

CEMETERY RULES PUBLIC REVIEW COMMENTS					
RULE Section (if noted)	NAME	COMMENT	DATE	Submitted by	PARD Response by email
	Watson, Emily	I understand the need for efficiency in maintenance. I really do. But please reconsider taking away people's right to grieve in the manner of their choosing in an effort to make it easier to mow. As someone who has lost a child, it cannot be overstated how important it is to have a place to sit, to share, to remember and to grieve. Bringing mementos and flowers and rocks and ornaments are things families need so they can feel close to their loved ones. And to take that away is needlessly cruel and incredibly insensitive. Loss is hard enough for everyone who must endure it. Please find the compassion to reconsider.	12/17/2017	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. Based on Public feedback we've added clarifications that decorations are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules have not been consistently enforced so before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
	Fowler, Amy Jo	I am an Austin Resident and active local voter. Never miss an election. My residence is in the zip code 78757. I am writing to express my adamant opposition to the proposed rules in the above referenced cemetery rules (R161-17.17), regarding new rules for the way local Austin residents decorate the graves of their loved ones who have passed. I am disgusted and repulsed by this new set of rules. This is the city of Austin. This is not Plano, or Flower Mound, or Katy. This is Keeping it Weird proud Austin, Texas. I am sorry that the city has hired lazy people to mow the lawn at the cemetery, who would prefer to desecrate family memorials so that they can ride lawn mowers to make their job easier. Maybe the city should improve its hiring practices so you can employ someone with hard working ethics and a respect for the dead and those who grieve for the dead. Passing this new set of rules will not just desecrate graves, it will destroy the reputation of the Austin Parks and Recreation department. I have always supported any and all increase in funding towards Austin Parks and Recreation Department. If this rule is passed, I will not be able to support your department in the future, when more money is requested through bond measures. This rule is stepping on the toes of long time supporters and avid voters that support your Department. It is also an absolute travesty to the heat and soul of this awesome city. I respectfully request that this rule be DENIED.	12/17/2017	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. Decorations are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
	Dequire, Lani	I am writing to express my anger and sadness at the measure that is set to go into effect on January 12, limiting the ways in which families can grieve and celebrate the short lives of their loved ones. <a href="http://www.austintexas.gov/edims/document.cfm?id=289890">http://www.austintexas.gov/edims/document.cfm?id=289890</a> 9 years ago my nephew passed away, still born at 37 weeks. My sister and brother-in-law, and our whole family, was rightfully devastated. Did I mention it was Thanksgiving? Yeah. For years now, having a space to customize, add to, maintain, share, and cry has been incredibly important for our family. Having our bench to sit on, the planted bulbs that bloom in the Spring, the personal offerings and mementos, etc. help making the reality of their loss bearable. I encourage the City of Austin to find other ways to save money on this issue than restricting families to grieve in city-mandated ways. It is cruel and insensitive. Sacred grave sites shouldn't be beholden to HOA-like regulations. C'mon. I understand that there are complications to maintaining these grounds and that the ability to do a fast, even mow is ideal, but taking the extra time (I believe it's 15 extra days a year?) to get the job done well while also having reverence for the physical expression of grief on the grounds doesn't seem like too much to ask.	12/17/2017	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. Decorations are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. Additionally, We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
14.4.7	Sylvana, James	Specifically: 14.4.7- Instructions for Space Holders and Space Holder's Rights ... (B) Construction or installation of slabs, curbing, steps, fencing, hedging, or enclosures of any kind will not be permitted on or around any space or lot. As found in: <a href="http://www.austintexas.gov/edims/document.cfm?id=289890">http://www.austintexas.gov/edims/document.cfm?id=289890</a> I'm writing out of concern for this proposed regulation. It does not appear to be solving any actual problem and instead appears to be aimed squarely at stifling the local creative culture of Austin, Texas. Cemeteries the world round are decorated and celebrated and memorialized in many creative ways that in no way create a public safety hazard. This rule making appears to be overly broad and unnecessarily confining. As a solution it only seems to be seeking a problem that does not exist. Please revise the rule making to deal with actual problems in terms that are not decorative but are actually deliberately and measurably insuring of health and safety.	12/18/2017	email	Your feedback is extremely valuable to us, it helps the City of Austin Cemeteries Operations understand which features, functionality concerns, and questions that are most important to you. We carefully review all of the feedback when determining how to accommodate both current and new customers of the City of Austin Cemeteries. We recognize and are extremely sensitive to the fact that people have a right to grieve in the manner of their choosing. All families should and will have a place to share, remember and grieve. Ornament decorations are allowed with restrictions and to ensure the safety of others coping with a loss. Construction or installation of slabs, curbing, steps, fencing, hedging, or enclosures of any kind unfortunately will not be permitted on or around any space or lot. These installations pose trip and fall hazards and specialized maintenance. We are being conscious to the overall safety of the public, visitors and staff of City of Austin Cemeteries. The new proposed cemetery rules are a less restrictive, safety regulated and a more empathetic update to the 1978 78504-22 resolution. We understand implementing these changes poses new challenges and are more than willing to work with our community. With the new rules implemented, we hope and strive to serve our supporters and community members.
	Blumenthal, Sally	my niece lives in austin and recently shared the idea of possible changes coming to honoring, or limiting remembrances or acknowledgements to headstones. i am a former hospice nurse (and co founder) and have been a therapist specializing in life threatening illness, dying and death for many years and grief. what i do know is grief comes in many forms. there is no right way to grieve, as long as it is honored, when the bereaved is ready. this comes through in so many creative unique ways that it would be hurtful and i believe harmful to have external limits on someone's personal expression of honoring of their loved one. please do what you can to allow this process to form and unfold organically as healing has a funny way of showing up. as long it does, let's honor and celebrate the healing journey, thank you.	12/18/2017	email	Thank you for having taken your time to provide us with your valuable feedback relating to your concerns with the new cemetery rules. Your helpful comments are much appreciated, and your feedback will help us to continually improve the standard of our facilities and services offered to all customers here at City of Austin Cemeteries. We recognize and are extremely sensitive to the fact that people have a right to grieve in the manner of their choosing. All families should and will have a place to share, remember and grieve. Ornamentation is allowed with restrictions and to ensure the safety of all staff and others coping with a loss, we ask all ornaments must be properly placed on the memorial via cemetery rules. An ornament or decoration is permitted in a space if: placed on a memorial; no longer than six inches in dimension; and the ornament or decoration will not interfere with mowing or other cemetery maintenance. The new proposed cemetery rules are a less restrictive, safety regulated and a more empathetic update to the 1978 78504-22 resolution. We understand implementing these changes poses new challenges and are more than willing to work with our community.
	Boyd, Kay	Earlier I wrote the cemetery division that I place flowers on 34 graves on family members of mine and my husband. Some of these go back to 1876. I am not going to buy vases for these. There is no place to put them. The last large containers I had in Oakwood were stolen. I also don't think the rules will be enforced the same at all cemeteries. There are cemeteries on the east side and areas of Oakwood and the annex where people cannot afford this extra expense. It will be a full time job checking each grave site. There are also many people who are not on the email list who are not aware of these new rules. And certainly many who do not take the newspaper.	12/19/2017	email	Your feedback is extremely valuable to us, it helps the City of Austin Cemeteries Operations understand which features, functionality concerns, and questions that are most important to you. We carefully review all community feedback when determining how to accommodate both current and new customers of the City of Austin Cemeteries. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. These rules will be implemented for all City of Austin Cemeteries. Cut and artificial flowers are permitted in a space if: Placed in an invertible vase or other container.
	Felchak, John	I approve of the Rules. What we must do now is to lobby the City Council to appropriate funds to implement the Master plans that were approved at least two years ago. I do not know of any of the recommendations being acted upon. This is so very disappointing to me. Is there any update on this.	1/3/2018	email	Thank you for having taken your time to provide us with your valuable feedback relating to the new cemetery rules. Your helpful comments are much appreciated, and your feedback will help us to continually improve the standard of our facilities and services offered to all customers here at City of Austin Cemeteries.
	Williams, Cynthia	In providing comment regarding the cemetery rules, there is no language or provision that outlines how reasonable accommodations will be provided for those persons who are disabled, and how will there be areas designated as handicap accessible.	1/8/2018	email	Your feedback is extremely valuable to us, it helps the City of Austin Cemeteries Operations understand which features, functionality concerns, and questions that are most important to you. The City of Austin is proud to comply with the Americans with Disabilities Act. Compliance with this act is outlined in other City of Austin policies that already apply to cemetery facilities and therefore was not additionally included in these rules. If you require assistance for participation in our programs or use of our facilities, please call (512) 974-3914.

Been, Beth	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Fracé, Summer	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Martínez, Terry	I am writing to you because I am very disturbed by the proposed cemetery rules. It seems cruel to take away memorials that have been approved and that have allowed families to assuage their grief with personal decorations and benches for their visits. If there is financial pressure, surely other approaches to savings can be found through working together with the community and city council in transparency. I urge you to reconsider the changes that are proposed and to show compassion for the grieving families.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us. Based on <a href="#">public</a> feedback we have amended the definition of memorial under 14.4.3(B)(6) to include benches and revised the proposed rules to accommodate existing benches <a href="#">with restrictions</a> , as outlined in 14.4.12 (D) (11). The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules have not been consistently enforced so before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety
Collins, Grace	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Fisher, Cindy	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.

Raiford Jr., Robert	I am long-time resident of Austin. I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of the Austin City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rule goes against many cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials, as I understand, have been sanctioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put a family's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions, and respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Adkins, Michele	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Baum, Philip	I am confused regarding two seemingly conflicting statements: - (8) "Owner" means a person in whose name a burial space is listed in the city cemetery office as the owner of the exclusive right of sepulture.- 14.4.5 Interments: (C) The cemetery administrator shall not allow an interment or disinterment to proceed until presented with written authorization from the owner. Here's my question: Won't the owner be dead?	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. An Owner may be the original purchaser(s), heir(s) of the original purchaser(s), or an owner may be listed as a church, organization or association, which purchases multiple spaces on behalf of individuals.
Carbone, Kata	I support the cemetery rules, particularly aspects related to safety and maintenance, and I appreciate the decorum with which memorials, plants, and decorations are to be placed. The cemetery administration must now be held accountable for enforcing these rules, correcting violations, and obtaining adequate recompense as necessary when plot owners or visitors violate the rules.	1/10/2018	email	Thank you for having taken your time to provide us with your valuable feedback relating to the new cemetery rules. Your helpful comments are much appreciated, and your feedback will help us to continually improve the standard of our facilities and services offered to all customers here at City of Austin Cemeteries. Upon adoption of the rules we will begin a notification period for enforcement.
Kisssoyan, Kimberley	I am writing to you to voice my concern over the forced removal of plantings, memorials, benches, flowers, and decorations at Austin's cemeteries. I am concerned that the city has not received sufficient community feedback on this issue, in large part because PARD pushed this through over the holidays when they knew it wouldn't get the attention it deserved. You cannot simply side-step the city council's recommendation that you not make decisions without community input. You are breaking promises to grieving families about how we were told we could memorialize our children, siblings, spouses and parents. You are making it difficult for people to process their grief, particularly the young and the old, by not allowing a place to sit graveside because of the removal of benches. You will be effectively desecrating Jewish graves when you go against their religious traditions and remove their stones. This is both a legal and an ethical issue. If you go through with this, outrage and lawsuits will follow. We have voices. This is unthinkable cruel. Please do not do this. Please.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us. Based on the feedback we have received we have amended the definition of memorial under 14.4.3(B)(6) to include benches. We have also revised 14.4.12(D)(11), to accommodate existing benches. While allowing for cultural and religious expression; stones, flowers, and memorabilia are allowed be placed at the head of a space or on the headstone. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Tobia, Edward	Our grandson who had been stillborn is buried in a city cemetery. It appears that the new proposed rules (Rule No. R161-17.17) would change what had been allowed in the past and change promises made to families about how they could memorialize a loved one, especially a child. All this so that mowing is made easier? It's shameful that the city has posted the opportunity for feedback about the proposed rules over the holidays when few people would notice and it's also shameful that there is little regard for those who want to memorialize a lost child in a tasteful and meaningful way (see photo). I'm aware that this issue has been brought to the City Council in the past and that there may very well be some legal and ethical issues related to the passage of these proposed rules. Please consider the negative feedback the city will receive if you move forward with these rules.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. Decorations are allowed on memorials with restrictions to ensure the safety of cemetery patrons and the staff tasked with maintaining the cemeteries. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11) and to include "Memorialization Space", as outlined in 14.4.12 (D). The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules have not been consistently enforced so before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Ford, Hannah	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been previously allowed and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.

