permits may be advisable depending on the type of activity you are conducting and the type of infrastructure or bird species present on your project site.

What does IPaC use to generate the list of migratory birds that potentially occur in my specified location?

The Migratory Bird Resource List is comprised of Birds of Conservation Concern (BCC) and other species that may warrant special attention in your project location, such as those listed under the Endangered Species Act or the Bald and Golden Eagle Protection Act and those species marked as “Vulnerable”. See the FAQ “What are the levels of concern for migratory birds?” for more information on the levels of concern covered in the IPaC migratory bird species list.

The migratory bird list generated for your project is derived from data provided by the Avian Knowledge Network (AKN). The AKN data is based on a growing collection of survey, banding, and citizen science datasets and is queried and filtered to return a list of those birds reported as occurring in the 10km grid cell(s) with which your project intersects. These species have been identified as warranting special attention because they are BCC species in that area, an eagle (Bald and Golden Eagle Protection Act requirements may apply), or a species that has a particular vulnerability to offshore activities or development.

Again, the Migratory Bird Resource list includes only a subset of birds that may occur in your project area. It is not representative of all birds that may occur in your project area. To get a list of all birds potentially present in your project area, and to verify survey effort when no results present, please visit the Rapid Avian Information Locator (RAIL) Tool.

NOT FOR CONSULTATION

Why are subspecies showing up on my list?

Subspecies profiles are included on the list of species present in your project area because observations in the AKN for **the species** are being detected. If the species are present, that means that the subspecies may also be present. If a subspecies shows up on your list, you may need to rely on other resources to determine if that subspecies may be present (e.g. your local FWS field office, state surveys, your own surveys).

What does IPaC use to generate the probability of presence graphs for the migratory birds potentially occurring in my specified location?

The probability of presence graphs associated with your migratory bird list are based on data provided by the Avian Knowledge Network (AKN). This data is derived from a growing collection of survey, banding, and citizen science datasets.

Probability of presence data is continuously being updated as new and better information becomes available. To learn more about how the probability of presence graphs are produced and how to interpret them, go to the Probability of Presence Summary and then click on the "Tell me about these graphs" link.

How do I know if a bird is breeding, wintering, or migrating in my area?

To see what part of a particular bird's range your project area falls within (i.e. breeding, wintering, migrating, or resident), you may query your location using the RAIL Tool and view the range maps provided for birds in your area at the bottom of the profiles provided for each bird in your results. If a bird on your IPaC migratory bird species list has a breeding season associated with it (indicated by yellow vertical bars on the phenology graph in your “IPaC PROBABILITY OF PRESENCE SUMMARY” at the top of your results list), there may be nests present at some point within the timeframe specified. If "Breeds elsewhere" is indicated, then the bird likely does not breed in your project area.

What are the levels of concern for migratory birds?

Migratory birds delivered through IPaC fall into the following distinct categories of concern:

1. "BCC Rangewide" birds are Birds of Conservation Concern (BCC) that are of concern throughout their range anywhere within the USA (including Hawaii, the Pacific Islands, Puerto Rico, and the Virgin Islands);
2. "BCC - BCR" birds are BCCs that are of concern only in particular Bird Conservation Regions (BCRs) in the continental USA; and
3. "Non-BCC - Vulnerable" birds are not BCC species in your project area, but appear on your list either because of the Bald and Golden Eagle Protection Act requirements (for eagles) or (for non-eagles) potential susceptibilities in offshore areas from certain types of development or activities (e.g. offshore energy development or longline fishing).

Although it is important to avoid and minimize impacts to all birds, efforts should be made, in particular, to avoid and minimize impacts to the birds on this list, especially BCC species. For more information on avoidance and minimization measures you can implement to help avoid and minimize migratory bird impacts, please see the FAQ “Tell me more about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds”.

Details about birds that are potentially affected by offshore projects

For additional details about the relative occurrence and abundance of both individual bird species and groups of bird species within your project area off the Atlantic Coast, please visit the Northeast Ocean Data Portal. The Portal also offers data and information about other taxa besides birds that may be helpful to you in your project review. Alternately, you may download the bird model results files underlying the portal maps through the NOAA NCCOS Integrative Statistical Modeling and Predictive Mapping of Marine Bird Distributions and Abundance on the Atlantic Outer Continental Shelf project webpage.

Proper interpretation and use of your migratory bird report

The migratory bird list generated is not a list of all birds in your project area, only a subset of birds of priority concern. To learn more about how your list is generated and see options for identifying what other birds may be in your project area, please see the FAQ "What does IPaC use to generate the migratory birds potentially occurring in my specified location". Please be aware this report provides the "probability of presence" of birds within the 10 km grid cell(s) that overlap your project; not your exact project footprint. On the graphs provided, please look carefully at the survey effort (indicated by the black vertical line) and for the existence of the "no data" indicator (a red horizontal line). A high survey effort is the key component. If the survey effort is high, then the probability of presence score can be viewed as more dependable. In contrast, a low survey effort bar or no data bar means a lack of data and, therefore, a lack of certainty about presence of the species. This list does not represent all birds present in your project area. It is simply a starting point for identifying what birds of concern have the potential to be in your project area, when they might be there, and if they might be breeding (which means nests might be present). The list and associated information help you know what to look for to confirm presence and helps guide implementation of avoidance and minimization measures to eliminate or reduce potential impacts from your project activities, should presence be confirmed. To learn more about avoidance and minimization measures, visit the FAQ "Tell me about avoidance and minimization measures I can implement to avoid or minimize impacts to migratory birds".

Interpreting the Probability of Presence Graphs

Each green bar represents the bird's relative probability of presence in the 10km grid cell(s) your project overlaps during a particular week of the year. A taller bar indicates a higher probability of species presence. The survey effort can be used to establish a level of confidence in the presence score.

How is the probability of presence score calculated? The calculation is done in three steps:

The probability of presence for each week is calculated as the number of survey events in the week where the species was detected divided by the total number of survey events for that week. For example, if in week 12 there

NOT FOR CONSULTATION

were 20 survey events and the Spotted Towhee was found in 5 of them, the probability of presence of the Spotted Towhee in week 12 is 0.25.

To properly present the pattern of presence across the year, the relative probability of presence is calculated. This is the probability of presence divided by the maximum probability of presence across all weeks. For example, imagine the probability of presence in week 20 for the Spotted Towhee is 0.05, and that the probability of presence at week 12 (0.25) is the maximum of any week of the year. The relative probability of presence on week 12 is 0.25/0.25 = 1; at week 20 it is 0.05/0.25 = 0.2.

The relative probability of presence calculated in the previous step undergoes a statistical conversion so that all possible values fall between 0 and 10, inclusive. This is the probability of presence score.

Breeding Season ()
Yellow bars denote a very liberal estimate of the time-frame inside which the bird breeds across its entire range. If there are no yellow bars shown for a bird, it does not breed in your project area.

Survey Effort ()
Vertical black lines superimposed on probability of presence bars indicate the number of surveys performed for that species in the 10km grid cell(s) your project area overlaps.

No Data ()
A week is marked as having no data if there were no survey events for that week.

Survey Timeframe
Surveys from only the last 10 years are used in order to ensure delivery of currently relevant information. The exception to this is areas off the Atlantic coast, where bird returns are based on all years of available data, since data in these areas is currently much more sparse.

Facilities

National Wildlife Refuge lands

Any activity proposed on lands managed by the National Wildlife Refuge system must undergo a 'Compatibility Determination' conducted by the Refuge. Please contact the individual Refuges to discuss any questions or concerns.

There are no refuge lands at this location.

Fish hatcheries

There are no fish hatcheries at this location.

Wetlands in the National Wetlands Inventory (NWI)

Impacts to NWI wetlands and other aquatic habitats may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal statutes.

For more information please contact the Regulatory Program of the local U.S. Army Corps of Engineers District.

Please note that the NWI data being shown may be out of date. We are currently working to update our NWI data set. We recommend you verify these results with a site visit to determine the actual extent of wetlands on site.

This location overlaps the following wetlands:

RIVERINE
27391713

A full description for each wetland code can be found at the National Wetlands Inventory website

NOTE: This initial screening does **not** replace an on-site delineation to determine whether wetlands

NOT FOR CONSULTATION

occur. Additional information on the NWI data is provided below.

Data limitations

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Data exclusions

Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tuberficid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Data precautions

Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate Federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

NOT FOR CONSULTATION

Scott Cashen, M.S.
Senior Wildlife Biologist

Scott Cashen has 32 years of professional experience in natural resources management. During that time he has worked as a field biologist, forester, environmental consultant, and instructor of Wildlife Management. Mr. Cashen focuses on CEQA/NEPA compliance issues, endangered species, scientific field studies, and other topics that require a high level of scientific expertise.

Mr. Cashen has knowledge and experience with numerous taxa, ecoregions, biological resource issues, and environmental regulations. As a biological resources expert, Mr. Cashen is knowledgeable of the various agency-promulgated guidelines for field surveys, impact assessments, and mitigation. Mr. Cashen has led field investigations on several special-status species, including ones focusing on the yellow-legged frog, red-legged frog, desert tortoise, steelhead, burrowing owl, California spotted owl, northern goshawk, willow flycatcher, Peninsular bighorn sheep, red panda, and various forest carnivores.

Mr. Cashen is a recognized expert on the environmental impacts of renewable energy development. He has been involved in the environmental review process of over 100 solar, wind, biomass, and geothermal energy projects. Mr. Cashen's role in this capacity has encompassed all stages of the environmental review process, from initial document review through litigation support. Mr. Cashen provided expert witness testimony on several of the Department of the Interior's "fast-tracked" renewable energy projects. His testimony on those projects helped lead agencies develop project alternatives and mitigation measures to reduce environmental impacts associated with the projects.

Mr. Cashen was a member of the independent scientific review panel for the Quincy Library Group project, the largest community forestry project in the United States. As a member of the panel, Mr. Cashen was responsible for advising the U.S. Forest Service on its scientific monitoring program, and for preparing a final report to Congress describing the effectiveness of the Herger-Feinstein Forest Recovery Act of 1998.

AREAS OF EXPERTISE

- CEQA, NEPA, and Endangered Species Act compliance issues
- Comprehensive biological resource assessments
- Endangered species management
- Renewable energy development
- Scientific field studies, grant writing and technical editing

EDUCATION

M.S. Wildlife and Fisheries Science - The Pennsylvania State University (1998)
Thesis: *Avian Use of Restored Wetlands in Pennsylvania*
B.S. Resource Management - The University of California, Berkeley (1992)

PROFESSIONAL EXPERIENCE

Litigation Support / Expert Witness

Mr. Cashen has served as a biological resources expert for over 125 projects subject to environmental review under the California Environmental Quality Act (CEQA) and/or the National Environmental Policy Act (NEPA). As a biological resources expert, Mr. Cashen reviews CEQA/NEPA documents and provides his clients with an assessment of biological resource issues. He then submits formal comments on the scientific and legal adequacy of the project's environmental documents (e.g., Environmental Impact Report). If needed, Mr. Cashen conducts field studies to generate evidence for legal testimony, or he can obtain supplemental testimony from his deep network of species-specific experts. Mr. Cashen has provided written and oral testimony to the California Energy Commission, California Public Utilities Commission, and U.S. district courts. His clients have included law firms, non-profit organizations, and citizen groups.

REPRESENTATIVE EXPERIENCE

Solar Energy

- Abengoa Mojave Solar Project
- Avenal Energy Power Plant
- Beacon Solar Energy Project
- Blythe Solar Power Project
- Calico Solar Project
- California Flats Solar Project
- Calipatria Solar Farm II
- Carrizo Energy Solar Farm
- Catalina Renewable Energy
- Fink Road Solar Farm
- Genesis Solar Energy Project
- Heber Solar Energy Facility
- Imperial Valley Solar Project
- Ivanpah Solar Electric Generating
- Maricopa Sun Solar Complex
- McCoy Solar Project
- Mt. Signal and Calexico Solar
- Panoche Valley Solar
- San Joaquin Solar I & II
- San Luis Solar Project
- Stateline Solar Project
- Solar Gen II Projects
- SR Solis Oro Loma
- Vestal Solar Facilities
- Victorville 2 Power Project
- Willow Springs Solar

Geothermal Energy

- Casa Diablo IV Geothermal
- East Brawley Geothermal
- Mammoth Pacific 1 Replacement
- Orni 21 Geothermal Project
- Western GeoPower Plant

Wind Energy

- Catalina Renewable Energy
- Ocotillo Wind Energy Project
- SD County Wind Energy
- Searchlight Wind Project
- Shu'luuk Wind Project
- Tres Vaqueros Repowering Project
- Tule Wind Project
- Vasco Winds Relicensing Project

Biomass Facilities

- CA Ethanol Project
- Colusa Biomass Project
- Tracy Green Energy Project

Other Development Projects

- Cal-Am Desalination Project
- Carnegie SVRA Expansion Project
- Lakeview Substation Project
- Monterey Bay Shores Ecoresort
- Phillips 66 Rail Spur
- Valero Benecia Crude By Rail
- Pacheco Dam Expansion Project

Project Management

Mr. Cashen has managed several large-scale wildlife, forestry, and natural resource management projects. Many of the projects have required hiring and training field crews, coordinating with other professionals, and communicating with project stakeholders. Mr. Cashen's experience in study design, data collection, and scientific writing make him an effective project manager, and his background in several different natural resource disciplines enable him to address the many facets of contemporary land management in a cost-effective manner.

REPRESENTATIVE EXPERIENCE

Wildlife Studies

- Peninsular Bighorn Sheep Resource Use and Behavior Study: (*CA State Parks*)
- "KV" Spotted Owl and Northern Goshawk Inventory: (*USFS, Plumas NF*)
- Amphibian Inventory Project: (*USFS, Plumas NF*)
- San Mateo Creek Steelhead Restoration Project: (*Trout Unlimited and CA Coastal Conservancy, Orange County*)
- Delta Meadows State Park Special-Status Species Inventory: (*CA State Parks, Locke*)

Natural Resources Management

- Mather Lake Resource Management Study and Plan – (*Sacramento County*)
- Placer County Vernal Pool Study – (*Placer County*)
- Weidemann Ranch Mitigation Project – (*Toll Brothers, Inc., San Ramon*)
- Ion Communities Biological Resource Assessments – (*Ion Communities, Riverside and San Bernardino Counties*)
- Del Rio Hills Biological Resource Assessment – (*The Wyro Company, Rio Vista*)

Forestry

- Forest Health Improvement Projects – (*CalFire, SD and Riverside Counties*)
- San Diego Bark Beetle Tree Removal Project – (*SDG&E, San Diego Co.*)
- San Diego Bark Beetle Tree Removal Project – (*San Diego County/NRCS*)
- Hillslope Monitoring Project – (*CalFire, throughout California*)

Biological Resources

Mr. Cashen has a diverse background with biological resources. He has conducted comprehensive biological resource assessments, habitat evaluations, species inventories, and scientific peer review. Mr. Cashen has led investigations on several special-status species, including ones focusing on the foothill yellow-legged frog, mountain yellow-legged frog, desert tortoise, steelhead, burrowing owl, California spotted owl, northern goshawk, willow flycatcher, Peninsular bighorn sheep, red panda, and forest carnivores.

