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MEMORANDUM

DATE: DECEMBER 22, 2022

TO: COASTAL PERMIT ADMINISTRATOR

FROM: PLANNER JULIANA CHERRY

SUBJECT: CDP 2022-0033 REVISED REQUEST TO TEST FOUR ADDITIONAL WELL SITES

BACKGROUND: Coastal Element Policy 4.7-4 requires the property owner to demonstrate a sufficient supply of water prior to the issuance of a coastal development permit. In September 2022, the applicant filed application CDP_2022-0033, a request to drill a fourth production well and repair and test three existing wells on-site. During November and December, the applicant talked with staff about the juxtaposition of Well #4 to a Bishop Pine Forest and neighboring leach lines. On December 19, an updated site plan was filed showing four additional well sites. These are proposed Test Wells A, B, C, and D (See Attachments B and C).

UPDATED APPLICANT'S STATEMENT: Requesting (1) to repair and maintain existing wells; (2) to drill up to four test wells and demonstrate adequate water supply ...; and (3) proposing that the first well to produce sufficient water will be converted to a residential production well. If individual wells fail to satisfy Policy 4.7-4, then the tested well yields would be combined to facilitate an efficient and sustainable rate of output. (4) Proposing avoidance measures to protect on-site sensitive habitats. See Attachment C.

CLARIFICATIONS TO PUBLISHED REPORT: As shown on Site Plan Sheet 1, the site is highly constrained by existing habitat and buffers intended to protect them. Staff Report Section 4 analysis supports that there are *no other feasible sites available on the parcel for a new well, except within ESHA buffers* and as proposed, *the application suitably addresses local regulations intended to protect sensitive coastal resources* (see page CPA-5).

With the approval of the revised request, the applicant can proceed to repair existing wells and install additional wells, as needed to satisfy Coastal Element Policy 4.7-4 (See Staff Report Section 1). As the December 22, 2022 CPA Staff Report for CDP _2022-0033 analysis can be extended to the revised project, staff does not recommend substantial changes to the Findings and Conditions, as published.

RECOMMENDATION: Pursuant to the provisions of Chapter 20.532 and Chapter 20.536 of the Mendocino County Coastal Zoning Code (MCC), staff recommends the Coastal Permit Administrator approve CDP_2022-0033, which requests to drill up to four additional production wells, repair three existing wells, and avoids sensitive habitat areas, and adopt findings and conditions with recommended clarifications (Attachment A).

ATTACHMENTS:

A. Clarifications to recommended Findings & Conditions

B. Site Plan Sheets 1 and 2, revised December 12, 2022

C. Revision to project description. Wynn Coastal Planning. December 19, 2022

PROJECT FINDINGS AND CONDITIONS

December 22, 2022

Memorandum Attachment A describes clarifications the recommended action and revised findings, including revisions to Findings 1, 2, 5, and 8 and revisions to Condition #13. Noting stricken text indicates deletions; underlined text are additions.

Pursuant to the provisions of Chapter 20.532 and Chapter 20.536 of the Mendocino County Coastal Zoning Code (MCC), the Coastal Permit Administrator approves CDP_2022-0033, which requests to drill up to four additional production wells, repair three existing wells, and avoids sensitive habitat areas, and adopt the findings and conditions with suggested clarifications the request to drill a fourth production well and repair three existing wells, and adopts the following findings and conditions. Ground water testing is not subject to MCC Chapter 20.532.

REVISIONS TO RECOMMENDED FININDGS:

