

ZONING ADMINISTRATOR DECISION CONDITIONAL USE PERMIT



DECISION NO. 2015-026

HEARING DATE: November 24, 2015

DECISION DATE: December 8, 2015

FILE NO.: PCUP15-016

SUBJECT: A Conditional Use Permit to establish and operate an organic materials facility (composting of green waste, manure, food materials, fats oils and grease) on a 34.76-acre portion of a 37.4-acre parcel of land within the AG\SP (Agriculture Overlay) zoning district, located at the southwest corner of Schaefer Avenue and Campus Avenue, at 7435, 7345 and 7365 East Schaefer Avenue.

STAFF

RECOMMENDATION: Approval Approval subject to conditions Denial

PART A: BACKGROUND & ANALYSIS

HARVEST POWER, (herein after referred to as "Applicant") has filed an application requesting Conditional Use Permit approval, File No. PCUP15-016, as described in the subject of this Decision (herein after referred to as "Application" or "Project").

(a) Project Setting: The project site is comprised of 37.4 acres of land located at 7435, 7345 and 7365 East Schaefer Avenue, and is depicted in *Exhibit A: Aerial Photograph*, attached. Existing land uses, General Plan and zoning designations, and specific plan land uses on and surrounding the project site are as follows:

	<i>Existing Land Use</i>	<i>General Plan Designation</i>	<i>Zoning Designation</i>
<i>Site</i>	Dairy Cattle Ranch	LMDR / OS-NR	SP(AG)
<i>North</i>	Dairy Cattle Ranch	LDR	SP(AG)
<i>South</i>	Dairy Cattle Ranch	LMDR / MDR / OS-NR	SP(AG)
<i>East</i>	Water Treatment Facility	LDR / OS-NR	SP(AG)
<i>West</i>	Dairy Cattle Ranch	MDR / OS-NR	SP(AG)

(b) Project Analysis:

(1) Background—Harvest Power is proposing to establish and operate an organic materials facility (composting of green waste, manure, food materials, fats oils and grease) on the site of a former dairy farm, located at the southeast corner of Schaefer Avenue and Campus Avenue (**Exhibit A: Aerial Map**). The facility will clean, screen, grind, blend, and compost organic materials, including green materials (trimmings), manure, digestate from anaerobic digestion of food and green sources, and small amounts of food materials, such as fats, oils, and grease. Landscape maintenance vehicles will deliver the material to the site for processing. The majority of the green material entering the site will already be cleaned and ground. The unground green materials, and any food materials, will be processed through a grinder. Grinding equipment will reduce all plant debris by chopping it into a fine material. Once processed, the compost product will be sent to the staging area, where it will either be sold directly in bulk or mixed with other amendments, such as gypsum, to form specialized products (**Exhibit B: Site Plan**). The staging process is necessary to destroy any bacteria that may be within the material. Once the staging process is complete, the material is available for use as a mulch or ground cover. Harvest Power is anticipating that a majority of the processed material will be sold to wholesalers, with a small portion sold directly to customers. During normal operation, an average of 35-50 truck trips for material delivery and/or pickup will occur per day and may increase to 75-100 trucks per day during peak seasons in the fall and spring.

The project site is a former dairy farm. As a result, the site was designed to retain all dirt/manure onsite, during rain events (**Exhibit C: Site Photos**). The site has been graded so that all water drains internally into a central retention area. At the southeast portion of the site, there are two additional stormwater ponds for additional water retention. Furthermore, the facility perimeter will be bermed to prevent water from entering or leaving the site. In the event of a future rain, green waste material would not drain off the site. The retention system previously used when the dairy farm was active will be continued to be used and operated.

(2) Operations—The facility will operate from 6:00am through 6:00pm, Monday to Saturday, and employ approximately 10 people. The public will not generally access the site; however, individual landscapers may be able to recycle green materials and purchase compost from the site. Composting operations include the import of, on average, 500 combined tons per day of green waste and cattle manure from landscaping companies and dairies in the surrounding area. The amount may go up to 1,000 tons per day during the fall and spring seasons, as those are peak seasons for green materials productions. The manure will be stored on-site and will be treated until it has been fully composted. The finished compost product will be placed into separate piles, where it is either sold directly in bulk or mixed with other amendments such as gypsum, to form specialized products. During the composting process, the material will be placed into windrows, not exceeding 15-feet in height, 25-feet in width, and 250-feet in length, for fire protection measures, pursuant to the Ontario Fire Department's standard requirements.