REPRESENTATIVE EXPERIENCE

Biological Assessments/Biological Evaluations ("BA/BE")

- Aquatic Species BA/BE – Reliable Power Project (*SFPUC*)
- Terrestrial Species BA/BE – Reliable Power Project (*SFPUC*)
- Management Indicator Species Report – Reliable Power Project (*SFPUC*)
- Migratory Bird Report – Reliable Power Project (*SFPUC*)
- Terrestrial and Aquatic Species BA – Lower Cherry Aqueduct (*SFPUC*)
- Terrestrial and Aquatic Species BE – Lower Cherry Aqueduct (*SFPUC*)
- Terrestrial and Aquatic Species BA/BE – Public Lands Lease Application (*Society for the Conservation of Bighorn Sheep*)
- Terrestrial and Aquatic Species BA/BE – Simon Newman Ranch (*The Nature Conservancy*)
- Draft EIR (Vegetation and Special-Status Plants) - Wildland Fire Resiliency Program (*Midpeninsula Regional Open Space District*)

Avian

- Study design and Lead Investigator - Delta Meadows State Park Special-Status Species Inventory *(CA State Parks: Locke)*
- Study design and lead bird surveyor - Placer County Vernal Pool Study *(Placer County: throughout Placer County)*
- Surveyor - Willow flycatcher habitat mapping *(USFS: Plumas NF)*
- Surveyor - Tolay Creek, Cullinan Ranch, and Guadacanal Village restoration projects *(Ducks Unlimited/USGS: San Pablo Bay)*
- Study design and Lead Investigator - Bird use of restored wetlands research *(Pennsylvania Game Commission: throughout Pennsylvania)*
- Study design and surveyor - Baseline inventory of bird species at a 400-acre site in Napa County *(HCV Associates: Napa)*
- Surveyor - Baseline inventory of bird abundance following diesel spill *(LFR Levine-Fricke: Suisun Bay)*

- Study design and lead bird surveyor - Green Valley Creek Riparian Restoration Site *(City of Fairfield: Fairfield, CA)*
- Surveyor - Burrowing owl relocation and monitoring *(US Navy: Dixon, CA)*
- Surveyor - Pre-construction burrowing owl surveys *(various clients: Livermore, San Ramon, Rio Vista, Napa, Victorville, Imperial County, San Diego County)*
- Surveyor - Backcountry bird inventory *(National Park Service: Eagle, Alaska)*
- Lead surveyor - Tidal salt marsh bird surveys (*Point Reyes Bird Observatory: throughout Bay Area*)
- Surveyor – Pre-construction surveys for nesting birds (*various clients and locations)*

Amphibian

- Crew Leader - Red-legged frog, foothill yellow-legged frog, and mountain yellow-legged frog surveys *(USFS: Plumas NF)*
- Surveyor - Foothill yellow-legged frog surveys *(PG&E: North Fork Feather River)*
- Surveyor - Mountain yellow-legged frog surveys *(El Dorado Irrigation District: Desolation Wilderness)*
- Crew Leader - Bullfrog eradication *(Trout Unlimited: Cleveland NF)*

Fish and Aquatic Resources

- Surveyor - Hardhead minnow and other fish surveys *(USFS: Plumas NF)*
- Surveyor - Weber Creek aquatic habitat mapping (*El Dorado Irrigation District: Placerville, CA*)
- Surveyor - Green Valley Creek aquatic habitat mapping *(City of Fairfield: Fairfield, CA)*
- GPS Specialist - Salmonid spawning habitat mapping *(CDFG: Sacramento River)*
- Surveyor - Fish composition and abundance study (*PG&E: Upper North Fork Feather River and Lake Almanor*)
- Crew Leader - Surveys of steelhead abundance and habitat use *(CA Coastal Conservancy: Gualala River estuary)*
- Crew Leader - Exotic species identification and eradication *(Trout Unlimited: Cleveland NF)*

Mammals

- Principal Investigator – Peninsular bighorn sheep resource use and behavior study (*California State Parks: Freeman Properties*)

- Scientific Advisor –Study on red panda occupancy and abundance in eastern Nepal *(The Red Panda Network: CA and Nepal)*
- Surveyor - Forest carnivore surveys *(University of CA: Tahoe NF)*
- Surveyor - Relocation and monitoring of salt marsh harvest mice and other small mammals *(US Navy: Skagg's Island, CA)*
- Surveyor – Surveys for Monterey dusky-footed woodrat. Relocation of woodrat houses (*Touré Associates: Prunedale*)

Natural Resource Investigations / Multiple Species Studies

- Scientific Review Team Member – Member of the scientific review team assessing the effectiveness of the US Forest Service's implementation of the Herger-Feinstein Quincy Library Group Act.
- Lead Consultant - Baseline biological resource assessments and habitat mapping for CDF management units *(CDF: San Diego, San Bernardino, and Riverside Counties)*
- Biological Resources Expert – Peer review of CEQA/NEPA documents (*various law firms, non-profit organizations, and citizen groups)*
- Lead Consultant - Pre- and post-harvest biological resource assessments of tree removal sites *(SDG&E: San Diego County)*
- Crew Leader - T&E species habitat evaluations for Biological Assessment in support of a steelhead restoration plan *(Trout Unlimited: Cleveland NF)*
- Lead Investigator - Resource Management Study and Plan for Mather Lake Regional Park *(County of Sacramento: Sacramento, CA)*
- Lead Investigator - Biological Resources Assessment for 1,070-acre Alfaro Ranch property *(Yuba County, CA)*
- Lead Investigator - Wildlife Strike Hazard Management Plan *(HCV Associates: Napa)*
- Lead Investigator - Del Rio Hills Biological Resource Assessment *(The Wyro Company: Rio Vista, CA)*
- Lead Investigator – Ion Communities project sites (*Ion Communities: Riverside and San Bernardino Counties*)
- Surveyor – Tahoe Pilot Project: Validation of California's Wildlife Habitat Relationships (CWHR) Model *(University of California: Tahoe NF)*

Forestry

Mr. Cashen has five years of experience working as a consulting forester on projects throughout California. Mr. Cashen has consulted with landowners and timber operators on forest management practices; and he has worked on a variety of forestry tasks including selective tree marking, forest inventory, harvest layout, erosion control, and supervision of logging operations. Mr. Cashen's experience with many different natural resources enable him to provide a holistic approach to forest management, rather than just management of timber resources.

REPRESENTATIVE EXPERIENCE

- Lead Consultant - CalFire fuels treatment projects *(SD and Riverside Counties)*
- Lead Consultant and supervisor of harvest activities – San Diego Gas and Electric Bark Beetle Tree Removal Project *(San Diego)*
- Crew Leader - Hillslope Monitoring Program *(CalFire: throughout California)*
- Consulting Forester – Forest inventories and timber harvest projects *(various clients throughout California)*

PERMITS

U.S. Fish and Wildlife Service Section 10(a)(1)(A) Recovery Permit for the Peninsular bighorn sheep

TEACHING EXPERIENCE

Instructor: Wildlife Management - The Pennsylvania State University, 1998

Teaching Assistant: Ornithology - The Pennsylvania State University, 1996-1997

PUBLICATIONS

Gutiérrez RJ, AS Cheng, DR Becker, S Cashen, et al. 2015. Legislated collaboration in a conservation conflict: a case study of the Quincy Library group in California, USA. Chapter 19 *in*: Redpath SR, et al. (eds). Conflicts in Conservation: Navigating Towards Solutions. Cambridge Univ. Press, Cambridge, UK.

Cheng AS, Gutiérrez RJ, Cashen S, et al. 2016. Is There a Place for Legislating Place-Based Collaborative Forestry Proposals?: Examining the Herger-Feinstein Quincy Library Group Forest Recovery Act Pilot Project. Journal of Forestry 114(4):494-504

Video Comments submitted:

To View, Please visit the following link, videos are at the bottom of the page:

https://www.amadorcounty.gov/Home/Components/Calendar/Event/8614/15?curm=9&cury=2026

Board of Supervisors Agenda Item Report

Submitting Department: Social Services
Meeting Date: November 10, 2026

SUBJECT
Social Services - Resolution Appointing Melissa T. Chavez as Deputy Public Administrator/Guardian/Conservator (PAGC)

Recommendation:
Approval

4/5 vote required:
No

Distribution Instructions:
Email to Julie Hohenberger

ATTACHMENTS
- Memo Appointment of Deputy PAGC.docx
- Amador County PAPGPC Resolution Draft.docx

DEPARTMENT OF SOCIAL SERVICES

10877 Conductor Blvd. Sutter Creek, CA 95685 209-223-6550

Date: October 20, 2026

To: Amador County Board of Supervisors

From: Anne Watts, Director, Amador County Department of Social Services

Re: Request to Appoint Melissa Chavez as Deputy Amador County Public Administrator/Guardian/Conservator

The Amador County Department of Social Services (DSS) requests the adoption of the resolution appointing Melissa Chavez, Deputy Director of Social Services, as Deputy Amador County Public Administrator/ Guardian/ Conservator (PAGC). While Aditra Miller remains the duly appointed Public Administrator/Public Guardian/Public Conservator, the resolution authorizes Melissa Chavez to perform the functions of that office during the appointed officer's absence or unavailability, or as otherwise properly assigned, to ensure continuity of County services.

BEFORE THE BOARD OF SUPERVISORS OF THE COUNTY OF AMADOR, STATE OF CALIFORNIA

IN THE MATTER OF:

RESOLUTION APPOINTING MELISSA T. CHAVEZ AS AMADOR COUNTY DEPUTY PUBLIC ADMINISTRATOR, PUBLIC GUARDIAN/PUBLIC CONSERVATOR

RESOLUTION NO. XX

WHEREAS, Amador County Code Chapter 2.18 establishes and consolidates the offices of Public Administrator and Public Guardian/Conservator, and Section 2.18.030 authorizes the Board of Supervisors to appoint deputy public administrators-public guardians/conservators; and

WHEREAS, the Board of Supervisors appointed Aditra Miller to serve as the County Public Administrator/Public Guardian/Public Conservator by Resolution No. 24-103; and

WHEREAS, the County desires continuity in the administration of public administrator, guardianship, and conservatorship functions during the absence or unavailability of the appointed officer and at other times when authorized and necessary; and

WHEREAS, Melissa T. Chavez serves as Deputy Director of the Amador County Department of Social Services;

THEREFORE, BE IT RESOLVED that the Board of Supervisors of the County of Amador hereby appoints Melissa T. Chavez as Deputy Public Administrator/Public Guardian/Public Conservator, effective November 10, 2026, pursuant to Amador County Code Section 2.18.030, subject to applicable law and any required oath, bond, filing, or other qualification.

BE IT FURTHER RESOLVED that, while Aditra Miller remains the duly appointed Public Administrator/Public Guardian/Public Conservator, Melissa T. Chavez is authorized, within the lawful authority of the deputy office and subject to applicable court orders, to perform the functions of that office during the appointed officer's absence or unavailability, or as otherwise properly assigned, to ensure continuity of County services.

BE IT FURTHER RESOLVED that this appointment does not remove, replace, or otherwise alter Aditra Miller's existing appointment, and shall remain effective until modified or rescinded by the Board of Supervisors, subject to applicable law.

BE IT FURTHER RESOLVED that compensation, bonding, oath and filing requirements, and any authority to execute documents or act in pending court proceedings shall be administered in accordance with applicable law and County policy, as reviewed by County Counsel.

The foregoing resolution was duly passed and adopted by the Board of Supervisors in the County of Amador at a regular meeting thereof, held on the 10th day of November 2026, by the following vote:

AYES:
NOES:

ABSENT:

_____

Patrick Crew, Chairman, Board of Supervisors

ATTEST:

HEATHER PEEK, Clerk of the Board of Supervisors,
Amador County, California

_____

Board of Supervisors Agenda Item Report

Submitting Department: Social Services
Meeting Date: November 10, 2026

SUBJECT
Social Services and Juvenile Probation: Child Welfare System Improvement Plan

Recommendation:
Review and approve the Amador County Child Welfare Services System Improvement Plan.

4/5 vote required:
No

Distribution Instructions:
Email to Julie Hohenberger

ATTACHMENTS

- Memo - Child Welfare System Improvement Plan.pdf
- Amador SIP 2024-2029.pdf
- SIP Signature Page (2).pdf

DEPARTMENT OF SOCIAL SERVICES

10877 Conductor Blvd. Sutter Creek, CA 95685 209-223-6550

Date: November 3, 2026

To: Amador County Board of Supervisors

From: Jennifer Mynderup, Chief Probation Officer, Amador County Probation Department
Anne Watts, Director, Amador County Department of Social Services

Re: Approval of the Amador County Child Welfare Services System Improvement Plan

The purpose of the California Department of Social Services (CDSS) California-Child and Family Services Review (C-CFSR) is to strengthen the accountability system used in California to monitor and to assess the quality of services provided on behalf of children who experience maltreatment and are being served by Child Protective Services (CPS) or Juvenile Probation. The C-CFSR includes a County Self-Assessment followed by the development of a five-year System Improvement Plan (SIP). The System Improvement Plan (SIP) serves as an operational agreement between CDSS, CPS, and Juvenile Probation delineating how the county will improve the system of care for children and families. The SIP is an obligation to implement specific strategies to achieve measurable improvements and is not intended to be Amador County's comprehensive child welfare plan. The SIP is a flexible approach to planning for system change and may be adjusted to address ongoing barriers and challenges to completing strategies. The SIP is updated as necessary, but at least annually.

The Amador County Department of Social Services and Probation Department are requesting that the Board of Supervisors approve the November 2024 to November 2029 SIP. Due to staffing changes, vacancies, and challenges in Amador County, there has been a delay in completing the written plan. The SIP has now been approved by CDSS and is ready for Board of Supervisors approval.

The Amador County Self-Assessment C-CFSR planning team, stakeholders group, and peer review participants identified the priority needs and outcome improvement goals for this SIP. Throughout this five-year process, Amador County CPS and Juvenile Probation will work in collaboration with their community and prevention partners to analyze strengths and needs from prevention through the continuum of care, including reviews of the current levels of performance, strategy completion, procedural and systemic practices, and available resources to maximize services to children and families in Amador County.

The Amador County Self-Assessment C-CFSR team also collaborates with California's Office of Child Abuse Prevention (OCAP) to ensure the continuous improvement of services provided to children receiving Title IV-B and Title IV-E child welfare funded services. The SIP outcome measures, systemic factors, and strategies are integrated with the OCAP funded programs,

including Child Abuse Prevention, Intervention, and Treatment (CAPIT), Community Based Child Abuse Prevention (CBCAP), and Promoting Safe and Stable Families (PSSF). The SIP includes a coordinated service provision plan for how Amador County will utilize these prevention funds to strengthen and to preserve families and to help children find permanent families when they are unable to return to their families of origin.

Amador County Child Protective Services selected the following strategies:

1. Implement progressive family visitation plans
2. Improve internal practices and policies regarding family finding to increase the number of relatives and natural supports engaged to support children
3. Increase collaboration with local Tribal Representatives and enhance Indian Child Welfare Act (ICWA) practices

The goals of these strategies are to decrease the number of children who reenter out of home placement following a return home to a parent or guardian and to strengthen agency collaboration.

Amador County Juvenile Probation selected the following strategies:

1. Expand and utilize alternative sanctions to prevent youth placement in out-of-home care

The goal of this strategy is to promote youth permanency by keeping youth in their homes, limiting exposure to custodial settings, and supporting their continued engagement in school and community environments.

RECOMMENDATION

The Amador County Department of Social Services and the Amador County Probation Department recommend that the Board of Supervisors approve the 2024-2029 Child Welfare Services System Improvement Plan. It is further requested that the Board Chair sign the attached C-CFSR Signature Page for final submission to the California Department of Social Services.

System Improvement Plan

Amador County
November 2024-November 2029

[

CDSS
CALIFORNIA
DEPARTMENT OF
SOCIAL SERVICES

Table of Contents

Introduction 2

SIP Narrative 3

C-CFSR Team 3

Core Representatives ..... **Error! Bookmark not defined.**

Prioritization of Outcomes 8

Prioritization of Direct Service Needs 221

Child Welfare/Probation Placement Initiatives 23

5–Year SIP Chart – Child Welfare and Probation 25

CAPIT/CBCAP/PSSF 38

Program and Evaluation Description 40

CAPIT/CBCAP/PSSF 42

Program and Evaluation Description 43

CAPIT/CBCAP/PSSF 45

Program and Evaluation Description 46

CAPIT/CBCAP/PSSF Expenditure Worksheet 48

Introduction

The California Department of Social Services (CDSS) California-Child and Family Services Review (C-CFSR) process was created to include child protective services, foster care, adoption, family preservation, family support, and independent living.[1] The purpose of the C-CFSR is to significantly strengthen the accountability system used in California to monitor and assess the quality of services provided on behalf of children who experience maltreatment.[2]

As a key component of the C-CFSR process, the five-year System Improvement Plan (SIP) establishes an operational agreement between CDSS, Amador County Child Welfare Services (CWS), and Probation that delineates how the county will improve the system of care for children and families.[3] This process values the principle that preventing child abuse and supporting families is a cost-effective strategy for protecting children, nurturing families, and maximizing the quality of life for California residents.[4]

The 2024 County Self-Assessment (CSA) C-CFSR planning team, stakeholder group, and peer review participants identified the priority needs and outcome improvement goals for this SIP. Throughout this five-year process, Amador County CWS and Probation will work in collaboration with their community and prevention partners to analyze strengths and needs from prevention through the continuum of care, including reviews of the current levels of performance, procedural and systemic practices, and available resources to maximize services to children and families in Amador County.