- 1. Pursuant to Mendocino County Coastal Zoning Code Section 20.532.095(A)(2), the proposed project is in conformance with the Coastal Element and its policies discussed in this report, including Policy 4.7-4 (see Board of Supervisor's Resolution No. 06-020) which requires "the permit issuing authority and the applicant to substantiate that APNs 118-320-10, 118-320-11, and 118-320-12 have adequate water supply and septic capacity to serve the proposed development". The request to test the yield from four wells is consistent Consistent with Mendocino County Coastal Element policies, the property owner intends to test groundwater extraction rates on four new test wells and three existing wells; and
- 2. Pursuant to Mendocino County Coastal Zoning Code Section 20.532.095(A)(2), access to utilities, access roads including County Road 500D, drainage and other necessary facilities is adequate to repair of three existing wells and to drill a fourth new production wells; and
- 3. Pursuant to Mendocino County Coastal Zoning Code Section 20.532.095(A)(3), the proposed project is consistent with the purpose and intent of the Rural Residential District (Coastal Element Chapter 2.2 policies), the provisions of the Mendocino County Coastal Zoning Code including Chapter 20.376, and preserves the integrity of the Rural Residential District as maintaining water wells supports the existing residential use; and
- 4. Pursuant to Mendocino County Coastal Zoning Code Section 20.532.095(A)(4), the proposed project would not have any significant adverse impacts on the environment within the meaning of the California Environmental Quality Act (CEQA) and Class 1 and Class 3 categorical exemptions are recommended; and
- 5. Pursuant to Mendocino County Coastal Zoning Code Section 20.532.095(A)(5), the proposed well testing, drilling, and repair would not have any adverse impacts on any known archaeological or paleontological resource and on April 13, 2022, the Archaeological Commission accepted Max Neri's Samantha Beck's cultural survey report recommendations presented for CDB_2021-0010 and CDP_2021-0016, which are applications associated with CDP_2022-0033; and
- 6. Pursuant to Mendocino County Coastal Zoning Code Section 20.532.095(A)(6), other public services including but not limited to, solid waste and public roadway capacity have been considered and are adequate to serve maintaining and drilling a well; and
- 7. Pursuant to Mendocino County Coastal Zoning Code Section 20.532.095(B)(1), County Road 500D is conterminous with a coastal access trail; as proposed the development does not conflict with Coastal Element Chapter 3.6 public access and public recreation policies; and

87. Pursuant to Mendocino County Coastal Zoning Code Section 20.532.100(A)(1), maintaining existing wells and drilling a fourth production wells will not impact any environmentally sensitive habitat areas as avoidance measures are part of the project design. Proposed test well locations are The location of Well #4 is not consistent with MCC Section 20.496.020(A)(4), as the well would be drilled within the Bishop Pine Forest ESHA, but the project is designed to avoid directly impacting the pines and there is no feasible alternative location on this highly constrained site. The application suitably addresses local regulations intended to protect sensitive coastal resources. As conditioned, the project would be consistent with Coastal Element Chapter 3.1 policies and MCC Chapter 20.496 regulations.

REVISIONS TO RECOMMENDED CONDITIONS:

- 1. This action authorizing CDP_2022-0033 shall become final on the 11th day following the decision unless an appeal is filed pursuant to Section 20.544.015 of the Mendocino County Coastal Zoning Code. The permit shall become effective after the ten working-day appeal period to the Coastal Commission has expired and no appeal has been filed with the Coastal Commission. The permit shall expire and become null and void at the expiration of two years after the effective date except where construction and or use of the property in reliance on such permit has been initiated prior to its expiration. To remain valid, progress toward completion of the project must be continuous.
- 2. The use and occupancy of the premises shall be established and maintained in conformance with the provisions of Division II of Title 20 of the Mendocino County Code.
- 3. The application, along with supplemental exhibits and related material, shall be considered elements of this permit, and that compliance therewith is mandatory, unless an amendment has been approved by the Coastal Permit Administrator.
- 4. This permit shall be subject to the securing of all necessary permits for the proposed development from County, State and Federal agencies having jurisdiction.
- 5. The property owners shall secure all required building permits for the proposed project, as required by the Building Inspection Division of the Department of Planning and Building Services.
- 6. This permit, CDP_2022-0033, shall be subject to revocation or modification upon a finding of any one or more of the following:
 - a. The permit was obtained or extended by fraud.
 - b. One or more of the conditions upon which the permit was granted have been violated.
 - c. The use for which the permit was granted is conducted so as to be detrimental to the public health, welfare or safety, or to be a nuisance.
 - d. A final judgment of a court of competent jurisdiction has declared one or more conditions to be void or ineffective or has enjoined or otherwise prohibited the enforcement or operation of one or more such conditions.
- 7. This permit, CDP_2022-0033, is issued without a legal determination having been made upon the number, size or shape of parcels encompassed within the permit described boundaries. Should, at any time, a legal determination be made that the number, size or shape of parcels within the permit described boundaries are different than that which is legally required by this permit, this permit shall become null and void.
- 8. If any archaeological sites or artifacts are discovered during site excavation or construction activities, the property owner shall cease and desist from all further excavation and disturbances within one hundred (100) feet of the discovery and make notification of the discovery to the Director of the Department of Planning and Building Services. The Director will coordinate further actions for the

