

D. OLD BUSINESS

May 24, 2021 Desk Packet Materials

- 1. Conditional Land Use Permit (CLUP)
Modification of CLUP for Material Extraction
PC Resolution 2021-10
Applicant: River Resources, LLC
Location: 34386 Patson Rd., Soldotna, AK
99669**

Kenai Peninsula Borough

Planning Department

MEMORANDUM

TO: Blair Martin, Planning Commission Chair
Kenai Peninsula Borough Planning Commissioners

THRU: Melanie Aeschliman, Planning Director

FROM: Bryan Taylor, Planner

DATE: May 24, 2021

RE: Resolution 2021-10 Modification of CLUP for Material Extraction

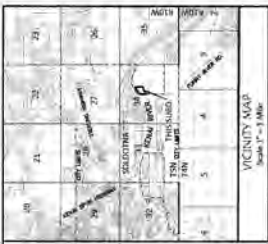
During consideration of the above resolution at the Planning Commission's April 12, 2021, meeting, I was asked by the commission to review ADNR's data to see if there were any wells within the vicinity of the Rivers Resources LLC approved material site along Kenai River Avenue that were not represented within the Well Log Tracking System (WELTS).

I conducted a site visit to inspect lands in the vicinity of the material site along Kenai Avenue, Marcus Street, and Patson Road/Circle. I did not find evidence of any water wells along Kenai River Avenue south of the material site. At the end of Marcus Street (approximately ¼ mile east of the material site) there are two residences on parcels 135-243-17, belonging to Michael and Ann Gravier, and 135-243-06, belonging to William and Karen Ferguson. Only one well is shown in the WELTS inventory in this area, located on the Gravier property.

Along Patson Road/Circle to the north of the material site there is new construction, which appears to have begun this season. Since the field surveys represented on the site plan for the River Resources LLC modification application, there have been two resubdivisions of Tracts of land along the river. I have enclosed copies of the new plats. Several of the parcels have new homes under construction. In addition to the seasonal residence shown on the site plan, there appears to be nine other homes newly constructed or under construction along Patson Road/Patson Circle. Any new wells installed along with construction are not yet represented within the WELTS inventory or shown the applicant's site plan. However, as shown within the site plan, the proposed excavation below the water table will not be within 300 feet of these properties.

encl.

