

# EXHIBIT A



Aaron Mount <aaron.mount@edcgov.us>

---

## Use of Property at 3962 Mineshaft Ct

---

**Margaret Mirande** <margaretmirande@yahoo.com>  
Reply-To: Margaret Mirande <margaretmirande@yahoo.com>  
To: Mark Charlton <mccharlton@hotmail.com>  
Cc: Aaron Mount <aaron.mount@edcgov.us>

Fri, Mar 6, 2015 at 6:59 PM

I am Margaret A. Mirande and I currently reside at 3382 Brittan Ave., San Carlos, CA 94070.

I, Margaret A. Mirande, and my late husband, John H. Mirande, resided at 3962 Mineshaft Court, Shingle Springs, CA 95682 from April 15, 1989 until January 17, 2006.

I and my husband, John Mirande, did not operate a stainless steel fabrication shop as described by Special Use Permit 78-16 on this property at any time during our residence. The metal building was used only for storage.

Sincerely,  
Margaret A. Mirande

# EXHIBIT B

Bus Lic#: 021821 Status: OUT OF BUS  
 Bus Entity: DIAMOND SPRINGS IMAGING CENTER  
 Owner Name 1: JOHN H MIRANDE  
 Owner Name 2:  
 Owner Name 3:

| Mess Date | Message | ID |
|-----------|---------|----|
|-----------|---------|----|

|       |                                     |  |
|-------|-------------------------------------|--|
| ***** | No messages found for this business |  |
|-------|-------------------------------------|--|

End of List

F7=Prev Msgs

F8=Next Msgs

ENTER = Next BL screen

UTM070B

Business License Inquiry 2 of 4 PLADM 06/09/2015 14:25:46  
Ind: X Prtnrsp: Corp: Status: O A=Active E=Exp S=Sold O=OutOfBus P=Pend  
DBA1:  
DBA2:  
DBA3: Exempt:

Bus Entity: DIAMOND SPRINGS IMAGING CENTER BL NBR: 021821

Bus Type1: 510 Desc: PHOTOGRAPHERS; VIDEO; STUDIOS; EQUIPMENT & SUPPLIES  
Bus Type2: Desc:  
Bus Type3: Desc:

NAICS Cd1: 541922 Desc: Commercial Photography  
NAICS Cd2: Desc:  
NAICS Cd3: Desc:

Bus. Addr: Street 484 MAIN ST # 1  
City State ZIP: DIAMOND SPRINGS CA 95619 Ctry: USA

Mail Addr: Street 484 MAIN ST # 1  
City State ZIP: DIAMOND SPRINGS CA 95619 Ctry: USA

F3=Quit Page 1/3 Enter=Next Page F9=Messages F11=Old fields UTM070A

Bus Entity: DIAMOND SPRINGS IMAGING CENTER

BL NBR: 021821

Payment Dt: 08/24/1998 Pymt Amt: 22.00 Clerk: BJM Fee Exempt: N

Renewal Dt: 09/01/1999 Issue Dt: 08/24/1998 Employer Id Num:

Parcel: 054 402 40 100 Bus Phone: 530 622-1873 Contractor Lic#:

OWNER 1(F.M.L): JOHN H MIRANDE

OWNER 1 Street:

Own1 CityStZIP:

Ctry: USA

Owner 2(F.M.L):

Owner 2 Street:

Own2 CityStZIP:

Ctry: USA

Owner 3(F.M.L):

Owner 3 Street:

Own3 CityStZIP:

Ctry: USA

Business License Inquiry PLADM 06/09/2015 14:26:10  
Ind: Prtnrsp: Corp: Status: A=Active E=Exp S=Sold O=OutOfBus P=Pend  
DBA1:  
DBA2:  
DBA3: Exempt:

Bus Entity: \_\_\_\_\_ BL NBR: <

Bus Type1: Desc:  
Bus Type2: Desc:  
Bus Type3: Desc:

NAICS Cd1: Desc: Commercial Photography  
NAICS Cd2: Desc:  
NAICS Cd3: Desc:

Bus. Addr: Street  
City State ZIP: Ctry:

Mail Addr: Street  
City State ZIP: Ctry:

No more Licenses to display for this Name

F3=Quit Page 1/3 Enter=Next Page F9=Messages F11=Old fields UTM070A

## Exhibit C

|   |
|---|
| Letter dated July 2, 2013 from Planning Services requesting owner to provide County with a site plan and narrative of uses at the site.   |
| Letter dated September 24, 2013 from Planning Services requesting use to cease or submit revision to Special Use Permit S78-0016  |
| Letter dated January 21, 2014 from Planning Services stating that use ceased for greater than a year therefore SUP was null and void, 60 days to respond  |
| Letter dated February 13, 2014 from Brad Clark confirming 90 day extension to appeal action taken by our office as reflected in the letter dated January 21, 2014. Applicant supplied letters from previous property owners showing continued use of property consistent with S78-0016. |
| Letter dated March 14, 2014 from Planning Services rescinding the letter dated January 21, 2014 and requesting site plan and project narrative showing compliance with S78-0016   |
| Letter dated April 28, 2014 from Brad Clark providing project narrative and site plan.  |
| Letter dated June 23, 2014 from Planning Services stating that use has expanded beyond S78-0016 and requesting revision to SUP or change of operation to be consistent. 45 days to respond to letter.   |
| Letter dated August 18, 2014 from Brad Clark responding to request for a special use permit revision.   |
| Letter dated August 25, 2014 from Planning Services supplying a special use permit application and fee quote.   |



# COMMUNITY DEVELOPMENT AGENCY

## DEVELOPMENT SERVICES DIVISION

<http://www.edcgov.us/DevServices/>

---

**PLACERVILLE OFFICE:**

2850 Fairlane Court, Placerville, CA 95667

**BUILDING**

(530) 621-5315 / (530) 622-1708 Fax

[bdgdept@edcgov.us](mailto:bdgdept@edcgov.us)

**PLANNING**

(530) 621-5355 / (530) 642-0508 Fax

[planning@edcgov.us](mailto:planning@edcgov.us)

**LAKE TAHOE OFFICE:**

3368 Lake Tahoe Blvd., Suite 302

South Lake Tahoe, CA 96150

(530) 573-3330

(530) 542-9082 Fax

[tahoebuild@edcgov.us](mailto:tahoebuild@edcgov.us)

July 2, 2013

**CERTIFIED MAIL**

Carrie S Martin  
Erik Martin  
3962 Mineshaft Court  
Shingle Springs, CA 95682

**Re: Letter of Advisement  
Special Use Permit S78-0016/Code Enforcement Case Number 211618  
Assessor's Parcel Numbers: 070-250-45**

Dear property owners:

Planning Services has received a complaint that your business is creating excessive traffic on Minshaft Court, that materials associated with the business are being stored outside, and employees are at the site. After reviewing the project files, it has been determined that the current activities on your parcel may be exceeding those allowed by the Special Use Permit which are as follows:

1. Development is to be consistent with the site plan;
2. Operational hours from 7:00 A.M. to 5:00 P.M.;
3. Structure to be painted earth colors;
4. The use is exclusively for the applicant, not to include employees, and not transferrable with the sale of the property.

In order to better determine if the activities are consistent with the use permit, please submit the following within 30 days of the date of this letter:

1. Site plan that accurately shows the current site layout and also specifically includes the areas used outside of the structure approved for the business consistent with the Final Conditions of Approval and site plan for S78-0016 (Attachments 1 and 2).
2. A narrative that shows how your project complies with the conditions of approval..

Please call me at (530) 621-5345, or email me at [aaron.mount@edcgov.us](mailto:aaron.mount@edcgov.us) if you have any questions or concerns regarding this notification. I am also available if you would like to schedule a time for a site visit by myself and my supervisor, Peter Maurer.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Mount', written over a thin horizontal line.