	Martinez, Sorfia	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. They would significantly affect many people who have not been able to vote - or even in many cases to comment on the rule, as it is not a well publicized proposal or process. People grieve, mourn, and memorialize in unique ways, driven by personality and religion. A blanket removal of memorials other than headstones would cause grief, anger, hardship, and religious objections - not to mention make our city a blander place. Removing benches seems especially egregious. Many people need them in order to spend time at a gravesite. I am disabled, and cannot stand for long. I used to take my grandmother to visit her relatives in the cemetery, and benches were important for her. In addition to the moral and human concerns, the existing memorials were erected and placed legally. Removing them would likely open the city to lawsuits. Since this change is being done to save money, it seems counterproductive. Please reject this rule.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. We agree that people should be able to grieve in the manner of their choosing but in a public setting there must be rules to protect the rights of all customers while providing a safe and accessible environment. Decorations are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. We have revised the proposed rules to accommodate existing benches, as outlined in 14.4.12 (D) (11) and to include "Memorialization Space", as outlined in 14.4.12 (D).
14.4.3.B.2	Blythe, Sharon	After attending two cemetery rules meetings October 23rd and October 26th (not really meetings just dog and pony show – no chairs or general group discussion) where the draft rules were distributed, I am reporting that there are serious flaws in the draft rules and the changes made from the 1978 version are detrimental to the cemetery plot owners. Here are my major concerns (my comments are in red): see below. 14.4.3.B.2- <b>The definition of a cemetery is broader in State law than just designated by the City. Please correct this definition to be in accordance with State law. The state law says anywhere there is a body buried is a cemetery.</b>	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your feedback is extremely valuable to us, it helps the City of Austin Cemeteries Operations understand which features, functionality concerns, and questions that are most important to you. Although state law does apply to a broader family of properties, the City's rules are applicable only to tracts of land designated as a municipal cemetery by the City.
	Blythe, Sharon	The definition of a Cemetery Employee includes a contractor. <b>A contractor should not be included in this definition.</b>	1/10/2018	email	Based on your feedback we have removed the inclusion of contractors as cemetery employees.
14.4.4	Blythe, Sharon	14.4.4 –Use of Cemetery Facilities Generally (E) A person may not enter areas reserved for the use of cemetery employees. <b>These areas are not defined and could include the office or other areas frequented by cemetery owners. This need rework.</b>	1/10/2018	email	We carefully review all feedback to determine how to best accommodate both current and new Cemeteries Operations currently has signs in place at AMP identifying the Maintenance area (surrounded in privacy fencing with a west and north gates) as an area reserved for the use of cemetery employees. We will assess the cemeteries to determine if additional signs are needed and if we need to modify the language on the signs to be more specific.
14.4.5	Blythe, Sharon	14.4.5 – Interments (F) Cemetery personnel shall only be responsible for the opening and closing of the grave. <b>Currently, the contractor does this function. The cemetery personnel are responsible for other things that are spelled out in Texas Health and Safety Code Section 713.011. This section defines what the City is responsible for in the care of the cemetery. See 14.1.13 in the draft rules which spells out the duties of the City.</b>	1/10/2018	email	14.4.5 is written to convey that Cemeteries Operations will be held ultimately responsible for the opening and closing of the grave, even when this task is performed by a contractor hired by the City of Austin to perform these duties. The contractor is operating at the direction of the Cemetery Administrator.
14.4.9	Blythe, Sharon	14.4.9 – Memorials – (A) All memorials shall be installed and maintained at the owner's expense. <b>This is in direct contradiction of the Health and Safety Code Section 713.011 which explicitly requires the city to level and straighten markers or memorials.</b> (K) .....The expense of such correction, removal, or repair may be charged to the space owner. <b>This contradicts Health and Safety Code Section 713.011. It was the legislature's intent to have the city fund all maintenance in the cemetery but the city has failed in these duties.</b>	1/10/2018	email	The Parks and Recreation Department, as the City department given responsibility for Austin's municipal cemeteries, has put in place a program to address health, safety, comfort, and welfare issues impacting the public in the City's cemeteries. State statute enables the City to implement this program and intervene in the maintenance of lots when necessary to protect the public. These rules make clear in 14.4.13 that the City reserves all rights necessary to accomplish its responsibilities. The priorities of the City's program are dictated by the nature and scale of potential impacts to the public as well as the resources available to the department.
14.4.10	Blythe, Sharon	14.4.11 – Rules for memorial work – (A) The cemetery administrator must approve.....the inscriptions.....of all memorials..... - <b>This is over reaching a family's wishes.</b> (D) Owner and owner's heirs are responsible for cleaning and repairing damaged memorials. <b>This contradicts State law Health and Safety Code 713.011.</b>	1/10/2018	email	In accordance with the Rules, we do request additional information, including the design. We are doing this as a pre-cautionary step toward greater diversification and inclusion, particularly in light of hate crimes, cemetery vandalism, etc. that have increased over the past couple of years. It is not intended to exclude people from freedom of expression, but to simply support the changing times.
14.4.11	Blythe, Sharon	14.4.12 - General Regulations – (A) Peace and Quiet (1) A person shall preserve the peace and quiet of the cemetery by observing the law governing noise and amplified sound. – <b>This is exactly what is written in the general parks rules for the city with cemetery inserted rather than park. It appears that the City law department wrote these draft rules but they have never attended a cemetery meeting of stakeholders and work in the dark. The City law says that sound cannot exceed 85 decibels at the property line and this noise level would not be appropriate for a cemetery.</b> (2) A person may not use offensive language..... that would be offensive to a person of ordinary sensibility. <b>Ordinary sensibility is not defined.</b> (B) Disruptive Behavior; Ejection from Facilities – If a person's conduct violates these rules.....the person may be warned and asked to stop..... If a person persists.....a cemetery employee may eject the person from the cemetery. <b>This is too broad and needs rework. Any cemetery employee can eject anyone from the cemetery if they want to without supervision. There are no guidelines here for when these ejections might occur. A widow might cry and be rejected.</b> (C) Public and Private Events – (1) Organized events and tours must be approved in advance by the Parks and Recreation Department's Special Events Office. <b>The Special Events Office personal have never attended a cemetery meeting and heard the public so what is their criteria for issuing a permit? Special Events (programming) according to the Cemetery Master Plan were not to be allowed at Austin Memorial Park at this time. The rules are not separated into different cemeteries to comply with the Master Plan. Special Events should be defined by individual cemetery and not a blanket statement that the Events office can authorize them. Funerals are private events so according to the draft rules the Events office would authorize them.</b> (D) Ornamentation and Decoration – (8) An ornament or decoration is permitted in a space if: (b) no longer than six inches in any dimension. <b>Many flower arrangements are bigger than six inches. This rule needs rework.</b>	1/10/2018	email	Regulations of noise and amplified sound are found in City Code Chapter 9-2. We adopted the local laws governing noise and amplified sound to ensure support with enforcement. We did not find anything pertaining to this particular issue in State Law. We also experience cultural and religious practices that may be considered loud such as military honors that are performed at a service, or a congregation signing a hymn also during a service. Cemeteries Operations will address all high decibel situations on an individual basis, and we will do our best to not interfere with or hinder any appropriate forms or acts of cultural or religious expression. We have revised rules to include "Memorialization Space", as outlined in 14.4.12 (D). The Events Division will be aware of any individual restrictions that apply similar to special restrictions on individual parks. The process for applying for an event is located on our web page at <a href="http://www.austintexas.gov/department/parks-special-events">http://www.austintexas.gov/department/parks-special-events</a>
	Blythe, Sharon	In conclusion, these draft rules are not acceptable and further will not be enforced since they are slated to be approved only by the Parks Department Cemetery Administrator. These rules will not be going to City Council for approval so the public's elected officials have no say in them. These rule updates need approval by City Council and not just the Cemetery personnel. My suggestion would be to put these draft rules aside and engage the Parks and Recreation Board to form a working group of citizens to discuss the rules and come to conclusions about what should be in them that would satisfy most people who own property in the cemetery.	1/10/2018	email	City Council directed and authorized staff to adopt rules by a prescribed process by approving City Code Section 10-1-2. City Council set out the process for the adoption of rules under City Code Chapter 1-2.
	Volk, Brendan	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
	Furman, Frankie	I have a very sturdy bench that is made out of metal and recycled plastic. It will not deteriorate. It is near a tree and on out families 12 plot parcel. It has been there a long long time and has not been in the way of mowers. I would like to keep that bench there. It is not dangerous and is not bothering in any way. May I please leave it there?	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. Based on the feedback we have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.



Eastburn, Rebecca	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions. I'm honestly appalled that I have to even send an email like this!!!!!!!!!!!!!!	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Parchesky, Jessica	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Gandin Le, Jennifer	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring the removal of memorials that are decades old and have never bothered anyone is unethical and likely illegal. The rules go against cultural and religious practices and are a slap in the face of all of Austin's communities who observe their loved ones' memories with elaborate memorials. Removing benches from grave sites is just cruel to those who want to visit their departed loved ones but who cannot stand for long. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Lawn maintenance should not come above human grief and memorial rituals. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Bankston, Emily	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Schroeder, Martha	My concern is section "(D) Ornamentation and Decoration". Particularly (3) Cut and artificial flowers are permitted in a space if: a. placed in an invertible vase or other container; b. placed on a memorial; and c. the flowers are not dead or deteriorated. (4) Flowers placed on a memorial flush to the ground shall be placed in an invertible vase designed for that purpose. This section discriminates against those families that have had family members buried there for years and have memorials flush with the ground. In my case I have two grandfathers and a grandmother buried at Austin Memorial with memorials that are flush with the ground. They do not have vases attached to them that would allow me to continue to honor them by placing flowers at the head of each marker. I understand the need for making changes to the cemetery rules but they should not be retroactive. These rules were not in place when these family members were interned at Austin Memorial. I am NOT in favor of these changes.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. Based on the feedback we have received, we have revised rules to include "Memorialization Space", as outlined in 14.4.12 (D) which allows for an invertible vase or other container. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Lessin, Nicole	I am writing to express my strong objection to the proposed rule changes (Rule R161-17.17). It is required by law to seek community input before making such changes. People who have lost family members and loved ones have already been through enough and do not need to be intruded upon as they seek to create their own memorials. It is not fair to try to raise revenue on the backs of those already grieving. This is a moral issue and a legal one as well.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The Parks and Recreation Department adheres to the City of Austin's Public Participation Principles. We believe that those impacted by the decisions we make as public servants have the right to participate in that decision making process. City Council directed and authorized staff to adopt rules by a prescribed process by approving City Code Section 10-1-2. City Council set out the process for the adoption of rules under City Code Chapter 1-2. PARD is acting within its authority outlined in the City Code and Council Resolution. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.

Lowther, Sabrina	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions. As a genealogist, I feel especially strongly about preserving the personality of the gravesites of our precious lost love ones.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Hunter, Melinda	PARD appears to have no understanding of cultural forms of mourning. Attempting to save money by creating a sterile one size fits all cemetery is out of a dystopian novel, not something for a diverse city. Please involve the community in a search for a better solution. Please respect our shared humanity.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. City Council directed and authorized staff to adopt rules by a prescribed process by approving City Code Section 10-1-2. City Council set out the process for the adoption of rules under City Code Chapter 1-2. We agree that people should be able to grieve in the manner of their choosing but in a public setting there must be rules to protect the rights of all customers while providing a safe and accessible environment. Decorations including personal, cultural or religious ornamentation are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules have not been consistently enforced so before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. . We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11).
Kresha, Matthew	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
O'Keefe, Adrienne	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Credidio, Jeannie	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.

Dixon, Jeff	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Manners, Christie	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. I visit my family's plot and sit on our family bench under the shade of an oak tree we planted in 1991. My grandparents, uncle, and mother rest in those grounds near the bench. My dad and I go to the cemetery seeking solace and peace. On hot summer days, the marble bench in the shade provides a welcome cool refuge. The cemetery is a beautiful and peaceful respite in the middle of a very busy and growing city. One day, my Dad, my husband and my children will occupy that space and I hope the bench and memorials provide the same peace and refuge for generations to come. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Gamble, Maya Guerra	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Troncoso, Beth	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
O'Connell, Tere	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.

Fly, Kate	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I strongly object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please have a heart and reach that place deep inside of you that connects to people and humanity. Put people's grief and history above lawn maintenance. Perhaps you can gather an assembly for the people who are affected by such a gross change and ask for suggestions on how you can all accomplish what is needed. I bet you'll find help beyond this immoral choice that leads to a brighter solution. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions. I have skills in this area so if you find yourself out of options which help the families I'd be happy to offer support. Please consider how you would feel if you put care and personalized love mimentos in a spot that specifically represented your connection to a loved one and some city ruling was trying to mow over it and destroy that without asking how you feel or what else could be achieved in respect. Those who visit already have a mutual understanding. It's not like they see it as an eye sore. So I invite you to take a second look and try to see things differently. You just may make a difference in more than just grass.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
DeGuire, Danny	I am writing to you this evening with a heavy heart. You see, I love my daughter very much, and it brings me great joy when she smiles and is happy. But I know that she will smile less often if you proceed with the implementation of Rule R161-17.17 because she will no longer have the comfort and joy she now has when visiting her son's grave site—his home. It is his home because my daughter makes it so. His name is Wiley. She brings him gifts on his birthday and on holidays. She celebrates this life we all enjoy with him by sitting on the precious bench she bought for his visitors to rest upon while they visit with him at his home. Some of his visitors are growing older, like myself, and need his graveside bench for our visits. And we also need to know that our daughter and her family are free to express their love for Wiley by bringing him gifts and fresh decorations for his home. I don't know if R161-17.17 is an over-reach of your authority or not. I don't know whether this is all just about finding an easier way to cut grass. I don't care. What I care about is the prospect of my daughter once again experiencing a loss of contact with my grandson that is not necessary and defies reason. And by the way, it is fundamentally wrong and a bad thing to do. It is within your power to prevent this loss, D'Anne, and I implore you to think of my daughter and her family before approving this rule. And then make the right decision to vote it down.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us. Based on the feedback we have received, we have revised the proposed rules to accommodate existing benches, as outlined in 14.4.12 (D) (11) and to include "Memorialization Space", as outlined in 14.4.12 (D). Decorations including personal, cultural or religious ornamentation are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules have not been consistently enforced so before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety.
Flynn, Colleen	I would very much like to submit my personal comment on the city's proposed changes to its cemetery rules (Rule R161-17.17). I cannot tell you how strongly I object to the adoption of these rules. PARD is creating a rule that affects the many many in the community without the proper input from them, along with the support of our City Council. Requiring decade old memorials to be removed is insensitive and I believe unethical (and I'm hoping it's also illegal,) not to mention morally offensive. The rules go against cultural and/or religious practices, not to mention simple human decency. Memorials have been permitted by the cemetery and paid for by family members. PARD should not have the right to undo what has been approved by past cemetery management and public sentiment. If this is nothing more than a financial issue, surely it should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and human history above lawn maintenance. I must say I find these proposed rules and the reason for them to be insensitive and yes even immoral. I plead with the city to come up with better ideas for meeting their budget and consider the needs of those impacted by these rules. Surely the city can involve the community in coming up with better solutions. Please be respectful of your community's rights and time honored traditions.	1/10/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Piston, Ed	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. We have an elected City Council and Mayor for a reason. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. It is a heartless act perpetrated on people who have often suffered enough. Please put people's grief and history above lawn maintenance. I object to these rules and implore that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Anything else is just plain lazy.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Hunter, Chris	As a long time resident of Austin, I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. A significant change like this should not be undertaken by PARD alone and should only be pursued with the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.



Kissoyan, Ruby	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Bustamante, Monika	I would like to submit my official objection to the proposed cemetery rules (Rule R161-17.17). I strongly oppose the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Bingham, John	Please forgive me for waiting until the last minute to respond. I have not attended any of the recent meetings, but have responded to all the surveys that I was able to find over the years. I appreciate everything that the City of Austin has done over the last few years to upgrade it's cemeteries and their ongoing care. I understand and support the need for rules and regulations, but would like to offer the following hoping and believing that there can be individual compromise and still uphold the standards we are all working for. Our family buried our son, Brad Bingham, at Austin Memorial Park in 2002. The reason we picked this location was because our son loved Austin and its uniqueness and when we visited there, we knew that it had the uniqueness he enjoyed. He was buried in Section 6 and at that time there were only approximately twenty or so graves there. We also purchased five other sites adjacent to his. With pride we outlined his grave with stones that we found at the cemetery, planted grass, erected a bench specifically designed with the logo of his scholarship fund we established at his old high school. We have fertilized, watered and with the approval of the contractors and now the city officials now there, we have mowed and weed eated and maintained the area on a weekly basis for almost 16 years now. During that time, we have met and become friends with families of those buried close to Brad, and with their approval, we now do the mowing of an area approximately 10 x 20 yards including many of their families graves. Many of the 'neighbors' have told us that the reason they picked that area was because of the care taken there, all with the knowledge and approval of the cemetery management, past and present. I have attached pictures of the area for review. We have become familiar and worked hand in hand with the current city crews in our section. They approve of how we maintain Brad's area and we have done everything they have asked us to do. I don't believe we have ever been a nuisance or problem to them. We understand and agree that the cemetery must have rules and regulations for it to operate and be maintained properly. We would suggest that hard and fast rules be looked at with compromise on an individual basis with what has been done over the years and would ask for such a compromise in Brad's area to continue as we have done for so long. We would also ask that we all remember that we are in Austin, Texas and we have a history of doing things different, but right.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Weintraub, Sharon	I have been involved in the cemetery rules and regulations revision process since October of 2013. This process has been going on for over four years, all solely due to delays imposed by the Austin Parks and Recreation Department (PARD); I am attaching a copy of a timeline of the controversy to this letter. I do not understand why the sudden rush by PARD to finalize the rules or why review and discussion of an issue that is so important to so many members of the public is limited to a single month during a time when many stakeholders are celebrating the holidays or are out of town. I am also still waiting for documents I have requested from the City of Austin pursuant to the Texas Public Information Act (Chapter 552, Texas Government Code) and reserve the right to amend these comments as I receive more information. In this letter I will set out my objections to the proposed rules and end with suggestions to reasonably resolve this controversy. Austin City Council, not the Austin Parks and Recreation Department, has the sole authority to amend and approve rules regulating the cemeteries On May 28, 1978, the Austin City Council enacted rules and regulations for all cemeteries owned and operated by the City of Austin. The resolution expressly reserves to the City Council the "right at any time and from time to time to change, amend, alter, repeal, rescind, or add to these rules or regulations or any part thereof or to adopt any new rule or regulation or any temporary exception with respect to said cemetery or anything pertaining thereto." These said rules and regulations are substantially identical to the current cemetery rules and regulations. In fact, the rules and regulations published by PARD on its website include this language reserving to the the City of Austin the authority to revise and amend the rules and regulations. Therefore, only the Austin City Council has the authority to revise to amend the current rules and regulations. Not only does PARD lack the express authority to enact new rules, the rules proposed by PARD conflict with or needlessly duplicate the existing rules and regulations enacted by the City Council. While PARD could propose new rules, only the City Council has the express authority to enact them. PARD has no authority to enact completely new cemetery rules and regulations on its own and any such rules and regulations proposed by PARD must be submitted to the City Council for review and enactment, including comment and debate at public hearings. Any rules or regulations PARD attempts to enact without City Council approval would be invalid and any attempt by PARD to enforce such rules would be void and illegal.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us. Based on the feedback we have received we have amended the definition of memorial under 14.4.3(B) (6) to include benches with restrictions, We have also revised 14.4.12(D) (11), to accommodate existing benches. While allowing for cultural and religious expression; stones, flowers, and memorabilia are allowed be placed at the head of a space or on the headstone, we have also revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D).