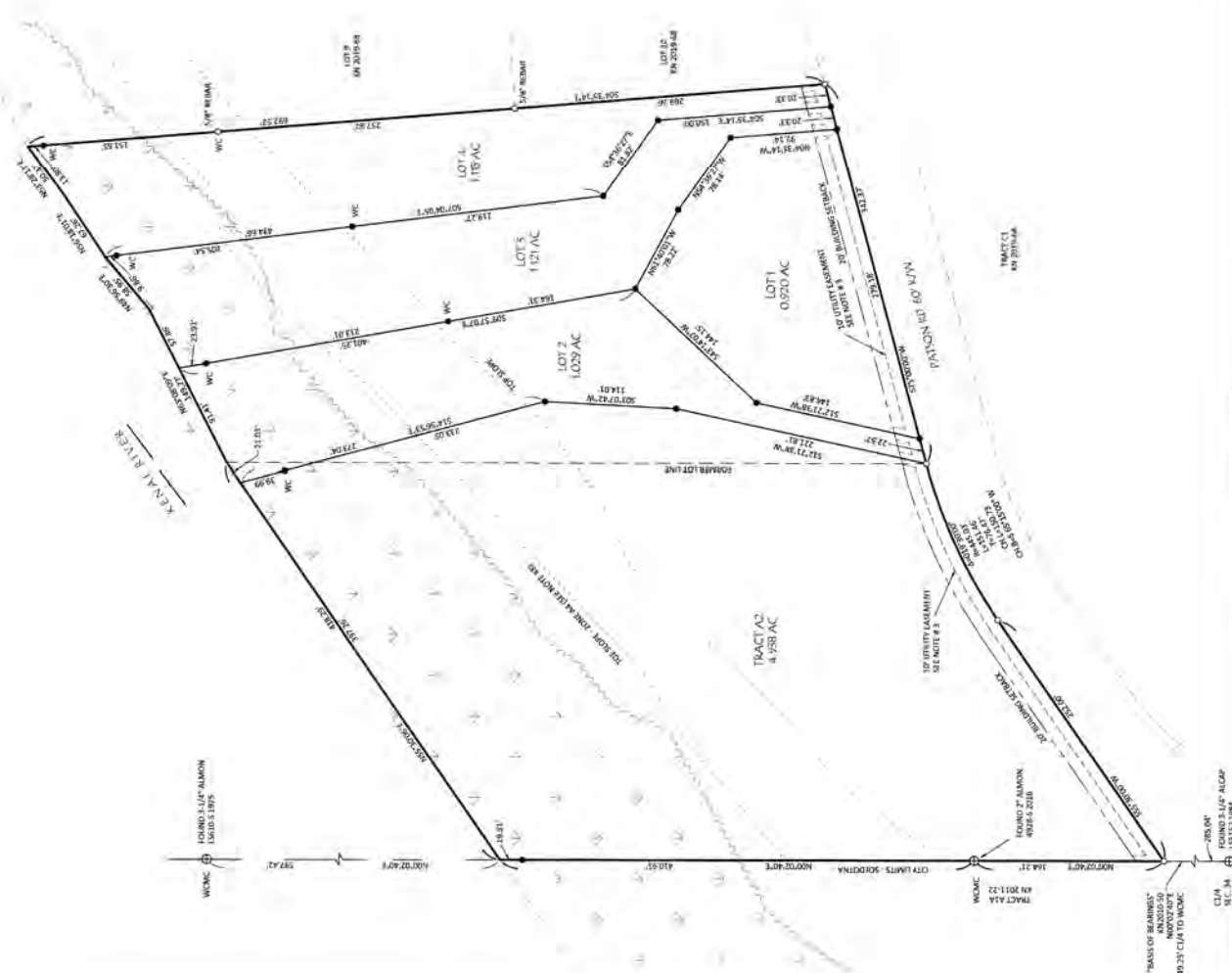




WASTEWATER DISPOSAL LOTS 1-4
 SOIL CONDITIONS, WATER TABLE LEVELS, AND SOIL SLOPES IN THIS SUBDIVISION HAVE BEEN FOUND SUITABLE FOR CONVENTIONAL ONSITE WASTEWATER DISPOSAL. THE SUBDIVISION IS DESIGNED TO MEET THE REQUIREMENTS OF THE KENAI PENINSULA BOROUGH, ANY OTHER TYPE OF WASTEWATER TREATMENT SYSTEM MUST MEET THE REGULATORY REQUIREMENTS OF THE ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION.

Signature
 STATE OF ALASKA
 COUNTY OF MATKUSIK
 DISTRICT 10
 DATE 08/13/20

WASTEWATER DISPOSAL TRACT A2
 THIS TRACT AT LOTS 1-4, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 53, 54, 55, 56, 57, 58, 59, 60, 61, 62, 63, 64, 65, 66, 67, 68, 69, 70, 71, 72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82, 83, 84, 85, 86, 87, 88, 89, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99, 100, 101, 102, 103, 104, 105, 106, 107, 108, 109, 110, 111, 112, 113, 114, 115, 116, 117, 118, 119, 120, 121, 122, 123, 124, 125, 126, 127, 128, 129, 130, 131, 132, 133, 134, 135, 136, 137, 138, 139, 140, 141, 142, 143, 144, 145, 146, 147, 148, 149, 150, 151, 152, 153, 154, 155, 156, 157, 158, 159, 160, 161, 162, 163, 164, 165, 166, 167, 168, 169, 170, 171, 172, 173, 174, 175, 176, 177, 178, 179, 180, 181, 182, 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193, 194, 195, 196, 197, 198, 199, 200, 201, 202, 203, 204, 205, 206, 207, 208, 209, 210, 211, 212, 213, 214, 215, 216, 217, 218, 219, 220, 221, 222, 223, 224, 225, 226, 227, 228, 229, 230, 231, 232, 233, 234, 235, 236, 237, 238, 239, 240, 241, 242, 243, 244, 245, 246, 247, 248, 249, 250, 251, 252, 253, 254, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 265, 266, 267, 268, 269, 270, 271, 272, 273, 274, 275, 276, 277, 278, 279, 280, 281, 282, 283, 284, 285, 286, 287, 288, 289, 290, 291, 292, 293, 294, 295, 296, 297, 298, 299, 300, 301, 302, 303, 304, 305, 306, 307, 308, 309, 310, 311, 312, 313, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 324, 325, 326, 327, 328, 329, 330, 331, 332, 333, 334, 335, 336, 337, 338, 339, 340, 341, 342, 343, 344, 345, 346, 347, 348, 349, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, 360, 361, 362, 363, 364, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 416, 417, 418, 419, 420, 421, 422, 423, 424, 425, 426, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 455, 456, 457, 458, 459, 460, 461, 462, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 489, 490, 491, 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 502, 503, 504, 505, 506, 507, 508, 509, 510, 511, 512, 513, 514, 515, 516, 517, 518, 519, 520, 521, 522, 523, 524, 525, 526, 527, 528, 529, 530, 531, 532, 533, 534, 535, 536, 537, 538, 539, 540, 541, 542, 543, 544, 545, 546, 547, 548, 549, 550, 551, 552, 553, 554, 555, 556, 557, 558, 559, 560, 561, 562, 563, 564, 565, 566, 567, 568, 569, 570, 571, 572, 573, 574, 575, 576, 577, 578, 579, 580, 581, 582, 583, 584, 585, 586, 587, 588, 589, 590, 591, 592, 593, 594, 595, 596, 597, 598, 599, 600, 601, 602, 603, 604, 605, 606, 607, 608, 609, 610, 611, 612, 613, 614, 615, 616, 617, 618, 619, 620, 621, 622, 623, 624, 625, 626, 627, 628, 629, 630, 631, 632, 633, 634, 635, 636, 637, 638, 639, 640, 641, 642, 643, 644, 645, 646, 647, 648, 649, 650, 651, 652, 653, 654, 655, 656, 657, 658, 659, 660, 661, 662, 663, 664, 665, 666, 667, 668, 669, 670, 671, 672, 673, 674, 675, 676, 677, 678, 679, 680, 681, 682, 683, 684, 685, 686, 687, 688, 689, 690, 691, 692, 693, 694, 695, 696, 697, 698, 699, 700, 701, 702, 703, 704, 705, 706, 707, 708, 709, 710, 711, 712, 713, 714, 715, 716, 717, 718, 719, 720, 721, 722, 723, 724, 725, 726, 727, 728, 729, 730, 731, 732, 733, 734, 735, 736, 737, 738, 739, 740, 741, 742, 743, 744, 745, 746, 747, 748, 749, 750, 751, 752, 753, 754, 755, 756, 757, 758, 759, 760, 761, 762, 763, 764, 765, 766, 767, 768, 769, 770, 771, 772, 773, 774, 775, 776, 777, 778, 779, 780, 781, 782, 783, 784, 785, 786, 787, 788, 789, 790, 791, 792, 793, 794, 795, 796, 797, 798, 799, 800, 801, 802, 803, 804, 805, 806, 807, 808, 809, 810, 811, 812, 813, 814, 815, 816, 817, 818, 819, 820, 821, 822, 823, 824, 825, 826, 827, 828, 829, 830, 831, 832, 833, 834, 835, 836, 837, 838, 839, 840, 841, 842, 843, 844, 845, 846, 847, 848, 849, 850, 851, 852, 853, 854, 855, 856, 857, 858, 859, 860, 861, 862, 863, 864, 865, 866, 867, 868, 869, 870, 871, 872, 873, 874, 875, 876, 877, 878, 879, 880, 881, 882, 883, 884, 885, 886, 887, 888, 889, 890, 891, 892, 893, 894, 895, 896, 897, 898, 899, 900, 901, 902, 903, 904, 905, 906, 907, 908, 909, 910, 911, 912, 913, 914, 915, 916, 917, 918, 919, 920, 921, 922, 923, 924, 925, 926, 927, 928, 929, 930, 931, 932, 933, 934, 935, 936, 937, 938, 939, 940, 941, 942, 943, 944, 945, 946, 947, 948, 949, 950, 951, 952, 953, 954, 955, 956, 957, 958, 959, 960, 961, 962, 963, 964, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974, 975, 976, 977, 978, 979, 980, 981, 982, 983, 984, 985, 986, 987, 988, 989, 990, 991, 992, 993, 994, 995, 996, 997, 998, 999, 1000.



