



**ALBEMARLE COUNTY PLANNING**  
**STAFF REPORT SUMMARY**

<b>Proposal:</b> SP202100009 Natural Burial Ground at Panorama Farms	<b>Staff:</b> Mariah Gleason, Senior Planner II
<b>Planning Commission Public Hearing:</b> July 6, 2021	<b>Board of Supervisors Hearing:</b> TBD
<b>Owner:</b> Panorama Farms Inc.	<b>Applicant:</b> Christopher Murray
<b>Acreage:</b> 706.4 acres	<b>Special Use Permit for:</b> Cemetery use under Zoning Ordinance 18-10.2.2(32)
<b>TMP:</b> 04500-00-00-00100 (portion) <b>Location:</b> 3550 Reas Ford Lane, Earlysville VA 22936, at the western parcel entrance	<b>By-right use:</b> RA Rural Area - agricultural, forestal, and fishery uses; residential density (0.5 unit/acre in development lots)
<b>Magisterial District:</b> Rio	<b>Conditions:</b> Yes <b>EC:</b> No
<b>Proposal:</b> Request for cemetery uses on approximately 20-acres of a 706.40-acre parcel.	<b>Requested # of Dwelling Units:</b> None
<b>DA:</b> <span style="float: right;"><b>RA: X</b></span>	<b>Comp. Plan Designation:</b> Rural Area – preserve and protect agricultural, forestal, open space, and natural, historic and scenic resources; residential (0.5 unit/ acre in development lots)
<b>Character of Property:</b> This portion of the property is comprised of rolling fields and some wooded areas, generally located along on-site streams and property edges. The proposed burial area encompasses both field and wooded areas and is undeveloped. A nearby barn on the property, located south of the subject area, is approved for special events (SP201100027). An old farm road, consisting of packed dirt and gravel, bifurcates the proposed burial area, providing access to the proposed use and also the special event facilities.	<b>Use of Surrounding Properties:</b> Surrounding properties are zoned for Rural Area uses. Most, if not all, of the properties are developed as rural area residences.
<b>Factors Favorable:</b> <ol style="list-style-type: none"> <li>1. The proposed use will offer a service that is not currently available in Albemarle County.</li> <li>2. Income from this use would help support the preservation of farm and agricultural property.</li> <li>3. The proposed use will protect and preserve, in perpetuity, a natural, rural landscape.</li> <li>4. The proposed use is consistent with the character of the nearby area.</li> <li>5. The proposed use is compatible with adjacent uses in this area.</li> <li>6. The proposed use is consistent with the purpose and intent of the Rural Area zoning district.</li> <li>7. The proposed use is consistent with the recommendations of the Comprehensive Plan.</li> </ol>	<b>Factors Unfavorable:</b> <ol style="list-style-type: none"> <li>1. The proposed use will generate additional traffic on Reas Ford Lane.</li> </ol>
<b>Recommendation:</b> Staff recommends approval of SP202100009 Natural Burial Ground at Panorama Farms with conditions.	

**STAFF PERSON:** Mariah Gleason, Senior Planner II  
**PLANNING COMMISSION:** July 6, 2021  
**BOARD OF SUPERVISORS:** TBD

**PETITION:**

PROJECT: SP202100009 Natural Burial Ground at Panorama Farms

MAGISTERIAL DISTRICT: Rio

TAX MAP/PARCEL: 04500000000100 (portion)

LOCATION: 3550 Reas Ford Lane, Earlysville VA 22936, at the western entrance of the parcel

PROPOSAL: The applicant is requesting approval of a special use permit to establish a cemetery on approximately 20-acres of a 706.40-acre parcel.

PETITION: Cemetery uses are allowed by special use permit under Section 10.2.2(32) of the Zoning Ordinance. No new dwelling units proposed.

ZONING: RA, Rural Area - agricultural, forestal, and fishery uses; residential density (0.5 unit/acre in development lots)

OVERLAY DISTRICT: AIA, Airport Impact Area

COMPREHENSIVE PLAN: Rural Area – preserve and protect agricultural, forestal, open space, and natural, historic and scenic resources; residential (0.5 unit/ acre in development lots) within Rural Area 1 of the Comprehensive Plan

**CHARACTER OF SURROUNDING AREA:**

Surrounding properties are also zoned for Rural Area uses. Most, if not all, of the properties are developed as rural area residences, also containing wooded and/or cleared/pastural land. The southern edge of the property is adjacent to the South Fork Rivanna Reservoir. Attachment 1 provides an aerial map of the subject property and surrounding areas.