- protection of the archaeological resources in accordance with Section 22.12.090 of the Mendocino County Code.
- 9. Any Building Permit request shall include all conditions of approval of Coastal Development Permit CDP_2022-0033. Conditions shall be attached to or printed on the plans submitted.
- 10. In accordance with MCC Chapter 20.492 and MCC Section 20.500.020(E)(3), all well drilling and repair, and grading specifications and techniques shall follow the recommendations cited in the California Building Code; the geotechnical engineer's report (e.g., Brunsing Associates, Geotechnical Investigation Proposed Bertrand/Daniel Residence, 11800 Road 500 D, Mendocino, California, May 8, 2019); and satisfy regulations stated MCC Chapters 20.492 Grading, Erosion, and Runoff and 20.500 Hazard Areas.
- 11. In accordance with **MCC Chapter 20.496**, sensitive habitat area buffer widths shall be no less than 100-feet wide. Buffers shall be established for (a) *Bishop Pine Forest ESHA*, (b) *Sonoma Tree Vole Habitat*, (c) off-site *Cascara shrubland ESHA*, (d) on-site *Wetland ESHA*, and (e) other sensitive coastal resources.
- 12. Rodenticides, and other products harmful to Sonoma Tree Voles, are prohibited.
- 13. The project shall <u>adhere to include</u> the <u>following</u> avoidance measures, as described in Wynn Coastal Planning & Biology's December 28, 2020, *Biological Scoping & Botanical Survey Report* section 7 and Appendix F: Report of Compliance section 4 (preamble):.
 - a) Remove the least number of trees necessary. Native coniferous trees should only be removed if strictly necessary (See report sections 7.1.1 and 7.2.1). For example, situate leach lines where possible between the trees, rather than remove trees.
 - b) Replace Bishop pine trees. Bishop pine trees that are removed should be replaced at a minimum 1:1 ratio in an appropriate location on the project site. Locations toward the northern end of the parcel would expand Bishop pine forest southward from Bishop pine forest located on State Parks land and result in more contiguous habitat beneficial to Sonoma tree voles (See 7.1.2). Locations most beneficial to Sonoma tree voles should be chosen, with special consideration given to habitat connectivity to existing occupied and potential habitat and a corridor to other habitat off site. (See report section 7.2.2).
 - c) Improve Bishop pine forest habitat by removing invasive plants. Remove invasive plant species from the Bishop pine forest and areas where Bishop pines will be planted. The plant species targeted to remove are: English ivy (Hedera helix), English holly (Ilex aquifolium), cotoneaster (Cotoneaster spp.), pampas grass (Cortaderia jubata), Scotch broom (Cytisus scoparius), blackwood acacia (Acacia melanoxylon), red claws (Escallonia rubra), purple fox glove (Digitalis purpurea), and red-hot poker (Kniphofia uvaria) (See section 7.1.3). Using hand tools is encouraged. Applying herbicides is discouraged. Consultation with California Department of Fish & Wildlife, California State Parks, and the Coastal Permit Administrator is required prior to using (large) equipment on-site.
 - d) <u>Coordinate with CDFW</u>. Coordination should occur with California Department of Fish and Wildlife to determine if there are additional recommendations or requirements from that agency. (See section 7.2.3).
 - e) <u>Fifty-foot buffer during construction</u>. No construction or materials staging shall occur within fifty feet of wetland areas and vegetation, except as authorized by this permit (See section 7.3.1).
 - f) <u>Construction During Dry Season</u>. Ground disturbing construction should occur only during the dry season. If a rain event occurs during the ground disturbance period, all ground disturbing activities will cease for a period of 48 hours after the rain stops (See section 7.3.2).