The C-CFSR team collaborates with the Office of Child Abuse Prevention (OCAP) to ensure the continuous improvement of services provided to children receiving Title IV-B and Title IV-E child welfare funded services. The SIP outcome measures, systemic factors, and strategies will be integrated with OCAP programs, which include Child Abuse Prevention,

[1] Welfare and Institutions Code sections 10605, 10605.1, and 10605.2; Government Code Section 30026.5
[2] All County Information Notice I-16-12
[3] California – Child and Family Service Review 12/21/12 v.8, p. 45
[4] http://calswec.berkeley.edu/peer-quality-case-review

Intervention and Treatment (CAPIT), Community Based Child Abuse Prevention (CBCAP), and Promoting Safe and Stable Families (PSSF) funding and programs.

The SIP is an obligation to implement specific measurable improvements and is not intended to be Amador County's comprehensive child welfare plan. The SIP includes a coordinated service provision plan for how Amador County will use prevention, early intervention, and treatment funds (CAPIT/CBCAP/PSSF) to strengthen and preserve families and help children find permanent families when they cannot return to their families of origin. The SIP is a flexible approach to planning for system change and may be adjusted to address ongoing barriers and challenges to completing strategies. The SIP is updated as needed to document completed activities, reflect changes to the plan, and describe Amador County's successes and barriers in reaching performance goals.

SIP Narrative

C-CFSR TEAM

Per AB 636, the Amador County Department of Social Services, Probation, and the CDSS partnered to plan, conduct, and implement the Amador County Self-Assessment and System Improvement Plan. The core planning team included the 1) Social Service Director (Anne Watts), Program Manager (Michel Habbestad), 2) Probation Chief (Mark Bonini) and Supervisor (James King), 3) CDSS Program and Performance Improvement Consultants (Natasha Melvin) and the Office of Child Abuse and Prevention (George Gomez), and 4) staff from the Integrated Human Services Group who were contracted to serve as consultants, facilitators, and event coordinators.

Small county data can be challenging to navigate, as one or two sibling sets can significantly skew county performance. Still, in recent years Amador County Child Welfare has consistently struggled to meet the national performance in four measures: maltreatment in foster care, recurrence of maltreatment, re-entry to care, and placement stability. The most recent performance is noted in the chart on page 7.

CORE REPRESENTATIVES

As part of the CSA, Amador County sought participation of key community stakeholders to discuss demographics, regional needs and resources, and individual areas of focus related to outcomes for children and families. This was accomplished through several activities, including an Amador County stakeholder meeting on August 19, 2024. The report includes findings from the stakeholder meeting and focus groups throughout. IHSG facilitated the stakeholder meeting, Peer Review, and focus groups. Participants received a presentation on Amador County demographics and outcome data, along with a brief overview of the day's event schedule. Small focus groups were conducted within the stakeholder meeting on a range of pertinent topics: permanency, reentry and reunification, wellbeing and transitional-age youth, recurrence of maltreatment, probation, general strengths, challenges, collaboration, and service array and access to services.

All of the required core participants contributed to the Amador County Self-Assessment. The following attended the stakeholder meeting:

Name	Organization	Job Title
Josie Craig	Valley Mountain Regional	Program Manager
Fara Roberts	Nexus/CASA	Program Manager
Emma Swett	Nexus	Deputy Programs Director
Antionette Del Rio	Foothill Indian Education	Director Indian Education
Gus Leal	Amador Social Services	Eligibility Program Manager
Joanne Hasson	Public Health	Director
Marsha Stone	Public Health	Health Educator
Jamie Hicks	Operation Care	Shelter Coordinator
Gina Whitaker	CAPC and First5	Family Engagement and Child Abuse prevention Coordinator
Renee Day	Superior Court	Judge
Nina Machado	First 5	Executive Director
Jessica Walling	Nexus YFS	FURS
Heidi Galvez	Amador Office of Education	Program Coordinator Foster Youth Services
Sylvia Newlun	Behavioral Health – Mental Health	LMFT
Helene Hyllen	CDSS	Adoptions Specialist
Christy Byrd	Amador CWS	Social Worker Supervisor

Carina Haley	Amador CWS	CWS Social worker
Josue Guerra	CA Tribal TANF Partnership	Manager
Shelbie Byrd	CA Tribal TANF Partnership	Case Manager
Stephanie Mulford	Amador County Unified School District	School Community Outreach Liaison
Tarren Arnold	Amador County Unified School District	School Community Outreach Liaison
Shannon Sutton	Amador Co Social Services/Housing	Housing Program Manager
Jeanne Okumura Harvey	EA Family Services	Supervisor
Jennifer Hansen Silva	EA Family Services	Social Worker
Gladys Bell	FIT ACUSD	Homeless Liaison
Laurel Gamp	Sierra Child Family	Administrator
Lindsey Philpot	CDSS Adoptions	Manager
Mark Bonini	Amador Co Probation	Chief Probation Director
James King	Probation	Supervisor
Anne Watts	HHS Amador County	Director
Mikey Habbestad	HHS, Amador County	Program Manager
Gigi Ferrari	CDSS/OCAP	Consultant
Trang Do	CDSS	Consultant
Natasha Melvin	CDSS	Consultant
George Gomez	CDSS/OCAP	Consultant
Karena Brown	CDSS	Manager
Alissa Sykes	Integrated Human Services Group	Consultant
Rob Doty	Integrated Human Services Group	Consultant

Amador County Department of Social Services remains committed to ensuring the health, safety, and wellbeing of all youth. The Department values community and stakeholder feedback such as that gathered throughout the County Self-Assessment (CSA) and System Improvement Plan (SIP) development beginning in 2024. As reported in the CSA, the process helped to identify several needs and strengths in service provision. The Department has made efforts to include strategies and action steps in this SIP to address these areas as much as possible. Areas that have presented opportunities for growth include:

- A need for consistent Child and Family Team (CFT) implementation for all children and families to ensure all team members are engaged in providing support for the duration of the case, including family- finding efforts that will support a successful permanency plan.

- Improvement in formal collaboration between county agencies.
- Improved employee training, recruitment, and retention to decrease worker burnout and turnover. Specific areas of training needs identified include: Child and Adolescent Needs and Strengths (CANS), family finding and engagement, Child and Family Teaming, state and county policies and procedures.
- Increased use of Safety Organized Practices (SOP).
- A need for improved visitation practices.

Child and Family Services Review (CFSR) statewide data indicators provide Child Welfare Services performance information on states' child safety and permanency outcomes. The statewide data indicators are aggregate measures calculated using information that states report to the Adoption and Foster Care Analysis and Reporting System (AFCARS) and the National Child Abuse and Neglect Data System (NCANDS). An in-depth review of the CFSR data indicators supported the development of the System Improvement Plan focus areas. In addition, this process used SafeMeasures data to support and augment the CFSR statewide data indicators. SafeMeasures is a data system created by Evident Change, formerly the National Council on Crime & Delinquency and Children's Research Center, a nonprofit that uses data and research to improve social systems. SafeMeasures provides real-time analysis of case-specific information in the Child Welfare System Case Management System (CWS/CMS), helping monitor practice outcomes and drill down into critical information for every child and case.

Overall Performance of Outcome Data Measures: Child Welfare

Outcome data measures were extracted from the Center for Social Services Research, School of Social Services, U.C. Berkeley website (Q2 2025).

The following outcome data measures performed *at or above* the national performance for child welfare. Note that most of the federal outcomes have no data for the selected quarter:

Table 1: Child Welfare Performing at or Above the National Performance

Statewide Data Outcomes and Measures	National Performance	County
4-P1 Permanency in 12 Months for Children entering Foster Care	At or above 35.2%	Meets Standard (most recently 40.6%)
4-P2 Permanency in 12 Months for Children in foster care 12 to 23 Months	At or above 43.8%	Meets Standard in four of five years (most recently 54.6%)
4-P3 Permanency in 12 Months for Children in foster care 24 Months or More	At or above 37.3%	Meets Standard in four of five years (most recently 25%)

The following outcome data measures were found to be performing ***below*** the national performance for child welfare:

Table 2: Child Welfare Performing Below National Performance

Statewide Data Outcomes and Measures	National Performance	County
4-S1 Maltreatment in Foster care	No more than 9.07 victimizations per 100,000 days in care	Did not meet the standard in the most recent two of five years (most recently 38.47)
4-S2 Recurrence of Maltreatment	At or below 9.7%	Did not meet the standard in two of five years (most recently 14.5%)
4-P4 Re-Entry to Foster Care in 12 Months	At or below 5.6%	Did not meet standards (most recently 36.4%)
4-P5 Placement Stability	At or below 4.48 moves per 1,000 days in foster care	Did not meet standards in two of five years (most recently 4.59)

Overall Performance of Outcome Data Measures: Probation

Fewer than ten probation youth were placed out of home during this review period, and all data is masked. One record was missing from CWS/CMS, indicating a need for Juvenile Probation training. Still, an "n" so small makes it difficult to identify patterns and trends; probation had no children meet criteria in S1, S2, P4, or P5, and all youth reunified in 12-23

months. Probation performed *at or above* the national performance on all measures except exiting care within the first 12 months.

PRIORITIZATION OF OUTCOMES

Child Welfare Services

A thorough analysis of data related to Safety, Permanency, and Wellbeing was completed as part of the County Self-Assessment (CSA) utilizing Berkeley (UCB) Child Welfare Indicators Project (CCWIP). The CSA Baseline period used is Q2 2024, released in October 2024.

Quarterly data reports are generated by CCWIP, which collects information from the Child Welfare Services/Case Management System (CWS/CMS), California's child welfare administrative data system. The state and federal outcome data are grouped into three categories:

- Safety outcomes measure whether children are, first and foremost, protected from abuse and neglect and are maintained safely in their own homes whenever possible and appropriate.
- Permanency outcomes measure whether children have permanency and stability in their lives and family relationships, and whether children's connections are preserved. Permanency outcomes include reunification measures, adoption measures, measures for children in long-term care, and placement stability and preservation of family relationships.
- Well-being outcomes measure whether children's needs are assessed and addressed and whether child welfare efforts are designed not only to protect children from harm but also to empower families to meet their children's physical, emotional, and developmental needs.

For historical context, Amador County CWS developed four strategies for the 2019-2024 SIP, all consistent with the needs identified in the CSA. Trends that were noted at that time included failed placements and moves for youth; delays, interruptions, and access barriers to mental health services; Intensive Services Foster Care placement supports to create stability; and maltreatment of children in placement; a need for Trauma-Informed Care (TIC) education and

practices (both foster parents and youth reported that caregivers could benefit from trauma-based training); a need for more timely and intensive family finding efforts; improved consistency with both engagement and visitation; and high turnover and vacancy rates in social services staff.

The Department expected that addressing these challenges would improve outcomes for both measures P2 and P3 and meet national performance by the fifth year of the System Improvement Plan.

Strategy 1: Improve Visitation Practices

Strategy 2: Reincorporate Safety Organized Practice (SOP) tools

Strategy 3: Strengthen Child and Family Teams (CFT's) and CFT Meeting Practices

Strategy 4: Improved Training and Support for CWS Staff

The strategies were effective, and Amador County experienced significant progress in both P2 and P3, performing at or above the national performance in four of five years. We are building on these prior successes in our current SIP efforts.

In measures where Amador County did not consistently perform at or above the national level, we did not see a pattern or trend in measures related to safety, permanency, and wellbeing, except for P4, Re-Entry to Foster Care in 12 months. Data show that Amador County consistently underperformed in P4 according to national/statewide standards. As the number of children in out-of-home placement in Amador is small, data can be dramatically impacted or skewed with the entry or exit of just one family system in any given cohort, but Amador saw more than twice the re-entries within twelve months than the national performance.

In addition to peer feedback and qualitative and quantitative evaluation of each measure and family system, Amador plans to begin evaluating cases that did and did not re-enter to help identify root causes of re-entry and inform next steps to identify and expand best practices. Upon initial review, the lack of a progressive expansion of visitation may have hidden underlying challenges to child safety, as the re-entry cases were all a parent returning to use. We believe that developing practice approaches that incorporate progressive visitation and

strengthened Child and Family Teaming throughout the life of the case, as well as improving communication and collaboration with tribal partners beginning at the hotline, will improve outcomes in P4 and most other measures.

Amador County's SIP strategies will leverage CAPIT/CBCAP/PSSF Funds aligned with strategies to prevent re-entry. These funds will be used as noted on the expenditure workbook at the end of this document, specifically:

- PSSF funds support parent education, transportation, and family counseling to promote healthy relationships, improve parenting skills, and increase family coping skills to prevent child abuse and neglect, while also promoting timely family reunification through the Nurturing Parenting Program and Active Parenting of Teens.
- CAPIT funds are used to support home visitation, parenting support during supervised visits, PCIT, and PC-CARE family counseling.
- CBCAP funds are used for parent education, parent leadership training, and transportation

Amador County's three SIP strategies for Child Welfare are:

1. Implement Progressive Visitation Plans: "Develop internal practices and policies regarding progressive visitation."
2. Engaging the Child and Family Team to support progressive visitation, reunification, and case closure: "Improve internal practices and policies regarding family finding to increase the number of relatives and natural supports engaged to support children. "
3. Increase collaboration with local Tribal Representatives and enhance ICWA practices.

Two of these strategies fall under Outcome Measure P4, and one is Systemic Factor E – Agency Collaboration.

Amador County's rationale for selecting the first two strategies is aimed directly at mitigating the additional trauma children and families experience when, for a second time, they are separated from each other, from their cultures, and from their communities, and an acknowledgment that our government services support families for a relatively brief period given the eighteen years of a child's life. Family and natural supports keep children connected

to what they know, remind them they are loved, and help mitigate the impact of foster care while promoting safety with their primary caregiver. The value is that all children can spend as much time with their parents and reunify as soon as possible, with assurances of safety and oversight beyond the Child Welfare agency. In evaluating circumstances that contributed to re-entry, parental return to substance use was the precipitating factor. There are opportunities to approach expanded visits differently to identify and address any worries that may arise without compromising child safety. Anecdotal feedback is that more time in extended (unsupervised) visits as a part of a family's transition prior to formal reunification could have helped to more meaningfully engage natural supports and better assess parent strengths and remaining needs. Navigating this process while the child is still in out-of-home placement would likely still have resulted in successful reunification, shifting what support looked like for parents and ultimately preventing re-entries.

This value and the tools used are trauma-informed and grounded in Safety Organized Practice (SOP), which has positively impacted social worker practice and engagement with support networks. However, more work is needed to identify, locate, notify, and meaningfully engage family systems and natural supports. Identifying family and natural supports from the beginning, when a call comes to the hotline, will strengthen planning during an investigation. When Child Welfare serves families, we often see more professionals in Child and Family Team meetings than natural supports. When the process of identifying and engaging natural supports begins at the hotline and continues through the investigation and case opening, there is an opportunity to convene a robust Child and Family Team meeting and ensure the natural supports can support the family and promote child safety ongoing, thereby decreasing the likelihood of return to foster care. This means ensuring supports understand what safety threats look like and can intervene, that natural supports leave each meeting with tasks they've committed to, and that parents and children have support outside government systems. A robust Child and Family Team also helps decrease the trauma that is inherent to system involvement, decreasing the need for more or higher-level placements and intensive behavioral health services. While expanding Child and Family Teaming processes was part of the prior SIP, it included no components specific to expanding visitations, and there are still opportunities to engage the family's network earlier.

Regarding the third strategy, Amador County wants to continue building its relationship with tribal partners, ensure effective partnership between entities, and ensure service coordination for tribal families is timely and effective. Amador County has already reached out to several tribal partners about participating in the county's System Improvement Plan. Tracy Tripp from the Ione Band of Miwok agreed to participate in virtual meetings with Amador County and CDSS. The Wilton Tribe also wanted to participate but worried about staffing resources and its ability to participate consistently. Amador County leadership has not yet heard back from the California Valley Miwok Tribe but continues to work toward improved partnership with this tribe as well. Amador County has already engaged CDSS' Office of Tribal Affairs to partner in this work and continue improving partnerships with the County, building on efforts driven by AB2083.

The following is a description of the action steps that CWS has identified for each strategy outlined for each target improvement goal.

<u>Outcome Measure: P4 – Re-entry to Foster Care</u>

Strategy 1: Implement progressive visitation plans.

Outcome data measures for P4, extracted from the Center for Social Services Research, School of Social Services, U.C. Berkeley website, indicate that children who exited foster care returned within 12 months at a rate below the national average. A closer look at this shows a pattern of abrupt returns without gradual transitions that allow parents to slowly assume more responsibility. A slower transition would allow parents to identify triggers and other parenting struggles, address these challenges, and increase the likelihood of continued recovery. Without a rich array of natural supports, people who can both help with parenting responsibilities and also support parent sobriety, there is an increased likelihood of returning to foster care due to parent return to drug use.

