

James Feenan - Fwd: comments on CDP_2019-0003 (KARAPINAR)

Mendocino County

From: Vandy Vandewater**To:** James Feenan**Date:** 10/27/2021 2:46 PM**Subject:** Fwd: comments on CDP_2019-0003 (KARAPINAR)**Cc:** Brooke Larsen

OCT 27 2021

Planning & Building Services

Hi Jim,

Can you please post this as public comment for CDP_2019-0003.

Thank you!

Vandy

>>> "Kraemer, Melissa@Coastal" <Melissa.Kraemer@coastal.ca.gov> 10/6/2021 9:22 AM >>>

Hello

We reviewed the draft staff report for the subject application (linked here:

<https://www.mendocinocounty.org/home/showpublisheddocument/46026/637689436822957985>)

We don't think the County can make the necessary findings to approve the proposed FCU, because water supply testing has not yet been completed to demonstrate adequacy of water to serve the proposed development. The County's LCP requires that the approving authority consider whether an adequate onsite water source to serve proposed development is available **before** approving a CDP. See County Land Use Plan (LUP) Policy 3.8-1, which requires that the adequacy of water services, among others, be evaluated when CDP applications are granted or modified, in conjunction with LUP Policy 3.9-1 and Coastal Zoning Code sec. 20.532.095(A)(2), which require that residential development **only** be authorized "provided that adequate... water... exists..." and that there are **findings** to support the approving authority's decision that "The proposed development will be provided with adequate utilities, access roads, drainage and other necessary facilities." At this point, because no water testing has been done, it is unknown whether there is adequate water to support the proposed use. In order to allow the County to make the necessary findings demonstrating that adequate services exist to serve the proposed development, the County needs to receive evidence of an adequate water supply prior to approval of the CDP. As currently recommended, proof of water is not required to be submitted until after the CDP has been issued and before the building permit is issued. As we have recommended to the County in comments on various other CDPs in the past, we recommend the County require submittal of proof of water as a CDP application filing requirement rather than as a condition of approval of building permit issuance. **Recommended special condition 14 is inadequate to find LCP consistency, and we recommend the County either (1) delay acting on the application altogether, until water supply adequacy has been demonstrated or (2) not approve the FCU at this time/delete that element from the scope of this CDP authorization.**

Thanks for the opportunity to comment.

Melissa B. Kraemer *(she/her)*

North Coast District Supervisor

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