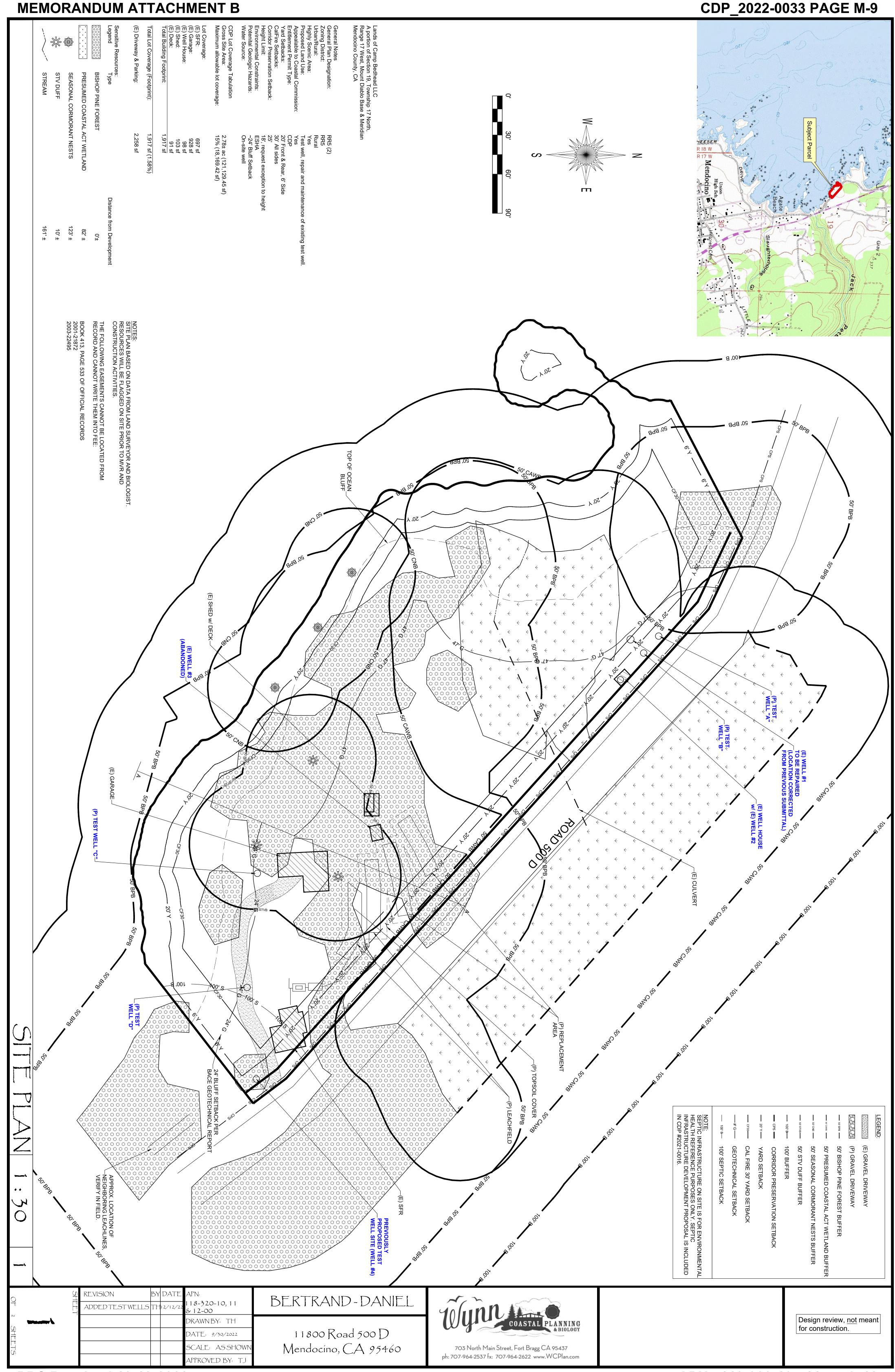
MEMORANDUM ATTACHMENT A CLARIFICATIONS TO RECOMMENDED FINDINGS & CONDITIONS

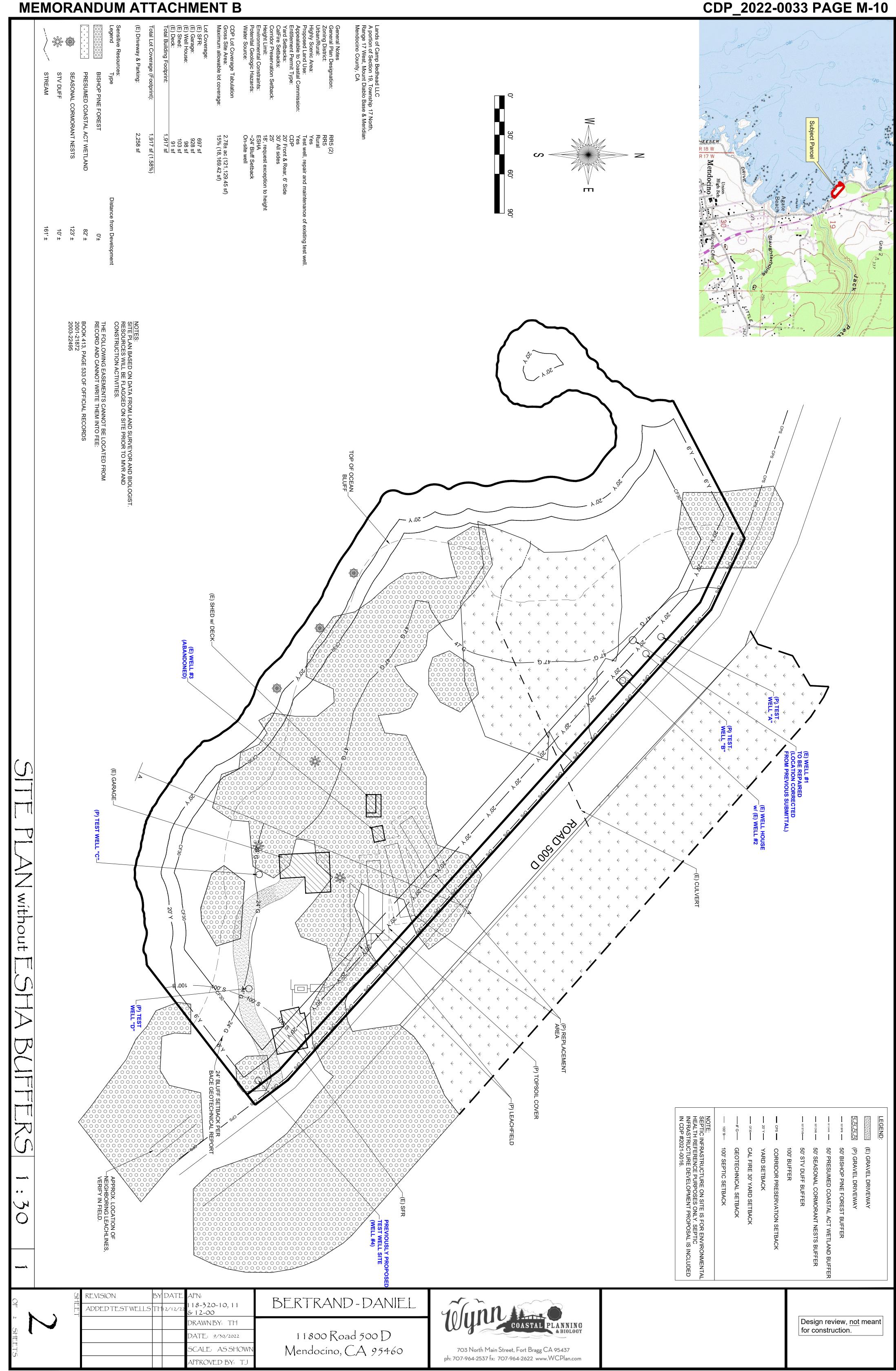
- g) Straw Wattles and Exclusionary Fencing. Straw wattles shall be installed between construction related impact areas and portions of the Wetland ESHA, the septic leach fields, and existing Well #1. No materials storage, heavy equipment use or other impacts shall occur within ESHA or their buffer areas, except as authorized by this permit. Straw wattles shall be properly installed to intercept liquids leaving the construction area. All fencing shall be maintained in a functional manner through the duration of construction and until all disturbed soil is stabilized. Fencing shall be checked, and appropriate maintenance shall occur, on a weekly basis and after every rain event (See section 7.3.3).
- h) <u>Employ Best Management Practices (BMPs)</u>. Standard Best Management Practices shall be employed to assure minimization of erosion resulting from construction. Ground disturbance shall be limited to the minimum necessary and disturbed soil areas shall be stabilized as soon as feasible. Areas of bare soil should be seeded with native erosion control seed mix. (See section 7.3.4).
- i) <u>Seasonal Avoidance of Birds</u>. No surveys are recommended if activity occurs in the non-breeding season (September to January). <u>If development is to occur during the breeding season (February to August)</u>, a preconstruction survey is recommended within 14 days of the onset of construction to ensure that no nesting birds will be disturbed during development (See section 7.4.1).
- j) <u>Bird Nest Avoidance</u>. If active special status bird nests are observed, no ground disturbance activities shall occur within a 100-foot exclusion zone. These exclusion zones may vary depending on species, habitat and level of disturbance. The exclusion zone shall remain in place around the active nest until all young are no longer dependent upon the nest. A biologist should monitor the nest site weekly during the breeding season to ensure the buffer is sufficient to protect the nest site from potential disturbance. Attention should also be paid to the cormorants located on the bluff edge to ensure that nests are buffered by 100 feet during the breeding season (See section 7.4.2).