Aaron Mount, Associate Planner  
Planning Services

Attachments: Attachment 1: Final Conditions of Approval for Special Use Permit S78-0016  
Attachment 2: Approved Site Plan for Special Use Permit S78-0016

Cc: Jim Wassner, Code Compliance Division

\\DSFS\DS-Shared\DISCRETIONARY\1978\S78-0016 Endean Machine Shop\S78-16 Code Compliance 2.0.docx





# COMMUNITY DEVELOPMENT AGENCY

## DEVELOPMENT SERVICES DIVISION

<http://www.edcgov.us/DevServices/>

---

**PLACERVILLE OFFICE:**

2850 Fairlane Court, Placerville, CA 95667

**BUILDING**

(530) 621-5315 / (530) 622-1708 Fax

[bdgdept@edcgov.us](mailto:bdgdept@edcgov.us)

**PLANNING**

(530) 621-5355 / (530) 642-0508 Fax

[planning@edcgov.us](mailto:planning@edcgov.us)

**LAKE TAHOE OFFICE:**

3368 Lake Tahoe Blvd., Suite 302

South Lake Tahoe, CA 96150

(530) 573-3330

(530) 542-9082 Fax

[tahoebuild@edcgov.us](mailto:tahoebuild@edcgov.us)

### CERTIFIED

September 24, 2013

Erik Martin  
3962 Mineshaft Court  
Shingle Springs, CA 95682

Re: Special Use Permit S78-0016  
APN 070-250-45

Dear Mr. Martin:

On February 28, 1978 the County approved Special Use Permit S78-0016, authorizing a fabrication shop as a home occupation to be conducted on your property. This use was subject to conditions which limited the use to no employees and all uses to be within the accessory building. Attached is a copy of the site plan and conditions of approval which establish the limitations under which you may operate.

The County has received complaints that you have multiple employees, outside storage, and other uses that go beyond a home occupation. This is in conflict with the provisions of the special use permit. Please cease this activity immediately. Failure to do so could result in revocation of the special use permit, fines, and/or prosecution by the County.

You may apply for a revision to the special use permit. An application for a revision must be submitted to the County Community Development Agency, Planning Services, and will be processed as provided in Chapter 17.22 of the County Code. The application will be subject to a public hearing and may be approved, conditionally approved or denied based on the findings required in Section 17.22.540.

A response to this letter must be made within 30 days by either notifying the County that the unauthorized activity has ceased, or by submitting a special use permit revision application. Please contact me if you have any questions or wish to meet to discuss your operation.

Sincerely,



Aaron Mount, Associate Planner



# COMMUNITY DEVELOPMENT AGENCY

## DEVELOPMENT SERVICES DIVISION

<http://www.edcgov.us/DevServices/>

**PLACERVILLE OFFICE:**

2850 Fairlane Court, Placerville, CA 95667

**BUILDING**

(530) 621-6315 / (530) 622-1708 Fax

[bdgdept@edcgov.us](mailto:bdgdept@edcgov.us)

**PLANNING**

(530) 621-3355 / (530) 642-0508 Fax

[planning@edcgov.us](mailto:planning@edcgov.us)

**LAKE TAHOE OFFICE:**

3368 Lake Tahoe Blvd., Suite 302

South Lake Tahoe, CA 96160

(530) 573-3330

(530) 642-9082 Fax

[tahoebuild@edcgov.us](mailto:tahoebuild@edcgov.us)

January 21, 2014

JAN 23 2014

CERTIFIED MAIL

Erik Martin  
3962 Mineshaft Court  
Shingle Springs, CA 95682

Re: Special Use Permit S78-0016  
APN 070-250-45

Dear Mr. Martin,

On February 28, 1978 the County approved Special Use Permit S78-0016, authorizing a fabrication shop as a home occupation to be conducted on your property.

Title 17 of the El Dorado County Ordinance states;  
*17.22.260 Revocation.*

- A. All permits authorized by this chapter shall automatically expire by operation of law when:*
  - 2. The use authorized by the permit has ceased for a period of one year for any reason;*
- When it is discovered that a permit has expired, the Planning Department shall send notice of such termination to the property owner and/or applicant. Failure to send such notice shall not affect the expiration of the permit.*

Planning Services has determined that the uses allowed by Special Use Permit S78-0016 ceased for multiple years prior to your ownership of the parcel. This is based on County records showing that the previous owners of the parcel occupied the site for approximately 17 years and did not operate a fabrication shop as a home occupation. Therefore, S78-0016 by operation of law has expired and is no longer in effect for APN 070-250-45.