**PLANNING AND ZONING HISTORY:**

- SDP199700113 Panorama Farms Wayside Stand Permit for Composting Operation
  - While a letter of determination, dated August 19, 1997, found composting operations at Panorama Farms to be a bonafide agricultural operation permitted by-right in the Rural Area, the scale of the operation required a wayside stand permit. This application for a wayside stand permit was evaluated and approved on September 12, 1997.
- SP198100030 Edward Cleveland and Sharon K. Davis
  - On July 15, 1981, the Board of Supervisors approved, with conditions, a request for an additional development right on TMP 45-1, to permit a dwelling on a 14.5-acre parcel that had no existing right. The resulting lot was subdivided off of the subject property and is located at the end of Reas Ford Lane, beyond the entrance to this proposed use.
- SP199700011 Panorama Trails, Inc
  - This application was a request for an athletic facility that would have provided mountain-bike trails for club use. The request was withdrawn in March 1998.
- SP199700027 A.R.C. Natural History Day Camp/E.E.C. Day Camp
  - On August 20, 1997, the Board of Supervisors approved, with conditions, a special use permit allowing the operation of environmental-education day camps. Conditions of approval limited the camps to a number of one- and two-week summer sessions with maximum enrollments of 30 campers for E.E.C. and 35 campers for A.R.C. Another condition of approval required a “Road Narrows” sign to be posted on Reas Ford Lane, which serves as the access road to the camps.

- SP200000054 Albemarle High School Cross-Country
  - On April, 18, 2001, the Board of Supervisors approved a special use permit request to allow a cross-country running course, including competitions with other teams, in accordance with Section 10.2.2.4 of the Zoning Ordinance which allows for “swim, golf, tennis or similar athletic facilities”. Access for this use is provided by Panorama Road, on the opposite side of the parcel from the current proposal, and not through Reas Ford Lane.
- SP200000073 Panorama Farms Bicycle Trails
  - On April 18, 2001, the Board of Supervisors also approved, with conditions, a special use permit request to allow a commercial mountain bike trail, including competitions, in accordance with Section 10.2.2.4 of the Zoning Ordinance which allows for “swim, golf, tennis or similar athletic facilities”. Access for this use is provided by Panorama Road, on the opposite side of the parcel from the current proposal, and not through Reas Ford Lane.
- SDP201100016 Verizon Wireless
  - On September 23, 2011, the County approved a site plan for a personal wireless service facility. This facility is located on the opposite side of the parcel from the current proposal.
- SP201100027 Panorama Events
  - On June 6, 2012, the Board of Supervisors approved, with conditions, a special use permit to allow special events in an existing barn located just south of the current proposed use. Access to the special event facilities is via Reas Ford Lane. Conditions of approval included the following:
    - The maximum number of special events per calendar year shall not exceed twenty-four (24);
    - The maximum number of special event guests shall not exceed two hundred (200) persons;
    - Hours of operation for the special events shall be no earlier than 11:30am and no later than 10:30pm;
    - No new permanent outdoor lighting shall be installed for this use;
    - There shall be no outdoor amplified sound permitted for this use; and
    - The use shall not commence without approval from the Virginia Department of Transportation of sight distance from the entrance to the property.

**DETAILS OF THE PROPOSAL:**

The applicant is requesting approval for cemetery uses on approximately 20-acres of a 706.4-acre parcel. Attachment 2 provides a copy of the applicant’s Project Narrative. The applicant for this proposal is specifically seeking to establish a “green” cemetery, which is described in the narrative as:

“...a cemetery in which everything in the ground is biodegradable. Unlike at a conventional cemetery, there is no embalming, no metal or exotic wood caskets, and no concrete vaults. Above the ground, green interment sites are usually marked with flat, natural fieldstones or with native plantings. No plastic memorials are permitted.”

Maps of the proposed 20-acre burial area and associated, supportive facilities (e.g. parking areas and a potential future pavilion location) are provided in Attachments 3 and 5, respectively. As the aerial imagery shows, the proposed burial area encompasses both wooded and open field lands. There are two site entrances proposed for the use. One entrance, located to the north of the property, exists today. The second, southern entrance is an older entrance to the farm property that would be improved at such a time that an additional entrance is needed. The

Virginia Department of Transportation, VDOT, has reviewed both points of access and approved of the proposed locations.

