

Thank you Ms. Moreira and Ms. Kutsuris for letting me talk today. I will be brief.

First, I want to acknowledge the amount of work that the County has done in putting together this EIR. It has been immense...But this amount of work is more than justified, given the huge and negative impact that this proposed cemetery would have on all who live nearby. That is why the neighbors are so concerned about it. Not because we're 'nimby neighbors' but because we want to avoid the 'significant and unavoidable' problems that the proposed cemetery would cause, since these 'significant and unavoidable' impacts would jeopardize our ability to live and support ourselves here in the Tassajara Valley.

At issue today is the adequacy of the EIR, so I will limit my comments to that topic. We believe that the EIR is inadequate for the following reasons.

The FEIR proposes a brand new alternative which is significantly changed from the DEIR alternatives, and in fact it is so different that the existing FEIR is inadequate by not allowing time for the public to review it and to submit comments on it.

In particular, this new alternative leaves so much undefined that it is impossible to assess the impacts of the mitigations that are defined, much less the mitigations that are not. For example:

- a. The new FEIR alternative recommends phased development based on how much water might be found in the future. But isn't a project required by CEQA to

demonstrate sufficient water for its entire scope at build-out, not just enough for an initial phase?

- b. Also, the new alternative's 'phased development' never defines what the phases actually consist of. If the phases are not defined, it is not possible to evaluate the environmental impact of the phased development – the impact might be less than the original project proposal, or it might even be more. Without this information, it is impossible to address whether all of the environmental issues have been identified or addressed, another inadequacy.
- c. Also missing are adequate mitigation measures to be taken if triggering criteria (such as groundwater level declines) were to occur (ref. page 2-62, page 70 of the pdf). For example, the suggested mitigation for both local residents and the cemetery if groundwater were to decline is to deepen wells on a case-by-case basis – but that may or may not solve the problem. And what if it doesn't work? These actions need to be specified so that their environmental impacts can be evaluated for the FEIR to be adequate.

In summary, we believe that the FEIR has not adequately considered all the actions necessary to make this new Enhanced Modified Alternative a viable part of a CEQA document.

While we have a host of other issues with the FEIR, we recognize that these issues are unrelated to the question of adequacy and so will defer that discussion for another day.

Thank you again for letting me speak today.