In addition to reviewing current practices, peer feedback has been considered, and it is evident that improved progressive visitation practices are necessary to support successful reunification. By evaluating local family systems that did and did not return to foster care, Amador County can identify internal best practices and areas for growth.

- By evaluating other counties' progressive visitation plans, Amador County can create criteria to consider, propose transition timeframes, and ensure children remain safe while spending more time with their parents.
- Documenting these practices and training staff will ensure consistency and allow the county to continue evaluating outcomes and making modifications as needed.
- Building a larger Child and Family Team with more natural supports will help safely expand visitation, support reunification, and decrease the likelihood of re-entry. The county has contracted with a community-based organization to facilitate Child and Family Team Meetings, with the goal of shifting that responsibility away from case-carrying staff and allowing more flexibility/timeliness in holding these CFTMs. Ensuring there is timely and accurate communication between Behavioral Health and Child Welfare will decrease the likelihood of expanding visitation or reunifying children to families who continue to abuse substances.

Clear understanding and active partnership, with providers' buy-in for this shift, will help ensure it is applied consistently.

Action Steps:

- Analyze current practices that help prevent re-entry to foster care, review trauma-informed practices, and assess the short- and long-term impact on family systems when they re-enter. This feedback will be used to inform the Progressive Visitation Plans Policy and Procedure.
- Research progressive visitation plans used by other counties
- Create an Amador County Policy and Procedure for progressive visitation plans that include best practices grounded in the CFT process.

- Train CWS staff on the Policy and Procedure, and collect pre- and post-training feedback to assess their understanding and perceived skill in developing progressive visitation plans.
- Develop forms to audit court reports and case files, and track trainings for progressive visitation, with manager oversight.
- Ensure CFTs have robust natural supports, that they understand their role in the team and case plan goals, and teach the CFT how to manage meetings, address safety, and support the family system when visits expand and children reunify.
- Improve communication between CWS and Behavioral Health for shared clients in substance abuse disorder treatment to ensure information is shared timely and completely.

Evaluation Methods:

- Monitor development and implementation of progressive visitation plans by review of case notes, court reports, and CFTM notes. If plans are not identified per the Policy and Procedure, supervisors will coach social work staff to develop transitions that expand parent responsibilities without sacrificing child safety.
- Monitor the number of youth with active progressive visitation plans.
- Monitor the number of additional natural supports involved in supporting youth, parents, and caregivers in progressive visitation plans. The role of natural supports in progressive visitation plans will be clearly detailed, and we will track data for both timely permanency and re-entry. While increasing natural support and developing progressive visitation plans does not guarantee re-entry will be avoided, we believe it will significantly reduce the likelihood of re-entry. If children re-enter in the future, a retrospective evaluation of the role of natural supports can help inform alternative approaches in future cases to support permanency.
- Monitor re-entry rates, and determine if the presence or absence of progressive visitation plans has impacted permanency

Strategy 2: Improve internal practices and policies regarding family finding to increase the number of relatives and natural supports engaged to support children.

- Engagement and Teaming are foundational elements for both Safety Organized Practice and the Integrated Core Practice Model. Because families' time in formal systems is relatively brief, building natural networks of support will help preserve important relationships and culture and increase the likelihood that children can return to their parents and stay there safely.
- Once CDSS fully implements required processes to support CFTM and IP-CANS fidelity, staff will be trained, and the policy will be revisited annually, more frequently if staff bring recommendations for additional upgrades or the county identifies a gap in the new process.
- Leaning into improvement plans from the County Practice and Improvement Plan to bring CFTM and IP-CANS processes to fidelity will further bolster this practice.
- Natural supports and Tribal partners will be encouraged to contribute to family goals and assume specific roles to support child safety and successful reunification, and ensure they understand the safety threats, areas of worry, and short- and long-term goals. In alignment with Amador County's County Performance and Improvement Plan, brochures will be provided to children, families, and their natural supports that outline the CFT purpose, CFT meeting process, and the value of teaming. The CFT meeting action plan will capture the roles of natural supports.
- In addition to the CDSS-required survey, Amador County will solicit additional feedback to assess family and natural supports' perceptions of engagement and value in supporting the family system through the CDSS CFTM survey. Data will be reviewed quarterly for general process and fidelity measures and used to provide staff with feedback on what's working well and where families' experiences may reflect opportunities for growth.

- CWS leadership will develop opportunities to review case files, court reports, and case plans to ensure relatives and natural supports are identified at the hotline and engaged as early as possible in the referral assessment.

Action Steps:

- Revise procedures to include best practices beyond the legal requirements of Family Finding, Engagement and Support, including bolstering inquiries to identify natural supports at the hotline and during the investigation, and engaging the Team in active roles to support child safety and family stability.
- Revise procedures for Safety Planning.
- Train staff on both enhancements (to FFES and Safety Planning).
- Ensure natural supports are invited to participate in CFTMs, understand their role in the team and case plan goals, and understand short- and long-term outcomes for families, including after-care plans. This will occur through engagement during the referral assessment process, sharing relevant brochures and other information with each participant in the CFT, and ensuring families and their supports experience the process as family-driven and meaningful, not perfunctory. This will be driven by creative strategies and approaches to ensure that engagement is possible regardless of geography or scheduling conflict. While in-person CFTMs are preferred, virtual options will be offered to decrease barriers to participation.
- Offer the CDSS CFTM survey to all attendees and encourage them to complete the survey. If technology is a barrier, CWS will consider providing a device for use immediately after concluding the CFT meeting. If the information gleaned from those surveys lacks the detail the county needs to support continued upgrades, Amador will develop a survey for family/natural supports.
- Tracking resources to identify family-specific engagement will support case reviews, and Amador will implement the CFT Meeting Observation Tool.

Evaluation Methods:

- Monitor the number of natural supports involved in supporting youth, parents, and caregivers in progressive visitation plans via an internal tracking document.
- Monitor feedback from CFTM participants to ensure they experience engagement and additional value in their role in the CFT via CFTM survey and, if needed, offer additional opportunities for participants to give feedback.
- Monitor identification and engagement of natural supports in referrals, case notes, court reports, and CFTM notes.
- Monitor identification of roles and responsibilities of natural supports in CFTM notes and Action Plans.
- Monitor re-entry rates and determine if the presence or absence of expanded natural supports in teaming impacted permanency. Data will be reviewed quarterly. For all families who re-entered, a deep-dive case review form will be developed to evaluate various aspects of social worker compliance, engagement, and the empowerment of families and their supports.

Systemic Factor: Agency Collaboration

Strategy 3: Increase collaboration with local Tribal Representatives and enhance ICWA practices.

Action Steps:

- Establish and conduct Quarterly Meetings with child welfare leadership and local Tribal representatives to increase collaboration around ICWA cases, policies, and procedures.
- Create a Tribal contact and communication sheet to help verify Tribal enrollment status and/or when working with Tribal social workers. Child Welfare staff participate in annual ICWA training. Revise and maintain processes for monitoring compliance with ICWA policies and procedures.
- Develop a written agreement and/or MOU between local Tribes and Child Welfare addressing agency collaboration, including processes related to communication, joint assessments, Tribally Approved homes, and data sharing. Monitor and evaluate strategy implementation via case review or court reports, contact notes, and CFTM survey data. Data will be reviewed at quarterly

meetings with tribal partners, and additional information will be solicited at that time to ensure any thoughts or feedback are captured. These components will inform future staff training needs.

Evaluation Methods:

- Monitor development of MOUs, communication sheets, and formal meeting schedules.
- Monitor participation in and stated understanding of CWS staff in ICWA requirements.
- Monitor casework of staff in ICWA cases, including court reports, contact notes, and CFTM notes to ensure laws are followed, Tribal partners are actively included in conversations, and driving decision-making.
- Solicit feedback from Tribal representatives at least quarterly, more frequently if the tribe prefers, and incorporate feedback to upgrade existing practices.

Although Probation's data reflects performance on par with national performance, the self-assessment process revealed that documentation is challenging given the small number of youth whose information and casework must also be managed in CWS/CMS, and that probation cases would benefit from more alternatives to address technical violations. Currently, consequences for youth violations of probation terms and conditions are standard. Even when violations are technical or minimal and not a threat to the community, sanctions are applied as standard and can have unintended consequences that reduce youth stability, permanency, and wellbeing. When youth violate the terms and conditions of probation, the current process is to evaluate the severity of the violation, identify available resources to address the behavior, review the history of supervision, and to staff the case with a supervisor to determine the appropriate response. The Probation Department makes all efforts to avoid detention/removal unless there is a clear pattern of dangerous or uncontrollable behavior.

Amador County Probation believes that a broader array of pro-social and employment opportunities, and not imposing blanket consequences for a technical violation as they would for an offense that risks public safety, will support youth as a whole and specifically decrease entry to care. This approach builds on what Amador County identified in its prior System

Improvement Plan (2019-2024), and probation officers will continue to strengthen collaborative efforts across the community to support youth and improve outcomes.

The following is a description of the action steps that Probation has identified for each strategy outlined for each target improvement goal.

Systemic Factor F: Service Array

Strategy 1: Expand access to alternative sanctions.

- By evaluating current resources, Amador County Juvenile Probation can provide officers with a comprehensive list and identify any gaps.
- Helping officers and court partners understand the impact of current sanction practices and current goals of the Probation Department will help ensure alignment and enable this collective to continue to build a broader array of resources and ensure that the sanctions are appropriate to the violation
- Explore additional partnerships with new community providers to increase the array of approved alternative sanction options
- Advocating for local funding or identifying grant resources as needed to support development and maintenance of alternatives will support sustainability of these options.
- Develop and train officers on a policy and procedure for using alternative sanctions, including eligibility criteria and the referral process.
- Creating a quick-reference guide will help streamline referrals or connections to alternative sanctions and help track youth outcomes longitudinally.
- There are also opportunities to work more "upstream," so evaluating probation processes as a whole to maximize connection to resources that could prevent out-of-home placement is key. Parent protective factors and the domains of the IP-CANS will be assessed to support earlier intervention and identify themes in youth coming to probation's attention to develop prevention services for younger children.
- The hope is that engaging in pro-social activities will help youth feel valued and supported and see opportunities to make other connections and choices.

- A monthly review of custody recommendations, as well as the use of alternative sanctions, will help identify opportunities for additional staff training or a need to develop additional community resources.
- School attendance and other home factors will also be evaluated to ensure youth have a broad range of support, that strengths can be identified, and that the whole youth will be served, not just what appears directly related to the offense.

Action Steps:

- Conduct an inventory of current community-based programs and services.
- Develop a workgroup of probation officers and court partners to explore, assess the viability of, and expand alternative sanctions and the use of pro-social activities. Convene quarterly to develop and evaluate resources and the impact of alternative sanctions.
- Expand access to existing community service providers and programs to support alternative sanctions by developing MOUs and developing/expanding contracts, as well as seeking organic connections between community needs and youth needs.
- Create a Policy and Procedure for using alternative sanctions, including eligibility criteria and referral processes, plus quick-reference guides or digital dashboards to streamline referrals. Included in this will be increasing the frequency of CFTMs beyond the minimum requirement, providing orientation brochures to support engagement and understanding of the process, as well as surveys to gather
- feedback from participants, and review of all CFTM Action Plans.
- Train Probation officers on Policy and Procedures.
- Monitoring/Evaluation-Review all custody recommendations monthly to track use of alternative sanctions.
- Monitor school attendance and home stability indicators to ensure youth remain connected to positive supports.
- Track outcomes longitudinally; were youth with alternative sanctions placed in out-of-home care after 6 and 12 months?
- Revamp processes and increase community-based resources to prevent youth from requiring out-of-home placement by identifying community opportunities for pro-

social activities through private employers and other county programs, and using the "snowball effect" to identify additional resources.

- Probation officers will promote pro-social activities to build positive community engagement and help prevent entry into care.
- Hold case consultation meetings with officers to identify youth who could safely be diverted from custody

Evaluation Methods:

- Monitor the number and variety of alternative sanction programs available.
- Monitor changes in resources and any funding needs.
- Monitor the number of officers trained and actively using alternative sanctions through staff feedback, court reports, contact notes, and CFTM notes to ensure sanctions are congruent with the infraction and do not create unintended consequences.
- Monitor the number of youth diverted from custody due to alternative sanctions
- Monitor the overall number of custody admissions for technical violations or minor offenses.
- Monitor youth school attendance and other home stability factors following the use of alternative sanctions.
- Monitor feedback from youth and families on the effectiveness and accessibility of alternative sanction options.

PRIORITIZATION OF DIRECT SERVICE NEEDS

Amador County participates in a competitive Request for Proposal (RFP) process to select and fund CAPIT, CBCAP, and PSSF resources. This RFP is open to all community-based organizations, for-profit and non-profit agencies that provide services to children and their families. All guidelines are in line with State and Federal procurement guidelines. All proposals are reviewed by an Evaluation Committee. The Evaluation Committee may be composed of County staff and other parties that have expertise or experience in child abuse prevention, intervention, and treatment services.

The Amador County Department of Social Services is designated as the lead agency responsible for administering CBCAP, CAPIT, and PSSF funds and providing oversight. Amador County Department of Social Services provides the following program oversight:

- Data collection
- Program outcome evaluations
- Fiscal compliance
- Compliance with completion and submission of required monthly, quarterly, and annual reports

The CAPIT/CBCAP/PSSF Service Provision Plan

An Expenditure Workbook for the CAPIT/CBCAP/PSSF service provision has been attached to this report. The workbook identifies how funds will be expended for programs/services/activities within Amador County that are allowable under each funding source for the five-year period.

CAPIT/CBCAP/PSSF Program and Evaluation Description

The templates for the CAPIT/CBCAP/PSSF are attached to this report. These templates were designed to describe the programs selected and the program evaluation needed to ensure compliance with state and federal requirements. The templates are included for the following programs/services/activities:

PSSF funds support parent education, transportation, and family counseling to promote healthy relationships, improve parenting skills, and increase coping skills within the family to prevent child abuse and neglect, while also promoting timely family reunification through the Nurturing Parenting Program and Active Parenting of Teens.

CAPIT funds are used to support home visitation, parenting support during supervised visits, PCIT, and PC-CARE family counseling.

CBCAP funds support parent education, parent leadership training, and transportation.

Agencies currently providing services funded by CBCAP, CAPIT, and PSSF know which regions in the community need to be targeted. The central offices are located in Jackson. Outreach efforts are and will continue to be made in outlying areas of the community,

specifically through the home visiting program, which brings parenting education and support services to the home. Also, the agency will assist with arranging transportation to and from these regions of the County.

Child Welfare/Probation Placement Initiatives

State and Federal Mandates

CWS has implemented promising practices that contribute to the successful achievement of improving outcomes for children and families in Amador County. Some successes and promising practices include:

ICPM Training

All County Letter No. 20-72, the 2018 PIP, contains seven goals designed to improve the safety, permanency, and wellbeing of children and families involved with California's child welfare system. Goal 5 of the PIP addressed the need to strengthen ongoing educational and training opportunities for staff and supervisors working in the child welfare system. The CDSS MPP Section 14-611.5 required 40 hours of continuing training to be completed every two years. Amendments modified that requirement to 20 hours of continuing training annually. Six of those hours must be related to and reflective of a specific practice element of the ICPM designated for that fiscal year by the CDSS, in partnership with stakeholders. The ICPM practice elements are: Foundation, Assessment, Engagement, Teaming, Service Planning and Delivery, and Transition. For the 2020-2021 fiscal year, the practice element selected is Service Planning and Delivery, and CWS staff have completed required training.

Safety Organized Practice

Safety Organized Practice (SOP) has positively impacted social worker practice and engagement with support networks. However, more work is needed to meaningfully engage natural supports, promote placement with relatives, and strengthen connections for youth and families navigating the Child Welfare and Probation systems.

Child Family Teams (CFTs) are an integral part of the Safety Organized Practice

Framework. SOPs are child welfare approaches focused on the child's safety within the family system. The SOP methodology draws on a variety of best- and evidence-informed practices, including group supervision, Signs of Safety, Motivational Interviewing, and solution-focused treatment. Safety Organized Practice (SOP) provides a common language and framework to strengthen critical thinking and judgment for everyone involved in a family, supporting a balanced, complete picture of child welfare issues.[5]

Kin-First Culture

A kin-first culture is a national best practice, and one component is placing youth with kin, including relatives and natural supports. Building on this is expanding the Child and Family Team to ensure there are robust natural supports engaged in decision-making and ongoing connections with youth during and beyond their open case with Child Welfare or Probation.