You shall cease all commercial on-site uses within 60 days of receipt of this letter. Failure to do so could result in code enforcement action, fines, and/or prosecution by the County. A response to this letter must be made within 30 days notifying the County that the unauthorized activity has ceased or your plan to cease the activity within the 60 day time frame. Please contact me if you have any questions or wish to meet to discuss this letter.

Sincerely,

Aaron Mount, Project Planner

Cc: Ron Briggs, District Four Supervisor  
Jim Wassner, Code Enforcement

**BRAD CLARK  
ATTORNEY AT LAW**

243 Placerville Drive  
Placerville, California 95667

[www.bradclarklaw.com](http://www.bradclarklaw.com)  
Email: [brad@bradclarklaw.com](mailto:brad@bradclarklaw.com)

Placerville (530) 621-4170  
Fax (530) 621-2910

February 13, 2014

**VIA U.S. MAIL**

Mr. Roger Trout  
Planning Department  
2850 Fair Lane  
Placerville CA 95667

14 FEB 18 AM 11:29  
RECEIVED  
PLANNING DEPARTMENT

Re: Martin, Erik – 3962 Mineshaft Ct. Shingle Springs CA 95682

Dear Mr. Trout:

Thank you for the opportunity to meet with you at your office on February 11, 2014 on behalf of my client Erik Martin. This letter serves as confirmation that we agreed upon a 90 day extension from yesterday's meeting to appeal action taken by your office as reflected in the letter dated January 21, 2014 from Aaron Mount. (Attached for reference) That time frame will allow us to meet and review options.

As I informed you at our meeting, my client asserts that a business has never ceased to operate at the subject property and as such the special use permit did not expire. Attached please find letters confirming my clients findings from the two previous owners of the subject property stating that they continued to run business at the site. My client is certain that he has maintained consistent operations of a business on site since his purchase of the property approximately 8 years ago.

As a reminder, you agreed to revise the letter dated January 21, 2014 to be consistent with the process we have agreed upon. I have confirmed that my client and I are willing to meet with you in the coming weeks to address concerns and look for solutions.

Best regards,

  
BRAD CLARK, Esq.

BC/cc  
cc:client  
Enclosures

County of El Dorado  
Building Services  
2850 Fairlane Court, Building C  
Placerville, CA 95667

Re: Business Use Statement for Special Use Permit 78-16

May 6, 2013

To Whom It May Concern:

The purpose of this letter is to confirm I, Thomas Endean, operated a business consistent with Special Use Permit 78-16 on parcel 070-250-45 from the time the Special Use Permit was issued until selling the property on April 15, 1989.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Endean', written over a horizontal line.

Thomas Endean

County of El Dorado  
Building Services  
2850 Fairlane Court, Building C  
Placerville, CA 95667

Re: Use Statement for Special Use Permit 78-16

May 6, 2013

To Whom It May Concern:

The purpose of this letter is to confirm that any and all uses I, Margaret Mirande, and my late husband, John Mirande, made of the metal building were within the scope of uses permitted under Special Use Permit 78-16 on parcel 070-250-45 from the date of purchase on April 15, 1989 to the date of sale January 17, 2006.

Sincerely,

A handwritten signature in cursive script that reads "Margaret Mirande". The signature is written in black ink and is positioned above the printed name.

Margaret Mirande



# COMMUNITY DEVELOPMENT AGENCY

## DEVELOPMENT SERVICES DIVISION

<http://www.edcgov.us/DevServices/>

---

**PLACERVILLE OFFICE:**

2850 Fairlane Court, Placerville, CA 95667

**BUILDING**

(530) 621-5315 / (530) 622-1708 Fax

[bdgdept@edcgov.us](mailto:bdgdept@edcgov.us)

**PLANNING**

(530) 621-5355 / (530) 642-0508 Fax

[planning@edcgov.us](mailto:planning@edcgov.us)

**LAKE TAHOE OFFICE:**

3368 Lake Tahoe Blvd., Suite 302

South Lake Tahoe, CA 96150

(530) 573-3330

(530) 542-9082 Fax

[tahoebuild@edcgov.us](mailto:tahoebuild@edcgov.us)

March 14, 2014

Erik Martin  
3962 Mineshaft Court  
Shingle Springs, CA 95682

Re: Special Use Permit S78-0016  
APN 070-250-45

Dear Mr. Martin:

Planning Services agrees to rescind the letter dated January 21, 2014 stating that you shall cease all commercial on-site uses within 60 days of receipt of the letter.