No additional new buildings will need to be constructed as a result of the composting use. The existing on-site building located at the main entrance will adequately serve the use in providing office and employee space. The residences at 7435, 7445, and 7477 E. Schaefer Avenue (northeastern portion of the site) will remain residential, and will not be part of the composting facility operation. Machinery, including a compost turner, grinder, trommel screen (used to separate materials by size), loaders, a scale, and a water truck, and various other smaller pieces of equipment, will be brought on-site in support of the use.

Harvest has several facilities across North America, including two large windrow composting facilities in the Central Valley. The facility design will comply with the State of California/Regional Water Resources Control Board General Order for Composting Facilities, South Coast Air Quality Management District, CalRecycle and Regional Water Quality Control Board. In addition, mandated Best Management Practices and testing for minimizing dust, odor, and leachate will be adhered to and records kept demonstrating compliance. Prior to operation of the facility, Harvest will install Decagon soil moisture probes into the lowest point of the large north-south oriented pond to monitor soil moisture, soil electrical conductivity and temperature. These probes will be installed at 1', 2', and 5' depths in the event that water collects in the pond. These probes will provide a means of monitoring water infiltration into the ground. By monitoring the probes and documenting soil moisture, assurance can be provided that even in the event water collects in the pond, it is not infiltrating to a depth of 5' below ground level. In the event that the probe at the 5' depth level becomes saturated, Harvest can modify the pond's surface to further reduce infiltration.

A minimal amount of site work will be necessary to implement the use. The primary entrance to the site, located on the northwestern portion of the site, from Schaefer Avenue, will be reconstructed to support trucks and utilize rumble plates to prevent material from leaving the site. The entrance to the facility will be paved with asphalt and from there, "all weather" surface will continue through to the truck scale area. The roads throughout the rest of the facility will be an "all-weather" surface material, pursuant to the Ontario Fire Department's standard requirements. The driveway at the eastern edge of the site will be used for emergency entrance and exit only, in which the applicant will provide signage accordingly. In addition, berms will be constructed along the entire perimeter of the facility to screen the composting use from view, as well as prevent material from leaving the site during a rainstorm event. The berms will be regularly inspected and repaired as needed. Additionally, a landscaped berm will be constructed along Schaefer Avenue, from the proposed office on the west to the residences on the east, to provide for additional screening. Also, the existing ranch houses along Schaefer Avenue will screen the composting operations behind, from street view.

The site generally drains to the south, whereby wastewater from rain storms or general operations will drain into an existing retention area, which was designed previously as part of the site's engineered waste management plan, to contain animal waste runoff, when the site was an operating dairy cattle ranch. This drainage system and waste

retention basin will remain in effect to support the green waste and manure composting use. Additionally, two high capacity water tanks will be installed near the two wells on site, around the perimeter of the composting area, to provide irrigation service for the composting process, as well as fire mitigation (**Exhibit B: Site Plan**).

(3) Surrounding Sensitive Uses—The project site is located approximately one-half mile from the nearest residential tract (**Exhibit D: Buffer Map**). Between the manure composting site and the nearest residential tract, are several operating dairy cattle ranches and a plant nursery. Due to the distance between the project site and the nearest residential tract, it is not anticipated that the manure composting use will create any impacts above and beyond those that are typically associated with the other agricultural uses existing throughout the surrounding area.

(4) Land Use Compatibility—The project site is located within the Specific Plan (Agriculture) zoning district. Within this district, green waste processing facilities are a conditionally permitted use. It is staff's belief that the recommended conditions of approval will sufficiently mitigate potential impacts associated with the proposed use. Additionally, businesses within the surrounding area will not be exposed to any impacts resulting from the green waste processing facility beyond those that would normally be associated with any other use similarly allowed within the Specific Plan (Agriculture) zoning district. However, the City of Chino currently owns property adjacent to the east of the project site and has expressed concerns regarding the proposed land use. The Chino site is currently being developed to serve as the Eastside Water Treatment Facility with reservoir storage facilities and pumping station. The City of Chino has opposed the project due to the possible groundwater and air quality concerns (**Exhibit E: City of Chino Comments**). Below are Chino's concerns and staff's response:

- Groundwater quality impacts from potential contaminants leaching into the groundwater as a result noted composted materials/wastes, especially the fats, grease and oils.