[55] https://humanservices.ucdavis.edu/sites/default/files/142198_1.pdf

Five-Year SIP CHART – CHILD WELFARE

Priority Outcome Measure or Systemic Factor: P-4 – Foster Care Re-Entry

National Standard: at or below 5.6%

CSA Baseline Performance:

The current rate of P-4 (re-entry to foster care) is 10% which does not meet the national performance.

Parents spend time with their children in foster care, but there is no structured methodology to evaluate safety, or support a progressive increase in time together and decrease to the level of supervision.

Target Improvement Goal: Develop internal practices and policies regarding progressive visitation, resulting in visitation and reunification plans that promote child safety.

Priority Outcome Measure or Systemic Factor: P-4 – Foster Care Re-Entry

National Standard: at or below 5.6%

CSA Baseline Performance:

The current rate of P-4 (re-entry to foster care) is 10%, which does not meet the national performance.

Child and Family Team meetings are coordinated as required, but there are barriers to timeliness, there is no Policy and Procedure, mechanism to audit, or specific training that staff have had available to support exceeding the basic requirements around Child and Family Teaming to improve engagement and create a wider safety net to support expanded visitation practices and the reunification process.

Target Improvement Goal: Improve internal practices and policies regarding family finding, resulting in an increase in the number of relatives and natural supports that are engaged to support children.

Target Improvement Goal: Improve internal practices and policies regarding family finding, resulting in an increase in the number of relatives that are engaged to support children.

- Year 1: remained at Baseline. Approval of the County Self-Assessment and development of this System Improvement Plan did not meet timelines, and the process overall has been delayed and complicated by changes in staffing and leadership.
- Year 2: CWS will research and develop a structure to methodically move families through the visitation array, and work with system partners to reduce barriers to ROIs and ensure they are building a CFT within the first 30 days of placement; given the data lag there may be no discernable change in performance.
- Year 3: CWS will train staff on progressive visitation plans and begin implementing progressive visitation and the goal is to decrease re-entry to less than 7.5%.
- Year 4: CWS will expand Child and Family Team Meetings to specifically create a community-based team to support family systems, so children remain safe and visitation does not expand beyond what is appropriate. Amador hopes to see re-entry continue to decrease below 6%.
- Year 5: CWS and Juvenile Probation family finding efforts will expand to include inquiries during all calls to the hotline, all assigned investigations, and will include natural supports in CFTMs prior to referral closure. Amador's goal is to be at or less than the national standard for re-entry.

Priority Outcome Measure or Systemic Factor: Systemic Factor E – Agency Collaboration

National Standard: N/A

CSA Baseline Performance: Collaboration with tribal partners and compliance with the Indian Child Welfare Act occurs, but there are opportunities to strengthen relationships, formalize processes and partnerships in placement and other tasks, and steps are necessary to ensure all staff comply with the Indian Child Welfare Act from receipt of the referral through closure of the family's case

Target Improvement Goal:

- Year 1: remained at Baseline. Approval of the County Self-Assessment and development of this System Improvement Plan did not meet timelines, and the process overall has been delayed and complicated by changes in staffing and leadership.
- Year 2: CWS will work with tribal partners to increase scheduled meetings and train staff in the ICWA.
- Year 3: CWS will amend the 2083 MOU and/or develop a separate MOU with tribes
- Year 4: CWS will increase compliance with ICWA and developed procedures and processes to support tribal youth and partner with tribes 75% of the time.

Strategy 1: Implement progressive visitation plans.	☐ CAPIT ☐ CBCAP ☐ PSSF N/A	Applicable Outcome Measure: P-4 – Re-Entry to Foster Care ☐ Title IV-E Child Welfare Waiver Demonstration Capped Allocation Project	
Action Steps:	Implementation Date:	Completion Date:	Person Responsible:
A. Ensure CFTs have robust natural supports, that they understand their role in the team and case plan goals, and teach the CFT how to manage meetings, address safety, and support the family system when visits expand and children reunify.	July 2026	October 2026	Supervisors Social Workers
B. Improve communication between CWS and Behavioral Health for shared clients in substance abuse disorder treatment to ensure information about progress and relapse is shared timely and completely.	July 2026	November 2028	Program Manager Supervisors Social Workers
C. Conduct a SWOT analysis with staff of current practices that help prevent re-entry to foster care, review trauma-informed practices and the short- and long-term impact on family systems when they re-enter.	August 2026	December 2026	Program Manager Supervisors Analyst

D. Research progressive visitation plans used by other counties	August 2026	October 2026	Analyst
E. Create a Policy and Procedure for progressive visitation plans that include best practices grounded in the CFT process.	October2026	January2027	Analyst Program Manager
F. Train Child Welfare staff on the Policy and Procedure and collect their feedback pre-and post-training to ascertain their level of understanding and perception of skill to develop progressive visitation plans	January 2027	May 2027	Analyst Program Manager
G. Develop forms to audit court reports, case files, and track trainings for progressive visitation.	May 2027	July 2027	Analyst Program Manager

Strategy 2: Improve internal practices and policies regarding family finding to increase the number of relatives and natural supports engaged to support children	☐ CAPIT ☐ CBCAP ☐ PSSF ☒ N/A	Applicable Outcome Measure: P4 – Re-Entry to Foster Care ☐ Title IV-E Child Welfare Waiver Demonstration Capped Allocation Project	
Action Steps:	Implementation Date:	Completion Date:	Person Responsible:
A. Modify existing tracking resources to identify family-specific engagement will be employed to support case reviews, and Amador will implement the use of the FT Meeting Observation Tool	January 2027	March 2027	Analyst
B. Ensure natural supports are invited to participate in CFTMs, that they understand their role in the team and case plan goals, specifically short- and long-term outcomes for families, including after-care plans	January 2027	October 2027	Supervisors Social Workers
C. Revise Procedures for Safety Planning.	July 2027	October 2027	Analyst
D. Offer the CDSS CFTM survey to all attendees and encourage them to complete the survey. If technology is a barrier, CWS will consider availing a device for use immediately concluding the CFT meeting. If the information gleaned lacks detail needed by the county to support continued upgrades, Amador will develop a survey for family/natural supports who participate in CFTMs	July 2027	December 2027	Analyst

to assess their perceptions of engagement, being a valuable part of the process. This survey can be upgraded based on feedback to ensure Amador County is asking the correct questions.			
E. Train Child Welfare staff on both enhancements and collect their feedback pre-and post-training to ascertain their level of understanding and perception of skill.	November 2027	December 2027	Analyst
G. Ensure identification of and contact with kin and natural connections documented in the case plan, including their roles and commitments they have made to support the child and family system.	March 2028	November 2028	Social Workers Supervisors
I. Social worker supervisor and probation supervisor will audit participation of kin and natural supports in CFTMs and case plans and assess staff feelings of competence in this best practice quarterly.	April 2028	November 2028	Supervisors

Strategy 3: Increase collaboration with local Tribal Representatives and enhance ICWA practices	☐ CAPIT ☐ CBCAP ☐ PSSF ☒ N/A	Applicable Systemic Factor: G - Agency Collaboration ☐ Title IV-E Child Welfare Waiver Demonstration Capped Allocation Project	
Action Steps:	Implementation Date:	Completion Date:	Person Responsible:

A. Establish and conduct Quarterly Meetings with child welfare leadership and local Tribal representatives to increase collaboration around ICWA cases, policies, and procedures.	September 2026	January 2027	Program Manager Supervisors Social Workers
B. Create a Tribal contact and communication sheet to assist with verifying Tribal enrollment status and/or when working with Tribal social workers.	January 2027	June 2027	Program Manager
C. Child Welfare staff participate in annual ICWA training.	January 2027	December 2027	Program Manager Supervisors Social Workers
D. Revise and maintain processes for monitoring compliance with ICWA policies and procedures.	April 2027	April 2028	Supervisors Tribal Government
F. Develop a written agreement and/or MOU between local Tribes and Child Welfare addressing agency collaboration, including processes related to communication, joint assessments, Tribally Approved homes, and data sharing.	January 2028	July 2029	Program Manager Director Tribal Government

G. Monitor and evaluate strategy implementation.	January 2028	December 2028	Program Manager Tribal Government

Five-Year SIP CHART – PROBATION

Priority Outcome Measure or Systemic Factor: Systemic Factor F – Service Array

National Standard: N/A

CSA Baseline Performance: There is no Policy and Procedure, mechanism to audit, or specific training that staff have had available to support alternative sanctions for technical violations. Consequences for violations of the terms and conditions of probation for youth are standard. At times, the violations are technical or minimal and not a threat to the community, yet the sanctions can have unintended consequences that decrease youth stability, permanency, and wellbeing. When youth violate the terms and conditions of probation, the current process is to evaluate the severity of the violation, identify available resources to address the behavior, review the history of supervision, and to staff the case with a supervisor to determine the appropriate response. The Probation Department makes all efforts to avoid detention/removal unless there is a clear pattern of dangerous or uncontrollable behavior.

Target Improvement Goal: Increase the availability, accessibility, and consistent utilization of alternative sanctions within the probation process to promote youth permanency by keeping youth in their homes, limiting exposure to custodial settings, and supporting their continued engagement in school and community environments.

- Year 1: remained at Baseline. The County Self-Assessment process was delayed, and development of this System Improvement Plan did not meet timelines.
- Year 2: Juvenile Probation will map existing resources, engage partners in willingness to shift how sanctions are approached, and identify/develop community-based alternatives to sanctions.
- Year 3: Juvenile Probation will develop Policy and Procedures and train officers on alternative sanctions. Officers will begin employing alternatives.
- Year 4: Juvenile Probation will continue to employ alternative sanctions and see improvements to youth permanency and wellbeing without negative impacts to community safety.
- Year 5: Juvenile Probation will continue to employ these alternatives and evaluate immediate and one-year outcomes ongoing.

Strategy 1: Expand and utilize alternative sanctions to prevent youth placement in out-of-home care.	☐ CAPIT ☐ CBCAP ☐ PSSF	Applicable Systemic Factor: F – Service Array	
	N/A	☐ Title IV-E Child Welfare Waiver Demonstration Capped Allocation Project	
Action Steps:	Implementation Date:	Completion Date:	Person Responsible:
A**.** Conduct an inventory of current community-based programs and services.	July 2026	July 2026	Probation Supervisor
B. Develop a workgroup consisting of probation officers and court partners on the exploration, viability, and expansion of alternative sanctions and the use of pro-social activities.	July 2026	November 2028	Probation Supervisor
C. Expand access to existing community service providers and programs to support alternative sanctions by developing MOUs and developing/expanding contracts.	July 2026	January 2027	Probation Supervisor
D. Create Policy and Procedure regarding the use of alternative sanctions, including eligibility criteria and referral processes and quick-reference guides or digital dashboards to streamline the referral process.	July 2027	December 2027	Probation Supervisor

E. Train probation officers on the Policy and Procedures.	January 2028	April 2028	Probation Supervisor
G. Revamp processes and increase community-based resources that will prevent youth from requiring out-of-home placement by identifying community opportunities for pro-social activities through private employers, other county programs, and using the "snowball effect" use existing/new resources to identify additional resources.	January 2027	November 2029	Probation Supervisor
F. Monitoring/Evaluation-Review all custody recommendations monthly to track use of alternative sanctions. Monitor school attendance and home stability indicators to ensure youth remain connected to positive supports. Track outcomes longitudinally; were youth with alternative sanctions placed in out-of-home care after 6- and 12-months?	April 2028	November 2028	Probation Supervisor
H. Probation officers will promote pro-social activities as a way to build positive community engagement, to help prevent entry into care.	September 2028	July 2029	Probation Supervisor Probation Officers

I. Hold case consultation meetings with officers to identify youth who could safety be diverted from custody	September 2028	July 2029	Probation Supervisor

CAPIT/CBCAP/PSSF
Program and Evaluation Description

Program Description

Program Name

Parent Education - Parenting with a Purpose (Expenditure Workbook Line 1)

Service Provider

Nexus Youth & Family Services (Nexus)

Program Description

The service provider offers a series of instructional, interactive parenting classes utilizing the evidence-based Nurturing Parenting Program curriculum. The classes are separated into three program offerings to serve families with children of varying ages. Each quarter, the Parent Educator facilitates a seven-week (14-hour) Parenting with a Purpose parenting basics course for all families. In addition, the Parent Educator offers three full-day (8-hour) group Practical Parenting courses. Each group course is designed for families with children in the following age groups: 0 to 5; 6 to 12; and 13 to 18. Each participating family receives a minimum of 20 hours of instruction and guidance that is appropriate and practical for their individual progressive level or stage. Child care is offered to families who attend parenting classes. Staff also use the Nurturing Parenting Program curriculum when planning child care and socialization activities. Staff offer the parenting instruction in both in-person and virtual formats. For participants who choose the distance learning option, staff provide written materials and a Zoom link to connect directly to live class sessions. Nexus also implements a tablet lending library so clients can check out a device, if needed, to use at home to log in to weekly sessions. Services are provided in English and Spanish. Outreach for parenting classes is conducted county-wide by sharing promotional information through email lists, radio announcements, social media, Parent Advisory Council activities, and community outreach events. Partner agencies provide referrals for services, and families self-refer as well.

During parenting classes, participants learn effective strategies for positive parenting, daily routines, child safety, nutrition, and the importance of play, as well as child development fundamentals and appropriate expectations. Courses include the following instructional themes: increased self-awareness; positive concept/self-esteem and levels of empathy; alternatives to hitting and yelling; enhanced family communication and awareness of needs; replacing abusive behaviors with nurturing behaviors; physical and emotional development; appropriate role and developmental expectations; building on parental strengths; and problem-solving skills. The Parent Educator also provides the Nurturing Fathers Program as a supplemental resource to help participants develop attitudes and skills for male nurturance, and integrates content and materials from Nurturing Parenting Program: Working with Families with Special Needs and Health Challenges into parenting lessons to better support families facing complex and unique situations. In addition, participants access podcasts, online workshops, and supplemental video instruction, including Nutrition Education; How to Be a Better Co-Parent; and Positive Parenting Strategies for the Teenage Years. They also view wellness workshop videos on the Nexus YouTube channel.

Program participants also receive information, referral services, and assistance obtaining community

resources, including linkages to early health and development programs so families can secure appropriate intervention for their children. During class, parents of children ages 0-5 receive ASQ-3 and ASQ:SE-2 screenings to monitor their child's developmental, behavioral, and socio-emotional growth, celebrate milestones, identify possible delays or concerns, and access needed resources. Families also receive student support services to help children reduce behavioral and disciplinary challenges and increase school attendance and academic performance.

In addition, parents are connected to domestic violence and family safety services, alcohol-drug resistance and treatment programs, therapeutic counseling, and anger management classes as necessary.

Program participants are invited and encouraged to participate in the volunteer Nexus Parent Advisory Council. The Parent Educator recruits local parents and caregivers to serve on the Council and advise the agency on matters related to child abuse prevention programming, including sharing their expertise, insights, experiences, and cultural perspectives; providing input and knowledge regarding needs and disparities in access to resources; identifying gaps and assessing the impact of services; as well as assisting with program outreach. The Council provides invaluable feedback and recommendations to help guide program planning and implementation. The group meets quarterly and is comprised of parents and caregivers who represent our local community, such as parents of children with disabilities, parents with disabilities, racial and ethnic minorities, and members of underrepresented and underserved groups, including those previously involved in the child welfare system. Working collaboratively with members of the Council, staff are able to gain a fundamental perspective on how to best address program opportunities and challenges, obtain thoughtful, reflective suggestions for effective service implementation, receive innovative ideas to improve service delivery, and build an expert team to improve outreach mechanisms and broaden community awareness of resources. To support Council members' personal growth and development, ensure parents are prepared to serve on the Council, and promote the Council's relevance, effectiveness, and overall functioning, Nexus implements a comprehensive parent leadership training plan.

Transportation assistance is offered to program participants to attend in-person parenting classes and other support services.