- NOTES:**
1. WATER SUPPLY AND SEWAGE DISPOSAL SYSTEMS SHALL BE PERMITTED ONLY IN CONFORMANCE WITH APPLICABLE REQUIREMENTS OF 18 AAC 27 AND 18 AAC 28.
 2. BUILDING STRUCKY: A BUILDING STRUCKY OF 20 FT. IS REQUIRED FROM ALL FIRST ADJACENT PROPERTY LINES UNLESS A LEADER STANDARD IS PROVIDED BY RESOLUTION OF THE DISTRICT BOARD.
 3. THE FRONT YARD SETBACK FOR THE SUBDIVISION SHALL BE 20 FEET. THE FRONT YARD SETBACK FOR THE SIDE LOT AND ALSO A UTILITY EASEMENT.
 4. "NEIGHBORHOOD STRUCTURES" SHALL BE CONSTRUCTED OR PLACED WITHIN A UTILITY EASEMENT, WHICH WOULD INTERFERE WITH THE ABILITY OF A UTILITY TO USE THE EASEMENT.
 5. THE NATURAL MEANS OF DRAINAGE HIGH WATER OF THE KENAI RIVER FORM THE TRUE CORNER OF THE SUBDIVISION. THE TRUE CORNER BEING ON THE EXTENSION OF THE SIDE LOT AND THE INTERSECTION WITH THE NATURAL MEANS.
 6. PORTIONS OF THIS SUBDIVISION ARE WITHIN THE KENAI PENINSULA BOROUGH 20-FOOT FLOOD HAZARD AREA. THE TRUE CORNER BEING ON THE EXTENSION OF THE SIDE LOT AND THE INTERSECTION WITH THE NATURAL MEANS.
 7. "NOISE ON THE PROPERTY" WITHIN THIS SUBDIVISION HAS BEEN DESIGNATED BY FEMA AS A FLOOD HAZARD AREA DUE TO THE FACT THAT THE PLAT IS RECORDED WITH THE DISTRICT BOARD OF SUPERVISORS. THE TRUE CORNER BEING ON THE EXTENSION OF THE SIDE LOT AND THE INTERSECTION WITH THE NATURAL MEANS.
 8. "NOISE ON THE PROPERTY" WITHIN THIS SUBDIVISION HAS BEEN DESIGNATED BY FEMA AS A FLOOD HAZARD AREA DUE TO THE FACT THAT THE PLAT IS RECORDED WITH THE DISTRICT BOARD OF SUPERVISORS. THE TRUE CORNER BEING ON THE EXTENSION OF THE SIDE LOT AND THE INTERSECTION WITH THE NATURAL MEANS.
 9. "NOISE ON THE PROPERTY" WITHIN THIS SUBDIVISION HAS BEEN DESIGNATED BY FEMA AS A FLOOD HAZARD AREA DUE TO THE FACT THAT THE PLAT IS RECORDED WITH THE DISTRICT BOARD OF SUPERVISORS. THE TRUE CORNER BEING ON THE EXTENSION OF THE SIDE LOT AND THE INTERSECTION WITH THE NATURAL MEANS.
 10. "NOISE ON THE PROPERTY" WITHIN THIS SUBDIVISION HAS BEEN DESIGNATED BY FEMA AS A FLOOD HAZARD AREA DUE TO THE FACT THAT THE PLAT IS RECORDED WITH THE DISTRICT BOARD OF SUPERVISORS. THE TRUE CORNER BEING ON THE EXTENSION OF THE SIDE LOT AND THE INTERSECTION WITH THE NATURAL MEANS.
 11. "NOISE ON THE PROPERTY" WITHIN THIS SUBDIVISION HAS BEEN DESIGNATED BY FEMA AS A FLOOD HAZARD AREA DUE TO THE FACT THAT THE PLAT IS RECORDED WITH THE DISTRICT BOARD OF SUPERVISORS. THE TRUE CORNER BEING ON THE EXTENSION OF THE SIDE LOT AND THE INTERSECTION WITH THE NATURAL MEANS.