Harvest will install Decagon soil moisture probes into the lowest point of the large north-south oriented pond to monitor soil moisture, soil electrical conductivity and temperate. These probes will be installed at 1', 2', and 5' depths in the event that water collects in the pond. These probes will provide a means of monitoring water infiltration into the ground. By monitoring the probes and documenting soil moisture, assurance can be provided that even in the event water collects in the pond, it is not infiltrating to a depth of 5' below ground level. In the event that the probe at the 5' depth level becomes saturated, Harvest can modify the pond's surface to further reduce infiltration. The probes soil moisture, conductivity, and temperature data will be recorded and transmitted by a 3G cellular device to a remote server for storage and internet accessibility. In addition, Harvest will comply with a Stormwater Pollution Prevention Plan (SWPPP) and Odor Minimization Plan to facilitate for any off-site nuisance.

- Impairment of stored drinking water from odors and particulates migrating towards the City's vented reservoir storage facilities (one – 4 million gallon reservoir, and one ½ million gallon reservoir) and water treatment plant building from prevailing southwest winds.

The facility is required to develop an Odor Impact Mitigation Plan (OIMP) to comply with the full CalRecycle permit. The OIMP includes contact information and specific protocols designed to prevent odor, and address odor issues if they do arise. The OIMP focuses on processes to prevent odor from migrating off site during the feedstock delivery, composting and curing phases and the protocol to deal with odor issues if they do arise. The processes include standard BMPs such as mixing the commingled materials with green materials immediately upon arrival at the site, and incorporating into compost windrows (or CASP) as soon as possible within a maximum of 48 hours, and all the process protocols detailed in AQMD Rule 1133.3. Watering of windrows is required prior to or during turning mitigating emissions and dust. The turning of windrows helps ensure proper density and porosity for oxygen transfer and prevents anaerobic odors. A specific protocol for neighbor notification and response to neighbor issues is also included. The facility will be required to comply with this OIMP; oversight will be conducted by employees of the San Bernardino County Health Department as local enforcement for CalRecycle. The final copy will be approved by CalRecycle and a copy will be forwarded to the County. The documents required by CalRecycle also include vector attraction reductions protocols to ensure that flies are not an issue on or off the site.

- Windblown debris/trash accumulating along the fence-line of the two neighboring properties.

Harvest will contract with haulers directly to control the materials entering and leaving the site. Majority of the green materials coming to the site will already be clean and ground. In addition, the composting facility will provide limited access to the general public. This allows for the composting facility to regulate the incoming materials and prevent excessive debris and trash to accumulate on site.

- Negative effects to City facilities from vectors attracted to the composting facility.

The project site is a former dairy farm. As a result, the site was already designed and has already been graded so that all water drains internally into a several storage basins. The storage basins will be inspected annually and cleaned as needed or if accumulated sediment/debris is found. In addition, on site staff will walk the site regularly to monitor the perimeter of the site throughout the day to ensure that there is no off site nuisance from odor, vectors or debris generated from the composting facility.

- Dust created by truck traffic accessing the site via the unpaved access road boarding adjacent to the City's property.

The composting facility is set back at minimum of 100' from the eastern property line and there are no travel corridors in this setback. The existing driveway on the eastern boundary will be used for emergency entrance and exit only, in which the applicant will provide signage accordingly. A row of trees along the eastern boundary and a berm also separate the two properties. The primary entrance to the site, located on the northwestern portion of the site, from Schaefer Avenue, will be reconstructed to support trucks and utilize rumble plates to prevent material from leaving the site. The entrance to the facility will be paved with asphalt and from there, "all-weather" surface will continue through to the truck scale area. The roads throughout the rest of the facility will be an "all-weather" surface material, pursuant to the Ontario Fire Department's standard requirements. In addition, low emissions requirements are set forth in the mitigation measures in the Mitigation Monitoring Reporting Program.