FUNDING SOURCES

SOURCE	LIST FUNDED ACTIVITIES
CAPIT	
CBCAP	parent education, parent leadership training,
PSSF Family Preservation	parent education
PSSF Family Support	parent education
PSSF Family Reunification	
PSSF Adoption Promotion and Support	parent education
OTHER Source(s): Amador County Behavioral Health	ancillary wellness workshops and online video presentations

IDENTIFY PRIORITY NEED OUTLINED IN CSA

Lack of Services/Resources noted throughout the report

TARGET POPULATION

Primary – Parents/Caregivers
Secondary – Parents/Caregivers At-Risk
Tertiary – Parents/Caregivers in CWS

The parent education services supported by CBCAP funds address primary and secondary prevention, with education strategies that help all families, as well as targeting children and families at risk for abuse or neglect but who do not have an open child welfare case.

Parent education is also supported by PSSF funds, which target other distinct families (including adoptive and extended) with children who are at risk of abuse or neglect, including those who do have an open child welfare case.

TARGET GEOGRAPHIC AREA

Services are available for all Amador County communities. Parenting classes are currently offered in Jackson as well as the outlying areas of Pine Grove and Ione. Service locations are dependent upon the number of enrolled families from a specific catchment area of the county. Parenting instruction may also be provided at Mule Creek State Prison for inmates who interact with their children during in-person visiting hours as well as those preparing to reenter the community and return to their families. In addition, parenting workshops may be provided during Family Urgent Response System (FURS) and Head Start parent meetings held in Jackson, as well as Perinatal Substance Use Disorder group sessions held at Amador County Behavioral Health in Sutter Creek.

TIMELINE

The county's contract with the current service provider extends through June 2027. It is anticipated that the RFP process will be followed and completed for the remainder of the 2025-2029 SIP cycle.

EVALUATION

PROGRAM OUTCOME(S) AND MEASUREMENT & QUALITY ASSURANCE (QA) MONITORING

Desired Outcome	Indicator	Source of Measure	Frequency
Participants will have increased knowledge of parenting and child development.	A minimum of 80% of participants will show improvement in at least three (3) parenting topic and/or skill areas.	Adult Adolescent Parenting Inventory (AAPI) Nurturing Skills Competency Scale (NSCS) Protective Factors Survey (PFS) BRRIIM assessments case notes, client logs, client surveys, client observations	pre and post administered at program beginning and program completion completed throughout the course of program participation

		informal interviews with parent volunteers	

QUALITY ASSURANCE (QA) MONITORING

Method or Tool	Frequency	Utilization	Action
Staff meetings to review program progress Sign-in sheets and data reports Progress reports and annual report	meetings are held monthly at the end of each month at the end of each quarter and program year	Management and staff attend meetings to review program data and ensure benchmarks are met and quality services are provided. Sign-in sheets and data reports are submitted to the county for review and approval. Progress reports and annual report are submitted to the county for review and approval.	Changes to service implementation are made as needed to ensure program compliance and continuous quality improvement.

CLIENT SATISFACTION

Method or Tool	Frequency	Utilization	Action
Client Satisfaction Survey	at the end of each parenting class session	Surveys are completed by program participants to rate the quality of each class session as well as the quality of the program in general. Parents answer specific questions regarding the level of satisfaction with program implementation and information presented and are offered opportunities to make recommendations to improve the instruction.	Surveys are reviewed by staff to assess service effectiveness. Changes to service implementation are made as needed to ensure program compliance and continuous quality improvement.

Program Description

Program Name

Home Visiting Expenditure Workbook Line 2

Service Provider

Nexus Youth & Family Services (Nexus)

Program Description

The service provider offers home visiting services designed to enhance family resiliency by increasing and strengthening caregiver skills and competencies, reducing or preventing child abuse, fostering support and safety for children, and promoting the permanency and well-being of children, youth, and families. Services focus on building nurturing parenting skills and increasing life skills of families with children at risk for involvement in the child welfare system or with open child welfare cases. The Home Visitors and Family Advocates provide in-home parenting support utilizing the evidence-based Nurturing Parenting Program curriculum. During engagement contacts, program participants learn effective strategies for positive parenting, daily routines, child safety, nutrition, and the importance of play, as well as child development fundamentals and appropriate expectations. Staff provide support and guidance regarding the following positive parenting topics: increased self-awareness; positive concept/self-esteem and levels of empathy; alternatives to hitting and yelling; enhanced family communication and awareness of needs; replacing abusive behaviors with nurturing behaviors; physical and emotional development; appropriate role and developmental expectations; building on parental strengths; and problem-solving skills. In addition, staff offer information and resources on home routines, money management, time management, housekeeping skills, and building a relationship with the child's school. Staff provide case management for home-visiting families to help them set goals, develop action plans, track progress, and improve family functioning. Families with children ages 0-5 are provided ASQ-3 and ASQ SE-2 screenings to monitor their child's developmental, behavioral, and socio-emotional growth, celebrate milestones, identify possible delays or concerns, and access needed resources. Families also receive student support services to help children reduce behavioral and disciplinary challenges and increase school attendance and academic performance. Bilingual and bicultural Family Advocates provide Spanish and Russian translation, supportive services, and engagement strategies to coordinate culturally appropriate services for clients. To help home-visiting families increase their capacity to meet children's needs, staff also offer information and referral services and help families obtain community resources. They help families overcome barriers to accessing services, such as transportation, culture, language, stigma, and mistrust, and serve on the Amador County MDT. Families who participate in the program receive services weekly or as often as necessary and appropriate to engage them in the process of identifying and achieving goals. The duration of services is dependent upon individual family needs. To increase access to services and client engagement, staff offer a hybrid program that includes both in-person and virtual individual parent education and case management. Nexus implements a tablet lending library for clients to check out a device, if needed, to use at home to participate in services. Outreach for home visiting is conducted county-wide through the dissemination of promotional information via shared email lists, radio announcements, social media, Parent Advisory Council activities, and community outreach events. Partner agencies provide referrals for services, and families can also self-refer.

In addition to offering parenting support in the family home, services are also provided during supervised family visits through coaching. To implement this service delivery model, staff collaborate with the Child and Family Team (CFT) and CPS social workers to organize the interactions, discuss family needs and

progress, and develop an individualized coaching plan designed to help the parents interact positively with their children, learn to manage behaviors, and improve the quality of the parent-child relationship.

Therapists also provide Parent-Child Interaction Therapy (PCIT) and Parent-Child CARE (PC-CARE) services during scheduled home visits as well as in the clinical setting. PCIT and PC-CARE are family counseling programs designed to help both parents and children improve family functioning and cohesion and teach parents the skills necessary to manage their child's behavior challenges. The PCIT program is conducted in two phases. The first phase focuses on enhancing the parent-child relationship, and the second focuses on improving child compliance. In both phases, parents learn specific skills and practice them during therapy until they achieve mastery and the child's behavior improves. PC-CARE incorporates PCIT concepts but presents the information in a briefer, more streamlined manner.

FUNDING SOURCES

SOURCE	LIST FUNDED ACTIVITIES
CAPIT	home visitation, parenting support during supervised visits, PCIT and PC-CARE family counseling
CBCAP	
PSSF Family Preservation	
PSSF Family Support	
PSSF Family Reunification	
PSSF Adoption Promotion and Support	
OTHER Source(s): Amador County Behavioral Health	Family Advocates to provide case management activities, referrals, transportation and translation
OTHER Source(s): Therapy Associates, Therapy Trainees volunteer hours as in-kind	PCIT and PC-CARE family counseling

IDENTIFY PRIORITY NEED OUTLINED IN CSA

Lack of Services/Resources as noted throughout the CSA

TARGET POPULATION

Primary – Families
Secondary – Families At-Risk
Tertiary – Families in CWS

TARGET GEOGRAPHIC AREA

Services are available for families from all regions of Amador County.

TIMELINE

The county's contract with the current service provider extends through June 2027. It is anticipated that the RFP process will be followed and completed for the remainder of the 2025-2029 SIP cycle.

EVALUATION

PROGRAM OUTCOME(S) AND MEASUREMENT & QUALITY ASSURANCE (QA) MONITORING

Desired Outcome	Indicator	Source of Measure	Frequency
Participants will have increased knowledge	A minimum of 80% of participants will show	Adult Adolescent Parenting Inventory (AAPI)	pre and post administered at

of parenting and child development.	improvement in at least three (3) parenting topic and/or skill areas.	Nurturing Skills Competency Scale (NSCS) Protective Factors Survey (PFS) BRRIIM assessments PCIT and PC-CARE clinical assessments case notes, client logs, client surveys	program beginning and program completion completed throughout the course of program participation

QUALITY ASSURANCE (QA) MONITORING

Method or Tool	Frequency	Utilization	Action
Staff meetings to review program progress Data reports Progress reports and annual report	meetings are held monthly at the end of each month at the end of each quarter and program year	Management and staff attend meetings to review program data and ensure benchmarks are met and quality services are provided. Data reports are submitted to the county for review and approval. Progress reports and annual report are submitted to the county for review and approval.	Changes to service implementation are made as needed to ensure program compliance and continuous quality improvement.

CLIENT SATISFACTION

Method or Tool	Frequency	Utilization	Action
Client Satisfaction Survey	at the completion of home visiting services	Surveys are utilized to evaluate the quality of service delivery of the home visiting program. They measure outcomes related to the following areas: staff punctuality and preparedness; information received during home visits; as well as staff knowledge. Participants are offered opportunities to make	Surveys are reviewed by staff to assess service effectiveness. Changes to service implementation are made as needed to ensure program compliance and continuous quality improvement.

		recommendations to improve services.	

PROGRAM DESCRIPTION

PROGRAM NAME

Common Ground Family Counseling Services (Expenditure Workbook Line 3)

SERVICE PROVIDER

Nexus Youth & Family Services (Nexus)

PROGRAM DESCRIPTION

The service provider offers Common Ground as a 7-week family counseling program using the Active Parenting of Teens curriculum. Parents and teens meet with trained clinicians/facilitators for 21 hours to fully complete the Common Ground course. Services are provided by licensed clinicians, therapy associates, and therapy trainees. Active Parenting of Teens is an evidence-based, interactive intervention designed to increase protective factors through a family-systems approach. The curriculum focuses on improving communication, behavior management, and interpersonal relationships between parents and teens. During the group course, parents are taught nurturing parenting practices, positive discipline strategies, and techniques to reinforce newly learned skills at home. Meanwhile, teens learn essential life skills such as active communication, moral reasoning, social resistance, and conflict resolution. Each session concludes with a structured family enrichment activity in which participants develop and practice an action plan to work toward achieving Common Ground. Families also receive weekly homework assignments to reinforce the skills learned during each session and to encourage continued growth outside the counseling environment. Common Ground clinicians also provide individual counseling sessions as needed using the Active Parenting of Teens curriculum as a proven modality to enhance and strengthen personal and familial relationships. Individual counseling sessions are offered weekly or as often as necessary in order to achieve positive client outcomes. Through this approach, the program supports lasting positive changes in family functioning and teen development. Parents and teens are empowered to listen respectfully, communicate honestly and openly, set and respect limits, appreciate and honor differences, and apply the five principles for creating Common Ground: 1) I am committed to communicating my feelings respectfully; 2) I take personal responsibility for my actions; 3) I try to understand the goals of others in my family; 4) I make effective choices that keep me healthy and safe; and 5) I believe that conflicts can end in win-win results.

FUNDING SOURCES

SOURCE	LIST FUNDED ACTIVITIES
CAPIT	
CBCAP	
PSSF Family Preservation	Common Ground family counseling
PSSF Family Support	
PSSF Family Reunification	Common Ground family counseling
PSSF Adoption Promotion and Support	Common Ground family counseling
OTHER Source(s): Therapy Associates, Therapy Trainees volunteer hours as in-kind	Common Ground family counseling

IDENTIFY PRIORITY NEED OUTLINED IN CSA

Behavioral/Mental Health as noted throughout the CSA

TARGET POPULATION

Secondary – Families At-Risk
Tertiary – Families in CWS

TARGET GEOGRAPHIC AREA

Services are available for all Amador County communities. Common Ground family counseling services are currently offered in Jackson. Transportation options and support are available to assist families with accessing services.

TIMELINE

The county's contract with the current service provider extends through June 2027. It is anticipated that the RFP process will be followed and completed for the remainder of the 2025-2029 SIP cycle.

EVALUATION

PROGRAM OUTCOME(S) AND MEASUREMENT & QUALITY ASSURANCE (QA) MONITORING

Desired Outcome	Indicator	Source of Measure	Frequency
Participants will experience improved parenting skills and family functioning.	A minimum of 80% of participants will show improvement in at least three (3) healthy relationship topic and/or skill areas.	Active Parenting Survey Child Behavior Checklist (CBCL) treatment plans, case notes	pre and post administered at program beginning and program completion completed throughout the course of program participation

QUALITY ASSURANCE (QA) MONITORING

Method or Tool	Frequency	Utilization	Action
Staff meetings to review program progress Sign-in sheets and data reports Progress reports and annual report	meetings are held monthly at the end of each month at the end of each quarter and program year	Management and staff attend meetings to review program data and ensure benchmarks are met and quality services are provided. Sign-in sheets and data reports are submitted to the county for review and approval. Progress reports and annual report are submitted to the county for review and approval.	Changes to service implementation are made as needed to ensure program compliance and continuous quality improvement.

CLIENT SATISFACTION

Method or Tool	Frequency	Utilization	Action
Client Satisfaction Survey	completed at the end of treatment	Surveys are utilized to evaluate the quality of	Surveys are reviewed by staff to assess service

		service delivery of the Common Ground family counseling program. They measure outcomes related to client satisfaction in the following areas: staff helpfulness; timeliness of communication and presentations; respectful treatment of clients; efforts to seek client input on topics covered; effectiveness in teaching new skills; provision of meaningful activities; and sharing of effective strategies to support problem-solving. Participants are offered opportunities to make recommendations to improve services.	effectiveness. Changes to service implementation are made as needed to ensure program compliance and continuous quality improvement.

CAPIT/CBCAP/PSSF Expenditure Workbook
Proposed Expenditures
Worksheet 1

(1) DATE SUBMITTED: 7/18/05 | (2) DATES FOR THIS WORKBOOK 11/1/24 thru 11/1/29 | (3) DATE APPROVED BY OCAP: Internal Use Only

(4) COUNTY: Amador | (5) PERIOD OF SIP: 11/1/24 thru 11/1/29 | (6) YEARS:

(7) ALLOCATION (Use the latest Fiscal or All County Information Notice for Allocation): **CAPIT:** $ 55,000 **CBCAP:** $12,200 **PSSF:** $18,353

No.	Program Name	Applies to CBCAP Programs Only	Name of Service Provider	Service Provider is Unknown, Date Revised Workbook to be Submitted to OCAP	CAPIT		CBCAP		PSSF						OTHER SOURCES	NAME OF OTHER	TOTAL
					Dollar amount to be spent on CAPIT Programs	CAPIT is used for Administration	Dollar amount to be spent on CBCAP Programs	CBCAP is used for Administration	Dollar amount to be spent on Family Preservation	Dollar amount to be spent on Family Support	Dollar amount to be spent on Family Reunification	Dollar amount to be spent on Adoption Promotion & Support	Dollar amount of PSSF allocation to be spent on PSSF activities (Sum of columns G1-G4)	PSSF is used for Administration	Dollar amount from other sources	List the name(s) of the other funding source(s)	Total dollar amount to be spent on this Program (Sum of Columns E, F, G5)
A	B	C	D1	D2	E1	E2	F1	F2	G1	G2	G3	G4	G5	G6	H1	H2	I
1	Parent Education	Direct Service	Nexus Youth & Family Services				$12,200		$3,950	$4,250	$0	$3,950	**$12,150**		$7,920	Behavioral Health	**$32,270**
2	Home Visiting		Nexus Youth & Family Services		$55,000		$0		$0	$0	$0	$0	**$0**		$61,719	Behavioral Health	**$116,719**
3	Common Ground Family Counseling Services		Nexus Youth & Family Services		$0		$0		$300	$0	$4,250	$300	**$4,850**		$0		**$4,850**
4					$0		$0		$0	$0	$0	$0	**$0**		$0		**$0**
5					$0		$0		$0	$0	$0	$0	**$0**		$0		**$0**
6							$0		$0	$0	$0	$0	**$0**		$0		**$0**
7					$0		$0		$0	$0	$0	$0	**$0**		$0		**$0**
8					$0		$0		$0	$0	$0	$0	**$0**		$0		**$0**
9					$0		$0		$0	$0	$0	$0	**$0**		$0		**$0**
10					$0		$0		$0	$0	$0	$0	**$0**		$0		**$0**
11					$0		$0		$0	$0	$0	$0	**$0**		$0		**$0**
12					$0		$0		$0	$0	$0	$0	**$0**		$0		**$0**
13					$0		$0		$0	$0	$0	$0	**$0**		$0		**$0**
14					$0		$0		$0	$0	$0	$0	**$0**		$0		**$0**
15					$0		$0		$0	$0	$0	$0	**$0**		$0		**$0**
	Totals				**$55,000**		**$12,200**		**$4,250**	**$4,250**	**$4,250**	**$4,250**	**$17,000**		**$69,639**		**$153,839**
									25%	**25%**	**25%**	**25%**	**100%**				