On February 28, 1978 the County approved Special Use Permit S78-0016, authorizing a fabrication shop as a home occupation to be conducted on your property. This use was subject to the following conditions:

1. Development is to be consistent with the site plan;
2. Operational hours from 7:00 A.M. to 5:00 P.M.;
3. Structure to be painted earth colors;
4. The use is exclusively for the applicant, not to include employees, and not transferrable with the sale of the property.

The County has received complaints that you have multiple employees, outside storage, noise emitting beyond the property lines, deliveries by large trucks resulting in damage to private roads, reportable quantities of hazardous materials, industrial painting, buildings constructed without permits, and fabrication of large electrical panel boxes. These uses, if confirmed, may be in conflict with the provisions of the special use permit and the General Plan definition of a home occupation.

In order to better determine if the activities are consistent with the use permit, please submit the following within 30 days of the date of this letter:

1. Site plan that accurately shows the current site layout and also specifically includes the areas used outside of the structure approved for the business consistent with the Final Conditions of Approval and site plan for S78-0016 (Attachments 1 and 2).
2. A narrative that shows how your project complies with the conditions of approval.

Sincerely,

Aaron Mount, Associate Planner

**BRAD CLARK  
ATTORNEY AT LAW**

243 Placerville Drive  
Placerville, California 95667

[www.bradclarklaw.com](http://www.bradclarklaw.com)  
Email: [brad@bradclarklaw.com](mailto:brad@bradclarklaw.com)

Placerville (530) 621-4170  
Fax (530) 621-2910

April 28, 2014

**VIA U.S. MAIL**

Aaron Mount  
Planning Department  
2850 Fair Lane  
Placerville CA 95667

14 MAY - 2 AM 11:16  
RECEIVED  
PLANNING DEPARTMENT

Re: Martin, Erik – 3962 Mineshaft Ct. Shingle Springs CA 95682

Dear Mr. Mount:

I write on behalf of my client Eric Martin in response to your letter dated March 14, 2014 and received March 25, 2014. Enclosed please find an informal site plan as requested in your letter.

Mr. Martin responds to the complaints referenced in our letter as follows:

**MULTIPLE EMPLOYEES** - Mr. Martin has already stated in our meeting with Mr. Trout that he, his wife, and his nephew who all currently reside at the property do work for the business. I believe that having family members living on site and working in the business is consistent with the Special Use Permit. It would be a shame if Mr. Martin is asked to discharge his nephew from employment due to a technical interpretation of the County. It is my understanding that Mr. Martin is attempting to give his nephew a sense of worth, discipline and direction in life.

**NOISE EMITTING FROM PROPERTY LINES** - Mr. Martin cannot deny that there may be some noise emitting from the property line because use of power tools is a necessary and anticipated tool in metal fabrication. However, Mr. Martin asserts that said noise is not excessive nor has it changed significantly from the time the permit was issued. Mr. Martin contends that any noise created has not significantly increased from the noise emitted by the previous owners. Mr. Martin does not believe that he is in any way in violation of his Special Use Permit based on the noise Mr. Martin does not believe that any alleged noise raises to the level of nuisance to any of his neighbors. Nevertheless, Mr. Martin will continue to take reasonable measures to abate and reduce any noise he creates in his metal fabrication business.

**OUTSIDE STORAGE**- Mr. Martin asks for clarification on this issue. Mr. Martin does not believe that he is restricted from storage on site. That being said, there are no permanent storage facilities other than minimal storage in the permitted building currently on site. There have been from time to time certain things left on the grounds on a temporary basis.