CERTIFICATE OF OWNERSHIP AND DESIGNATION

I, the undersigned, hereby certify that I am the owner of the property described in the plat of subdivision and I hereby designate the property described in the plat of subdivision as a residential subdivision. I hereby certify that the property described in the plat of subdivision is suitable for residential use and I hereby certify that the property described in the plat of subdivision is suitable for residential use.

Signature
 STATE OF ALASKA
 COUNTY OF MATKUSIK
 DISTRICT 10
 DATE 08/13/20

NOTARY'S ACKNOWLEDGEMENT

I, the undersigned, hereby certify that I am the owner of the property described in the plat of subdivision and I hereby designate the property described in the plat of subdivision as a residential subdivision. I hereby certify that the property described in the plat of subdivision is suitable for residential use and I hereby certify that the property described in the plat of subdivision is suitable for residential use.

Signature
 STATE OF ALASKA
 COUNTY OF MATKUSIK
 DISTRICT 10
 DATE 08/13/20

PLAT APPROVAL

I, the undersigned, hereby certify that I am the owner of the property described in the plat of subdivision and I hereby designate the property described in the plat of subdivision as a residential subdivision. I hereby certify that the property described in the plat of subdivision is suitable for residential use and I hereby certify that the property described in the plat of subdivision is suitable for residential use.

Signature
 STATE OF ALASKA
 COUNTY OF MATKUSIK
 DISTRICT 10
 DATE 08/13/20

PATSON PROPERTIES INCORPORATED
 (A RESIDENTIAL TRACT IN THE CITY OF ANCHORAGE, ALASKA)
 BARNES, LLC OWNER
 ANCHORAGE, ALASKA
 A 12.4 AC. PARCELS SITUATED IN FORMER LOT 1 IN THE NE 1/4 OF SECTION 10, T14N, R14E, ALASKA AND THE KENAI PENINSULA BOROUGH, IN THE CITY OF ANCHORAGE, ALASKA.

From: [Planning Dept.](#)
To: [Taylor, Bryan](#)
Cc: [Aeschliman, Melanie](#)
Subject: FW: Foster permit to extract below water table
Date: Wednesday, May 5, 2021 2:13:02 PM
Attachments: [IMG_4338.jpg](#)
[IMG_4339.jpg](#)
[Taylor.jpg](#)
[McLane.pdf](#)
[image001.png](#)

Julie Hindman

Platting Specialist
Ph: (907) 714-2210
Fx: (907) 714-2378

Email Sig



From: Patrick Nolden <pnolden@alaska.edu>

Sent: Wednesday, May 5, 2021 12:27 PM

To: Planning Dept, <planning@kpb.us>; Pierce, Charlie <CPierce@kpb.us>; bhinnert@kpb.us; Derkevorkian, Richard <rderkevorkian@kpb.us>; Bjorkman, Jesse <JBjorkman@kpb.us>; Cox, Tyson <tysoncox@kpb.us>; Elam, Bill <belam@kpb.us>; Carpenter, Kenn <KCarpenter@kpb.us>; njohnson@kpb.us; Chesley, Lane <lchesley@kpb.us>; Dunne, Willy <WDunne@kpb.us>; Dale McBride <dale.mcbride@nstar-tech.com>; Mike Pomplin <j3cubpilot@yahoo.com>

Subject: Foster permit to extract below water table

Planning Commision,

All we are asking, comply with your own ordinances and mandates.

21.29.050. - Permit conditions.

1. 21.29.050 C States groundwater elevation, flow direction, and flow rate for the parcel be measured in 3 month intervals for **at least one year** prior to application.

- Data collected by McLane was for 8.5 months, not **mandatory** 12 months. (Attachment 4338)

-Foster Construction applied for permit 2/26/2021, less than **mandated** year of testing before permitting. (Signature found in Planning Commision meeting notes, pg 181, 02/14/2021) Testing started 05/04/2020(Attachment 4338)

2. 21.29.050 A, B, C and D All work done by
a qualified **independent** civil engineer or professional hydrologist
- Water Source Separation - Exemption of dewatering may be granted if the
operator provides a statement under seal and supporting data from a duly licensed
and qualified and **impartial** civil engineer

-**McLane** is not an **impartial** independent civil engineer group with regards to Foster
Excavation.(Attachment McLane)

3. (Attachment 4338) McLane states monitoring wells were initially installed April
2020.(Attachment Taylor) Brian Taylor wrote in an email monitoring of test wells
were taking place September, 2019. Foster Construction did not have control of the
property at that date. A call from Taylor today, 05/04/2021 has changed the scenario
again. I feel new data may appear as we move forward, hmm.

Got wind of Brian Taylor's plight listening to him rationalize the low bond
amount for this event, \$30,000. Foster's will be pushing 1,000 gallons a
minute and may affect over a 100 wells and septic tanks. I personally feel
he is being persuaded(bullied) by entities to make it all look good, do what
they want, and pass muster so the entity can make money. So sad.

All we are asking, comply with your own ordinances and mandates. The
whole permitting process has to start again.