- Potential for fire created from heat generated by compost piles (a recent fire occurred at the intersection of Chino Avenue and Grove Avenue). These compost fires are typically allowed to burn themselves out. The stifling plumes of smoke would infiltrate the venting systems of the Chino facilities causing health concerns.

The applicant will abide by the current California Fire Code and all related standards. The applicant will operate under the fire protection plan developed in cooperation with the Ontario Fire Department. The Fire Department will have keys to all gates at the facility. Water tanks will be designed and equipped so as to couple with fire department equipment. In addition, all materials will be continuously monitored for temperature and moisture and turned to ensure that it meets the time and temperature reduction requirements for pathogen reduction set by CalRecycle and for reduction of Volatile Organic Compounds (VOC) as required by the Air District.

Staff believes the conditions of approval will serve adequate to mitigate any issues that have been mentioned.

(c) Airport Land Use Compatibility Plan: This project is located within the Airport Influence Area of Ontario International Airport (ONT) and was evaluated and found to be consistent with the policies and criteria of the Airport Land Use Compatibility Plan (ALUCP) for ONT. Any special conditions of approval associated with uses in close proximity to the airport are attached to this report.

(d) Departmental Review: Each City department has been provided the opportunity to review and comment on the subject application and recommend conditions of approval to be imposed upon the application. At the time of the Decision preparation, recommended conditions of approval were provided and are attached to this report.

(e) Assembly Bill No. (AB52) Consultation: The City of Ontario consulted with the Soboba Band of Luiseño Indians pursuant to AB52. The consultation included contacting the local Native American individuals identified by the NAHC via informative letters mailed on August 24, 2015. Consultation with the Soboba Band had occurred on October 21, 2015, and based on the disturbed nature of the area to support the agricultural use, the Soboba Band did not have any specific concerns regarding known cultural resources in the specified areas that the project encompasses and, therefore, has concluded consultation of the project.

(f) Public Notification: The subject application was advertised as a public hearing in at least one newspaper of general circulation in the City of Ontario (the Inland Valley Daily Bulletin newspaper). In addition, notices were mailed to all owners of real property located within 300 feet of the exterior boundaries of the property that is the subject of the hearing, as shown on the records of the County Assessor.

(g) Correspondence: As of the preparation of this Decision, Planning Department staff has received both written and verbal communications from the owners of properties surrounding the project site or from the public in general, regarding the subject application. The concerns were mainly focused on the operations of the composting facility and the kinds of impacts that would affect the surrounding areas. Staff further stated that the concerns would be noted as part of the analysis of the proposed project.

PART B: RECITALS

WHEREAS, the City of Ontario has received a request for Conditional Use Permit approval as described in Part A, above; and

WHEREAS, Ontario Municipal Code Section 9-1.0405(f) provides that the Zoning Administrator has the responsibility and authority to review and act upon Conditional Use Permits for existing structures; and

WHEREAS, all members of the Development Advisory Board of the City of Ontario were provided the opportunity to review and comment on the requested Conditional Use Permit, and no comments were received opposing the proposed use; and

WHEREAS, on October 19, 2015, the Zoning Administrator of the City of Ontario conducted a duly noticed public hearing on the application, as follows:

(a) Scott Murphy, the Zoning Administrator opened the public hearing and indicated that staff has requested to continue the item to the next regular Zoning Administrator meeting on November 2, 2015.

(b) There being no one else to offer testimony regarding the application, the Zoning Administrator continued public hearing; and

WHEREAS, on November 2, 2015, the Zoning Administrator of the City of Ontario conducted a duly noticed public hearing on the application, as follows:

(a) Scott Murphy, the Zoning Administrator opened the public hearing and indicated that staff has requested to continue the item indefinitely until further issues have been resolved. The Zoning Administrator recommended a special meeting be conducted for the item and staff agreed to notice the item for a special Zoning Administrator hearing on November 24, 2015.

(b) There being no one else to offer testimony regarding the application, the Zoning Administrator closed the public hearing; and

WHEREAS, on November 24, 2015, the Zoning Administrator of the City of Ontario conducted a duly noticed special public hearing on the application, as follows:

(a) Jeanie Irene Aguilo, *Assistant Planner*, presented the staff report on the proposed use, indicating the staff recommendation of approval subject to conditions of approval. Following staff's presentation, the Zoning Administrator opened the public hearing.