- k) <u>Construction activities during daylight hours</u>. Construction should occur during daylight hours to limit disturbing construction noise and minimize artificial lights (See sections 7.4.3 and 7.5.2).
- I) Pre-construction surveys for bats. Construction will ideally occur between September 1st and October 31 after the young have matured and prior to the bat hibernation period. If it is necessary to disturb potential bat roost sites between November 1 and August 31, pre-construction surveys should be performed by a qualified biologist 14 days prior to the onset if development activities. If active bat roosts are observed, no ground disturbance activities shall occur within a minimum 100-foot exclusion zone. These exclusion zones may vary depending on species, habitat and level of disturbance. The exclusion zone shall remain in place around the active roost until all young are no longer dependent upon the roost. Pre-construction bat surveys involve surveying trees, rock outcrops, and buildings subject to construction for evidence of bat use (guano accumulation, or acoustic or visual detections). If evidence of bat use is found, then biologists shall conduct acoustic surveys under appropriate conditions using an acoustic detector, to determine whether a site is occupied. If bats are observed, a minimum 50-foot buffer should be implemented around the bat cave (See section 7.5.1).
- m) Exclude bats from buildings. In order to avoid incidental impact to bats that may be roosting in existing buildings that will be demolished or modified, bats should be excluded by closing off potential entrances and installing one-way exit tubing. Exclusion tubes should be in place for at least 7 warm nights and should not be installed during pup-rearing season when mother bats could be separated from their non-flying young (See section 7.5.3).
- n) Reduce footprint of impact. The 100ft wetland buffer should be staked and flagged onsite to act as a visual reminder to construction personal to reduce the impact site to within the construction area. Construction will be occurring greater than 100ft from the wetland. The sea stack will also partially act as a natural buffer between the onsite wetland and proposed development. Some areas for ribbon placement may not be feasible due to the bluff edge and/or dense vegetation. The fence