The location of the proposed burial area is informed by multiple setbacks. Virginia State Code § 57-26 restricts the establishment of cemeteries within 250 yards, or 750 feet, from any residence without the consent of the owner of the legal and equitable title of the residence. The applicant has provided suitable documentation demonstrating consent from neighboring land owners to establish burial lands in areas closer than 750 feet from respective residences. That documentation can be referenced in Attachment 6. Additional setbacks include 100-foot setbacks from streams, a 70-foot setback from Reas Ford Lane to accommodate a gas line, and a 50-foot setback from the northeastern boundary line of the property, which exceeds the minimum 25-foot setback for rural area parcels required by Section 10.4 of the zoning ordinance.

### **COMMUNITY MEETING:**

In light of COVID-19, community input on this project was solicited through several means including phone, email, and a virtual community meeting held via Zoom. The virtual community meeting was held at 5:30pm on April 28, 2021. Mailed letters were sent to ninety-eight (98) surrounding property owners inviting them to participate in the meeting and share comments, concerns, and questions. The event was attended by a total of 12 participants. A recording of the virtual community meeting is available via the County calendar and Albemarle County's YouTube account.

Community comments and questions received during the meeting included:

- Concern regarding the quality and maintenance of Reas Ford Lane
  - The applicant responded by stating that the existing, northern site entrance was previously reviewed and approved for events for up to 200 people, referring to the approval for SP201100027. The applicant deferred maintenance of the road to VDOT, as a public road.
- Concern regarding potential traffic issues with the ingress and egress of vehicles, including emergency vehicles, on Reas Ford Lane
  - The applicant's response was that the number of attendees for green burials is typically smaller (12-15 attendees) and the intention is for the proposed cemetery uses to start slowly on the property. The applicant stated that other similar cemetery operators found that between 30-50% of the burial plots sales are "pre-need" and reserved. Thus, burials on the property may not occur for some time.
- Question about possible improvements to northern entrance and internal road serving the cemetery use
  - The applicant responded that no improvements are currently planned to the existing entrance and internal access road but that improvements could be discussed and incorporated in the future.
- Question regarding how the proposed cemetery use area would be protected and preserved if the property were subdivided and developed in the future.
  - The applicant stated that a perpetual care trust fund is required of cemeteries under Virginia State Code. This fund ensures the upkeep of the cemetery and the perpetual care of the plots therein, even if the cemetery should fail in the future.
- Question regarding ways the use may expand should the cemetery use be successful
  - The applicant responded that, should the proposed use be successful, they would prefer to expand the cemetery into the northern corner of the property as much as possible. The applicant explained that relegating the proposed use to one property corner would allow the remaining parcel area to retain flexibility for other activities to occur on Panorama Farms.

Of the input received from surrounding neighbors following the community meeting, two were supportive of the proposal and six noted concerns. Concerns were primarily around the use of Reas Ford Lane as the access road to the proposed cemetery – specifically traffic, the narrow design of the road, safety, dust, noise, and potential road damage – with additional concerns around the development of the proposed use. Overall, public input from community members, including those outside the immediate area, was almost equal regarding those supporting the proposal and those identifying concerns. Written public comments and photographs received by the County are contained in Attachment 7.

Through the community meeting and additional comments received by staff, only one community member, an abutting property owner to the north, had concerns with the proposed cemetery use itself. No issues about the green cemetery concept were raised during the community meeting or via public comments received by staff.

### **ANALYSIS OF THE SPECIAL USE PERMIT REQUEST:**

Special Use Permits are evaluated under reasonable standards, based on zoning principles which includes the proposal's compliance with the Comprehensive Plan. Any impacts caused by the proposal may be addressed through conditions and those conditions must be reasonably related and roughly proportional to the impacts.

***Section 33.39(B) states that the Commission, in making its recommendation, shall consider the same factors found in Section 33.40 (B):***

- 1. No substantial detriment. Whether the proposed special use will be a substantial detriment to adjacent parcels.***

#### Traffic

A significant number of community concerns were related to traffic and the width and quality of Reas Ford Lane. As a public road, Reas Ford Lane is owned and maintained by VDOT. VDOT reviewed the proposal and offered the comments below. VDOT has also indicated that no improvements on Reas Ford Lane have been identified at this time.