As an example of what Mr. Martin is looking for in clarification; Mr. Martin keeps a pull trailer on his property, which he most commonly uses to carry ATV's for recreational use but may on occasion use it in the business. Is the County of El Dorado claiming that he can't keep the trailer on site?

**DELIVERIES BY LARGE TRUCKS** – As previously discussed with Mr. Trout, Mr. Martin takes deliveries of metals delivered by trucks. The trucks routinely carry far more product than is

being delivered to Martin as the delivery company needs to make efficient use of the trucks in their delivery routes. This practice has been going on since well before Mr. Martin purchased the site and has not significantly changed since the Special Use Permit was issued. We contend that such deliveries were anticipated when the special use permit was issued.

Damage to Private Roads- Mr. Martin is not currently aware of significant damage to private roads. He is open to making reasonable repairs.

Hazardous Materials – Mr. Martin does not have hazardous materials on site. He does have oxygen cylinders that are registered with the county. He does at times keep 1 gallon or less paint, which he has confirmed through discussion with regulatory officials as appropriate.

Buildings Without Permit – To Mr. Martin's knowledge no buildings have been constructed without permit.

Fabrication of Large Electrical Panels - Mr. Martin does fabricate electrical panels. That is part of the function of a metal fabrication business.

Mr. Martin's business and operations are still consistent with the metal fabrication business anticipated when the Special Use Permit was issued. Deliveries of metals are made to site as they have been since the permit was issued. He then transports finished metal fabrication projects from site as a normal business function. He does not operate outside any parameters stated on the Special Use Permit.

Best regards,

BRAD CLARK, Esq.