Weintraub, Sharon	Neither the City of Austin or PARD has the legal authority to retroactively enforce current the rules or regulations or impose new rules or regulations regarding existing grave site memorials and gardens. I have made several extensive requests under the Texas Public Information Act (PIA), including any and all documents regarding the implementation and enforcement of the existing cemetery rules and regulations. This included any documentation regarding making such rules and regulations readily available to the public and to stakeholders purchasing grave sites and actions taken to enforce these rules and regulations. Not a single document I received under PIA showed that PARD had made any attempt following the enactment of the rules and regulations in 1978 to publicize these rules. There was no evidence that PARD had ever provided a single pamphlet, brochure, contract, or any other document setting forth these rules to any person purchasing a grave site within a cemetery operated by PARD. My brother, Steven Weintraub, and his wife, Tina Huckabee, purchased a grave site for their daughter Shoshana in 2006. My family has purchased five sites, one for my father, Russel J. Weintraub, interred 2012, one for my mother, Zeldia K. Weintraub, interred 2015, and sites for my brother, my sister-in-law, and myself. PARD never provided to any member of our family at any time a document or pamphlet setting out the cemetery rules and regulations. I also note that these rules and regulations are not included in the City of Austin Code of Ordinances, this is significant for two reasons: first, the said ordinances would be the most logical and readily accessible resource for a citizen trying to determine if there were rules and regulations regarding grave site memorials; and second, these existing rules and regulations are not ordinances, lacking the authority of law, and therefore can be waived by failure of the City of Austin or PARD to timely enforce them. Having failed to publicize or enforce these rules and regulations for over three decades, despite open, obvious, and continuing violations, PARD has effectively waived such rules and regulations and no longer has any legal right to try to retroactively enforce them. Nor does PARD have any authority to impose new rules on existing grave site memorials and gardens to the extent such new rules and regulations would force the entire or substantial removal of existing memorials or gardens. It is well established under law that when a city enacts an ordinance, law, rule, or regulation that significantly affects the enjoyment or use of an existing property or business, that existing use must either be grandfathered for as long as the initial use continues or the city must fairly compensate the the property holder for the loss of the value or use of the property. In this case, any existing memorials or gardens must be grandfathered as long as the initial use continues; PARD would be able to impose the new rules and regulations once the site holder failed to maintain the initial use, such as abandoning and substantially failing to maintain the grave site.	1/11/2018	email	City Council directed and authorized staff to adopt rules by a prescribed process by approving City Code Section 10-1-2. City Council set out the process for the adoption of rules under City Code Chapter 1-2.
Weintraub, Sharon	The City of Austin and PARD have failed to publicize or enforce the rules and regulations from the day they were enacted in 1978 until late September of 2013. According to the documents I received through the PIA request, there were no documented attempts by PARD to enforce the regulations for decades—there was not a single enforcement letter, notice, or any other document prior to September 13, 2016. The only documentation of any attempt to enforce the rules and regulations by PARD were two tables, a 2016 Violations Database and a 2017 Violations Database, running from September 13, 2016, through November 9, 2017. Of the 11 alleged violations in 2016, the record showed that PARD only attempted twice to contact the site holder. Of the 46 alleged violations in 2017, PARD only contacted a single site holder. It is also relevant to note that the majority of the alleged violations are reported in clusters: two on March 20, 2017, 11 on May 3, 2017, three on May 26, 2017; five on May 30, 2017; two on June 9, 2017; two on August 8, 2017; two on September 6, 2017; two on October 25, 2017, and two on November 9, 2017. It is interesting that after 38 years suddenly PARD is preoccupied with documenting alleged violations. It appears that PARD is attempting belatedly to create a paper trail to cover up its over three decades of neglect. PARD's failure to make any attempt to enforce the rules and regulations for 38 years effectively waives such the rules and regulations and they cannot be retroactively enforced.	1/11/2018	email	The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules have not been consistently enforced so before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety
Weintraub, Sharon	Not only has PARD failed to enforce the rules and regulations, for over three decades it has both implicitly and expressly authorized stakeholders to create memorials and gardens on grave sites. My 13-year-old niece died suddenly of myocarditis on April 28, 2006, and she was interred at Austin Memorial Park (AMP). My sister-in-law subsequently noticed tire tracks on her daughter's grave from maintenance equipment, which she found emotionally distressing and demeaning to the memory of her daughter. Huckabee is a master gardener who specializes in native and xeriscape plants. Noticing that other graves were covered by memorial gardens, often outlined in stone or brick, she twice contacted the office at AMP to request permission to plant a memorial garden on her daughter's grave. When she received no response, she and my brother outlined their daughter's grave in cut limestone and planted a number of native or nativized plants, including oxblood lillies and purple coneflowers, which have continued to thrive and bloom, adding color and greenery even during the summer when, because of drought and watering restrictions, the surrounding grounds were dead, brown, or bare. When my father was buried in 2012 we requested that AMP personnel not place sod on his grave and instead we outlined his grave with with stone. When my mother was buried in 2015 next to my father, PARD did not place any sod on her grave and instead my family extended a border of cut stone to embrace both parents. Not only do we have these personal examples of PARD implicitly permitting memorial gardens, we know of one instance in which city personnel not only expressly gave permission for a memorial garden, but actively assisted the person in measuring out the space.	1/11/2018	email	<a href="#">See previous response</a>
Weintraub, Sharon	We have been told by PARD personnel that this implicit and expressed permission was given by PARD's contractor, not PARD. According to the documents I received via my PIA request, beginning October 3, 1990, PARD contracted with Intercare Corporation for the management and operation of the city cemeteries. This contract was extended multiple times, PARD finally ending its contract and assuming control and operation of the cemeteries in April of 2013. Under the contract, Intercare was granted by PARD the control and operation of the cemeteries. Intercare therefore was PARD's authorized agent and had express, implied, and apparent authority regarding permitting grave site memorials and gardens. PARD, through its own omissions and inaction, made no apparent attempt during the 23 years it contracted with Intercare to require that Intercare publicize and enforce the cemetery rules and regulations. It is well established under law that a principal is wholly liable for an agent's actions if the principal ratifies, accepts, or adopts the agent's acts, either expressly by otherwise accepting the results of said actions, including through the principal's inaction or silence. Further, under law, a third party may rely in good faith on the representation by an authorized agent. Therefore, under well-established legal principles, Intercare was without doubt PARD's authorized agent for the operation and maintenance of the cemeteries through 2013, site holders had every legal right to rely on Intercare's expressed and implicit permission regarding grave site memorials and gardens, and PARD, through its silence and inaction, ratified Intercare's actions. PARD cannot escape the fact that for over three decades persons were allowed without interference to create grave site gardens and memorials by trying to place the blame on its own contractually authorized agent.	1/11/2018	email	<a href="#">See previous response</a>
Weintraub, Sharon	Further, PARD has no moral or ethical right to retroactively enforce either the current or new rules and regulations on existing grave site memorials and gardens. Such attempts by PARD would arbitrarily punish those Austin citizens who in good faith relied upon the acts and omissions by Intercare and PARD and created grave site memorials and gardens, many of which have been in place for years, if not decades. These grave site memorials and gardens were created by families and friends as part of the mourning process and were created to reflect the personality of the departed. Forcing the removal or destruction of these personal tributes will cause tremendous and unnecessary grief. Austin citizens should not suffer because of PARD's neglect and dereliction of its duties.	1/11/2018	email	City Council directed and authorized staff to adopt rules by a prescribed process by approving City Code Section 10-1-2. City Council set out the process for the adoption of rules under City Code Chapter 1-2.

Weintraub, Sharon	I want to emphasize that I am not saying that site holders should be able to place anything on a grave site. I fully accept the need for reasonable rules and regulation to apply to all future grave sites. I also acknowledge that PARD has the existing right to remove any items that present an imminent danger to public safety, that are broken or deteriorated, or encroach on public ways or other grave sites. However, PARD does not have the right at this point to interfere with any existing gravesite memorial or garden until the memorial or garden is abandoned. PARD has the legal duty and moral obligation to grandfather in existing memorials and gardens, but is free to work in good faith with the site holders to try to reach reasonable resolutions of issues.	1/11/2018	email	<a href="#">See previous response</a>
Weintraub, Sharon	The Austin Parks and Recreation Department has absolutely failed to comply with the City Council resolution enacted October 17, 2013. On October 17, 2013, I and other members of the public appeared at the meeting of the Austin City Council to protest the sudden declaration by PARD that it would be enforcing long-neglected cemetery rules. We asserted that the regulations needed to be revisited and revised and that the public and stakeholders must be involved in developing reasonable alternatives, balancing the rights of families and friends to uniquely honor their loved ones and the need to maintain cemetery grounds. We also noted that there was no urgency, as PARD already had the authority to remove any neglected or abandoned memorials and dead flowers and shrubs. In response to our concerns, the City Council enacted a resolution requiring the City Manager, in collaboration with stakeholders and a working group of the Parks and Recreation Board, to evaluate whether current cemetery policies related to grave ornamentation were appropriately sensitive to personal and cultural expressions of grieving, while preserving necessary safety for cemetery workers and respect for the values of all families. This process was to be completed over six months. As can be seen from the attached timeline, PARD has utterly and willfully failed to comply in any way with the City Council resolution. At no time was the City Manager involved and members of PARD have refused any direct discussion or negotiation with the public or stakeholders. Not once were the stakeholders ever actually allowed to sit down at the table with PARD and work together on some sort of reasonable compromise, which was certainly what was envisioned in the original City Council resolution. Following the city council resolution, at PARD's quarterly stakeholders meeting on October 24, 2013, we were told that PARD was developing a process to come up with the new rules for the cemetery within a week to 10 days and that interested parties would be informed then how they could participate in the process. On November 15, 2013, stakeholders were informed by PARD that it was drafting the meeting schedule and work plan for the public comment portion of this process and engaging a facilitator to coordinate the stakeholder meeting, but, because of the upcoming holidays, these stakeholder meetings would not begin until after January 1, 2014. During the quarterly cemetery stakeholders meeting on January 30, 2014, it was announced that that the attempt to hire a neutral facilitator for the review had fallen through and that PARD was going to put out a request for bids for such a facilitator.	1/11/2018	email	<a href="#">See previous response</a>
Weintraub, Sharon	On January 27, 2014, I e-mailed a very rough draft of proposed regulations to Patricia Jacobson of PARD, explaining to Ms. Jacobson that I was concerned because three of the six months allotted to process of developing a compromise on the current regulations had already passed and I thought at least we could begin with something on the table to discuss. Subsequently, I sent several requests regarding the status of the appointment of such a facilitator. On February 27, 2014, I received the following reply: "Quick email regarding the status of the Cemetery Rules Update process. We will release the Request for Quote (RFQ) for facilitation services today with the close next Friday. We will quickly then review and hopefully select a facilitator within the next week to begin the process. I regret that it's taken this long, but we're now ready to move forward." It was not until April 29, 2014, when PARD finally announced that it had retained Smith and Associates to provide facilitation services and coordinate updating the rules and regulations. Interested parties were urged to provide feedback by commenting via the survey posted on Speak Up Austin, which would not be ready until May 1, 2014, or by participating in one of the open house meetings taking place in May. The open houses were not scheduled until May 20 and May 21, 2014. The open houses turned out to be nothing more than an opportunity to meet various employees of Smith and Associates and to answer the same survey questions that appeared on the Speak Up Austin survey. However, stakeholders were informed that the initial presentation of the recommended rules and regulations would take place June 5, 2014, and that the final presentation would be on June 18, 2014.	1/11/2018	email	
Weintraub, Sharon	The subsequent interactions overseen by Smith and Associates were a series of on-line surveys and a handful of meetings that were little more than allowing stakeholders to respond to such surveys, with PARD and Smith and Associates controlling all discussions. The resulting proposed rules and regulations published by PARD and its consultants were supposed to be presented to the PARD board for approval on July 22, 2014. I and other stakeholders planned to appear at that meeting and protest not only the process by which the rules and regulations were developed, but many of the specific proposals as well. That meeting was canceled and the stakeholders were later told that instead the rules and regulations would be developed as part of the Cemetery Master Plan. I must note, that according to documents I received through my PIA request, Smith and Associates were paid at least \$32,920.92 for this failed and pointless endeavor. However, during the 2014 meetings, Cemeteries Manager Gilbert Hernandez told stakeholders that PARD had paid Smith and Associates a total of \$125,000. I subsequently contacted PARD multiple times regarding the status of the rules and regulations revision, and was always told that PARD was focused on the Master Plan, but would be returning to the rules and regulations process when the Master Plan was completed. However, many months later, when the draft of the Master Plan was made public, I contacted PARD and was informed that there would be an update on the process "very soon." There was no further action by PARD until October 27, 2016, when it reinitiated the rules and regulations process. At that meeting the public was told, much to their anger and dismay, that PARD did not have to have City Council approval of the proposed rules and regulations and that PARD would have new rules and regulations in place by January of 2017. However, again there was no action on the part of PARD until April of 2017, when it announced it had partnered with Conservation Corps "to facilitate the dialogue with the community regarding how to best update the Cemetery Rules." These meetings took place April 10, 18, 25, 26, and 27, 2017. I attended several of these meetings. Each time there was no representative from PARD attending and only a single facilitator from Conversation Corps who had no background or knowledge of the history of this issue. The meetings were not recorded, there are no transcripts of these meetings, and the facilitator appeared to take minimal, if any, notes.	1/11/2018	email	
Weintraub, Sharon	There was no further action from PARD until it announced in October 2017 that it would be posting draft cemetery rules and regulations and that there would be only two community meetings, October 23 and 26, 2017, to discuss the proposal. I was not able to attend either meeting as I had an out-of-town trip. I requested a copy of the proposed rules on both October 11 and 19, 2017, but they were not forthcoming. This entire process demonstrates the typical pattern for PARD, long delays with little or no communication with the public interrupted by a handful of hastily called public meetings with no meaningful discussion or negotiation, and then PARD trying to rush through rules and regulations that clearly were drafted with little thought or concern for the public or stakeholders. PARD should not be allowed to flout the City Council resolution. This entire process must be put on hold until PARD finally agrees to end its bureaucratic delay and equivocations and meet face to face with the public as intended by the City Council.	1/11/2018	email	