(b) Scott Murphy, the Zoning Administrator opened the public hearing had several questions regarding the information about digestate from anaerobic digestion of food and green sources, truck routes, clarification about "all weather" surfaces, and the use of probes for monitoring saturation and the ponds.

(c) Ms. Aguilo had replied that the Applicant can answer in regards to the digestate and probes information. She had also stated that the main truck route is on Euclid Avenue to Schaefer Avenue. Trucks would queue at the northwestern entrance on Schaefer Avenue to be weighed on the scale. The drive approach would be constructed to support trucks and utilize rumble plates to prevent material from leaving the site. The roads throughout the rest of the facility will be an "all-weather" surface material, which is compacted gravel.

(d) Mr. Murphy then proceeded to ask questions about the Conditions of Approval including a conflict between Planning Department conditions regarding berm setback. In addition, Mr. Murphy asked how condition 8.4 regarding nuisance issues will be addressed.

(e) Ms. Aguilo responded that the condition will be corrected to state that the berms shall be set back at least 10 feet from public right of ways boundaries and 5 feet from any other property lines or one half the height of the berm, whichever is greater. Mr. Zeledon also stated that the nuisance will be based complaints.

(f) Mr. Murphy had no further questions for staff and stated that two letters had been received dated November 24, 2015 from the City of Chino and Betty and Case Zwart opposing the project.

(g) Linda Novick, the applicant/representing the applicant, explained the business operation and spoke in favor of the application.

(h) Mr. Murphy had asked Ms. Novick about what the digestate from anaerobic digestion of food and green sources was regarding and the use of fats, oils, and grease. In addition, he asked about the ponds, odor impacts, and if there is an immediate need for a grinder.

(i) Ms. Novick had stated that majority of those items would be food and green materials collected from surrounding contracted municipalities and landscaping businesses. The fats, oils, and grease is used for natural convection ventilation for composting piles. She stated that the three ponds are 25 year, 24 hour ponds. She states that Harvest will comply with odor mitigation plans to prevent off-site odors. She had also explained that it is anticipated that majority of the materials coming on site will already be ground, but would prefer that the permit allow for a grinder if necessary in the future.

(j) Mr. Murphy had asked if Ms. Novick had any questions regarding the Conditions of Approval. Ms. Novick had stated she is fine with them and thanked staff for working with them. Mr. Murphy then opened it up for public testimony.

(k) Landon Kern, Associate Civil Engineer, from the City of Chino appeared and spoke. He stated that they have some concerns with their water treatment facility just to the east of the proposed site. He further stated that he had concerns with the location of the proposed project in regards to the prevailing winds, water quality, and public health.

(l) Gil Aldaco, Water Utilities Supervisor, from the City of Chino appeared and spoke against the project and reiterated the issues brought up by his colleague Mr. Kern.

(m) Ed Haringa, rents property at 7520 Schaefer Avenue, closest to the site and owns property at 7439 Chino Avenue. He appeared and spoke against the project. He had stated that he represents family owned cattle dairy farms and was speaking on behalf of 6 families. He mentioned the issues he has dealt with to other composting facilities in the area, concerns about air quality, and increased traffic.

(n) Gary Reitsma, resides at 8089 Chino Avenue, appeared and spoke against the project because the site is not within an enclosed building and the Santa Ana winds will be an issues.

(o) Rob Vandenheuvel, representing the Milk Producers Council, a non-profit organization, appeared and spoke against the project. He referenced Resolution 2013-127 and brought up the requirement for sensitive land uses.

(p) There being no one else to offer testimony regarding the application, the Zoning Administrator closed the public hearing.

WHEREAS, all legal prerequisites to the adoption of this Decision have occurred.

PART C: THE DECISION

NOW, THEREFORE, it is hereby found, determined and resolved by the Zoning Administrator of the City of Ontario as follows:

(a) All facts set forth in this Zoning Administrator Report and Decision are true and correct.