“Reas Ford Ln (Rte 661) is a gravel road with some narrow areas dropping as low as 14 feet wide, and is not built for large volumes of commercial traffic. That said, delivery trucks and box trucks were observed passing the VDOT inspector on this road. The Department does not have the authority to prevent vehicles from using a state highway unless there is an engineering feature preventing them (e.g., weight restricted bridge, low clearance that can't be raised, etc.). Both entrances onto Panorama Farms from Reas Ford Ln meet the requirements for a Low-Volume Commercial Entrance (after trimming some brush), as defined by Appendix F of the Road Design Manual. As long as the entrances see less than 50 vehicles per day AADT, the Department has not found any objections to the owner's plans related to the existing highway conditions.”

The Institute of Traffic Engineers (ITE) Trip Generation Manual 7<sup>th</sup> Edition (the most recent available to Albemarle County Staff) does not provide data for green cemeteries and only has select observational data from much larger facilities than this one. However, weekday averages provided in the ITE Manual show that a 20-acre cemetery could generate as many as 94 daily trips on weekdays and up to 136 daily trips on weekends. Daily trips, here, means travel by one vehicle in a single direction. Transportation staff reviewed the data collected by the applicant provided in Attachment 8 regarding burial attendance for other green cemeteries and believes that information to be valid and likely a better predictor of

traffic levels for this facility. According to that data, trip generation to this site would likely be much lower than that provided in the ITE Manual.

Note, staff analysis of traffic assumes full build out and operation of the cemetery. However, cemetery uses on the property are not likely to commence all at once. It is expected that the proposed use will instead grow and expand over time, as burials occur. In which case, the existing single entrance would be sufficient to support the proposed use initially. Depending on the number of actual vehicle trips associated with the incremental growth of the proposed use, the second site entrance will likely need to be developed and site entrances may require upgrades per VDOT standards. It is unknown when this “tipping point” may occur, as the County does not have enough information on expected vehicular trips associated with green cemeteries, specifically, nor is it known how the County may track the incremental growth of the proposed use. However, an opportunity to assess the site entrances would occur with the development of the potential future pavilion, which would require a site plan. The site plan process would allow VDOT and Fire/Rescue to evaluate and require any necessary to the site entrances at that time. Nevertheless, if improvements are found to be needed on Reas Ford Lane, the County has the general ability to work with VDOT to identify potential improvements.

Reas Ford Lane is proposed to serve as the access road to the proposed use. The 706.40-acre subject parcel does have another entrance on the east side of the parcel, via Panorama Road, off of Earlysville Road. However, Panorama Road does not connect all the way through to the east side of the property where the proposed cemetery use would be established. An existing entrance on Reas Ford Lane is already located on the property near the proposed use. Should the cemetery area be subdivided from the property in the future, staff finds that it would be appropriate for the use to be accessed from the nearby, existing public road.

As an access road, Reas Ford Lane is rural gravel road that supports two-way vehicular travel. Staff found that there are two locations in the 0.5-mile road length leading up to the proposed cemetery use entrances where the width of Reas Ford Lane narrows to less than 20 feet, potentially restricting two-way vehicular movements. Both of these locations are adjacent to a grass or low-foliage area on at least one side, potentially allowing for one vehicle to pull to the side of the road as oncoming traffic passes. Vehicles using the road to access the proposed use will likely enter and exit the parcel together, limiting the number of potential conflicts with on-coming traffic along Reas Ford Lane. Also, it is reasonable to assume that traffic associated with the proposed use would likely progress at comparatively slower speeds and likely exhibit more safe driving habits. In this way, while increased traffic may be expected by the commencement of this use, drivers accessing the use will likely not contribute to endangering the use of the road by others.

Lastly, review and approval of a previous special use permit on the subject parcel, SP201100027, found that Reas Ford Lane was sufficient to support 24 special events per year with up to 200 attendees each. Staff acknowledge that estimated traffic generated by the proposed use may be more consistent throughout the week, however, approval of the special events special use permit demonstrates that Reas Ford Lane was sufficient to support a higher number of attendees and vehicles to an individual event than what is anticipated by the proposed use. That said, based on the estimated vehicular trips associated with the proposed use (94 daily trips on weekdays and up to 136 daily trips on weekends – or 47 and 68 vehicles respectively) staff recommend Condition 3 to avoid negative traffic impacts created by multiple uses occurring on the property at the same time.