	Weintraub, Sharon	PARD failed to properly notify the public and stakeholders of the comment period and deadline, including providing an invalid e-mail address for public comments. As further evidence of PARD's attempts to completely avoid public participation, PARD's own website is completely silent regarding the comment period for the rules and fails to set forth the deadline for comments. A member of the public wishing to comment on the rules will find only a link to the proposed rules and instructions: "For more information about public input on Cemetery Rules & Regulations, please contact cemeteries@austintexas.gov." It would have been extraordinarily simple thing for PARD to post notice of the comment period and the deadline on its website and its failure to do so underscores PARD's complete lack of transparency and engagement in this process. Only those who have been involved in the process from the beginning and are on PARD's e-mail list have received actual notice of the deadline. PARD's e-mails inform this small select group of stakeholders that their comments on the draft cemetery rules must be emailed to D'Anne Williams at Danne.Williams@austintexas.gov. by January 11, 2018. However, using the link provided by PARD to send an e-mail resulted in an automatic response stating that the message could not be delivered because the address is invalid and that this is a permanent error. In other words, not only has PARD failed to properly notify the public at large about the comment period and deadline on its own website, PARD's notice to those on its e-mail list directs comments to an invalid e-mail address link and this has persisted through the entire comment period. PARD did not correct the link until January 10, 2018, only one day before the end of the comment period. The only other public notice I have seen is a single small sign posted at AMP (a photograph of the sign is included). The sign references a URL, <a href="http://austintexas.gov/cityclerk/notices/occ_notices.htm">http://austintexas.gov/cityclerk/notices/occ_notices.htm</a> ," which opens a website entitled "View Land Development Rules Notices posted on or after January 1, 2016." However, nothing in that page refers expressly to the proposed cemetery rules and regulations. Instead, the link to the proposal is entitled "Notice of Proposed Rule - Rule No. R161-17.17 (Received 12/11/2017)." Yet, the sign fails to include the proposed rule number. A citizen wishing to make public comment and unaware of the rule number could reasonably assume that the posted URL is incorrect and thereby be discouraged from making public comment. Further, the sign states that the public comment period is from "December 12, 2017—January 12, 2018." However, the e-mailed notices I have received from PARD state that the notice period ends January 11, 2018. This is contradictory and confusing; a citizen depending on the sign may actually miss the comment period by a single day. These facts demonstrate PARD's refusal to engage in an open and transparent public process and a complete lack of good faith on its part. PARD's own actions call into question the legitimacy of the process and the draft rules.	1/11/2018	email	Due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules
	Weintraub, Sharon	As a department of the City of Austin, it is both illegal and unethical for PARD to deny the public input in negotiating and commenting on the cemetery rules and regulations. After such blatant malfeasance by PARD, any action by PARD at this point to finalize cemetery rules and regulations are completely illegitimate, invalid, and of questionable legality.	1/11/2018	email	
14.4.12	Weintraub, Sharon	The proposed rules violate federal law. Section 14.4.12 (General Regulations)(D)(Ornamentation and Decoration) of the proposed rules provides that: (1) A person may not place any object, including ornaments, decorations, furniture, plants, or signs, in a cemetery that is not specifically permitted under these rules. (2) The Cemetery Administrator may remove any object in a cemetery that is not specifically permitted under these rules. (8) An ornament or decoration is permitted in a space if: (a) Placed on a memorial; (b) No longer than six inches in any dimension; and (c) The ornament or decoration will not interfere with mowing or other cemetery maintenance.	1/11/2018	email	
14.4.3	Weintraub, Sharon	Under 14.4.3 (Terms; Definitions), "Memorial" is defined any marker, monument, headstone, tablet, or other structure on or in any space for identification or in memory of the individual(s) interred there. This definition is confusing, because it is unclear whether "Memorial" applies to just the headstone or other marker or to the entire grave site, which could be defined as a "space. . . in memory of the individual(s) interred there." It is a tradition in the Jewish tradition to leave a small stone when visiting a grave site, as a symbol of the permanence of love and memory. The stones are traditionally placed on the headstone or at its foot and they are never meant to be removed. In the Jewish section of AMP, stones have been left by mourners and visitors on their loved ones graves for decades; there is even a receptacle holding stones for visitors to use. Up until now this has never been an issue; no document I received through the PIA request discusses or mentions the stones left at Jewish grave sites. However, if the proposed rules are interpreted in the strictest sense, then the stones could only be placed on the headstone itself and all other stones would not only be prohibited, but would be subject to removal by the Cemetery Administrator. This would be a blatant violation of Jewish tradition and a desecration of Jewish resting places. Title II of the United States Civil Rights Act of 1964 prohibits discrimination on the grounds of race, color, religion, or national origin in any place of public accommodation. The cemeteries are public parks and imposing any new regulation prohibiting Jewish citizens placing stones on graves when there has been no such limitation before and authorizing public employees to remove stones from Jewish graves clearly discriminates against the Jewish citizens of Austin. Barring Jewish visitors from engaging in this long established ritual will not only make Jewish citizens feel unwelcome in a public cemetery but could result in Jewish families refusing to bury their loved ones there or even moving current burials to a more welcoming venue. It is also possible that a stringent and narrow interpretation of this proposed rule could violate the religious beliefs or traditions of other religious or ethnic groups.	1/11/2018	email	Due to public feedback we have added to the definition of "Memorial" to include a tablet, monument bench or other structure and have added a definition for "Memorial Space" for the area the ornamentation can be placed which will further be described in 14.4.12 (D). The City of Austin and the Parks and Recreation Department are proud to comply with Title II of the United States Civil Rights Act of 1964. If you feel that there are specific violations of Title II, please contact the Department to review.
	Weintraub, Sharon	The proposed rules and regulations do not address alleged issues regarding non-weather-proof or unsafe grave decoration and fail to address existing grave site memorials or gardens. In October of 2013, I and other stakeholders were told that PARD wanted to enforce the rules and regulations in part because of concerns regarding public safety. We were told that people were leaving dangerous, deteriorating, or inappropriate items on graves, including non-weather-proof items as clothing and paper, glass or other breakable items, items that could blow away or fall over, or items such as cigarettes or alcohol. However, under that proposed rules, any item can be placed on the "memorial" as long as the item is no larger than six inches square. This means cans of beer, packages of cigarettes or cards, paper and books, fragile figurines, and a wide variety of items can be left on the memorial. There is not even any requirement that the item be anchored or otherwise prevented from blowing, falling, or rolling off the memorial. The entire rule, after over four years of wrangling and delays, appears completely arbitrary and pointless. Further, the proposed rules do not even address the issue of existing gardens and other grave site memorials that have remained in place for years (in some cases decades). As set forth above, PARD does not have the legal, much less moral or ethical, right to impose the existing or proposed rules on existing memorials and gardens. At this point in time, the vast majority of the memorials and gardens cannot be removed without significantly damaging or desecrating the graves. There are no provisions protecting or grandfathering in pre-existing memorials or requiring PARD to work with space holders to bring such sites within compliance.	1/11/2018	email	City Council directed and authorized staff to adopt rules by a prescribed process by approving City Code Section 10-1-2. City Council set out the process for the adoption of rules under City Code Chapter 1-2. Based on the feedback we have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Decorations including personal, cultural or religious ornamentation are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. Due to your feedback we have also added a requirement that items must be firmly anchored and secured. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety.



	Weintraub, Sharon	Further, there are no provisions requiring the publication and distribution of the regulations to avoid future conflicts. We are basically at the exact same place we were over four years ago. Existing grave site memorials must be grandfathered and addressed on a case-by-case basis. Further, if PARD is going to illegally attempt to enforce these proposed rules on existing grave sites, how is it planning to do so? Throughout the Austin cemetery system there are hundreds, if not thousands, of grave site memorials or gardens that do not comply with the proposed rules. Is PARD willing to redirect its limited employee resources from regular and much needed maintenance work to dig up benches, stones, curbing, trees, and plantings throughout the entire cemetery system? Many of the memorials and gardens have been in place for years and cannot be removed without substantially destroying or desecrating much of the grave site, leaving gapping holes, trenches, and exposed soil. And throughout the cemetery system there are hundreds of such existing gardens and memorials. Is PARD willing to sustain the public outcry that will follow when families start posting pictures of desecrated graves, destroyed memorials, and torn up gardens to news organizations and public media? Is PARD willing to provide the substantial materials, resources, and city employees to remove such memorials and to then immediately repair, fill-in, level, sod, water, and maintain these grave sites? Or are families and friends going to be forced to visit and watch the desecrated graves erode and deteriorate? Looking at the current and significant maintenance issues at AMP, such as the rusting and collapsing fence, dead and neglected trees, and pot-holed roads, it is very clear that PARD already lacks the resources to even minimally maintain the cemeteries.	1/11/2018	email	
	Weintraub, Sharon	PARC does not have the funds or resources to currently properly maintain the cemeteries and the cemeteries are not economically or ecologically sustainable. One argument PARC has made regarding the need to implement new cemetery rules and regulations is that the memorial gardens interfere with mowing. This is rather odd, because many of the gardens have been in place for decades and mowing does not appear to have been an issue until October of 2013. Prior to that, Intercare appears to have had no issues regarding mowing or memorial gardens. PARC personnel have told stakeholders that they need to be able to drive through the cemetery on large riding lawnmowers. The fact is that for most of the year, there is nothing to mow, especially during the recent droughts and watering limits, and even when there is rain, most of the greenery is weeds, with large existing bald areas. For all the years I have visited AMP there has never been a lush rolling grassy lawn and there is never going to be. The existing grass lawn is not economically or ecologically sustainable and the use of large heavy mowing equipment will only further erode and destroy what little top soil remains. Further, extensive use of heavy maintenance equipment will result in the same problem that drove my sister-in-law to plant a memorial garden on her daughter's grave in the first place—tire tracks and ruts left over the graves by maintenance equipment. Instead of worrying about lawnmower access, in the changing environment PARC needs to look at innovative, ecologically sustainable ways to maintain the cemeteries, such as xeriscaping and the extensive use of drought resistant hardy native plants. Frankly, looking at the condition of AMP, with its sagging rusting fence, multiple dead trees and limbs, collapsed and leaning memorials, and cracked and pot-holed roads, mowing is the least of PARC's worries when it comes to maintenance.	1/11/2018	email	
	Weintraub, Sharon	Further, it is my understanding from the many meetings I have attended, the only income that PARC receives through the cemeteries is from the sale of grave sites and burials, and that these funds are insufficient for even the most basic upkeep of the cemetery system. Even though PARC has recently increased the cost of burial sites, clearly the cemeteries are going to continue to lose income. First, over time as the cemeteries fill up there will be fewer available grave sites for sale. Ironically, more individuals throughout the country are eschewing the traditional burial, opting instead for alternatives seen as both more economically and environmentally sustainable, such as cremation and "green burial." This means that in the future there will even fewer customers willing to purchase a costly traditional grave site and thus less revenue for PARC. Without significant appropriations from the City of Austin, it is clear that PARC will continue to struggle for funds necessary for maintaining the cemetery system	1/11/2018	email	
	Weintraub, Sharon	Implementation of a cemetery trust to allow citizens to fund the perpetual care of grave sites can provide significant funding for PARC, as well as provide for a more ecologically sustainable and attractive cemeteries. Austin has in fact implemented such a trust. Under Section 713.002 (Local Trust for Cemetery), Texas Health and Safety Code, a municipality that owns, operates, or has control of a cemetery may act as a permanent trustee for the perpetual maintenance of the lots and graves in that cemetery. In order to act as such a trustee, the municipality's governing body must adopt an ordinance or resolution stating the municipality's willingness and intention to act as a trustee, creating a perpetual trust. Section 713.003 (Local Authority to Receive Gifts; Deposits for Care; Certificates) provides that such a municipality may adopt rules to receive a gift or grant from any source and to determine the amount necessary for permanent maintenance of a grave or burial lot. The municipality then must accept such amount on behalf of that person or a decedent for the designated grave or burial lot, and issue a certificate in the name of the municipality to the trustee or depositor. Pursuant to Section 713.004 (Use of Funds), the municipality is authorized to invest the funds received in interest-bearing bonds or governmental securities and to apply income or revenue of the fund must be used for the maintenance and care of the grave, lot, or burial place for which the funds are donated. However, any income or revenue that is more than the amount necessary to accomplish the trust may be used to beautify the entire cemetery. Finally, Section 713.006 (Tax) not only authorizes a municipality acting as a trustee under Section 713.002 to make appropriations from the municipality's annual budget for cemetery maintenance, but further provides that a municipality may impose a tax on all property in the municipality in an amount not exceeding five cents for each \$100 valuation of the property for maintenance of the cemetery. It appears the the City of Austin has indeed implemented such a trust pursuant to the Texas statutes. Section 10-1-11 of the Austin Code of Ordinances establishes the City of Austin Perpetual Care Trust Fund is established in accordance with Chapter 713 (Local Regulation of Cemeteries), Texas Health and Safety Code to: assure the perpetual maintenance of the city cemeteries; invest and reinvest money in trust accounts in the trust fund; and apply the income earned by the Trust Fund that is in excess of the amount necessary to maintain the individual cemetery lots or graves to the beautification of the city cemeteries generally.	1/11/2018	email	

	Weintraub, Sharon	Sections 10-1-12 authorizes the city clerk and the cemetery administrator to prescribe rules regarding the administration of the trust fund and authorizes the city clerk, in consultation with the administrator, to determine the amount of money necessary for the permanent care and upkeep of individual graves or family lots and to accept such amounts. Section 10-1-13 through 10-1-18 concern the process by which a person may submit an application to act as trustee for the person or a decedent and pay a deposit into the trust fund. Finally, Section 10-1-20 requires the director of the Financial and Administrative Services Department to invest the money deposited in interest-bearing bonds or governmental securities, keeping the principal of the funds deposited intact as a principal trust fund. The cemetery administrator must first apply the interest, revenue, or other accrual or increase in the funds deposited for a specific cemetery lot, grave, or burial space to maintain that specific lot, grave, or burial space. However, the director may authorize the administrator to use any revenue that is greater than the amount necessary to accomplish the trust for a specific cemetery lot or grave to beautify the cemetery where the lot or grave is located. I have attempted to contact the city clerk both by e-mail and telephone to find out how to apply as a trustee for my parents' graves, as well as the lot belonging to me, and the necessary amount of the deposit. I have not received a response to date. Subsequently, I filed a PIA request with the city seeking all documents, memorandum, accounts, records, and information regarding the City of Austin Perpetual Care Trust Fund established pursuant to Section 10-1-11 et seq. of the Austin Code of Ordinances from January 1, 1992, to date, including, but not limited to: any and all rules prescribed pursuant to Section 10-1-12; copies of all current and past written application forms prescribed by the City Clerk pursuant to Section 10-1-13; all current and past amounts, and the dates thereof, determined by the City Clerk as necessary for the permanent maintenance of a cemetery lot or burial space; the number of persons who have applied as trustees pursuant to Section 10-1-13 and the dates of said applications; the number of applications that have been accepted or rejected and the dates thereof, respectively; copies of all pages of the trust fund record book required pursuant to Section 10-1-19; and, an annual accounting of the trust fund of December 31 of each year from 1992 to present, including the principal, interest earned, and all deposits and expenditures. I have not yet received any documents.	1/11/2018	email	<a href="#">See previous response</a>
	Weintraub, Sharon	I would be more than willing to pay into such trust for to preserve and care the grave site garden for my parent's graves. Properly administered, such a trust could not only resolve issues regarding the grandfathering of existing grave site memorials and gardens, but could provide much needed funds to PARD for maintaining and beautifying the cemeteries as a whole. Further, PARD, working with stakeholders, could come up with reasonable rules and regulations that would permit the creation of gravesite gardens if the site holder has applied to the trust and deposited the requisite amount. Not only would this create additional funding for PARD and incentive for site holders to become trustees, it would allow family members and friends to create gardens in memory of their loved ones that could not only beautify and preserve the uniqueness of the City's cemeteries, but would be far more economically and ecologically sustainable. For example, PARD could allow the installation of gardens over graves, but expressly require that all plantings must be drought- and freeze-resistant, native or adapted, low- or no-maintenance, and be selected from plants recommended by the City of Austin's Grow Green Native and Adapted Landscape Plants guide. Further, PARD could issue guidelines limiting the size of plants, and barring certain types of plants, such as those with thorns or nettles, invasive or non-adapted plants, or plants that can spread through a rhizome or root systems, and setting out the type and height of any border or container. As I noted earlier, the garden on my niece's grave has added color and greenery to the cemetery even when surrounding grounds were brown and bare. I have planted a garden on my parents' graves using plants recommended by Huckabee, which included hardy and drought-resistant Engelmann's daisies with bright yellow blooms and beautiful evergreen leaves, pink and purple skullcaps, and a blue twist leaf yucca. Not only did these plants remain green all summer, the daisies and skullcaps brightened the area with their flowers. The plants were specifically selected to be compact and will not spread or grow outside of the boundaries of the graves.	1/11/2018	email	<a href="#">See previous response</a>
	Weintraub, Sharon	During the various hearings regarding the rules and regulations over the years, one issue that has come up is the lack of benches or other seating, even through the cemeteries are public parks. This is especially important, because many elderly or disabled persons visit the cemeteries regularly. One way to resolve this would be to allow trustees to make deposits to the trust fund specifically for the purchase by PARD of a bench dedicated in memory of a specific individual. PARD would then use income from the trust to purchase the bench. This method of funding could be used in a number of ways to maintain and beautify the cemeteries, such as allowing trustees to make deposits to purchase trees or stepping stones in memory of a deceased family member or friend.	1/11/2018	email	The proposed rules have been revised to allow for monument benches and allow benches placed before the adoption of the revised rules as long as they follow certain restrictions. Staff is also exploring the possibility of a memorial bench program.
	Weintraub, Sharon	Summary- I want to make one thing very clear—I and other stakeholders completely understand and agree that there is a need for reasonable regulations to protect the safety of PARD employees and the public. All we have ever wanted is to be able to sit down at a table with PARD to express our concerns and exchange ideas regarding the development of reasonable cemetery rules and restrictions, as envisioned by the October 17, 2013, City Council resolution. All the delay in the process has been due to bureaucratic foot-dragging, equivocation, and utter lack of transparency by PARD and its refusal to comply with that resolution. These latest proposals are just further evidence of PARD's absolute lack of good faith and its failure to truly engage with the stakeholders or the public. Despite over four years of surveys, meetings, and comments, PARD has clearly failed to work with or to listen to the public or stakeholders. This process has been a complete waste of stakeholder time and taxpayer funds (for example, the over \$32,000, and possibly as much as \$125,000, paid to Smith and Associates). Further, the rules do not even address PARD's supposed initial concerns regarding deteriorating or allegedly dangerous or inappropriate grave ornamentation, as under the proposed rules, any item can be placed on the "memorial" as long as it is no larger than six inches square. They also fail to address issues regarding existing grave site memorials and gardens.	1/11/2018	email	We agree that this has been a long and arduous process for all involved. The resting places for loved ones is a personal and emotional issue so we have strived to find a balance between a very personal life occurrence and the obligations of the City. It has taken far longer than any of us expected but we are committed to completing the process with sensitivity but also practicality. Thank you for your continued participation in the process. Your feedback have been invaluable.
	Weintraub, Sharon	In summary, after over four years of bureaucratic stonewalling, costly "consultants," meetings, surveys, and comments, PARD has not only completely failed to work with the stakeholders to address the issue that ignited this entire controversy, it has failed to comply with the October 17, 2013, City Council resolution. If anything, PARD's four years of delays and obstruction has made the problem even worst. The memorial garden over my niece's grave has now flourished for over a decade. My father has rested in AMP since 2012 and when my mother passed away in 2015 we extended the original stones outlining my father's grave and his memorial garden to encompass my mother's grave, so that my father and mother are again united. One other thing is also clear—if PARD approves the proposed rules as they now exist and continues to ignore the issue of existing memorial gardens, we will once again appear before City Council, testifying in great detail how PARD has willfully ignored the council's resolution and significantly wasted both taxpayer time and resources. This time, it may also be necessary for I and other stakeholders to consider legal redress	1/11/2018	email	<a href="#">See previous response</a>