Regards, Pat Nolden
UAA Adjunct
NAEP Assessment Coordinator
907.252.7288

From: [Taylor, Bryan](#)
To: [Shirnberg, Ann](#)
Subject: FW: <EXTERNAL-SENDER>River Resource LLC Gravel Pit and water table - dewatering
Date: Monday, May 24, 2021 9:05:50 AM
Attachments: [Working group addresses Kenai residents' gravel pit quarrels _The Seattle Times.pdf](#)
[McLane and Patson properties.pdf](#)
[Well distance.pdf](#)
[After deliberating with the many neighbors in the.pdf](#)

Ann here is the email from Mike Pomplin.

From: Mike Pomplin <j3cubpilot@yahoo.com>
Sent: Sunday, May 9, 2021 10:18 AM
To: Planning Dept, <planning@kpb.us>; Taylor, Bryan <BTaylor@kpb.us>
Subject: <EXTERNAL-SENDER>River Resource LLC Gravel Pit and water table - dewatering

CAUTION:This email originated from outside of the KPB system. Please use caution when responding or providing information. Do not click on links or open attachments unless you recognize the sender, know the content is safe and were expecting the communication.

I would like this document presented to the planning meeting May 24th against the River Resources LLC dewatering and enetering water tables along with the attached supporting documents

I have attached a PDF Of this document - a map showing the distance of my well to the gravel pt - An article from the Seattle times in regards to residents addressing the gravel pits and McLane saying they are committed to River Resources LLC in this manor

After deliberating with the many neighbors in the ½ mile radius of River Resources LLC gravel pit, it has come to our attention that some of the Kenai Peninsula Borough mandates have not been adhered to.

21.29.050. Permit conditions

(5) (A) groundwater elevation, flow direction, and flow rate for the subject parcel, measured in three-month intervals by a qualified independent civil engineer or professional hydrogeologist, for at least one year prior to application. Monitoring tubes or wells must be kept in place, and measurements taken, for the duration of any excavation in the water table.

1. First monitoring test May 4, 2020 as stated by McLane
2. February 26,2021 River Resource LLC applied for Application

The monitoring began:

- May 4, 2020 to July 15, 2020 = 75 days
- July 15, 2020 to October 15 2020 = approx. 90 days
- October 15, 2020 to January 18, 2021 = approx. 90 days

KPB 21.29.050 (A)(4)(d) bond for potential and accrued damages

4. Water Source Separation.

d. There shall be no dewatering either by pumping, ditching or some other form of draining unless an exemption is granted by the planning commission. The exemption for dewatering may be granted if the operator provides a statement under seal and supporting data from a duly licensed and **qualified impartial civil engineer**, that the dewatering will not lower any of the surrounding property's water systems and the **contractor posts a bond for liability for potential accrued damages**.

The wording that gets my attention is “**potential**” in the Staff Report, general overview item #3 “As required by KPB 21.29.050(A)(5) McLane Consulting has certified that the excavation plan proposed by the applicant will not negatively impact the quantity of the aquifer serving the existing water sources”

My well is located 1,831.58 feet from the gravel pit, that is approx. 1/3 mile and my well is 30 feet deep

Can McLane or River Resources guarantee – we will not lose water pressure, volume or quality?? If not, then it falls under “potential” as worded in KPB 21.29.050 (A)(4)(D) and the bond must be such that it covers all wells in the area current and future cost – This is a 40+ year project. A simple google search, the dollar has tripled in the last 40 years, \$10,000 in 1981 = \$30,000 in today's dollar. With that in mind, in 40 years you will get one average depth well drilled.

The other words that get my attention is “**qualified impartial civil engineer**” ***supplied by the “operator”*** McLane is anything but impartial.

Two Examples of wells due to excavating:

- Mike Leslie – who lives on Ciechanski Rd was told the same thing when the gravel pit went in, in his area, his well has never been the same.
- In Ester Alaska 1999 – they mined in the area of Canary Lane – Short story – the state sued the company and 12 homes got new wells and the remaining got water storage tanks (lack of pressure). This is on file with the DNR to verify.

With that said:

- It is necessary to have the well testing repeated as per borough code and mandate
- It is necessary to increase the bond to cover all wells and septic systems within the ½ mile radius to future cost.
- It is necessary that River Resources pay for an impartial civil engineer as noted in **KPB 21.29.050 (A)(4)(d)** to either repeat or review that data. McLane is not impartial, as they would not offer input from a residential view. The party was told by McLane it would be “conflict of interest”.

It is the consensus of all neighbors, we are not against development, we just wish to protect what is ours and following the rules.

In closing,
I see two paths

- 1) Well monitoring be done per KPB mandate, data reviewed by independent impartial civil engineer and bond set to cover current and future cost of all potential wells as determined by the impartial civil engineer.
- 2) De-watering permit denied

Working group addresses Kenai residents' gravel pit quarrels

Originally published May 29, 2018 at 11:07 pm | Updated May 30, 2018 at 9:20 am

By [The Associated Press](#)

The Associated Press

KENAI, Alaska (AP) — The Kenai Peninsula Borough's Material Site Working Group is addressing complaints by residents who say gravel pits languish after operators are finished; gathering trash, flooding and possibly lowering property values as an eyesore in the neighborhood.

Neighbors have weighed in throughout the process on issues of noise, dust, traffic, property values and quality of life. Operators have responded that further restrictions would raise the cost of gravel and inhibit private property rights as many operators work their own land.

The Kenai Peninsula Borough Planning Department has targeted a code rewrite that would clarify the process for reclamation and bonding on the site, the Peninsula Clarion reported Monday.