- along 500D Road will act as a buffer between the riparian area east of the parcel so ribbon is not needed along this area (See section 7.6.1).
- o) <u>Construction activities during daylight hours</u>. Construction should occur during daylight hours to minimize disturbing construction noise and artificial lights (See section 7.6.2).
- p) <u>Limit ground disturbing construction to dry season</u>. Ground disturbing construction within should occur during the dry season, which is generally April 1 to October 31 of any year (See section 7.6.3).
- q) Restrict staging area. Stage all building materials and construction vehicles in upland area greater than 100 feet from areas designated as wetland and riparian on the parcel where amphibians have a greater likelihood of being present. The fence on 500D Road also acts as a physical and visual buffer to the riparian area east of the parcel (See section 7.6.4).
- r) Contractor education. Within two weeks prior to construction activities, project contractors will be trained by a qualified biologist in the identification of frogs and salamanders that occur along the Mendocino County coast. Workers will be trained to differentiate between special status and common species and instructed on actions and communications required to be conducted in the event that special status amphibians are observed during construction (See section 7.6.4.1).
- s) <u>Pre-construction search</u>. During ground disturbing activities, construction crews will begin each day with a visual search around the staging and impact area to detect the presence of amphibians (See section 7.6.5).
- t) <u>Careful debris removal</u>. During construction and debris removal, any wood stockpiles should be moved carefully by hand in order to avoid accidental crushing or other damage to amphibians (See section 7.6.6).
- u) No construction during rain event. If a rain event occurs during the ground disturbance period, all ground disturbing activities will cease for a period of 48 hours, starting after the rain stops. Prior to resuming construction activities, trained construction crew member(s) will examine the site for the presence of special status amphibians. (1) If no special status amphibians are found during inspections, ground disturbing activities may resume. (2) If a special status amphibian is detected, construction crews will stop all ground disturbing work and will contact the California Department of Fish and Wildlife (CDFW) or a qualified biologist. Clearance from CDFW will then be needed prior to reinitiating work. CDFW will need to be consulted and will need to be in agreement with protective measures needed for any potential special status amphibians (See section 7.6.7).
- v) Clean heavy machinery. Heavy machinery such as and not limited to excavators and skid steers that may be used onsite have the potential to spread invasive plant material from use on other sites. Heavy machinery that is used in dirt needs to be power washed offsite to eliminate seeds and other propagules (See section 7.7.1).
- w) Plant non-invasive vegetation. While many ornamental landscapes on the California coast use non-native plants, invasive plants should not be planted. Some invasive plants that should be avoided are: Iceplant (Carpobrotus edulis, C. chiloensis, & Delosperma sp.), cotoneaster (Cotoneaster franchetii & C. pannosus), English holly (Ilex aquifolium), English ivy (Hedera helix), cape ivy (Delairea odorata), pampas grass (Cortaderia jubata & C. selloana), cape weed (Arctotheca calendula & A. prostrata), Crocosmia sp., blue gum eucalyptus (Eucalyptus globulus), red-hot poker (Kniphofia uvaria), periwinkle (Vinca major), bulbil bugle lily (Watsonia meriana), and callalily (Zantedeschia aethiopica) (See section 7.7.2).
- x) Reduce invasive vegetation. In order to prevent the spread of invasive plants already present at the site into additional areas, efforts should be undertaken to reduce, and if possible eliminate,