(b) Based upon the evidence presented to the Zoning Administrator during the above-referenced public hearing, the Zoning Administrator hereby finds as follows:

(1) The proposed location of the requested Conditional Use Permit will not be consistent with the Policy Plan component of The Ontario Plan and may be detrimental to the public health, safety, or welfare, or materially injurious to properties or improvements in the vicinity. The Ontario Plan (TOP) Policy LU2-2, Buffers, states “We require new uses to provide mitigation or buffers between existing uses where potential adverse impacts could occur.” Policy LU2-5, Regulation of Uses, states “We regulate the location, concentration and operations of uses that have impacts on surrounding land uses.” City Council Resolution No. 2013-127 establishes guidelines for the operation of composting facilities to ensure compatibility with surrounding land uses. The Resolution specifies a ½-mile separation between green waste facilities and residential properties and sensitive land uses (schools, day care facilities, elderly care facilities, hospitals, etc.). The project location is less than ½-mile from residential property and a church with day care services.

(2) The proposed location of the Conditional Use Permit is not in accord with the objectives and purposes of the Ontario Development Code and the zoning designation within which the site is located, including Article 1: Purposes and Objectives. City Council Resolution No. 2013-127 identifies the intent of the guidelines as providing distance criteria for new composting facilities stemming from resident input at neighborhood meetings on composting facility applications and based on an “outpouring of testimony against the location of these composting facilities. The reasons stated for the opposition includes odors, dust, pathogens, and increased truck traffic along existing streets.” The application encroaches into the distance separation identified between composting facilities and residential and sensitive land uses.

(3) Traffic generated by the proposed Conditional Use Permit may overload the capacity of the surrounding street system. Schaefer Avenue is currently a two-lane road, sized to accommodate anticipated trips associated with agricultural uses. A typical dairy anticipates 12-15 truck trips per week. The project proposes up to 50 trucks per day during normal operations and up to 100 trucks per day during peak season, a substantial increase over existing traffic.

(4) The proposed Conditional Use Permit will not comply with each of the applicable provisions of the Ontario Development Code and applicable municipal codes, including Article 13: Land Use and Special Requirements and Article 32: General Development Requirements and Exceptions. City Council Resolution No. 2013-127 establishes guidelines for the operation of composting facilities to ensure compatibility with surrounding land uses. The Resolution specifies a ½-mile separation between green waste facilities and residential properties and sensitive land uses. The project location is less than ½-mile from residential property and a church with daycare services.

(c) The Zoning Administrator hereby finds and determines that the proposed project is located within the Airport Influence Area of Ontario International Airport (ONT) and was evaluated and found to be consistent with the policies and criteria of the Airport Land Use Compatibility Plan (ALUCP) for ONT.

(d) Based upon the findings and conclusions set forth in Parts A, B and C above, the Zoning Administrator hereby **denies** File No. PCUP15-016.



APPROVED by the Zoning Administrator of the City of Ontario on this 8th day of December 2015.