"It is in the code, about the bonds, but that has not been our practice," Bruce Wall said, the borough planner, at the work group's meeting Wednesday. "We've been interpreting that pretty loosely. The state exemption (from bonding) is if you have less than five acres disturbed and if you excavate less than 50,000 cubic yards a year. Really, that's very few material sites in the borough that fall under that exemption, because most of them are over five acres of disturbed area. We just haven't been administering that bonding program."

The planning department's original drafted code rewrite included a suggestion of \$2,000 per acre for reclamation bonding, with a five-year reclamation plan required each time the permit renews. Planning Director Max Best said that \$2,000 number is up for discussion. Current code does not specify a dollar amount.

The Alaska Department of Natural Resources Division of Mining, Land and Water requires a bond for material mining sites — \$750 per acre disturbed. However, the borough working group had some concern that the state did not enforce the bond, nor was it scaled for inflation.

Working group member Larry Smith pointed out that people complaining about the gravel pits now may not see those existing ones fixed, but it could help in the future.

“We’re not going to take care of the scars,” he said. “We’re going to take care of the scars from this point forward.”

Information from: (Kenai, Alaska) Peninsula Clarion, <http://www.peninsulaclarion.com>

The Associated Press

The Seattle Times does not append comment threads to stories from wire services such as the Associated Press, The New York Times, The Washington Post or Bloomberg News. Rather, we focus on discussions related to local stories by our own staff. You can read more about our [community policies here](#).

Fw: Patson properties

From: Dale McBride (dale.mcbride@nstar-tech.com)

To: pnolden@alaska.edu; j3cubpilot@yahoo.com

Date: Tuesday, May 4, 2021, 07:29 AM AKDT

FYI

From: Gina Debardelaben <ginadebar@mclanecg.com>

Sent: Friday, April 23, 2021 1:32 PM

To: James Hall <jhall@mclanecg.com>; Dale McBride <dale.mcbride@nstar-tech.com>

Cc: Cody McLane <crmclane@mclanecg.com>

Subject: RE: Patson properties

Dale,

While I'd be happy to discuss the hydrology in the Patson property location with you and your concerns, it is a conflict of interest for McLane to represent you.

We have been working with the Fosters on their permit applications.

Thanks

Gina

Gina DeBardelaben, PE
Vice President
McLane Consulting, Inc.
907-283-4218 office
907-398-8143 mobile

From: James Hall <jhall@mclanecg.com>

Sent: Friday, April 23, 2021 8:05 AM

To: Dale McBride <dale.mcbride@nstar-tech.com>

Cc: Gina Debardelaben <ginadebar@mclanecg.com>; Cody McLane <crmclane@mclanecg.com>

Subject: RE: Patson properties

We have engineering and you can contact them with any questions you might have. They will assist or point you in the right direction. I've CC'd them on this email and contact info is listed below. Call the office or email them.

Gina Debardelaben <ginadebar@mclanecg.com>

Cody McLane <crmclane@mclanecg.com>

James Hall, PLS
McLane Consulting, Inc.
907-283-4218 office
907-953-5886 cell

From: Dale McBride <dale.mcbride@nstar-tech.com>

Sent: Friday, April 23, 2021 7:41 AM

To: James Hall <jhall@mclanecg.com>

Subject: Re: Patson proper es

James--

He may contact me directly. Thank you.

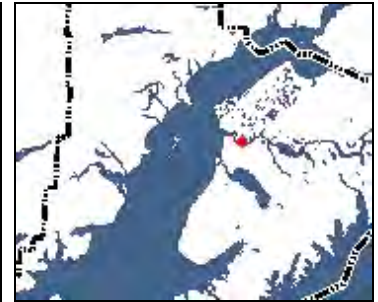
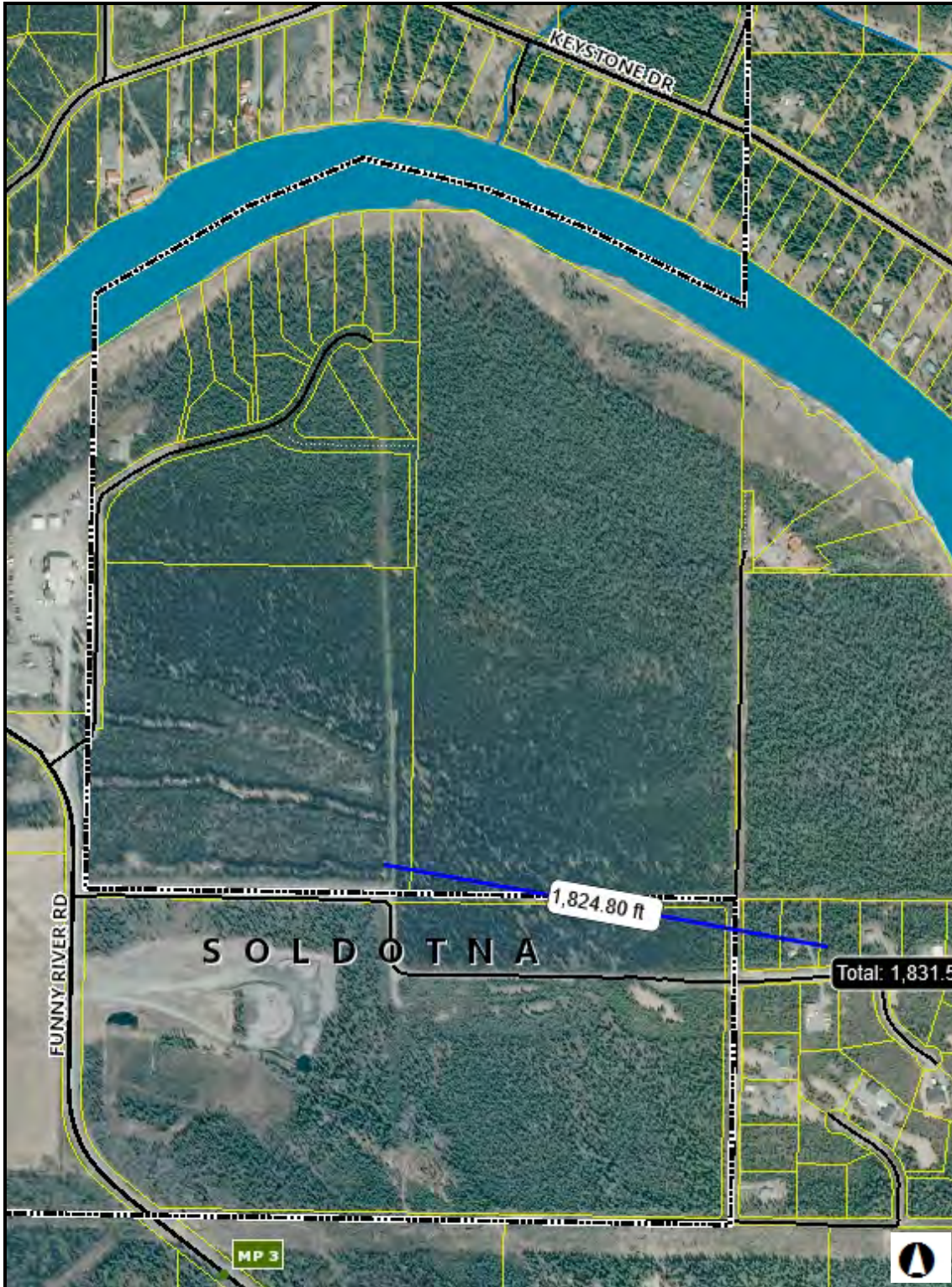
Does McLane Consulting Group have a hydrologist or engineer on staff that I can employ to provide some guidance on a potential hydrology issue?