	Weintraub, Sharon	<p>Timeline - In September of 2013, my sister-in-law Tina Huckabee, heard a rumor that the Austin Parks and Recreation Department (PARD) had plans to enforce rules regarding Austin Memorial Park (AMP) and would giving families only 30 days to remove grave site gardens, plantings, and other decorations, many of which had been in place for years. Huckabee contacted PARD on September 8, 2013, and was subsequently informed by PARD that beginning October 1, 2013, PARD would be identifying graves that were not in compliance to the rules and regulations and requiring families to bring these graves into compliance. She was also told that PARD had assumed cemetery management on April 1, 2013, and prior to this, a contractor had managed Cemeteries Operations. On October 17, 2013, I and a number of other members of the public appeared at the meeting of the Austin City Council to protest the sudden declaration by PARD that it would be enforcing long-neglected cemetery rules. We asserted that the current regulations, which had not been revised, publicized, or enforced since the 1970s, needed to be revisited and revised and that the public and stakeholders must be involved in developing reasonable alternatives, balancing the rights of families and friends to uniquely honor their loved ones and the need to maintain cemetery grounds. We argued that grieving families should not be forced to dismantle grave site memorials, many of which have been in place for years, simply because PARD had failed to fulfill its duties. Further, we stated that for PARD to retroactively enforce such regulations would arbitrarily punish those with family and friends memorialized at AMP, and that these citizens should not suffer because of the city's neglect and dereliction of its duties. We also noted that there was no urgency, as PARD already had the authority to remove any neglected or abandoned memorials and dead flowers and shrubs (a copy of my testimony submitted to the City Council follows at the end of this e-mail). In response to our concerns, the City Council enacted a resolution requiring the City Manager, in collaboration with stakeholders and a working group of the Parks and Recreation Board, to evaluate whether current cemetery policies related to grave ornamentation were appropriately sensitive to personal and cultural expressions of grieving, while preserving necessary safety for cemetery workers and respect for the values of all families. This process was to be completed over six months.</p>	1/11/2018	email	<a href="#">See previous response</a>
	Weintraub, Sharon	<p>Following the city council resolution, at PARD's quarterly stakeholders meeting on October 24, 2013, we were told that PARD was developing a process to come up with the new rules for the cemetery within a week to 10 days and that interested parties would be informed then how they could participate in the process. On November 15, 2013, after repeated requests by various interested persons, including me, we were informed by PARD that it was drafting the meeting schedule and work plan for the public comment portion of this process and engaging a facilitator to coordinate the stakeholder meetings to ensure effective and transparent public participation. However, we were told that because of the upcoming holidays, these stakeholder meetings would not begin until after January 1, 2014. During the quarterly cemetery stakeholders meeting on January 30, 2014, it was announced that the attempt to hire a neutral facilitator for the review had fallen through and that PARD was going to put out a request for bids for such a facilitator. On January 27, 2014, I e-mailed a very rough draft of proposed regulations to Patricia Jacobson of PARD (a copy is included at the end of this e-mail). I explained to Ms. Jacobson that I was concerned because three of the six months allotted to process of developing a compromise on the current regulations had already passed and I thought at least we could begin with something on the table to discuss. In these proposals, I tried to preserve the long-established tradition of individualizing grave sites, as well as balance the right of certain religious groups to practice their traditions and the need for families to mourn and memorialize their loved ones, with PARD's need to maintain the cemeteries. To that end, I proposed limits on the type, size, weight, number, and materials of items to be placed within a space or on a grave. Certain items, such as items with political statements or offensive language, non-weather resistant items, and bird baths and bird feeders, would be barred. The proposals made it clear that the space holder was responsible for maintaining any items or plantings within the space. However, the regulations also provided a simple process allowing PARD to remove noncompliant items. The proposals also clarified that PARD had the right to remove any dangerous or neglected materials without notification. Although the regulations grandfathered in existing grave site memorials within their allotted space, the proposed regulations also encouraged PARD to work with space holders to bring such sites within compliance. The proposals included specific regulations regarding plantings, limiting the type and sizes of plants that may be used within a space. There are also several alternate proposals regarding benches. Finally, there were provisions requiring the publication and distribution of the regulations to avoid future conflicts. Subsequently, I sent several requests regarding the status of the appointment of such a facilitator. On February 27, 2014, I received the following reply: "Quick email regarding the status of the Cemetery Rules Update process. We will release the Request for Quote (RFQ) for facilitation services today with the close next Friday. We will quickly then review and hopefully select a facilitator within the next week to begin the process. I regret that it's taken this long, but we're now ready to move forward."</p>	1/11/2018	email	<a href="#">See previous response</a>
	Weintraub, Sharon	<p>It was not until April 29, 2014, when PARD finally announced that it had retained Smith and Associates to provide facilitation services and coordinate updating the rules and regulations. Interested parties were urged to provide feedback by commenting via the survey posted on Speak Up Austin, which would not be ready until May 1, 2014, or by participating in one of the open house meetings taking place in May. The open houses were not scheduled until May 20 and May 21, 2014. I attended the open house on May 20th. There was no business meeting or discussion of proposed regulations. The open house turned out to be nothing more than an opportunity to meet various employees of Smith and Associates and to answer the same survey questions that appeared on the Speak Up Austin survey. However, at that open house, stakeholders were informed that the initial presentation of the recommended rules and regulations (RRR) would take place June 5, 2014, from 6:00 to 8:00 PM at the Zilker Botanical Garden Auditorium and that the final presentation of the RRR would be on June 18, 2014, at the same venue.</p>	1/11/2018	email	<a href="#">See previous response</a>
	Weintraub, Sharon	<p>The resulting meetings overseen by Smith and Associates were a series of on-line surveys and a handful of meetings that were little more than allowing stakeholders to respond to such surveys, with PARD and Smith and Associates making all the decisions. Not once were the stakeholders ever actually allowed to sit down at the table with PARD and work together on some sort of reasonable compromise, which was certainly what was envisioned in the original City Council resolution. The resulting proposed rules and regulations published by PARD and its consultants were unsatisfactory and unworkable. These rules and regulations were supposed to be presented to the PARD board for approval on July 22, 2014. I and other stakeholders planned to appear at that meeting and protest not only the process by which the rules and regulations were developed, but many of the specific proposals as well. That meeting was canceled and the stakeholders were later told that instead the rules and regulations would be developed as part of the Cemetery Master Plan.</p>	1/11/2018	email	<a href="#">See previous response</a>

	Weintraub, Sharon	I contacted PARD multiple times regarding the status of the rules and regulations revision, and was always told that PARD was focused on the Master Plan, but would be returning to the rules and regulations process when the Master Plan was completed. However, many months later, when the draft of the Master Plan was made public, the only reference to the current status of the rules and regulations revision was on page 505, which stated: "Since the master plan scope of work already includes a review of the rules for grave ornamentation, PARD asked the master plan team to expand the scope of their work. McDoux Preservation. . .drafted a revised scope of work, to include an analysis of the data gathered through the Smith/Associates public engagement process, a new review of best practices, the development of criteria for the evaluation of alternatives, and a few examples of such alternatives. That work is being completed separately from the master plan but may be appended to it at a later date." I again contacted PARD and pointed out that this appeared to mean that McDoux Preservation was reviewing and revising the cemetery rules and regulations without involving the stakeholders in the process, and was acting in violation of the October 17, 2013, resolution. I noted it therefore could be argued that any rules and regulations that might later appended to the Master Plan would be invalid, void, and without any force and effect. PARD's response was that there would be an update on the process "very soon." There was no further action by PARD until over three years later, on October 27, 2016, when PARD held a public meeting announcing that it was reinitiating the rules and regulations process. At that meeting the public was told that PARD did not have to have City Council approval of the proposed rules and regulations and that PARD would have new rules and regulations in place by January of 2017.	1/11/2018	email	<a href="#">See previous response</a>
	Weintraub, Sharon	In April of 2017, PARD announced it had partnered with Conservation Corps "to facilitate the dialogue with the community regarding how to best update the Cemetery Rules." These meetings took place April 10, 18, 25, 26, and 27, 2017. There was no further action from PARD until it announced in October 2017 that it would be posting draft cemetery rules and regulations and that there would be only two community meetings, October 23 and 26, 2017, to discuss the proposal. December 12, 2017, PARD posted the proposed rules and regulations at the City Clerk's office, with the public comment period to end Friday, January 11, 2018.	1/11/2018	email	<a href="#">See previous response</a>
	Christie, Stacy	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
	Mathis-Volk, Jennifer	As an Austin resident of nearly thirty years, I write to express my objections to the proposed changes to the cemetery rules. The sheer level of insensitivity -- or, rather, callousness, heartlessness, thoughtlessness, and soul-crushing cold-bloodedness -- is something I never expected to see from administrators in this city I once held so dear. I get it. PARD is not being funded to levels you need. It's true. Believe it or not, I've actually looked over the budgets for the past three years. Living next to a greenbelt entrance in 78704 and seeing the ongoing need for more attention with the limited funds PARD gets for parks, trails, etc., I carefully monitor the funds you're getting and how they're being used. So you want to save on mowing costs. At first blush, that seems to make fiscal sense. But, fiscal sense is not the only metric by which to measure the right or wrong of a measure, and this simply is not the way. You cannot dictate families' ability to grieve in their own way just to save on mowing costs. Furthermore, to do it after loved ones have been buried and graves have been erected is unconscionable. If you want to change the rules -- fine. Make them applicable for new plots. But not for established plots. A friend whose son's gravesite stands to be affected by PARD's proposed rule changes wrote: "A final resting place, for us, was like a hug or a womb and we worked hard to make it special. But if this goes through, we would have to take it all apart." You're asking this family to grieve all over again, this time for the loss of the home they made for the son they lost. Then there's the new requirement that offerings be placed on the headstone. What if the family purchased a curved a sloped headstone because no one ever enforced this kind of rule when they got the headstone? No flowers if you don't have a built in vase on your headstone. But, why would a family have purchased a vase built into the headstone if no one enforced a rule requiring flowers be placed into a built in vase before? Again, if you want to enforce these types of rules, families deserve the right to notice to plan their resting places and make informed choices when establishing them. Burial traditions of certain faiths involve leaving trinkets, decorations or rocks when visiting gravesites. In this way, the family can also see that others have visited and were thinking of the deceased. Do you really think that a family would have intentionally picked a finally resting site for a beloved family member that interferes with the beliefs of their faith? Yet, inevitably, your proposed changes will do that to many gravesites -- intentionally or not. All of this to save a bit of money of mowing. Surely there is someplace else in the budget to save a bit of money. I'm attaching some pictures of a gravesite of a friend's child. I think you should see them, as these rules will require that the site (a labor of love created over many years) be deconstructed. Now, from what I understand, you may recognize this site. As I understand it, you may have not correctly informed the public of this comment period and many, if not most of the comments you are receiving are a result of her and her tireless work to let people know of the atrocity PARD is about to commit.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. We agree that people should be able to grieve in the manner of their choosing but in a public setting there must be rules to protect the rights of all customers while providing a safe and accessible environment. Decorations both personal, cultural and religious are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules have not been consistently enforced so before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11) and we have added a definition for a "Memorialization Space" which allows for an invertible vase or other container.



Mathis-Volk, Jennifer	I would like to add an addendum to my previous comments to the proposed changes to the cemetery rules. Unless I am misreading something, I believe that adoption of these proposed rules at this juncture will be in violation of City Code. City Code section 1-2-4 appears to require that your notice as filed with the city clerk include your email address. Your notice, as included on the City website, did not meet this requirement. For this reason, I object that the public has not been given a proper opportunity to comment on the proposed changes. § 1-2-4 - NOTICE OF PROPOSED RULE. (A)Before a department may adopt a rule, the department must provide public notice as provided by this section. (B)A department proposing a rule for adoption must file with the city clerk a notice, signed by the director of the department proposing the rule. The notice must include:(1)the text of the proposed rule, indicating changes from the current text, if any, or a statement that the text is available from the department for public inspection or copying, and the manner and cost of obtaining a copy; (2)a brief explanation of the rule, or a statement that the explanation of the rule is available from the department for public inspection or copying, and the manner and cost of obtaining a copy;(3)an explanation of the authority under which the rule is proposed for adoption, and a certification that the rule was reviewed by the city attorney and found to be within the department's authority to adopt; and(4)a request for comments on the rule from the public, listing the name, e-mail address, and telephone number of the person to whom comments should be submitted and the last date by which comments may be submitted. In addition, although you were personally on notice of multiple instances of problems with the City's incorrect publication of your email address, you did not take action to ensure that these problems were rectified. To this moment -- the last day of the comment period -- this hyperlink on the City website notifying residents of the proposed changes links to an incorrect email address (spelling your first name with 3 N's). This is likely why the Austin American Statesman used that very same misspelling in notifying the public about these proposed changes and where to send comments. <a href="http://www.mystatesman.com/news/local/community-news-austin-cemetery-rules-proposed/lynmya8C1QKiCbOiRGn64M/">http://www.mystatesman.com/news/local/community-news-austin-cemetery-rules-proposed/lynmya8C1QKiCbOiRGn64M/</a> For all of these reasons, I object that the public has not been properly notified of these proposed changes.	1/12/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted.
Dieterich, Lana	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions. Sincerely, (your name)	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Grounds, Shannon	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Tobia, Nancy	To the Austin City Council: Nine years ago our first grandchild died at 37 weeks gestation and was born still. Wiley Joseph Cooper is his name, and he is buried in a city cemetery in Austin. Our family still bears this loss, and his gravesite is cared for lovingly to honor his memory. It is important to those of us left behind to remember him in this way. With this background you might be able to understand how alarmed I was to discover the rules that are being considered that will discourage families from honoring their dead in the way that will comfort them, honor their loved ones, and maintain their spiritual and family traditions (Rule No. R161-17.17). I might remind the powers that be that their power does not extend into the personal lives of citizens, especially when they have paid for the land their loved ones are buried on. These grieving families should be allowed to reverently care for that land in any way they see fit. To try to change people's traditions for the purpose of more efficiency is an affront to their humanity and an insult to the deceased whom the families have lost. I also find it disappointing that you have not given citizen's more time to challenge this change by limiting feedback to a short period during the holiday season. Why have there not been more open forums and news articles that honor the gravity of this situation and give citizens in Austin a voice in their city government. You may want to consider that this disregard for the right to an open forum on this issue will cause a backlash that you may not be prepared for. I am sure that when this topic came up for consideration, it seemed like a small, practical administrative decision to make these rules to solve an immediate problem. Unfortunately, the council did not have the foresight to see that this would impact real people, people who have had tremendous losses, and to which, compared to their needs, the mowing problem could not hold a candle. Please reconsider this rule. Think of your constituents and the battle that will ensue if this rule is passed. Think of the next election if you must. But mostly, I would challenge you to consider your own humanity and how this rule will impact real people who do not deserve one more betrayal, one more loss. You might also consider the negative feedback the city will receive nationally if you move forward with these rules. I challenge you to find another solution to the mowing problem. I challenge you to examine your conscience and do what is right for the people you serve. I challenge you to put yourself in the shoes of others, and vote NO on the passage of Rule No. R161-17.17. Austin is better than this. You are better than this. It is time to nip this heartless, administrative change in the bud. I have every confidence that you will do the right thing. If you don't, you will be hearing from me again.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. We agree that people should be able to grieve in the manner of their choosing but in a public setting there must be rules to protect the rights of all customers while providing a safe and accessible environment. Decorations are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules have not been consistently enforced so before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety.