invasive plants. Success eliminating some species of invasive non-native plants that occur on site is more likely than with others. For example, WCPB believes it would be beneficial and possible to eliminate English ivy (Hedera helix), English helly (Ilex aquifolium), cotoneaster (Cotoneaster spp.), pampas grass (Cortadoria jubata), Scotch broom (Cytisus scoparius), blackwood acacia (Acacia melanoxylon), red claws (Escallonia rubra), purple fox glove (Digitalis purpurea), and red-hot poker (Kniphofia uvaria) with a concerted effort. Himalayan blackberry (Rubus armeniacus) and poison hemlock (Conium maculatum) could be reduced but would either require significant soil disturbance to grub out roots and/or the application of herbicide to significantly diminish the population present. neither of which are desirable within the Coastal Act wetland where these species are most prevalent. Other invasive non-native plants present, such as bentgrass (Agrostis spp.), sweet vernal grass (Anthoxanthum odoratum), slender wild oats (Avena barbata), orchard grass (Dactylis glomerata), velvet grass (Holcus lanatus), sixweeks grass (Festuca myuros), rattlesnake grass (Briza maxima), hairy cat's ear (Hypochaeris radicata), and sheep sorrel (Rumex acetosella) are unlikely to be eliminated or significantly reduced. Reduction and elimination of target species within the Bishop pine forest are outlined above as compensatory mitigation measures for impacts to the Bishop pine forest. Additional invasive removal within the grassland and Coastal Act wetland areas of the parcel are recommended but in WCPB's opinion, should not be made a requirement of the project's approval (See section 7.7.3).