California – Child and Family Services Review Signature Sheet

For submittal of: CSA ☐ SIP ☒ Progress Report ☐

County	Amador
SIP Period Dates	2024-2029
Outcome Data Period	Q2 2024
County Child Welfare Agency Director	
Name	Anne Watts
Signature*	Anne Watts
Phone Number	(209)223-6550
Mailing Address	10877 Conductor Blvd, Sutter Creek, CA 95685
County Chief Probation Officer	
Name	Jennifer Mynderup
Signature*	Jennifer Mynderup
Phone Number	(209) 223-6387
Mailing Address	675 New York Ranch Rd. Jackson, CA 95642
Public Agency Designated to Administer CAPIT and CBCAP	
Name	Anne Watts
Signature*	Anne Watts
Phone Number	(209)223-6550
Mailing Address	10877 Conductor Blvd, Sutter Creek, CA 95685
Board of Supervisors (BOS) Signature	
BOS Approval Date	
Name	
Signature*	

Mail the original Signature Sheet to:

Children and Family Services Division
Performance and Program Improvement Bureau
California Department of Social Services
744 P Street, MS 8-13-518
Sacramento, CA 95814

*Signatures must be in blue ink

Contact Information		
Child Welfare Agency	Name	Anne Watts
	Agency	Amador County Social Services
	Phone & E-mail	(209)223-6550, awatts@amadorcounty.gov
	Mailing Address	10877 Conductor Blvd, Sutter Creek, CA 95685
Probation Agency	Name	Joshua Huggett
	Agency	Amador County Probation
	Phone & E-mail	(209) 223-6387, jhuggett@amadorcounty.gov
	Mailing Address	675 New York Ranch Rd. Jackson, CA 95642
Public Agency Administering CAPIT and CBCAP (if other than Child Welfare)	Name	
	Agency	
	Phone & E-mail	
	Mailing Address	
CAPIT Liaison	Name	Anne Watts
	Agency	Amador County Social Services
	Phone & E-mail	(209)223-6550, awatts@amadorcounty.gov
	Mailing Address	10877 Conductor Blvd, Sutter Creek, CA 95685
CBCAP Liaison	Name	Anne Watts
	Agency	Amador County Social Services
	Phone & E-mail	(209)223-6550, awatts@amadorcounty.gov
	Mailing Address	10877 Conductor Blvd, Sutter Creek, CA 95685
PSSF Liaison	Name	Anne Watts
	Agency	Amador County Social Services
	Phone & E-mail	(209)223-6550, awatts@amadorcounty.gov
	Mailing Address	10877 Conductor Blvd, Sutter Creek, CA 95685

Board of Supervisors Agenda Item Report

Submitting Department: Board of Supervisors
Meeting Date: November 10, 2026

SUBJECT
Correction to Staffing Action - Reclassification Deputy County Counsel I to II

Recommendation:
Approve

4/5 vote required:
No

Distribution Instructions:
Auditor, Budget Analyst, County Counsel and Human Resources

ATTACHMENTS

- Memo - Correction CC I-II.doc

AMADOR COUNTY
HUMAN RESOURCES DEPARTMENT
• Benefits • Personnel • Risk Management
(209) 223-6361 (209) 223-6456 (209) 223-6392

County Administration Center
810 Court Street
Jackson, California 95642
Facsimile: (209) 223-6426
Website: www.co.amador.ca.us

TO: Board of Supervisors

FROM: Lisa Gaebe, Human Resources Director

DATE: November 4, 2026

SUBJECT: Agenda Item for November 10, 2026 Board Consent Agenda
Correction to Staffing Action - Reclassification Deputy County Counsel I to II

The staffing action previously submitted for approval, effective September 22, 2026, requested the reclassification of the position of Deputy County Counsel I to Deputy County Counsel II. However, the request inadvertently omitted the corresponding salary step and rate of pay.

The original request should have specified approval of the reclassification at Step E, at an hourly rate of $70.01.

Accordingly, approval is respectfully requested to correct Sabrina Pierce's reclassification from Deputy County Counsel I, Step E, to Deputy County Counsel II, Step E, effective September 22, 2026, at the hourly rate of $70.01.

This staffing action is necessary to meet the department's operational needs, maintain continuity of legal services, and ensure that compensation is appropriately aligned with the level and scope of Ms. Pierce's assigned responsibilities.

Board of Supervisors Agenda Item Report

Submitting Department: Board of Supervisors
Meeting Date: November 10, 2026

SUBJECT
Revised job description and salary adjustment for Human Resources Technician classification.

Recommendation:
Approve

4/5 vote required:
No

Distribution Instructions:
Auditor, Budget Director and Human Resources

ATTACHMENTS

- Memo - HR Technician.doc
- Human Resources Technician (DRAFT) 11-26.doc
- Human Resources Technician (FINAL) 11-26.docx

AMADOR COUNTY
HUMAN RESOURCES DEPARTMENT
• Benefits • Personnel • Risk Management
(209) 223-6361 (209) 223-6456 (209) 223-6392

County Administration Center
810 Court Street
Jackson, California 95642
Facsimile: (209) 223-6426
Website: www.co.amador.ca.us

TO: Board of Supervisors

FROM: Lisa Gaebe, Human Resources Director

DATE: November 4, 2026

SUBJECT: Agenda Item for November 10, 2026 Board Consent Agenda
Human Resources Technician Revised Job Description and Salary Adjustment

The Human Resources Technician position has assumed additional responsibilities and duties, including providing support for Volunteer Administration, Records Administration, and Merit Systems Recruitment. These expanded responsibilities have increased the scope of work and level of responsibility associated with the position.

To appropriately recognize these additional duties and maintain internal salary equity with comparable positions, I am requesting that the Human Resources Technician job description be revised and the pay be adjusted to the same salary range as the current Records and Volunteer Administrator position.

The current salary range for Human Resources Technicians is Range 2513, Step A $29.71 to Step E $36.11. The requested adjustment would move the position to Range 2613, Step A $30.71 to Step E $37.33 and be effective October 26, 2026.

The Extra-Help Records Management Assistant position is currently vacant. The additional cost associated with this salary adjustment will be offset by the savings resulting from this vacancy. Therefore, this request is not anticipated to require additional funding.

Approval of this request will appropriately recognize the additional job duties added to the Human Resources Technicians and compensate them for their expanded duties and responsibilities, promote internal salary equity, and recognize the increased contributions they provide in support of departmental operations.

HUMAN RESOURCES TECHNICIAN

DEFINITION

Under general supervision, performs a variety of difficult, complex, and specialized program, office, administrative, and general support work for the County Human Resources Department. Provides information to the public and employees concerning recruitments, personnel rules, procedures, and risk and benefit programs; processes and maintains the official personnel records of the County; and performs related work as required.

DISTINGUISHING CHARACTERISTICS

This is a specialized single position classification which performs complex, technical, and specialized support functions for the County Human Resources Department. Incumbents are expected to learn personnel policies and procedures and respond accurately to inquiries from customers related to recruitment, benefit and risk programs.

REPORTS TO

Human Resources Director

CLASSIFICATIONS DIRECTLY SUPERVISED

Positions in this class may be assigned work coordination, training, and lead work responsibilities for other support staff.

EXAMPLES OF DUTIES

- Serves as an office receptionist greeting office visitors and answering the telephone, ~~providing~~ provides information and ~~referring~~ refers calls and visitors to others as necessary.

- Performs a variety of responsible office support work such as filing, composing confidential correspondence, preparation of spreadsheets, and data entry.

- Plans and participates in the recruitment and selection process, prepares job announcements, writes employment advertisements, and develops promotional advertising materials to fill position vacancies.

- Places social media and internet advertisements.

- Evaluates applicants qualifications to determine eligibility for participation in the selection processes; counsels' applicants regarding minimum qualifications and possible employment opportunities.

- Organizes selection processes, maintaining required documentation, and sending notices to job candidates.

- .
- Assists in the review and processes changes in employment status, including new hires, promotions, reclassification, transfers, separations, etc. to insure adherence with established Human Resources policies and procedures.
- Assists Department Heads (both appointed and elected officials) and employees by researching, interpreting, responding to, and resolving inquiries.
- Conducts new employee onboarding, new hire orientations, briefing employees on County benefits, providing instruction on enrollment forms; and addressing questions regarding benefits and other issues.
- Assists in the administration of the employee health, benefit and retirement programs.
- Conducts the annual open enrollment for benefits, reviewing forms for accuracy and completeness and processing enrollment information.
- Verifies purchase orders, processes claims and invoices, assists with the maintenance of work ~~and time~~ records.
- Maintains security and confidentiality of all employment, personnel, benefit and leave records of all current and former County employees.
- Assists in the preparation of mandated employment reports and records for the County, state and federal governments.
- May conduct salary, fringe benefit and personnel practices surveys.
- May conduct and/or coordinate employee and volunteer recognition events, meetings and training as related to human resources functions
- May serve on committees and task-forces.
- May prepare correspondence, reports, and Board of Supervisors agenda items.
- Coordinates required activities to support intern and volunteer recruitments; schedules interviews, and may represent Human Resources onrecruitment panels.
- Performs office and administrative functions related to Human Resources and Risk Management functions.
- Provides assistance in support of the county's risk management programs in such areas as insurance liability, workers compensation, and unemployment insurance.
- Creates County identification cards and may assist with programming building access cards.
- May assist in managing the county's Records Management and Volunteer Programs.

- May assist in developing and maintaining schedules for the delivery of records from all County departments.

- May develop and direct the maintenance of records for the storage, retention, retrieval, and destruction of records in accordance with administrative, legal, fiscal, and historical requirements after consultation with Department Heads; presents retention schedules to the Board of Supervisors for final approval; directs the work of assigned volunteer staff in Records activities and in interacting with the public interested in researching historical and archival information.

- May assist in organizing volunteer activities and recognition events to publicize, reward, and encourage community volunteerism.

- May assist in developing and implementing departmental policies, procedures, and practices.

- May provide guidance and maintain certain records as required by statute; identifies records.

TYPICAL PHYSICAL REQUIREMENTS

Sit for extended periods; frequently stand and walk; normal manual dexterity and eye-hand coordination; lift and move objects weighing up to 35 lbs., corrected hearing and vision to normal range; verbal communication; use of office equipment including computers, telephones, calculators, copiers, and FAX.

TYPICAL WORKING CONDITIONS

Work is performed in an office environment; continuous contact with staff and the public.

DESIRABLE QUALIFICATIONS

Knowledge of:

- Laws, rules and regulations applicable to the County's Human Resources programs.
- General knowledge of recruitment and selection process.
- General organization and functions of County government.
- Basic personnel and benefit administration principles, practices, methods, and techniques.
- Establishment and maintenance of filing and information retrieval systems.
- Personal computers and software applications related to administrative support work.
- Correct English usage, spelling, grammar, and punctuation.
- Basic mathematics.
- Principles of work coordination, organization and planning.

Ability to:

- Perform difficult and complex work involving use of considerable amount of independent judgment.
- Read, interpret, and apply a variety of rules, laws, policies and technical information.
- Follow oral and written instructions.
- Identify and handle confidential information.
- Use a personal computer and appropriate software for word processing, recordkeeping, and administrative functions.
- Deal tactfully and courteously with County staff, representatives of outside agencies, and the general public.
- Establish and maintain cooperative working relationships.
- Maintain and update records and reports.

TRAINING AND EXPERIENCE

Any combination of training and experience which would likely provide the required knowledge and abilities is qualifying. A typical way to obtain the required knowledge and abilities would be:

Education

A high school diploma or GED equivalent.

Experience

Two (2) years of responsible office and administrative support experience in Amador County or a minimum of five (5) years of previous administrative, office and general support work experience in a government or Human Resources office.

SPECIAL REQUIREMENTS

None

FLSA: COVERED
EEO: 6
NOVEMBER 2026

HUMAN RESOURCES TECHNICIAN

DEFINITION

Under general supervision, performs a variety of difficult, complex, and specialized program, office, administrative, and general support work for the County Human Resources Department. Provides information to the public and employees concerning recruitments, personnel rules, procedures, and risk and benefit programs; processes and maintains the official personnel records of the County; and performs related work as required.

DISTINGUISHING CHARACTERISTICS

This is a specialized single position classification which performs complex, technical, and specialized support functions for the County Human Resources Department. Incumbents are expected to learn personnel policies and procedures and respond accurately to inquiries from customers related to recruitment, benefit and risk programs.

REPORTS TO

Human Resources Director

CLASSIFICATIONS SUPERVISED

Positions in this class may be assigned work coordination, training, and lead work responsibilities for other support staff.

EXAMPLES OF DUTIES

The following are the duties performed by employees in this classification. However, employees may perform other related duties at an equivalent level. Each individual in the classification does not necessarily perform all the duties listed.

- Serves as an office receptionist greeting office visitors and answering the telephone, provides information and refers calls and visitors to others as necessary.

- Performs a variety of responsible office support work such as filing, composing confidential correspondence, preparation of spreadsheets and data entry.
- Plans and participates in the recruitment and selection process, prepares job announcements, writes employment advertisements, and develops promotional advertising materials to fill position vacancies.
- Places social media and Internet advertisements.
- Evaluates applicants qualifications to determine eligibility for participation in the selection processes; counsels' applicants regarding minimum qualifications and possible employment opportunities.
- Organizes selection processes, maintaining required documentation and sending notices to job candidates.
- Assists in the review and processes changes in employment status, including new hires, promotions, reclassification, transfers, separations, etc. to insure adherence with established Human Resources policies and procedures.
- Assists Department Heads (both appointed and elected officials) and employees by researching, interpreting, responding to and resolving inquiries.
- Conducts new employee onboarding, new hire orientations, briefing employees on County benefits, providing instruction on enrollment forms; and addressing questions regarding benefits and other issues.
- Assists in the administration of the employee health, benefit and retirement programs.
- Conducts the annual open enrollment for benefits, reviewing forms for accuracy and completeness and processing enrollment information.
- Verifies purchase orders, processes claims and invoices, assists with the maintenance of work records.
- Maintains security and confidentiality of all employment, personnel, benefit and leave records of all current and former County employees.
- Assists in the preparation of mandated employment reports and records for the County, state and federal governments.
- May conduct salary, fringe benefit and personnel practices surveys.
- May conduct and/or coordinate employee recognition and volunteer events, meetings and training as related to human resources functions.
- May serve on committees and taskforces.
- May prepare correspondence, reports and Board of Supervisors agenda items.
- Coordinates required activities to support intern and volunteer recruitments; schedules interviews and may represent Human Resources on recruitment panels.
- Performs office and administrative functions related to Human Resources and Risk Management functions.
- Provides assistance in support of the county's risk management programs in such areas as insurance liability, workers compensation, and unemployment insurance.
- Creates County identification cards and may assist with programming building access cards.
- May assist in managing the county's Records Management and Volunteer Programs.

- May assist in developing and maintaining schedules for the delivery of records from all County departments.
- May develop and direct the maintenance of records for the storage, retention, retrieval, and destruction of records in accordance with administrative, legal, fiscal, and historical requirements after consultation with Department Heads; presents retention schedules to the Board of Supervisors for final approval; directs the work of assigned volunteer staff in Records activities and in interacting with the public interested in researching historical and archival information.
- May assist in organizing volunteer activities and recognition events to publicize, reward, and encourage community volunteerism.
- May assist in developing and implementing departmental policies, procedures, and practices.
- May provide guidance and maintain certain records as required by statute; identifies records.

ESSENTIAL QUALIFICATIONS

Knowledge of:

- Laws, rules and regulations applicable to the County's Human Resources programs.
- General knowledge of recruitment and selection process.
- General organization and functions of County government.
- Basic personnel and benefit administration principles, practices, methods, and techniques.
- Establishment and maintenance of filing and information retrieval systems.
- Personal computers and software applications related to administrative support work.
- Correct English usage, spelling, grammar, and punctuation.
- Basic mathematics.
- Principles of work coordination, organization and planning.