Dimas, Andy	<p>First, I want to explain that I was born and raised in Austin and have many family and friends that are interred in the city cemeteries. I attended two of the cemetery rules meetings in October to learn and discuss these proposed rules and was very unhappy with the format used. It didn't allow for sharing of ideas and understanding of the pros and cons of these proposed rules. However, while attending these meetings, I learned that the direction and instruction of the Austin City Council were for the Parks Department to write policies associated with the existing rules and not to rewrite the rules. I also learned that the rules are only to be adopted by the Parks Department and will not go through City Council for approval. The Council should approve rules, and policies associated to fulfill the intent of the rules should be developed, written, and implemented by the parks department. Here are my issues:</p> <ul style="list-style-type: none"> <li>• Rewrite these rules to be policies as intended and keep the old rules. Rewriting these rules to include policy type language has made the rules flow inconsistently.</li> <li>• If you truly are to rewrite rules, go through a formal process including formal meetings with stakeholder input. (not the open house meeting method used)</li> <li>• City Council should approve rules.</li> <li>• Contractors are not employees</li> <li>• Use State of Texas definition for the cemeteries and comply with all State statues associated with city cemeteries and Health and Safety Codes.</li> </ul>	1/11/2018	email	<p>Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. City Council directed and authorized staff to adopt rules by a prescribed process by approving City Code Section 10-1-2. City Council set out the process for the adoption of rules under City Code Chapter 1-2. We agree that people should be able to grieve in the manner of their choosing but in a public setting there must be rules to protect the rights of all customers while providing a safe and accessible environment. Decorations are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules have not been consistently enforced so before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve the community.</p>
Cooper, Nancy	<p>I think it is unconscionable that the cemetery people will not allow the owners of their own plots to make and keep a remembrance for those wrenched from their lives. A few years ago, the cemetery people already took it upon themselves to remove *without proper notification* the memorials left by the mourners.</p> <p>That the cemetery people are more concerned about whoever mows the grass is laughable; that's part of the job: working around the cemetery plots. Each plot is a memorial, a sacred plot to which those who have lost loved ones can return and have a connection. If you have ever lost a DEAR LOVED ONE, the pain is unbelievable. To have a *SAFE* place to go to visit with the spirit of that loved one is tantamount to finding some peace with the loss, if possible. PLEASE do not take that option away!! If you want limits on how far out those tokens may be placed, then notify them, but don't take away the solemn connection which is so very, VERY much needed.</p>	1/11/2018	email	<p>Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. We agree that people should be able to grieve in the manner of their choosing but in a public setting there must be rules to protect the rights of all customers while providing a safe and accessible environment. Decorations are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules have not been consistently enforced so before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve the community.</p>
Huckabee, Tina	<p>I've been involved with the review of cemeteries since autumn of 2013 and have experienced little—if any—real commitment from PARD to actually work with the cemetery stakeholders and consider legitimate ideas and opinions of those who have loved ones buried at Austin Memorial Park, as well as other Austin cemeteries. Yes, there have been public surveys and certainly the City of Austin taxpayers funded plenty for “consultants” to sift through that information, but no one has ever invited myself or anyone else (that I'm aware of) to participate in legitimate discussions about moving forward with improvements at the city's cemeteries. The “public input” consisted of a few online surveys and a few meetings to review the findings of the surveys, supervised by facilitators hired by PARD, with little or no discussion and few, if any PARD representatives. The recent complaints from PARD seem to revolve around one issue (which has changed from what it was in 2013) and that is that the cemeteries are underfunded (which I have no doubt) and that PARD wishes to change the basic landscape and “personality” of various cemeteries. The solution for PARD's labor/maintenance issues appear to be to scrape all (or most) personal grave gardens and mementos and lay sod in order for the mowers to mow more efficiently. To me, the argument isn't logical: to save money, time and labor, PARD will completely remove gardens, grass, decorations—which will require money, time, and labor—and plant sod (which I understand will be a water-wise hybrid turf)—which will require money, time, and labor. Additionally, as far back as 1978, there is language indicating that ONLY the Austin City Council has authority to revise or amend new rules and regulations for Austin cemeteries, which means that PARD has NO authority to change rules without involvement of City Council. PARD's only right is to propose new rules, to be reviewed and enacted by city council after public hearings. The recent actions by PARD (holding under publicized public meetings and with a public comment period where the email link for comments hasn't worked for most of the public comment period—it was corrected on January 9; the deadline is midnight January 11), seems an attempt at a bypass of the legal process for proposing and enacting new cemetery regulations. For decades, PARD (and “contractors” hired by PARD/City of Austin) have implicitly and explicitly allowed the creation of personal gardens/benches/mementos in City of Austin cemeteries. To drastically change the rules, to not allow a grandfathering of existing graves, especially with no input and discussion with families (and grave owners/city of Austin taxpayers), is unconscionable and may well be illegal. Once more, there's been no attempt at negotiate in good faith with cemetery stakeholders and develop compromises with those whose love ones are buried at Austin cemeteries, either to grandfather in the existing grave memorial gardens/decorations or develop a set of rules and regulations in which all can agree.</p>	1/11/2018	email	<p>Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. City Council directed and authorized staff to adopt rules by a prescribed process by approving City Code Section 10-1-2. City Council set out the process for the adoption of rules under City Code Chapter 1-2. We agree that people should be able to grieve in the manner of their choosing but in a public setting there must be rules to protect the rights of all customers while providing a safe and accessible environment. Decorations are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules have not been consistently enforced so before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted.</p>
Huckabee, Tina	<p>I have recently discovered Section 713.002 (Local Trust for Cemetery), Texas Health and Safety Code, which states that a city that owns, operates and has control of a cemetery may set up a permanent trustee for perpetual maintenance of graves. Apparently, the City of Austin set up a trust: Section 10-1-11 of the Austin Code of Ordinances established a Perpetual Care Trust Fund for the perpetual maintenance of cemeteries in Austin. With PARD's complaints that they're underfunded and don't have the employees to adequately manage the cemeteries, it seems that a valuable tool for cemetery funding has been overlooked—or ignored. I'm sure that many family members with loved ones buried in Austin cemeteries would like to know about this perpetual care process and that many would take advantage of a perpetual care system if PARD bothered to advertise and make it available. Twice I've requested from the city clerk's office an application to become a trustee for my daughter's grave and have yet to receive any information about this process. The bottom line is this: PARD has never reasonably engaged with the public and concerned families about the issues facing maintenance of Austin's cemeteries. There have been no meaningful discussions—ever. Online surveys, money spent on holding meetings in which the “public” had little true input, and draconian rules published which are (more than likely) illegal and unenforceable given that the City Council is tasked with these kinds of regulations, as well as the long history of ignoring (and sometimes, actively supporting) the grave gardens, decorations, memorials developed over decades, do not count as meaningful discussions and efforts to compromise. I would be more than happy to sit down, engage in on-going meetings, with designated PARD representatives and other concerned citizens to develop a nuanced set of rules—but that suggestion has never been made, or promoted, by any representative from the city of Austin. PARD has excelled at bureaucratic delays and purposeful obfuscation, but that isn't, or shouldn't be, how regulations are developed. PARD should be following the original intent of the Austin City Council and work with concerned citizens to develop a comprehensive set of rules for Austin's cemeteries.</p>	1/11/2018	email	<p>Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. We agree that people should be able to grieve in the manner of their choosing but in a public setting there must be rules to protect the rights of all customers while providing a safe and accessible environment. Decorations are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules have not been consistently enforced so before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. We have revised the proposed rules to accommodate existing benches, as outlined in 14.4.12 (D) (11) and to include “Memorialization Space”, as outlined in 14.4.12 (D). We agree that this has been a long and arduous process for all involved. The resting places for loved ones is a personal and emotional issue so we have strived to find a balance between a very personal life occurrence and the obligations of the City. It has taken far longer than any of us expected but we are committed to completing the process with sensitivity but also practicality. Thank you for your continued participation in the process.</p>
Berger, Benjamin	<p>I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.</p>	1/11/2018	email	<p>Your feedback is extremely valuable to us, it helps the City of Austin Cemeteries Operations understand which features, functionality concerns, and questions that are most important to you. We carefully review all community feedback when determining how to accommodate both current and new customers of the City of Austin Cemeteries. We recognize and are extremely sensitive to the fact that people have a right to grieve in the manner of their choosing. All families should and will have a place to share, remember and grieve. Ornament decorations are allowed with restrictions and to ensure the safety of others coping with a loss. New memorials benches are more than welcome; however, we require that they be placed at the head as a memorial. These rules are intended to address those memorials and benches, which were not previously approved by the City, while still allowing for cultural and religious expression. Memorial benches can be a meaningful way to honor a deceased loved one, while offering a restful spot for people to sit. We are being conscious to the overall safety of the public, visitors and staff of City of Austin Cemeteries. The new proposed cemetery rules are a less restrictive, safety regulated and a more empathetic update to the 1978 78504-22 resolution. We understand implementing these changes poses new challenges and are more than willing to work with our community. We look forward to further engagement in enhancing our performance with the community's needs and safety in mind. The City is considering a memorial bench program, as well.</p>

Mueller, Monica	<p>I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This appears to be a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.</p>	1/11/2018	email	<p>Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.</p>
Pate, Ashli	<p>I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I have just learned of PARD's plans to change the cemetery rules, so I have not had time to write a personal and detailed objection letter. It's my understanding that opinions must be submitted by 6:00 pm today, so you may have seen a similarly scripted statement from others. However please do not interpret my selective use of a scripted statement as an indication of the level of my objection on this matter. As a former COA employee, I am absolutely appalled at PARD's plans to move forward with these rules without the input of the public and the support of City Council. I challenge you all to instead adopt a policy of full transparency to City of Austin residents by sharing the budget or logistical challenges you are trying to address, and allowing the public to participate in the problem-solving process instead of trying to quietly push through what would undoubtedly be a very unpopular policy change if City residents knew about it. Just to make my position clear, I strongly object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions. Remember that you are accountable to the citizens you serve. Does the City of Austin really believe that lawn maintenance is more important than meaningful memorializing? I don't.</p>	1/11/2018	email	<p>Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. We agree that people should be able to grieve in the manner of their choosing but in a public setting there must be rules to protect the rights of all customers while providing a safe and accessible environment. Decorations are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules have not been consistently enforced so before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. We have revised rules to include "Memorialization Space", as outlined in 14.4.12 (D). We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11).</p>
Cooper, Madison	<p>My son, Wiley Joseph Cooper, was stillborn on Thanksgiving Day 2008. He was at full term and due in early December. My wife, Laura, and I have a photograph of her and her enormous gorgeous belly, smiling and standing next to the dinner spread out on the table that evening. We learned later that Wiley had died suddenly earlier that morning; he was not alive in the photograph. Laura was admitted to the hospital that night. It is not possible to explain the impact of this sort of tragedy on a parent to those who haven't experienced it personally. But I can tell you that when I held his fully formed, beautiful body in my arms after he was pulled by C-section the next morning, something profound broke inside me and I was altered forever. For interment, we chose Austin Memorial Park Cemetery because of its beauty and character, and the legacy charm it offered in central Austin. It was (and remains) adorned throughout with inspiring and life-affirming signs of the living honoring our dead with objects that are both secular and devotional in nature. Prior to purchasing a plot, we met with cemetery personnel, and we discussed the various arrangements of stones, plants, fencing, wind chimes, benches, and ceremonial objects that we observed throughout the park and which attracted us to it. We requested permission to do the same, as we had a vision for creating a beautiful space for him, and for us eventually, similar to what we saw so many others had done. It was a request that was tied up existentially in who we are (all of us, you too) as human beings and the ways in which we honor our dead as a society and collective culture.</p>	1/11/2018	email	<p>Thank you for your feedback on the proposed cemetery rules amendment. We carefully review all feedback to determine how to best accommodate both current and new customers. City Council directed and authorized staff to adopt rules by a prescribed process by approving City Code Section 10-1-2. City Council set out the process for the adoption of rules under City Code Chapter 1-2. We agree that people should be able to grieve in the manner of their choosing but in a public setting there must be rules to protect the rights of all customers while providing a safe and accessible environment. Decorations are allowed on memorials with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules have not been consistently enforced so before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11) and to include "Memorialization Space", as outlined in 14.4.12 (D).</p>
Cooper, Madison	<p>Here is what occurred, and it is deeply, fundamentally important in relation to the Cemetery Manager's proposed rules: Cemetery staff told us that technically much of what we saw was probably not officially allowed. However in the infant/cremation section, they said they recognized the intensely sensitive nature of infant mortality and they make exceptions for families. They said the City does not enforce those rules for the infant section. I will repeat this. Cemetery personnel explicitly told us, as we considered whether to commit to a contract for a burial plot, that in the infant/cremation section of Austin Memorial Park the City makes exceptions to rules about what can be placed within an Owner's plot. This happened in advance of our purchase. We asked how we could know where our plot ends and another begins, so we would not infringe on adjacent plots. We were informed they could mark our plot with flags so we could install edging and rocks, and they had already done this in some cases before. We asked where we could place a bench, as there were many others throughout the park. Staff confirmed that we could purchase a plot next to an easement and place a bench in the easement. One man I remember speaking to specifically, who I assume was a site manager at Austin Memorial and finalized our plot selection, was highly empathetic, sensitive, compassionate, and exceptionally helpful to us. Death is hard enough to the survivors, and he was obviously attuned to just how shattering infant death is to a parent. To him, grief and ceremony were clearly of paramount concern, at least in this section of the cemetery. We explained our vision for bricks, stones, and bulbs; not only did he express no objection, he offered to facilitate. With these assurances and under these conditions, Laura and I purchased 3 plots adjacent to an easement: one for Wiley and one for each of us on either side. We believed we had found the right home to lay our son to rest, and ourselves someday. After the sale, cemetery personnel marked the corners of our plots with orange flags to facilitate installation. We purchased a bench and assembled it in the easement. The flags are clearly visible in these photographs:</p>	1/11/2018	email	<p>Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you.</p>