- 14. In accordance with MCC Chapter 20.480 and subject to Division of Environmental Health permits, repair and maintenance of the existing wells shall be allowed. (The 1982 Coastal Groundwater Study recommendation is that existing deep wells may be tested at any time. Testing shallow wells, e.g. less than 60-feet deep and obtaining water predominantly from cracks and fissures in bedrock, may be seasonally dependent. The 1989 Mendocino County Coastal Groundwater Development Guidelines establish "Proof of Water" testing procedures.)
- 15. Applicant shall obtain an encroachment permit from the Mendocino County Department of Transportation for any work within County rights-of-way.
- 16. In accordance with the 1982 *Mendocino County Coastal Ground Water Study* recommended water conservation measures, the project will incorporate proven water conservation technology in the construction of the project.
- 17. In accordance with the 1982 *Mendocino County Coastal Ground Water Study* recommended water conservation measures, the property owner will install and maintain water efficient irrigation systems that minimize runoff and evaporation, and maximize the water intended to reach plant roots. Drip irrigation, soil moisture sensors and automatic irrigation systems are methods of improving irrigation efficiency.
- 18. In accordance with the 1982 *Mendocino County Coastal Ground Water Study* recommended water conservation measures, the project will either keep rainwater on site in a retention basin to aid in ground water recharge, or where this is not feasible, the project shall be designed to reduce, retard, and disperse runoff. This may be accomplished by mulched and or terraced slopes to reduce erosion and retain rainfall, porous drain swales and paving materials for infiltration, out-sloped roads to spread runoff evenly down slope, and landscaping with suitable water-conserving erosion control plants that will protect the soil, facilitate infiltration of rainwater, and reduce runoff.
- 19. In accordance with the 1982 *Mendocino County Coastal Ground Water Study* recommended water conservation measures and to encourage ground water recharge, the project will preserve existing natural drainage areas and encourage the incorporation of natural drainage systems in the development of the site.





703 North Main Street, Fort Bragg CA 95437 ph: 707-964-2537 fx: 707-964-2622 www.WCPlan.com

SUBMITTAL

December 12, 2022

Julianna Cherry Planning and Building Services 120 West Fir Street Fort Bragg, CA 95437

RE: CDP_2022-0033

Owner: Camp Bedhead LLC

Site: 11800 Road 500 D

Mendocino, CA 95460

APNs: 118-320-10, 11, and 12

Dear Ms. Cherry:

Thank you for your continued attention to this project.

For your review and consideration are revisions to our Project Description as filed on September 30, 2022:

Propose drilling a <u>four (4)</u> test well<u>s</u> to demonstrate adequate water supply for the Single-Family Residence requested under CDP #2021-0016. Request that the first well to produce sufficient water will have infrastructure installed to prepare for its use as a production well in anticipation of future approval of CDP #2021-0016. Request that if a single well fails to produce more than 1 gallon per minute, additional wells may be used for production purposes simultaneously in order to facilitate an efficient and sustainable gallon per minute output. Also propose repair and maintenance of existing test well (Well #1) to facilitate an efficient gallon per minute output from existing test well.

Attached is an updated site plan reflecting the updated Project Description.

Discussion:

Proposed Test Wells A& B

- 1. Proposed Test Wells A&B are within the 50' Buffer for the wetland on-site.
 - a. They are adjacent to Well #1 which the applicant is proposing to repair and maintain.
 - i. Therefore, it is logical that the environmental impact of drilling a new well in this area and repairing an existing well is comparable.
 - There will be a similar amount of equipment and materials staged in the area with the drilling of the new wells compared to repair and maintenance of the existing well.
 - b. They are more than 100' from the proposed on-site leach lines.
 - c. There are no other locations for the wells on-site that are 100' from leach lines and outside of geotechnical setbacks.
 - d. Should Proposed Test Wells A&B not produce sufficient water, the applicant will explore drilling Proposed Test Wells C&D.

Proposed Test Wells C&D

- 1. Proposed Test Wells C&D are approximately 75' from the proposed leach lines.
- 2. Environmental Health standards require a 100' distance between wells and leach lines.

MEMORANDUM ATTACHMENT C

a. It is our understanding that waivers to the 100' distance are considered by Environmental Health if there are no other feasible locations for a well on-site and if the well casing is such that a 100' distance is achieved both horizontally and vertically.

Please note: The applicant understands that the waiver is not a guarantee and will be considered once Environmental Health has received a Well Permit Application. The applicant understands that if Environmental Health were to <u>deny</u> well permits for Proposed Test Wells A-D, that the applicant would need to return to the Planning and Building Department and submit a CDP Amendment.

Sincerely,

Tara Jackson Senior Planner

Java Jackson