Scott Murphy
Zoning Administrator

Exhibit A: Aerial Map

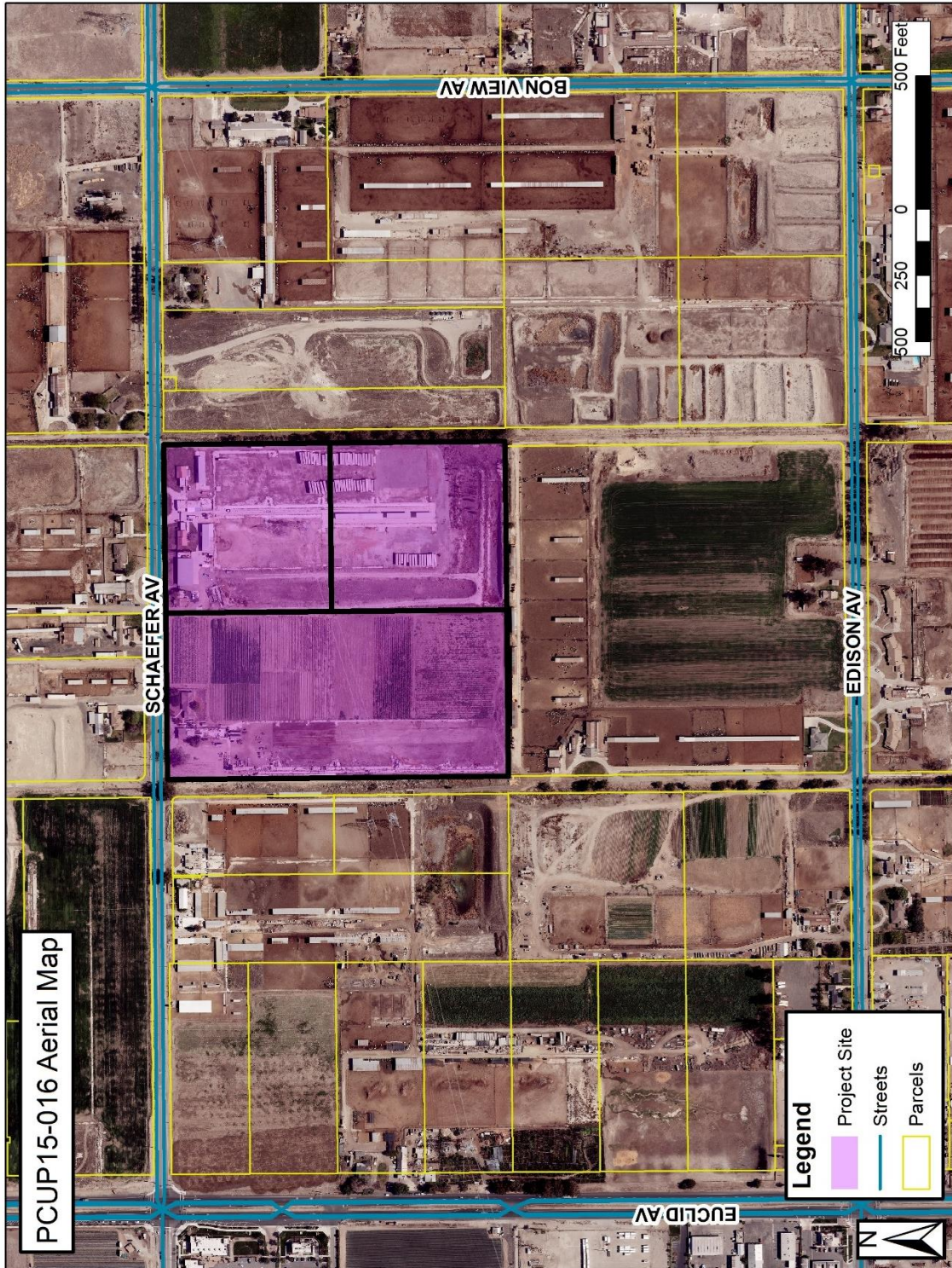


Exhibit B: Site Plan

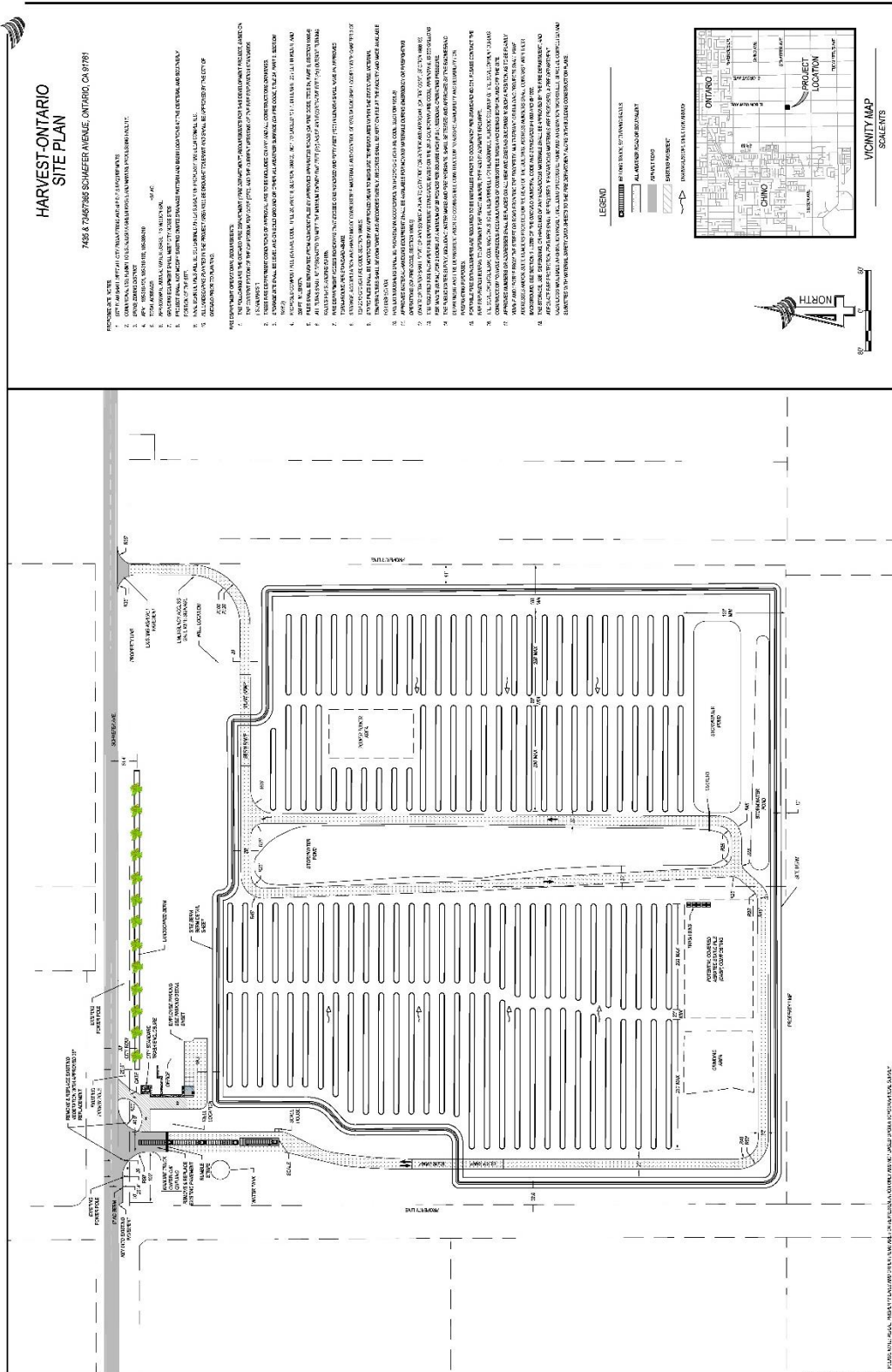


Exhibit C: Site Photos



PLANNING DEPARTMENT CONDITIONS OF APPROVAL
FILE NO.: PCUP15-016

Jeanie Aguilo

From: Aldaco, Gil [GALdaco@CityofChino.org]
Sent: Monday, July 20, 2015 2:39 PM
To: Jeanie Aguilo
Cc: Chris Lovell; Crosley, Dave; Ruiz, Frank; Himaya, Tomas; Vicario, Pete; Kern, Landon; sandrews@sandrewsengineering.com
Subject: File No. PCUP15-016 (7435 Schaefer Avenue)

Good afternoon Jeanie,

The land use would seem to be a fitting operation except for the neighboring drinking water facilities. As you know, the City of Chino is constructing a multi-million dollar water treatment facility, reservoir storage facilities, and pumping station on the neighboring property (7537 Schaefer Avenue). In regards to the proposed land use, I have the following concerns:

1. Groundwater quality impacts from potential contaminants leaching into the groundwater as a result noted composted materials/wastes, especially the fats, grease and oils.
2. Impairment of stored drinking water from odors and particulates migrating towards the City's vented reservoir storage facilities (one – 4 million gallon reservoir, and one ½ million gallon reservoir) and water treatment plant building from prevailing southwest winds.
3. Windblown debris/trash accumulating along the fence-line of the two neighboring properties.
4. Negative effects to City facilities from vectors attracted to the composting facility
5. Dust created by truck traffic accessing the site via the unpaved access road boarding adjacent to the City's property.
6. Potential for fire created from heat generated by compost piles (a recent fire occurred at the intersection of Chino Avenue and Grove Avenue). These compost fires are typically allowed to burn themselves out. The stifling plumes of smoke would infiltrate the venting systems of the Chino facilities causing health concerns.

This list is preliminary and subject to additional concerns brought to light by others of my agency. Based on the short list of concerns I would recommend rejection of the CUP proposal. Should you have any questions or desire to discuss my comments please do not hesitate to call.

Gilbert R. Aldaco
Water Utilites Supervisor
City of Chino Public Works
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Chino, CA 91710
909.334.3425
galdaco@cityofchino.org