Cooper, Madison	<p>Since 2008, we have visited several times a year to pull weeds and clear leaves. The tiles faded and broke over time, so we removed them. The bricks began to heave from the roots of a nearby tree, and most bulbs no longer return every year, so we reset and laid new mulch. The bench began to break, so we replaced it with a new one. In other words, we are excellent stewards of our plot and we honor our son regularly through it. Again, let's not get anyone mixed up here... 1) The City of Austin – or at minimum, staff approved by proxy through authority of the Cemetery Manager and City Council to represent the City of Austin to the public – directly represented to us the conditions of a plot sale. 2) We purchased our plots under those terms. 3) Those personnel subsequently participated directly in the installation process of bricks and stones around the perimeter of 3 adjacent plots. I cannot imagine any reasonable alternate explanation for the flags you see in the photographs, other than that I did it myself and I am lying to you now about all of this. I'm not an attorney, but I expect from a purely ethical and arguably moral perspective, a Cemetery Manager – and City Council generally – would have to be darn near heartless not to see what is wrong with a proposal to rip this material out. I have been told (and I admit I didn't hear it myself) that D'Anne Williams stated to my wife that contractor personnel were not authorized to do what they did in our case. My input to you here is that if someone means to say a contractor sold me a cemetery plot under false pretense, then I will initiate litigation. If instead you tell me the contractor did not intend to deceive me but instead acted in good faith -- which I believe -- though not with your authorization, then you are responsible for the contractor's behavior and must not conduct enforcement retroactively on the client. Not where dead children are involved. In either case, my plot should be grandfathered in. I happen to believe everyone's plot across the city should be grandfathered, but I recognize the City is faced with a legitimate concern about sustainable maintenance and you need a practical solution.</p>	1/11/2018	email	
Cooper, Madison	<p>To be clear, I absolutely recognize and take no issue with the City of Austin's need to ensure a safe working environment for groundskeepers, as well as to allow for mowing grass. My understanding is that these proposed rules attempt to address three major concerns from the Cemetery Manager: 1. the number of labor hours required for mowing (cost)2. the danger to people of objects struck by mowers, especially metal and glass (safety)3. complaints from citizens that objects placed in the cemeteries are: a. "unsightly" (this is not defined in the proposed rules, but we can speculate on examples such as broken icons/figurines, faded or ripped flags, dead plants, unstable/leaning fence edging, etc.) b. "disruptive to peace" (this is not defined and also not laid out in rules directly, but we can speculate on examples such as wind chimes, lights, fountains, pinwheels, etc.) c. discouraging them from buying a plot. Here is a suggestion for consideration: 1) Permanently grandfather all plots in the infant/cremation sections across Austin, in all cemeteries. This is a fraction of the total real estate that requires mowing. 2) Temporarily grandfather all plots in all sections across Austin for enough time to implement #3-6 below. Perhaps 2 years. 3) Develop and implement a process to notify/contact plot Owners with *months* of lead time, and provide a process to formally opt out (i.e. give them the right to grandfathering), under specific conditions of maintenance of existing artifacts. If they do not respond within a specified time frame, they automatically opt in. Many, many plot Owners no longer maintain their space at all, and this will address those cases. 4) Identify plots you believe are hazardous or problematic and provide a small financial incentive for those Owners to opt in. The money spent up front will return in reduced mowing costs later. 5) Post safety signs for visitors regarding mowing. Consult your legal representation regarding liability. Instruct mowers to mow no closer than (X) number of feet from visitors. Cemetery management should establish the minimum safe distance. 6) Continue the status quo with grounds keeping until the temporary grandfathering period expires. Rely more heavily on handheld trimmers for more precise mowing, and increase tolerance for higher grass heights to reduce risk of striking objects on the ground. 7) You should see a marginal decline in the number of hours required during the temporary grandfather period, and a significant decline after it ends. 8) Continue to address your budget concerns with City Council. 9) Amend the new rules at minimum to define "unsightly" and/or "unsafe" and provide yourselves with an additional mechanism to prohibit and even remove existing objects that are a source of sound.</p>	1/11/2018	email	
Cooper, Madison	<p>In other words, compromise. The proposed rules exhibit no spirit of compromise. Your problem in its essence is financial and you are approaching this with a "scorch the earth" mentality – almost literally. Labor itself is simply a budgetary concern and nothing more. If the Cemetery Manager can't afford to sustain mowing responsibilities due to the amount of time required to navigate physical impediments, changing rules to remove those physical impediments in sacred spaces is, to be blunt, immoral. It's also unnecessary and uncreative. Don't try to fix this problem by clearing 100% of the existing plots. Make progress. Put yourselves into an improved operational position where you can reduce risk in a large number of the plots over several months or years, but attach this to a process that allows active stewards of their plots to gain exceptions moving forward. Impose the rules on all new plots only. I also heard that D'Anne said they are losing business because people think the "place looks trashy." My only comment is I have never heard a more terrible business plan than "Grave sales are lagging, let's remove the junk." You've already been implementing a clean-up schedule on a recurring basis, so keep doing it. Set clear definitions for "unsightly material" (which the rules do not yet provide) and give advance notice before removing broken objects, as you've already been doing. At best, the concerns should be addressed in a forward and future-looking direction. We all do get it. You need money to support longer hours, improved safety equipment, and/or additional handheld trimmers that can more precisely mow around existing objects and markings, which takes time. But if such funding is not available, this is not a problem for existing plot Owners but rather an issue for City Council to address with the Cemetery Manager. You're solving the problem in the wrong direction, on the backs of the wrong people. In closing, I will just simply beg you. If I have to tear up my son's grave I will weep heavily as I do it. I will cry and despair not only for him, my wife, my living daughter, and myself, but for a city I have loved for over 20 years but which can muster no creativity or resolve to protect the legacy in some of its most sacred cultural spaces other than to sanitize them. I do appreciate the difficult position you are in as management, and am sincerely grateful that you are working on a solution. The one offered, however, is incorrect.</p>	1/11/2018	email	
Cooper, Madison	<p>P.S... The contact email address was incorrect in the official notice of public review from the Cemetery Manager. My understanding is that City Code requires an email address in the notice, and that address was wrong for nearly 30 days. The text of the email was updated on December 12 after we notified them of the error, but the underlying link remained incorrect, and the public could not use it to submit a comment. Incidentally the address was also wrong in a Statesman article in December as well, which must have been provided by the Cemetery Manager. This amounts either to obstruction or negligence – we should assume negligence – and since the official notice included a hyperlink it implicitly made that link a core element of the "contact information" required by Code, which renders the notice in violation for the majority of the comment period. It was corrected on January 10, roughly 36 hours before the close of the period. The notice on January 10 includes an explicit admission that the address has been updated. To me, that by itself is grounds for an extension to public comment of 30 days, if nothing else comes of this at all.</p>	1/11/2018	email	<p>Due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted.</p>



Ripple, Sean	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
Owens, Nancy	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is unethical and likely illegal. The rules go against cultural and religious practices. The removal of benches places an undue burden on families wishing to visit loved ones. Memorials have been permissioned and PARD does not have the right to undo what has been approved by past cemetery management. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please put people's grief and history above lawn maintenance. I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in better solutions. Please respect our rights and traditions.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
DeGuire Cooper, Laura	I'm exhausted. We, the grieving and the concerned and aggrieved, we have pooled our resources, spread the word, shined light on perceived injustice, rallied friends and family, watched with disbelief as this has bumbled forward for years now, and we have shown up to your meetings where no one was informed and no one was listening, and we have followed your unjust and misrepresented timelines, and we have gathered history, and marveled at your broken promises of inclusion, and been sad for your inability to handle this without trampling on us, and we have been hopeful and hopeless and baffled, and here, at this final hour, I'm not sure what else can be said that has not been said already. I personally have seen many of the comments you have received. I have seen our parents and sisters and brothers and friends and fellow concerned citizens give you every ounce of their reason and hearts and minds. Can you hear them? I've seen my parents plead for their child's and grandchild's history to not be unearthed. I've seen my husband open wounds within himself and writhe in the pain of this necessity. I've seen my Jewish friends afraid that this second home of theirs might force them to desecrate the grave of their daughter. I've seen stoic lawyers trip over statutes and grammar because their hearts have grown so large from the injustice and the anger, and still they write and fight, and document. They all do despite the emotional cost. Because they have to and it is the right thing to do. And honestly, there's not much left to say at this point. Every word you have received from all of these people is of my heart and my mind as well. I hold the city accountable for the disrespect it plans to inflict. From the disrespect for hispanic traditions by not allowing the covering of the body's resting place with artificial flowers and the impediments to cultural tradition, to the disregard for the Jewish tradition of leaving stones at the grave of the dead. To the idea that trimming around a tear-soaked teddy bear is a burden to your landscapers. To my own tearful plea to allow my living child to be able to eat a cupcake on a bench near her brother's landscaped, brick enclosed resting place. Do you get it? There are falsehoods in your official documents about the October meetings being about feedback (you tried to present us with your will in the guise of a meeting). I will leave the detailed timeline of those inaccuracies and failures to those who operate best though that avenue. Do you know what the cemetery manager told me? (And truly, she has an amazingly tough job trying to balance efficiency and budgets with sacred space, I don't completely blame her personally, I'm sure she is a good person.) She told me that her cemeteries are "losing business" because of the appearance of the cemeteries. I'm pretty sure that this is the only business where you can literally never run out of customers. Honestly, we bought our plots, put our names on the headstone next to the name of my stillborn son's, because of the wind chimes and the pinwheels, and the balloons, and stuffed animals, and life that we witnessed all over. The outward signs of love and the promise that grief could be colorful and personal and acceptable. You were not listening in October.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. We have carefully read every comment and attempted to respond in a personal way. We acknowledge that the comments are deeply personal. We agree that people should be able to grieve in the manner of their choosing. City Council directed and authorized staff to adopt rules by a prescribed process by approving City Code Section 10-1-2. City Council set out the process for the adoption of rules under City Code Chapter 1-2. PARD is acting within its authority outlined in the City Code and Council Resolution. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. It is our hope that you will find these response and revisions to the rules a good faith effort to accommodate the grieving practices of our community. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. The community involvement in the process to update and enforce the rules dates back to 2013. Thank you for your patience and dedication to the process. Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). The proposed rule has been revised to: (6) Trees, shrubs, and other live plants are permitted with the approval of the Cemetery Administrator. (7) The Cemetery Administrator may remove any tree, shrub, or other plant in a cemetery that is dead, deteriorated, or interferes with mowing or other cemetery maintenance.
DeGuire Cooper, Laura	Note the entry for November here: <a href="http://www.austintexas.gov/edims/pio/document.cfm?id=288209">http://www.austintexas.gov/edims/pio/document.cfm?id=288209</a> . Not a single word we said changed a thing. Shame on you for saying that meeting was for public input and that we affected a single thing in your presentation. You advertised a meeting and gave us post-it notes. The rules were already made and not one word was changed. For shame. We are being told that your budget is more important than our years of dedication to the memory of our loved ones. Than our religions. Than our tending to our sacred spaces. Than our communion with our families. Another gem from the community meeting in October- The cemetery manager looked me in the eye, my tear filled eyes, after telling me that we would need to go in and remove the bulbs that bloom each year, the bricks that encircle our final resting place, the stones with messages sent for months and years, the dragonfly bench which holds our weary bones and allows us to share said cupcakes and memories, she answers my question of "what are we to do to hold ourselves in reverence and love at the grave side of our son if we must remove our bench" with the answer, "you could bring a lawn chair or something." Is this the best you can do? Do families need to keep 3 lawn chairs in every car in case they want to go visit their children? Do elderly people need to hook a folding chair to their walkers every Sunday so they can wobble over to the nicely manicured lawn where they used to garden and sit quietly with their spouses? Can you see what you are asking us to do here? Isn't there the possibility that this budgetary and labor safety issue could be met some other way? Do promises need to be broken and people need to be retraumatized because of 15 hours of labor? Seriously, 15 extra hours. Watch the Fox7 news video from the night of the "community meeting." I can send to to you if it will help. This is really what it comes down to, isn't it? Can we prohibit glass? Start a trust? I know someone else has referenced one that is already in place. Opt-out of grave-tending if we tend our own? Will money for maintenance? Pay a HOA type fee? Involve faith-based organizations? Grandfather current memorials? Create some buzz for the unique nature of the cemetery? #KeepAustinMemorialParkCemeteryWeird? Keep going back to the drawing board because it really is important enough? I know you can do it. Let's not throw the baby out with the bathwater.	1/11/2018	email	We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. These rules are intended to address those memorials and benches, which were not previously approved by the City, while still allowing for cultural and religious expression. Memorial benches can be a meaningful way to honor a deceased loved one, while offering a restful spot for people to sit. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. Regarding planting, the proposed rule has been revised to: (6) Trees, shrubs, and other live plants are permitted with the approval of the Cemetery Administrator. (7) The Cemetery Administrator may remove any tree, shrub, or other plant in a cemetery that is dead, deteriorated, or interferes with mowing or other cemetery maintenance. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.

	DeGuire Cooper, Laura	So I'm exhausted. I have ideas and you have already received many ideas. We all have our stories. We are all dumbfounded. At this point I feel like this comment period is round one of something I hope I have the energy for. I suppose maybe you are hoping all of us will just give up and let you sanitize our cultural grieving spot. We won't. Whatever comes of this comment period, there will be round two. You'll either include us in round 2 so that we can find a way to meet your needs and ours, or we will fight you again. We may fight you with countless letters, media coverage, city council assistance, neighborhood association meetings, grief counselors, cultural and religious representatives, lawsuits, and demonstrations, but know that we will fight you. For there is no more formidable a foe than the grieving. This really is all we have. We have had to fight worse than the likes of the city and its budget and we are still standing. Please work with us and not against us. We want to help. But we will not be trampled for the sake of some grass and a budget line-item.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. Due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted.
	Ikard, Cindy	Enclosed are my comments on the Proposed Cemetery Rules. I am very disappointed in how grave decoration has been handled. The proposed rules for grave decoration primarily favor maintenance over individualization of grave sites. I do not believe this is in keeping with the direction from the City Council to allow for the public need for individual expressions of grief. My daughter is buried at Austin Memorial Park (AMP) Cemetery and I own the gravesite adjacent to hers, so I have a very strong interest in how the rules and regulations are changed at the cemetery. I specifically chose AMP Cemetery as the final resting place for my daughter because of the personalization of the grave spaces at the cemetery. If felt this personalization allowed for individual ways of remembering the deceased that gave me comfort and kept the cemetery from becoming a sterile place of just stone markers. 1. Grave Decoration: I see in the proposed rules that the focus has now swung more towards maintenance than allowing for individualization of the grave spaces. I am very disappointed in this turn of events.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
14.4.12(8)	Ikard, Cindy	The proposed rule 14.4.12 (8)-General Regulations allows only an ornament or decoration that is placed directly on a memorial. Although this may sound reasonable, in actual fact, it is extremely restrictive because most memorials do not have much space at all to accommodate a decoration. This regulation appears to be a clever, bureaucratic way of nearly completing eliminating ornamentation at a gravesite. It is extremely disappointing to those us who expected to have our desire for personalization of a gravesite accommodated in the proposed rules. This same proposed rule says that no ornament or decoration placed on a memorial can be longer than six inches in any dimension. Again, this seems very restrictive; the dimension is so small. I see no need for this particular requirement. If an 8 inch high angel figurine will fit on a memorial, I should be able to place it there. I would like to see this dimension requirement removed entirely.	1/11/2018	email	Based on public feedback the dimensions of ornaments and decorations within a "Memorial Space" have been expanded
14.4.10	Ikard, Cindy	2. 14.4.10-Memorial Foundations: This rule is confusing. In (A) it says all memorials must include a foundation. Then in (B) through (F) it proceeds to set requirements for concrete foundations. Are all the foundations to be concrete or are other types of foundations allowed? I believe concrete foundations should be required because of the substantial problem of shifting memorials that has occurred at AMP Cemetery. It would seem that concrete foundations would provide more stability for memorials. I recommend that 14.4.10(A) be modified to say: "All memorials must include a concrete foundation."	1/11/2018	email	Thank you for your feedback. Small monuments, such as corner markers and small "niche" stones do not require concrete foundations as they are not heavy enough to warrant them. These monuments do not require concrete foundations, but rather sand or mortar.
14.4.9(B)	Ikard, Cindy	3. 14.4.9(B)-Memorials: This proposed rule says that "memorials placed at the foot of a space will be flush, centered and in alignment with adjacent memorials." This doesn't make sense. Shouldn't it say "memorials placed at the head of a space will be flush, centered and in alignment with adjacent memorials." I believe it is important to require centering of the memorial at the head of a grave space as previous rules have done. This requirement has been important in preventing crowding of my grave space from an adjacent marker that was not centered but shifted closer over to my space. The adjacent marker was reset to be centered.	1/11/2018	email	
14.4.12(7)	Ikard, Cindy	4. 14.4.12(7)-General Regulations: I suggest that this be revised to include the right to remove anything planted without permission as required in (6) to protect nearby grave owners from plantings that may encroach on their space. It could be revised as follows: "The Cemetery Administrator may remove any tree, shrub, or other plant in a cemetery that is dead, deteriorated, interferes with mowing or other cemetery maintenance, or was planted without permission as required in 14.4.12(6) above."	1/11/2018	email	The proposed rule has been revised to: (6) Trees, shrubs, and other live plants are permitted with the approval of the Cemetery Administrator. (7) The Cemetery Administrator may remove any tree, shrub, or other plant in a cemetery that is dead, deteriorated, or interferes with mowing or other cemetery maintenance.
14.4.13(A)(2)	Ikard, Cindy	5. 14.4.13(A)(2)-Maintenance of Cemeteries: I suggest this be revised to say "Level, straighten or reset markers or memorials" to ensure that the City can reset dilapidated markers if the grave owners will not do it. I believe it is important to include the term reset because the definitions in 14.4.3-Terms; Definitions make a distinction between releveling and resetting.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you.
	Weintraub, Steven	An open request for comments on the proposed new cemetery rules (R161-17.17) has been asked for. Here is my response. A little history; my daughter, Shoshana Ruth Weintraub, died in April 2006 and was buried at Austin Memorial Park. Soon afterwards we noticed the cemetery had maintained the grave, including not adequately resodding. At that point my wife and I tried to contact the cemetery caretaker, leaving messages, asking permission plant gardens on her grave (similar to as on other graves in the cemetery), adding if we didn't hear back by a certain date, we assumed we had permission. We left messages multiple times. We didn't receive a response, so with the tacit permission, planted gardens, which by 2013 had been there 7 years. I first found out about the proposed cemetery rules rewrite/enforcement when I was visiting my daughter in October 2013. At that time, I was attending the annual synagogue remembrance service. The synagogue member in charge of the coordination with the cemetery came up to me and told me that in 2 months I would have to remove the garden on top of Shoshana's grave. From that time in 2013, my wife and I started pursuing a dialogue on the cemetery rules, resulting in a city council resolution on October 17, 2013 for the cemetery department to work with stakeholders to resolve this equitably. In the 4 years since, there have been very little outreach, two short abrupt meetings early on, informal surveys and, only in the last months, the presentation of the new rules as a fait accompli. I would assume, as one of the primary stakeholders raising the issue, I and my wife would be consulted. I'll add, by 2013, no one ever informed us about the cemetery rules. Not when we were choosing the plots, not when burying our daughter, not when we asked permission for the garden. We assumed asked as a nicety, and when no reply was received, assumed the tacit permission. It was only in 2013, when going in the process of contacting the city council that we learned there were existing rules. Now that I have discussed our history and my feelings, I now want to address the specifics of the planned rules I find objectionable. First is simply the legality of making us change the garden. The city and it's representative, by not replying to our request, granted tacit permission to have a variance to those rules. A variance, under Texas land use laws, you cannot withdraw (I leave the legal for those better versed in law to explain). By waiting 7 years of open and obvious variance before trying to enforce the rules, which you lost the legal ability to do so. I should add, that while our variance was tacit, we know of people where the permission was explicit. One of my major complaints on the new rules is a radical change in the general character of the cemetery. Decades of open use of the cemetery has given the place a character that is unique and in keeping with the Austin character. I remember going to the cemetery in the 70's and appreciating the character. I should add, that in general, there is nothing disrespectful or dangerous most of the ways people have memorialized their loved ones. Many of the things which would be removed by the can be found in the funerary traditions the people who placed them. For example, the gardens we have are quite common on graves in Europe and Israel. But the combined and varied memorials give the collective feelings of the people of Austin.	1/11/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. City Council directed and authorized staff to adopt rules by a prescribed process by approving City Code Section 10-1-2. City Council set out the process for the adoption of rules under City Code Chapter 1-2. PARD is acting within its authority outlined in the City Code and Council Resolution. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback. Based on the feedback we have received we have amended the definition of memorial under 14.4.3(B) (6) to include monument benches. Additionally, we have revised rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. The proposed rule has been revised to: (6) Trees, shrubs, and other live plants are permitted with the approval of the Cemetery Administrator. (7) The Cemetery Administrator may remove any tree, shrub, or other plant in a cemetery that is dead, deteriorated, or interferes with mowing or other cemetery maintenance. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment.