Based on the findings contained herein, staff does not find that the proposed use will create substantial detriment to adjacent parcels provided the conditions recommended by staff, whereas Condition 2 limits the operation and maintenance of the use to daylight hours therefore limiting dust generation and potential vehicle conflicts at night and Condition 3 restricts burial services from occurring simultaneously with special events permitted under SP201100027.

### Sound

Based on the often somber nature of burial services and the low number of attendees reported by other similar cemeteries, staff does not anticipate the regular use of sound amplification devices during burials. Also, the setbacks for the proposed burial area and uses are at least twice the minimum setbacks required for Rural Areas, under Section 10.4 of the zoning ordinance. Therefore, greater sound diminishment would be anticipated over the distance of the larger setback proposed by the applicant. Furthermore, Section 4.18 of the zoning ordinance regulates maximum sound levels allowed within Rural Areas. Should sound generated by this use exceed maximum noise levels permitted on the property, adjacent property owners would be protected by this ordinance provision.

Staff find that the proposed use will create no substantial detriment to adjacent parcels.

### Visual

As the applicant desires to establish a “green” cemetery, that resembles a natural landscape, it is not anticipated that there will be significant negative visual impacts associated with the proposed use. The narrative submitted by the applicant states that the success of a green cemetery is “measured by how little effect it has on the surrounding landscape, how visually unobtrusive it is, and how proactively it preserved the natural environment.”

In addition, proposed parking areas and the potential future pavilion associated with the cemetery use are not likely to be visible from Reas Ford Lane, primarily due to grading along the public road and proposed setbacks. In comment responses previously submitted, the applicant stated that the proposed size of the potential future pavilion will be approximately 1,200-2,000 square feet in size. Should the proposed pavilion be developed in the future, a site plan meeting the relevant regulations for structures in the Rural Areas would be required to allow the construction of the building. (Note: The site plan would be reviewed by Site Review Committee, which includes VDOT and Fire/Rescue. Any necessary upgrades to the site entrance could be evaluated and required at that time.)

Based on these findings, staff does not anticipate the proposed burial area or supportive parking areas and potential future pavilion to create substantial detriment to adjacent properties. This being the first green cemetery proposed in the County, staff recommend Conditions 5 and 6 which specifically address the continuation of the proposed burial area as a natural landscape and visual open space. Staff also recommend Condition 7 regarding the size of the potential future pavilion.

## **2. Character of the nearby area is unchanged. Whether the character of the adjacent parcels and the nearby area will be changed by the proposed special use.**

In addition to the findings contained in Factor #1 above, the operation of the proposed use will primarily utilize under-ground areas, leaving above-ground areas seemingly untouched as a perpetually preserved, natural, rural landscape. Also, by nature of establishing a cemetery, the ability to subdivide and develop this land for other purposes is being removed.

Staff, therefore, find that the character of the adjacent parcels and nearby area will be unchanged by the proposed cemetery use.

**3. *Harmony. Whether the proposed special use will be in harmony with the purpose and intent of this chapter,***

Albemarle County Code states that the purpose and intent of the Rural Area (RA) zoning district is the preservation of agricultural and forestal lands and activities; water supply protection; limited service delivery to the rural areas; and conservation of natural, scenic, and historic resources.

Allowing cemetery uses on this property is in conformance with the purpose and intent of the Rural Area. The proposed cemetery will be located on a portion of the property that will not be within established stream buffer areas and will not disturb existing septic fields and well locations on or adjacent to the property. In addition, the establishment of the cemetery as a “green” cemetery will support the conservation of a natural landscape.

***...with the uses permitted by right in the district,***

The subject property and surrounding adjacent properties are zoned Rural Areas. The proposed green cemetery will be complementary to by-right uses in the district.

***...with the regulations provided in Section 5 as applicable,***

There are no supplementary regulations for cemetery uses.

***...and with the public health, safety, and general welfare.***

VDOT reviewed the proposal and only noted possible future upgrades to the site entrance(s) proposed for the use. As noted above, if the potential pavilion structure is developed on the property in the future, a final site plan would be required. Any necessary upgrades to the site entrance(s) would be evaluated and required at that time.