Thanks.

Dale



Michael Pomplin Residence to gravel pit



Legend

- Mileposts
- City Limits
- Highways
- Major Roads
- Roads
 - Town Medium Volume
 - Town Low/Seasonal; Other
 - Proposed
- Parcels
- Image
 - Red: Band_1
 - Green: Band_2
 - Blue: Band_3

This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. It is not to be used for navigation.

Notes

Type any notes here.

DATE PRINTED: 5/9/2021

After deliberating with the many neighbors in the ½ mile radius of River Resources LLC gravel pit, it has come to our attention that some of the Kenai Peninsula Borough mandates have not been adhered to.

21.29.050. Permit conditions

(5) (A) groundwater elevation, flow direction, and flow rate for the subject parcel, measured in three-month intervals by a qualified independent civil engineer or professional hydrogeologist, for at least one year prior to application. Monitoring tubes or wells must be kept in place, and measurements taken, for the duration of any excavation in the water table.

1. First monitoring test May 4, 2020
2. February 26, 2021 River Resource LLC applied for Application

The monitoring began:

- May 4, 2020 to July 15, 2020 = 75 days
- July 15, 2020 to October 15 2020 = approx. 90 days
- October 15, 2020 to January 18, 2021 = approx. 90 days

KPB 21.29.050 (A)(4)(d) bond for potential and accrued damages

4. Water Source Separation.

- d. There shall be no dewatering either by pumping, ditching or some other form of draining unless an exemption is granted by the planning commission. The exemption for dewatering may be granted if the operator provides a statement under seal and supporting data from a duly licensed and **qualified impartial civil engineer**, that the dewatering will not lower any of the surrounding property's water systems and the **contractor posts a bond for liability for potential accrued damages**.

The wording that gets my attention is "potential" in the Staff Report, general overview item #3 "As required by KPB 21.29.050(A)(5) McLane Consulting has certified that the excavation plan proposed by the applicant will not negatively impact the quantity of the aquifer serving the existing water sources"

My well is located 1,831.58 feet from the gravel pit, that is approx. 1/3 mile and my well is 30 feet deep

Can McLane or River Resources guarantee – we will not lose water pressure, volume or quality?? If not, then it falls under "potential" as worded in KPB 21.29.050 (A)(4)(D) and the bond must be such that it covers all wells in the area current and future cost – this is a 40+ year project. A simple google search, the dollar has tripled in the last 40 years, \$10,000 in 1981 = \$30,000 in today's dollar. With that in mind, in 40 years you will get one average depth well drilled.

The other words that get my attention is "qualified impartial civil engineer" supplied by the "operator" McLane is anything but impartial.

Two Examples of wells due to excavating:

- Mike Leslie – who lives on Ciechanski Rd was told the same thing when the gravel pit went in, in his area, his well has never been the same.
- In Ester Alaska 1999 – they mined in the area of Canary Lane – Short story – the state sued the company and 12 homes got new wells and the remaining got water storage tanks (lack of pressure). This is on file with the DNR to verify.

With that said:

- It is necessary to have the well testing repeated as per borough code and mandate
- It is necessary to increase the bond to cover all wells and septic systems within the ½ mile radius to future cost
- It is necessary that River Resources pay for an impartial civil engineer as noted in **KPB 21.29.050 (A)(4)(d)** to either repeat or review that data. McLane is not impartial, as they would not offer input from a residential view. The party was told by McLane it would be "conflict of interest".