	Weintraub, Steven	This leads to a second complaint, general disregard for the traditions of different people. The rules are enforcing the bare lawn feel you would find in a military cemetery. This is not that type of cemetery. This is a community cemetery with a community of different traditions. The Hispanic tradition of leaving things on the grave for Dia De Los Muertos and the large informal gatherings would be banned by these rules. Just this year, there was a sign that anything left after November 1 would be cleaned up (even though the holiday lasts through November 2). The Jewish tradition of leaving rocks on the grave also would be banned. On my daughter's grave there are 100's of small stones left by the people who have visited. There is not enough room on the grave marker to hold even a small portion of these sacred reminders. The process used to derive the rules actually was an insult to those wanting to solve this peacefully. Lies about purpose, and intent were constant in the process. Our first meetings were met by antagonism by city staff who actually place police officers in the audience. Different reasons for the change were given over the years. First it was complaints on appearance (copies of which we never were given – even when we asked), then it was safety, now it is maintenance. The general distrust we stakeholders feel in this process has been engendered by years of city indifference to our view point and cavalier attitude to our desires and viewpoints. We were willing to sit down and work out compromises, we never felt the city staff ever tried to reach back. Finally, it ends up that the proposed change in rules is not proper under city ordinance. An earlier ordinance rests the ability to change the cemetery rules to the city council and not the parks department. For these rules to be enacted, it must be through a request from the council and finally approved by the council. This has not been done. More so, if the October 2013 resolution is the basis, then the stakeholder input has been inadequate. Finally, even this process has had flaws. For a large part of the feedback window, the email site given for response was inactive and bounce back the emails. Finally, there actually is a mechanism in city law that implies this use with a fund to provide for perpetual care. We're willing to use this to help pay for the costs of the garden. I should add, we understand the issues involved. We're not trying to be stubborn or belligerent, and are willing to make compromises and accommodations. We understand the short staffing and economics, I am active in the political life of the city. We are still willing to dialogue to come up with an equitable understanding. But, after 7 and now 11 years, the garden is a sacred space we feel we cannot disturb. So too are the mementos, many of which we did not place, but were left by people my daughter knew and touched (and we personally can only guess at who). The Jewish tradition of leaving a stone on the visit to the grave has resulted in hundreds left by us, and her friends. We ask you delay the rules. Open a new stakeholder dialogue. We're willing come to a reasonable compromise.	1/11/2018	email	The community input on the rules has been extensive and dates back to 2013. . The proposed rules are a result of all of that feedback. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
	Scheer, Sam	The following comments and observations are formally submitted as required as part of the open public comment period for draft 14.4.0 Rules for Cemeteries Owned and Operated by the City of Austin: 1. Sections 14.4.1 and 14.4.2 -- state that these rules apply to, and in, all cemeteries managed by Austin PARD and together imply that they contain all the rules that govern the Austin cemeteries. Recommend that you either clearly state that these really are all the rules that govern the conduct of operation at the cemeteries or if not, then a listing of the other rules and regulations be included herein so the public knows what all the governing rules are. 2. The Cemetery Administrator is cited throughout this document as the primary "go-to" person for approvals etc. There appears to be an inconsistency and/or lack of clarity as to who this is. If it is intended to be Ms. Walls-Davis, her title according to the PARD website is Cemetery Manager. If there actually is a Cemetery Administrator, it should be disclosed on your website and in this "rules" document made available to the public. 3. You define "space" as the area designated for a single casketed interment. You may want to clarify how a "space" is defined for smaller urns or other containers holding "cremains." 4. You define "relevel" as it pertains to monuments, etc. using sand. Why sand? Only sand? Will PARD do all of the required releveling? If not, and the monument providers may do releveling, they may feel that another material (e.g., gravel, concrete) may be a better and/ or safer choice. The current wording may put PARD in a legally vulnerable position.	1/12/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. 1. It is correct that these rules apply to all cemeteries managed by PARD. 2. The responsibility and role of Cemetery Administrator is established in City Code 10-1-2. The position is appointed by the City Manager and who can change that appointment as needed. Currently the role has been appointed to Tonja Walls-Davis as our Cemetery Manager. These rules are public document and have been posted to the City's website. 3. Based on the feedback received, we have revised the rules to read "space" means the area designated for interment. 4. Small monuments, such as corner markers and small "niche" stones do not require concrete foundations as they are not heavy enough to warrant them. These monuments do not require concrete foundations, but rather sand or mortar.
14.4.5(D)	Scheer, Sam	5. Section 14.4.5.(D) states that the Cemetery Administrator (Manager??) shall not be responsible for the accuracy of the data contained in an authorization for interment or disinterment or for the identity of the person to be interred or disinterred. If not the Cemetery Administrator/Manager, who IS responsible?? Someone has to be responsible.	1/12/2018	email	The Interment Request and Authorization Form is filled out by the Space Owner or Authorized User of the space. The Cemetery Administrator shall not be held responsible if the information provided is not accurate.
14.4.5(F)	Scheer, Sam	6. Section 14.4.5.(F) -- It should be clearly stated that the Cemetery Administrator/Manager is also responsible for accurately locating/specifying the location of each and every cemetery space -- no one else has the tools and capability to accurately locate each space.	1/12/2018	email	Cemetery Staff is responsible for accurately locating and determining the exact location of any burials or monuments within any given space.
14.4.7(B)	Scheer, Sam	7. Section 14.4.7.(B) states that construction or installation of slabs, curbing, steps, fencing, hedging, or enclosures of any kind will not be permitted on or around any space or lot. This is unacceptable to us at Temple Beth Shalom, and certainly at other Jewish congregational burial spaces, as stated. As you know, it has been traditional for centuries, and at Austin PARD cemeteries since inception, for Jewish cemetery section boundaries to be designated/encircled/enclosed with a hard border structure. In PARD cemeteries, it has always been shrubbery. We would expect that that practice will continued to be supported by PARD. The simple addition of "unless approved by the Cemetery Manager" should be sufficient.	1/12/2018	email	The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. The proposed rule has been revised to: (6) Trees, shrubs, and other live plants are permitted with the approval of the Cemetery Administrator. (7) The Cemetery Administrator may remove any tree, shrub, or other plant in a cemetery that is dead, deteriorated, or interferes with mowing or other cemetery maintenance.
14.4.9(B,E,F,G,K)	Scheer, Sam	8. Section 14.4.9.(B) Many gravesites have both a vertical headstone and a smaller, flat, foot stone. Is this still permitted? Assuming you. I recommend that you modify the wording to clearly state such. 9. Section 14.4.9.(E) Is this meant to apply to horizontal flat memorials? Needs clarification. 10. Section 14.4.9.(F). These words are OK for a single monument but you will need to add the situation as it applies to a "double-wide", couple, or family marker. 11. Section 14.4.9.(G). Recommend that you clarify whether or not the specified 42" height includes or excludes the mandatory base. 12. Section 14.4.9.(K) Recommend that you make it a requirement for PARD to notify the headstone owner in writing that the headstone or other memorial has become unsightly and will be removed in a specified period of time if specified corrective actions have not been taken.	1/12/2018	email	This rule is specifically talking about "Foot Markers" or stones installed at the "foot" or east end of a space. There are similar requirements in place for monuments installed at the head of a space.
14.4.10(C)	Scheer, Sam	13. Section 14.4.10.(C) How come cement grout is specified for use here but only sand is specified for use in section 14.4.3.(10)? Suggest making both requirements consistent.	1/12/2018	email	Small monuments, such as corner markers and small "niche" stones do not require concrete foundations as they are not heavy enough to warrant them. These monuments do not require concrete foundations, but rather sand or mortar.
14.4.11(A)	Scheer, Sam	14. Section 14.4.11.(A) The Cemetery Administrator must approve the size, craftsmanship, quality, inscriptions, and foundations of all memorials to be placed in the cemeteries?? REALLY??? Does the City want that responsibility? What criteria will the Cemetery Administrator use to determine her/his approval for the accuracy of the inscriptions? The Hebrew & Chinese inscriptions too? Suggest you delete this. 15. Section 14.4.11.(C) This rule states in part " . . . or any person . . . violates any rule or regulation of the cemeteries." Does this requirement apply to the contents of this document or are there other rules, regulations, requirements, etc, in other places not yet specified? Seems you'll need to to keep everyone honest. Hint: also see Comment #16 below.	1/12/2018	email	In accordance with the Rules, we do request additional information, including the design. We are doing this as a pre-cautionary step toward greater diversification and inclusion, particularly in light of hate crimes, cemetery vandalism, etc. that have increased over the past couple of years. It is not intended to exclude people from freedom of expression, but to simply support the changing times.
14.4.12(A&D) 14.4.7(B)	Scheer, Sam	16. Section 14.4.12.(A)(1) - What is the law governing noise and amplified sound? You need to specify if you require compliance. 17. Section 14.4.12.(D)(6) -- Seems to conflict with Section 14.4.7.(B)	1/12/2018	email	We experience cultural and religious practices that may be considered loud such as military honors that are performed at a service, or a congregation signing a hymn also during a service. Cemeteries Operations will address all high decibel situations on an individual basis, and we will do our best to not interfere with or hinder any appropriate forms or acts of cultural or religious expression. Regulations of noise and amplified sound are found in City Code Chapter 9-2. We adopted the local laws governing noise and amplified sound to ensure support with enforcement

	Scheer, Sam	18. All of these Rules seem to apply to the general public and its actions in the cemetery. What's missing are the rules, and responsibilities of PARD personnel toward keeping the cemetery as it SHOULD be!	1/12/2018	email	We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
	Mary Ellen	Please consider the personal side of the ruling concerning adornments on cemetery graves. When a person loses a loved one, particularly a child, the mourning is lifelong. Visiting the grave is a worldwide tradition that helps the family and friends deal with their sorrows. Creating a spot where love, prayers, memories and sadness can be expressed and shared is healing and essential. To restrict this process so a caretaker with a ride-upon mower or the like can more easily attend to the grounds is not a good reason to limit the expressions of love for the deceased. Neither is the cultural or religious beliefs of the families. If we cannot "rest in peace" together how can we ever learn to "live in peace" together? Thank you for your consideration in this matter. I hope the needs of the people in the community will guide your decision.	1/12/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. Based on the feedback received, we have revised the rules to include "Memorialization Space", as outlined in 14.4.12 (D). Ornamentation will be permitted with restrictions to ensure the safety of individuals coping with a loss, the visitors, and the staff tasked with maintaining the cemeteries. The intent is to allow for cultural and religious expression. Stones, flowers, and memorabilia may be placed at the head of a space or on the headstone. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
	Amisse, Thierry	I would like to submit my official comment on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD should stop this process and begin again. PARD should seek community input on rules that impact stakeholders. This process has been heartless. Requiring the removal of old memorials is cold and unnecessary. These memorials had approval and PARD should not change this policy. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Please balance people's grief and history against lawn maintenance costs. I object to these rules and insist that the city come up with another solution for this problem. Please involve the community and respect our rights and traditions.	1/12/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback; however, due to the omission of an email address contact in the posting and issues with links provided the Director has decided to extend the comment period by reposting the proposed rules with revisions based on the public feedback received in the last posting. There will be an additional 31 days for the public to review and comment on the proposed rules when they are reposted. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.
	McClure, Rachel	I would like to submit my official comments on the proposed cemetery rules (Rule R161-17.17). I object to the adoption of these rules. PARD does not have the authority to create a rule that affects the stakeholders without the proper community input and the support of City Council. Requiring decade old memorials to be removed is wrong. The rules go against decency, kindness, and respect for our dead. The removal of benches places an undue burden on families wishing to visit loved ones. I cannot stand for long periods of time, so I need a bench. Memorials have been permissioned and PARD should not retroactively deny decisions approved from past cemetery officials. This is a financial issue that should not be solved by taking away the rights and needs of cemetery stakeholders. Let's look across the country and see how other cemeteries have addressed this issue. Please include people's grief and history when devising a plan for lawn maintenance. In conclusion, I object to these rules and insist that the city come up with better ideas for meeting the needs of their budget and the needs of those impacted by these rules. Please involve the community in seeking a more appropriate solution. Please respect our burial rights and traditions in honoring our dead.	1/12/2018	email	Thank you for your feedback on the proposed cemetery rules amendment. Your input is valuable to us and helps Cemeteries Operations understand the features, functional concerns, and questions that are most important to you. We carefully review all feedback to determine how to best accommodate both current and new customers. City Council directed and authorized staff to adopt rules by a prescribed process by approving City Code Section 10-1-2. City Council set out the process for the adoption of rules under City Code Chapter 1-2. PARD is acting within its authority outlined in the City Code and Council Resolution. The community input on the rules has been extensive and dates back to 2013. The proposed rules are a result of all of that feedback. We agree that people should be able to grieve in the manner of their choosing. The intent of rules in a public setting is to protect the rights of all customers while providing a safe and accessible environment. The proposed rules are less restrictive and more safety oriented than the current rules adopted in 1978. The current rules were not consistently enforced which resulted in safety hazards, constrained maintenance, and inconsistent practices. Before implementing equal enforcement we have taken the opportunity to update the language and incorporate current needs and practices. Special considerations were made to accommodate as many of the grieving practices as possible in a safe and fair manner. These rules are intended to address those memorials and benches, which were not previously approved by the City, while still allowing for cultural and religious expression. Memorial benches can be a meaningful way to honor a deceased loved one, while offering a restful spot for people to sit. We have revised the proposed rules to accommodate existing benches with restrictions, as outlined in 14.4.12 (D) (11). The City of Austin is proud to comply with the Americans with Disabilities Act. If you require assistance for participation in our programs or use of our facilities, please call (512) 974-3914. We understand implementing these rules pose challenges and we are more than willing to discuss individual needs with the understanding that we must preserve the rights of all customers and provide overall safety. With the updated rules and a continuous open line of communication, we hope to be able to better serve our community.