The proposal was also reviewed by Fire/Rescue services, Virginia Health Department, and Albemarle County Engineering and Building Inspection divisions. No concerns around public health, safety, and general welfare were noted regarding the establishment of the use. Reviewers did offer the applicant recommendations around the operation of the facility, including approvals/permits for tree clearing activities and aspects that may be required with the potential development of a future pavilion structure.

Staff find that the proposed use will not be a detriment to public health, safety, or general welfare.

**4. *Consistency with the Comprehensive Plan. Whether the proposed special use will be consistent with the Comprehensive Plan.***

The Rural Area Chapter (Chapter 7) of the [Comprehensive Plan](#) designates this parcel, TMP 45-1, for Rural Area land uses. The intent of the Rural Area designation is to allow uses that preserve and protect agricultural, forestal, open space, and natural, historic, and scenic resources; and also to allow residential uses at a density of up to 0.5 acres per dwelling unit. While cemeteries are not explicitly addressed by the Comprehensive Plan, staff is able to make the following findings:

- The proposed use does not conflict with agricultural and forestal uses.
- The proposed use will protect and preserve a rural landscape.

- The proposed use will allow the land to act as a natural open space capable of supporting wildlife.
- The proposed use is appropriately located in the Rural Area because it:
  - Supports community needs without fostering developmental growth and further suburbanization in the Rural Areas, and
  - Relieves pressure to provide this land use within Development Areas, which are designated for more urban growth patterns.

Staff finds the proposed use to be consistent with the Comprehensive Plan.

**SUMMARY:**

Staff finds the following factors favorable to this request:

1. The proposed use will offer a service that is not currently available in Albemarle County.
2. Income from this use would help support the preservation of farm and agricultural property.
3. The proposed use will protect and preserve, in perpetuity, a natural, rural landscape.
4. The proposed use is consistent with the character of the nearby area.
5. The proposed use is compatible with adjacent uses in this area.
6. The proposed use is consistent with the purpose and intent of the Rural Area zoning district.
7. The proposed use is consistent with the recommendations of the Comprehensive Plan.

Staff finds the following factors unfavorable to this request:

1. The proposed use will generate additional traffic on Reas Ford Lane.

**RECOMMENDED ACTION:**

Based on the findings contained in this staff report, staff recommends approval of SP202100009 with the following conditions:

**CONDITIONS:**

1. Development of the use must be in general accord (as determined by the Director of Planning and the Zoning Administrator) with the conceptual plans titled “Green Cemetery Footprint – aerial – v 4.5” dated April 21,2021 and “Green Cemetery Parking and Pavilion – v 3.0 100ft scale” dated March 13, 2021. To be in general accord with the Conceptual Plans, development must reflect the following essential major elements:
  - Burial areas
  - Parking areas
  - Potential future pavilion location
  - A 250-foot setback of the burial areas from the dwelling unit on TMP 31-21E.
 Minor modifications to the plan which do not conflict with the elements above may be made to ensure compliance with the Zoning Ordinance.
2. Maintenance and operation, including the digging of graves, of the cemetery is restricted to day light hours only.
3. Burial services cannot be scheduled to occur at the same time as special events associated with SP201100027.
4. Only biodegradable materials may be interred into the ground during burials. Non-biodegradable materials include embalming fluids, non-biodegradable caskets, and concrete vaults.
5. No plastic memorials are permitted.

6. No individual grave will be marked by a fixed, upright marker, monument, or other structure.
7. The footprint of the pavilion structure will not exceed 2,000 square feet.

### **ATTACHMENTS**

- Attach. 1: [SP2021-9: Vicinity Map](#)
- Attach. 2: [SP2021-9: Project Narrative](#)
- Attach. 3: [SP2021-9: Proposed Burial Area](#)
- Attach. 4: [SP2021-9: Metes & Bounds Description of Proposed Burial Area](#)
- Attach. 5: [SP2021-9: Proposed Parking and Future Pavilion Areas](#)
- Attach. 6: [SP2021-9: Waivers Permitting Proposed Burial Area](#)
- Attach. 7: [SP2021-9: Written Public Comments and Photographs](#)
- Attach. 8: [SP2021-9: Green Cemetery Attendee Data](#)
- Attach. 9: [SP2021-9: SP201100027 Special Event Barn & Parking Location](#)