Ability to:

- Perform difficult and complex work involving use of considerable amount of independent judgment.
- Read, interpret, and apply a variety of rules, laws, policies and technical information.
- Follow oral and written instructions.
- Identify and handle confidential information.
- Use a personal computer and appropriate software for word processing, recordkeeping, and administrative functions.

- Deal tactfully and courteously with County staff, representatives of outside agencies, and the general public.
- Establish and maintain cooperative working relationships.
- Maintain and update records and reports.

TYPICAL PHYSICAL REQUIREMENTS

Sit for extended periods; frequently stand and walk; normal manual dexterity and eye-hand coordination; lift and move objects weighing up to 35 lbs., corrected hearing and vision to normal range; verbal communication; use of office equipment including computers, telephones, calculators, copiers, and FAX.

TYPICAL WORKING CONDITIONS

Work is performed in an office environment; continuous contact with staff and the public.

TRAINING AND EXPERIENCE

Any combination of training which would likely provide the required knowledge and experience is qualifying. A typical way to obtain the required knowledge and abilities would be:

Education

A high school diploma or GED equivalent.

Experience

Two (2) years of responsible office and administrative support experience in Amador County or a minimum of five (5) years of previous administrative, office and general support work experience in a government or Human Resources office.

SPECIAL REQUIREMENTS

None

Board of Supervisors Agenda Item Report

Submitting Department: Human Resources
Meeting Date: November 10, 2026

SUBJECT
Resolution Regarding Salaries and Fringe Benefits for Confidential Employees.

Recommendation:
Approve.

4/5 vote required:
No

Distribution Instructions:
Auditor, Budget Director, Human Resources, and Angie Creach Confidential Representative

ATTACHMENTS

- Confidential DRAFT 10.26.26.pdf
- Confidential_Resolution_DRAFT_11.10.26.docx

APPENDIX A
CONFIDENTIAL UNIT CLASSIFICATION AND WAGE PLAN
5.0% INCREASE - EFFECTIVE 9/28/2025

Amended 10/26/2026

Pay ranges for nonexempt classifications are as set forth below:

Range	Classification	Step A	Step B	Step C	Step D	Step E
2895	Accountant I - Confidential	33.53	35.21	36.97	38.82	40.76
2539	Administrative Supervisor (SO) - Confidential	29.97	31.47	33.04	34.69	36.43
3047	Clerk Of the Board	35.05	36.80	38.64	40.57	42.60
1762	Deputy Board Clerk I	22.20	23.31	24.48	25.70	26.98
1986	Deputy Board Clerk II	24.44	25.66	26.95	28.29	29.71
2293	Deputy Board Clerk III	27.51	28.89	30.33	31.85	33.44
3613	Executive Legal Assistant	40.71	42.75	44.88	47.13	49.48
4439	Grants Program Manager/Analyst	48.97	51.42	53.99	56.69	59.52
3020	Human Resource Specialist	34.78	36.52	38.34	40.26	42.28
~~2513~~	~~Human Resource Technician~~	~~29.71~~	~~31.20~~	~~32.76~~	~~34.39~~	~~36.11~~
2613	Human Resources Technician	30.71	32.25	33.86	35.55	37.33
3333	Paralegal (CC)	37.91	39.81	41.80	43.89	46.08
2532	Payroll Specialist I	29.90	31.40	32.96	34.61	36.34
2955	Payroll Specialist II	34.13	35.84	37.63	39.51	41.49
2613	Records and Volunteer Administrator	30.71	32.25	33.86	35.55	37.33
1646	Records Management Assistant	21.04	22.09	23.20	24.36	25.57
3419	Senior Administrative Analyst	38.77	40.71	42.74	44.88	47.13

Pay ranges for exempt classifications are as set forth below:

Range	Classification	Step A	Step B	Step C	Step D	Step E
4350	Budget Analyst	48.08	50.48	53.01	55.66	58.44
4779	Dep County Counsel I	52.37	54.99	57.74	60.62	63.66
5302	Dep County Counsel II	57.60	60.48	63.50	66.68	70.01
5875	Dep County Counsel III	63.33	66.50	69.82	73.31	76.98
3637	Payroll Manager	40.95	43.00	45.15	47.40	49.77
3691	Risk Analyst	41.49	43.56	45.74	48.03	50.43

BEFORE THE BOARD OF SUPERVISORS OF THE COUNTY OF AMADOR, STATE OF CALIFORNIA

IN THE MATTER OF:

RESOLUTION REGARDING SALARIES AND FRINGE BENEFITS FOR CONFIDENTIAL EMPLOYEES) RESOLUTION NO. 26-0XX

BE IT RESOLVED that this resolution is being adopted to address the following:

- Human Resources Technician Revised Job Description and Pay Adjustment from Range 2513, Step A $29.71 to Step E $36.11 to Range 2613, Step A $30.71 to Step E $37.33 effective October 26, 2026.

TERMS AND CONDITIONS

1. Employees herein identified serve at the pleasure of their respective Agency/Department Head or Elected Official, with the concurrence of the CAO. However, in the event of a proposed action that could result in demotion, reduction in hours, loss of pay, or termination, the concurrence of the Board of Supervisors shall be required if either the department head or the employee requests same. Such request(s) shall be made in writing within seven (7) working days of written notice of the proposed action.
2. Confidential employees are covered by the Fair Labor Standards Act (FLSA) as it relates to wages, overtime (based upon hours worked in excess of a regularly scheduled 8-hour workday or 40 hours per week), record keeping, and equal pay standards, with the exception of the following classifications:
    A. Budget Analyst
    B. Deputy County Counsel I
    C. Deputy County Counsel II
    D. Deputy County Counsel III
    E. Risk Analyst
    F. Payroll Manager
3. The exempt employees listed in number two (2) above are required to devote the appropriate amount of time at their place of work, either in the office or at other sites, necessary to complete the responsibilities and duties of their positions. Exempt employees are not eligible for overtime.
4. Confidential employees are eligible for, and will receive, step increases under the same terms and conditions as the County's General Unit bargaining group.
5. The salaries reflected above include a five percent (5%) differential above the County's General Unit bargaining group for confidential status.

Current Classification and Wage Plan and listed as Appendix A

BENEFIT PACKAGE

6. **Longevity:**
    A. Employees shall receive longevity wage increases on their base pay when they have completed: five (5), ten (10), fifteen (15), twenty (20), and twenty-five (25), twenty-five (30), thirty (35), and forty (40, years of years of regular and permanent County employment. At the completion of each of the benchmark years (i.e., 5, 10, 15, 20, 25, 30, 35, and 40 years), the employee shall receive the salary increase enumerated below for the applicable level of completed years of service:

Completed Years of Service	Base Salary Adjustment
5	2.500%*
10	5.063%*
15	7.700%*
20	10.390%*
25	13.150%*
30	15.650%*
35	18.150%*
40	20.650%*

**These amounts do not "stack" or "combine". Any special compensation shall be calculated on the combined rate of base pay PLUS longevity for employees eligible and so situated.*

7. **Voluntary Reduced Work Schedule:** Employees have the option to continue their voluntary reduced work schedule of 36 hours per week or 72 hours bi-weekly, request a voluntary reduced work schedule of 36 hours per week or 72 hours bi-weekly, or rescind their previous request for a voluntary reduced work schedule. Employees' seniority, benefits and leave accruals will not be affected. Employees have the option of working a 36 hour work week or work 72 hours every two weeks (40 hours one week and 32 hours the next week). Employees do not need to submit a request each year to continue their reduced work schedule. If an employee elects to take the reduced workweek, they shall remain on the reduced workweek until the beginning of the following fiscal year. The County reserves the right to rescind the reduced workweek at any time.

8. **Retirement Program**: Employees herein shall receive the same Public Employees' Retirement System program offered to the County's General bargaining group, as such program may be amended from time to time. The Employer Paid Member Contribution (EPMC) shall be as follows:

   A. All Classic employees shall pay the full seven percent (7%) of the EPMC for PERS Miscellaneous employees.

   B. All employees hired as new members according to PERS regulations, and pursuant to the Public Employee Pension Reform Act of 2013 ("PEPRA"), as amended, shall pay one-half (½) of the Normal Cost as determined by PERS.

   C. Deductions of employee pension contributions shall be by payroll on a pre-tax basis to the extent allowed by law.

9. **Health Insurance:** Employees herein shall be eligible for the same group health insurance programs provided to the County's General Unit Bargaining Group.

   A. The premium cost share will be 87.5% paid by the employer and 12.5% paid by the employee for all.

   B. Confidential employees retiring from County service shall be granted the right to continue participation in the group health insurance programs provided for active Confidential employees, to the extent said insurance programs allow, ***at the retired employee's expense***.

   C. For full-time Confidential employees, a cash payment of $233.04 per pay period (based on 24 pay periods annually) shall be paid to all Confidential employees in lieu of major medical insurance other than the County's, after proof of other major medical insurance has been obtained. The County shall retain the remainder of the premium it otherwise would have paid to that employee. If the employee opts to waive all benefits except life insurance, the cash payment will be $253.04 per 24 pay period based on (24) pay periods

annually. Part-time Confidential employees are eligible for a pro-rated cash payment in lieu of major medical insurance, subject to the same terms and conditions as listed above. If the employee waives all benefits, except life insurance, the cash total is $3.16 per hour worked and will be paid based on twenty-four (24) pay periods.

10. **Sick Leave**: Employees herein shall accrue sick leave at the same rate as the County's General Unit bargaining group as follows:

    A. Regular full-time and regular part-time employees shall earn and accrue paid sick leave in regular increments of 3.6923 hours each pay period for every eighty (80) hours worked up to a maximum of 96 hours per year.

    B. Employees on a voluntary reduced work schedule shall earn and accrue paid sick leave in regular increments of 3.6923 hours paid sick leave each pay period for every seventy-two (72) hours worked up to a maximum of 96 hours per year.

    C. Unused sick leave shall accrue from year to year.

    D. Upon retirement only, a Confidential employee who has accrued at least 500 hours of unused sick leave shall have an amount equal to one-half (½) of their accrued sick leave hours, up to a maximum of 500 hours, converted to its cash value and contributed to the employee's Retirement Health Savings (RHS) account.
    If a retired Confidential employee dies with a remaining balance in their RHS account and leaves no eligible spouse or dependent beneficiary, the remaining funds shall be forfeited. Any forfeited funds shall be allocated in equal shares to the RHS accounts of other retired Confidential employees who maintain active RHS accounts at the time the forfeiture occurs.

11. **Vacation Leave**: Employees herein shall earn and accrue paid vacation leave in accordance with the following provisions (all other terms and conditions shall be the same as the County's General Unit bargaining group):

    A. **Years 1-9**: For the first through the ninth continuous years of service, vacation leave shall be earned and accrued at the rate of 4.9230 hours in regular increments each pay period for every eighty (80) hours worked up to a maximum of 128 hours per year. Employees on a voluntary reduced work schedule, vacation leave shall be earned and accrued in regular increments of 4.9230 each pay period for every 72 hours worked up to a maximum of 128 hours per year.

    B. **Years 10 Plus**: For the tenth and succeeding continuous years of service, vacation leave shall be earned and accrued at the rate of 6.4615 hours in regular increments each pay period for every eighty (80) hours worked up to a maximum of 168 hours per year. Employees on a voluntary reduced work schedule, vacation leave shall be earned and accrued at the rate of 6.4615 in regular increments each pay period for every seventy-two (72) hours worked up to a maximum of 168 hours per year.

    C. Employees will only be allowed to carry over a two (2) year vacation accrual maximum. Accrual of vacation leave shall cease when the maximum amount of vacation leave allowed has accrued and been unused by the employee but shall recommend when the unused balance of an employee's accrued vacation leave is below the maximum allowed accrual.

    D. Employees in this unit may elect to be paid off in cash (up to 40 hours only); provided, however, that the criteria outlined in Amador County #2-230 has been met.

12. **Holiday Leave**: Confidential employees will receive the same paid holiday leave as the County's General Unit bargaining group. Employees taking the voluntary reduced work schedule or working an

alternative work schedule will be paid eight (8) hours of holiday pay. Any difference in the number of hours used on that holiday can be taken from vacation and/or CTO leave. If vacation and/or CTO are not available, employees will be docked the difference in pay. Confidential employees in the Sheriff's Office assigned to a 4/10 work schedule shall be credited with ten (10) hours of holiday leave for each eligible holiday.

13. **Administrative Leave**: Exempt professional classifications (*i.e.* Deputy County Counsel I, II and III) shall earn and accrue Administrative Leave in regular increments of 1.5384 hours each pay period for every eighty (80) hours worked up to a maximum of forty (40) hours per year. For employees on a voluntary reduced work schedule they shall earn and accrue paid Administrative Leave in regular increments of 1.5384 hours paid sick leave each pay period for every seventy-two (72) hours worked up to a maximum of forty (40) hours per year.

    A. An eligible employee may accrue Administrative leave up to a maximum amount equal to twice their current annual Administrative accrual rate (i.e., 10 days). Accrual of Administrative leave shall cease when the maximum amount of Administrative leave allowed has accrued and been unused by the employee, but shall recommence when the unused balance of an employee's accrued Administrative leave is below the maximum allowed accrual.

    B. Eligible employees must pass their probationary period before leave can be utilized.

    C. The probationary period for Administrative employees, for purposes of Administrative leave benefits, shall be twelve (12) months.

    D. Part-time employees will have the leave pro-rated based on the number of hours worked.

    E. An eligible employee who separates from County employment will be paid in cash for any unused Administrative Leave. If an employee transfers to another unit that has no Administrative Leave, the employee will be paid off in cash.

14. **Miscellaneous Stipends:** Sheriff's Office employees in the Confidential Unit will receive a monthly stipend of $40.00 ($18.46 per pay period) for the care, maintenance and replacement of required work attire. Initial clothing is purchased by Sheriff's Department.

15. **Bar Dues:** The County shall pay for employees the cost of the State Bar Association dues necessary for the employee to practice law in California. The County shall pay for the minimum cost of the dues only (referred to on State Bar Membership Statement as membership fees) and shall not pay for any additional options such as CDCBA, CSCHS, lobbying, etc.

    The County shall make the payment each year on or before the annual renewal due date specified by the State Bar for an employee who has been employed as an Amador County Deputy County Counsel as of January 1 of the year for which the dues are paid. The employee shall provide their invoice to the Auditor's Office one month before the due date of each year to ensure his/her dues will be paid before the due date.

16. **Deferred Compensation Annuity Program:** Every regular employee may enroll in a Deferred Compensation Annuity Program offered by a carrier through the County, in accordance with the enrollment provisions established by the carrier. For contributions to such a program, the employee shall utilize monthly payroll deductions, which shall be authorized, in writing, by the employee at least thirty (30) days prior to the first deduction. At its sole discretion, the County may change Deferred Compensation Plans. The County will contribute $23.08 per pay period (based on 26 pay periods per year) up to $600.00 annually to the section 457 deferred compensation account of each employee who contributes at least $23.08 per pay period (based on 26 pay periods per year) to their deferred compensation. In the years where there is an additional pay period (27 pay periods), the County will

contribute $22.22 per pay period up to $600 annually to the section 457 deferred compensation account of each employee who contributes at least $22.22 per pay period up to $600 annually. However, if the employee ceases such contributions, the county match will no longer apply.

17. **Employee Wellness Program**: The County agrees to provide up to $100.00 per calendar year cost reimbursement to non-smoking Confidential employees who participate in an organized fitness program or organized weight-reduction program.

INTERNSHIP PROGRAM

On March 28, 2023, the Board of Supervisors adopted the Use of Interns Policy #2-244, which authorized County departments to hire interns as temporary employees. All placements are contingent upon departmental budget appropriations and County Administrative Officer approval of such requests for temporary help.

Internships are temporary positions within this Unit. They are designed to provide job training. No intern may work more than 999 hours per fiscal year. Interns do not receive seniority, vacation, sick leave, holiday pay, health benefits, or any other type of benefits or incentives unless required under state and federal law. Duties will vary widely based on the training assignment and department needs.

No interns may be paid in excess of state minimum wage per hour, with the exception of legislative or legal interns.

EFFECTIVE DATE

The foregoing resolution was duly passed and adopted by the Board of Supervisors in the County of Amador at a regular meeting thereof, held on the 10th day of November, 2026, by the following vote:

AYES:
NOES:
ABSENT:

_____
Patrick Crew, Chairman, Board of Supervisors

ATTEST:
HEATHER PEEK, Clerk of the
Board of Supervisors, Amador County, California

_____