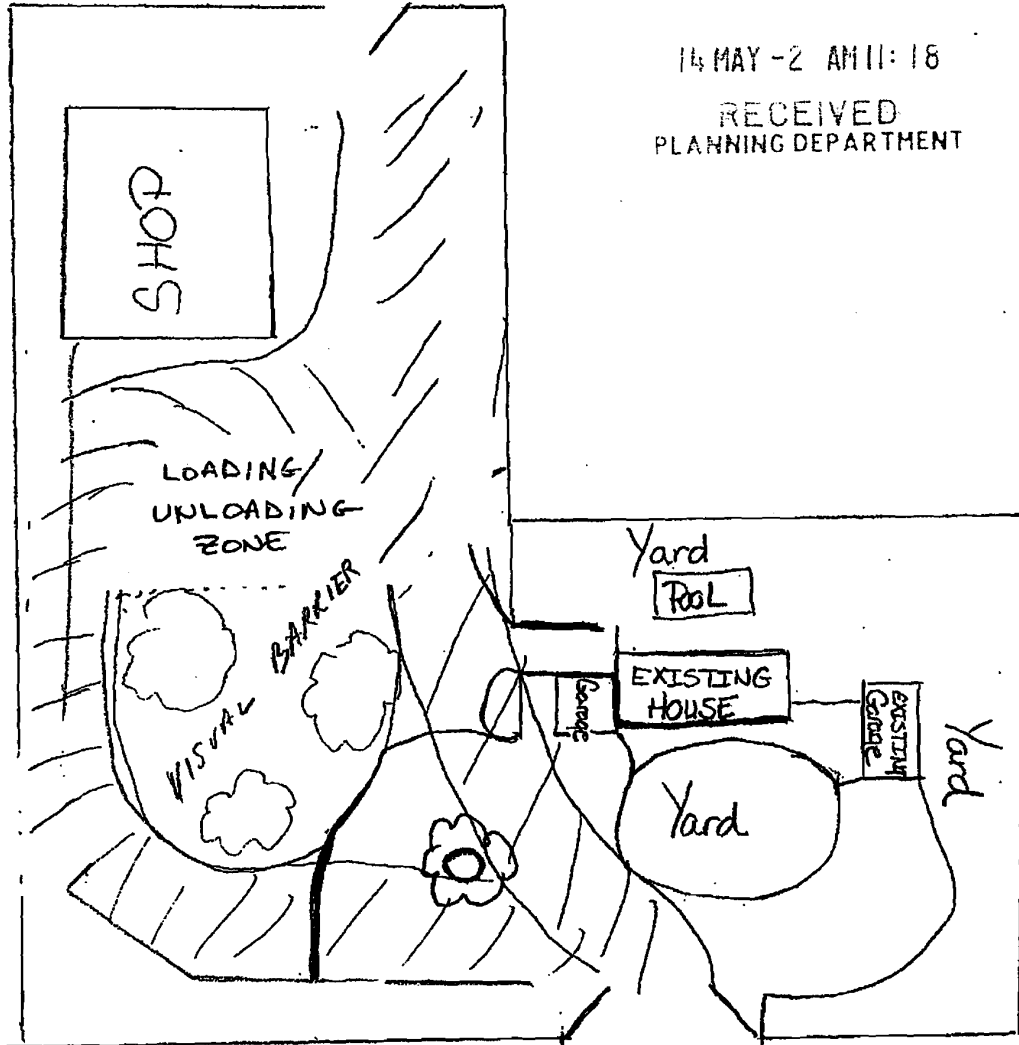
cc:client  
Enclosures



WHISPERING PINES

14 MAY -2 AM 11:18

RECEIVED  
PLANNING DEPARTMENT



TRUCK ROUTE +  
LOADING + UNLOADING ZONE



# COMMUNITY DEVELOPMENT AGENCY

## DEVELOPMENT SERVICES DIVISION

<http://www.edcgov.us/DevServices/>

**PLACERVILLE OFFICE:**

2850 Fairlane Court, Placerville, CA 95667

**BUILDING**

(530) 621-5315 / (530) 622-1708 Fax

[bldgdept@edcgov.us](mailto:bldgdept@edcgov.us)

**PLANNING**

(530) 621-5355 / (530) 642-0508 Fax

[planning@edcgov.us](mailto:planning@edcgov.us)

**LAKE TAHOE OFFICE:**

3368 Lake Tahoe Blvd., Suite 302

South Lake Tahoe, CA 96150

(530) 573-3330

(530) 542-9082 Fax

[tahoebuild@edcgov.us](mailto:tahoebuild@edcgov.us)

June 23, 2014

Brad Clark  
243 Placerville Drive  
Placerville, CA 95667

Re: Special Use Permit S78-0016  
APN 070-250-45

Dear Mr. Clark:

In response to your letter dated April 28, 2014 the Development Services Department concludes that the existing uses are inconsistent with Special Use Permit S78-0016, based on the following:

1. Employees: In your letter you state that the property owner, his wife, and his nephew, who reside on the site, work for the business. Condition of approval number 4 specifically states that the use is exclusively for the applicant only.
2. Scale of fabrication: The Special Use Permit was approved for stainless steel fabrication as a home occupation and the current uses at the site appear to have enlarged to a scale that would be found to be an expansion beyond those approved by the Special Use Permit.

Section 17.22.270.B.2 of the Zoning Ordinance states that "changes to a project which result in an expansion or substantial alteration of the project...may only be approved by the approving authority pursuant to the requirements for submittal of a new permit". The Development Services Department recommends the following two options:

- A. Submit a revision request to expand the Special Use Permit. Attached is an application with the required submittal items highlighted.
- B. Change the operation to comply with the Special Use Permit.

Please respond within 45 days of the receipt of this letter.

Please call me at (530) 621-5355 if you have any questions or concerns regarding the requested items. If you continue to have concerns regarding the requested information, I can schedule a meeting with the Development Services Division Director.



# COMMUNITY DEVELOPMENT AGENCY

## DEVELOPMENT SERVICES DIVISION

<http://www.edcgov.us/DevServices/>

---

**PLACERVILLE OFFICE:**

2850 Fairlane Court, Placerville, CA 95667

**BUILDING**

(530) 621-5315 / (530) 622-1708 Fax

[bldddept@edcgov.us](mailto:bldddept@edcgov.us)

**PLANNING**

(530) 621-5355 / (530) 642-0508 Fax

[planning@edcgov.us](mailto:planning@edcgov.us)

**LAKE TAHOE OFFICE:**

3368 Lake Tahoe Blvd., Suite 302

South Lake Tahoe, CA 96150

(530) 573-3330

(530) 542-9082 Fax

[tahoebuild@edcgov.us](mailto:tahoebuild@edcgov.us)

Sincerely,

Aaron Mount  
Associate Planner

Attachments: Letter From Brad Clark dated April 28, 2014  
Special Use Permit S78-16  
Special Use Permit application

Cc: Erik Martin  
3962 Mineshaft Ct.  
Shingle Springs, CA 95682

District IV-Ron Briggs

**BRAD CLARK  
ATTORNEY AT LAW**

243 Placerville Drive  
Placerville, California 95667

[www.bradclarklaw.com](http://www.bradclarklaw.com)  
Email: [brad@bradclarklaw.com](mailto:brad@bradclarklaw.com)

Placerville (530) 621-4170  
Fax (530) 621-2910

August 18, 2014

**VIA U.S. MAIL**

Aaron Mount  
Planning Department  
2850 Fair Lane  
Placerville CA 95667

14 AUG 20 AM 11:35  
RECEIVED  
PLANNING DEPARTMENT

Re: Martin, Erik – 3962 Mineshaft Ct. Shingle Springs CA 95682

Dear Mr. Mount:

In response to your letter dated June 17, 2014, Mr. Martin is willing to submit a revision request to expand the Special Use Permit in an effort to clarify any dispute and avoid adversarial proceedings. Mr. Martin is willing to submit a revision request on the condition that he does not waive any defense of his current permit. In other words, if for some reason the revision process fails Mr. Martin will assert and does not waive the assertion that he is in compliance with his current permit. Thus, his revision request should not be construed as an admission or adoption of your conclusions stated in your June 17, 2014 letter.

1. Mr. Martin asserts that the condition number 4 should not be read to deny his ability to use family members living in his home as employees in his home business. Any attempt to deny his ability to hire family members will be vigorously defended; and

2. Mr. Martin does not agree that his business activities have expanded beyond those approved in his current Special Use Permit. Based on independent research, Mr. Martin's business' practices are very similar in scope as compared to the business practices of the previous owners. He has not expanded in a material manner nor has he altered the project substantially from the original concepts and designs anticipated in the original permit.

We are both a bit confused with the process of submitting a revision request to expand the Special Use Permit. Please forward the steps in this process.

Mr. Martin is prepared for reasonable expenses toward the revision process. However, if the expense is excessive, Mr. Martin will be forced to explore different options.

Best regards,

  
BRAD CLARK, Esq.

cc: client



# COMMUNITY DEVELOPMENT AGENCY

## DEVELOPMENT SERVICES DIVISION

<http://www.edcgov.us/DevServices/>

**PLACERVILLE OFFICE:**

2850 Fairlane Court, Placerville, CA 95667

**BUILDING**

(530) 621-5315 / (530) 622-1708 Fax

[bldgdept@edcgov.us](mailto:bldgdept@edcgov.us)

**PLANNING**

(530) 621-5355 / (530) 642-0508 Fax

[planning@edcgov.us](mailto:planning@edcgov.us)

**LAKE TAHOE OFFICE:**

3368 Lake Tahoe Blvd., Suite 302

South Lake Tahoe, CA 96150

(530) 573-3330

(530) 542-9082 Fax

[tahoebuild@edcgov.us](mailto:tahoebuild@edcgov.us)

August 25, 2014

Brad Clark  
243 Placerville Drive  
Placerville, CA 95667

Re: Special Use Permit S78-0016  
APN 070-250-45

Dear Mr. Clark:

In response to your letter dated August 18, 2014 we have attached the required Special Use Permit application and fee schedule. The highlighted items in the application are required but additional items may be requested based on the project description and review of the submitted application. The total application fee is \$519 and will be required at the time of the application submittal.

Submittal of the application shall be made within 30 days of receipt of this letter.

Please call me at (530) 621-5355 if you have any questions or concerns regarding the requested items. If you continue to have concerns regarding the requested information, I can schedule a meeting with the Development Services Division Director.

Sincerely,

Aaron Mount  
Associate Planner

Attachments: Special Use Permit Application  
Fee Quote

Cc: Erik Martin  
3962 Mineshaft Ct.  
Shingle Springs, CA 95682

District IV-Ron Briggs