It is the consensus of all neighbors, we are not against development, we just wish to protect what is ours and following the rules.

In closing,
I see two paths

- 1) Well monitoring be done per KPB mandate, data reviewed by independent impartial civil engineer and bond set to cover current and future cost of all potential wells as determined by the impartial civil engineer
- 2) De-watering permit denied

From: [Mike Pomplin](#)
To: [Planning Dept.;](#) [Taylor, Bryan](#)
Subject: <EXTERNAL-SENDER>River Resource LLC Gravel Pit and water table - dewatering
Date: Sunday, May 9, 2021 10:19:05 AM
Attachments: [Working group addresses Kenai residents' gravel pit quarrels](#) [The Seattle Times.pdf](#)
[McLane and Patson properties.pdf](#)
[Well distance.pdf](#)
[After deliberating with the many neighbors in the.pdf](#)

CAUTION: This email originated from outside of the KPB system. Please use caution when responding or providing information. Do not click on links or open attachments unless you recognize the sender, know the content is safe and were expecting the communication.

I would like this document presented to the planning meeting May 24th against the River Resources LLC dewatering and entering water tables along with the attached supporting documents

I have attached a PDF of this document - a map showing the distance of my well to the gravel pit - An article from the Seattle times in regards to residents addressing the gravel pits and McLane saying they are committed to River Resources LLC in this manner

After deliberating with the many neighbors in the ½ mile radius of River Resources LLC gravel pit, it has come to our attention that some of the Kenai Peninsula Borough mandates have not been adhered to.

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1. First monitoring test May 4, 2020 as stated by McLane

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- May 4, 2020 to July 15, 2020 = 75 days
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- 2) De-watering permit denied

From: [William Ferguson](#)
To: [Pierce, Charlie](#); [Taylor, Bryan](#)
Cc: [Michael Gravier](#); [Patrick Nolden](#)
Subject: <EXTERNAL-SENDER>Ferguson response to expert findings of data at 34386Patson Rd.
Date: Tuesday, May 11, 2021 4:40:28 PM

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----- Forwarded Message -----

From: William Ferguson <bkakdream@yahoo.com>
Subject: findings of experts concerning mining in the water table

Gentlemen:

It is my duty to respond to our findings during the request for postponement of the approval for River Resources LLC modification permit on April 12, 2021, zoom planning meeting of the Kenai Peninsula Borough.

I was able to counsel with two separate Engineering firms and they analyzed the data that was provided from the KPB staff meeting notes. As they read through the data they came to the section whereby the planning commission was recommending approval of the modification of the permit to mine in the water table at the material site 34386 Patson Rd. Soldotna, AK 99669. After reading that section which essentially says your approving the permit regardless of what actual independent engineers might say or citizen rebuttals of said permit. They refused to continue to involve themselves in rendering their opinion as the recommendation was made before any citizen or professional opinion was proffered the week prior to the meeting being held!

Dale McBride, a resident of the actual subdivision in very near proximity of the gravel pit area, has found several discrepancies made by the Borough. In the accepting the permit out of order and many other items which will be detailed in a letter being sent to the planning commission by affected citizen's. Recommending protest of this process; due to the unfairness and non compliance by the KPB with their own codes. So I will not repeat them but refer to them and that I have signed my agreement with this document.

So far as I'm and others concerned in this process it has been a sham from the start going back to 2019. I have lived at this location (34484 Marcus St.) for 25 years and now since the mining of gravel has begun I hear the constant drone of machinery and back up alarms Monday to Friday to say that is offensive would be a gross understatement. This is not what I had in mind for my peaceful retirement turning out this way. As a planner to allow this to happen you should be ashamed, but I assume you're not affected as it was evidence at the zoom meeting that a postponement was not going to change things (your words) your attitude is apparent that the whole process of putting up with affected citizens is just an annoyance to you; making recommendations to approve modification of original permit without any consideration of citizen input.

It will be one thing to put up with the noise, now that this pit is here; however, let me state for

the record that I now have my Alaska water rights in hand and have ran a complete base line of my water quality. Should my water be affected by quantity or quality due to the mining in the water table (if it is approved) I will seek immediate remedy from KPB and River Resources LLC by any legal means necessary since the mining in the water table activity is the only process that could effect my water system.

Regards,

William J. and Karen T. Ferguson

We are Michael and Ann Gravier, 34540 Marcus St, Soldotna, AK 99669

May 10, 2021

At the last Planning Meeting held via Zoom, on April 12, 2021 when I was voicing my concerns of any impact to my well, Kyle Foster, said "It was a stretch" as to whether my well could be impacted. He did not indicate if that statement was derived from modeling or just his experience.

Either way, his statement indicates that there is some, perhaps small, chance my well will be impacted by the planned dewatering project.

Since River Resources (Kyle Foster) has stated that there is at least a chance my well could be impacted I request modelling for the project that includes all wells in the area be completed and made public. Since the gravel pit (mine) is benefiting from the project, they should be required to provide, through the borough, enough funds for citizens to hire needed experts.

One of the reasons given by the Planning Commission for the delay was for citizens to consult with or hire an engineer/hydrologist. Attempts to find a local consultant were unsuccessful due to conflicts of interest or reluctance on the part of the consultants.

While Mike worked for DEC, he processed mining permits for Pebble, Red Dog, Donlin, Ft Knox Gold Mine, Wishbone Hills, and Bokan Mountain Rare Earth Elements (SE AK, SW of Ketchikan).

The permitting procedures always follow the same process. The mining corporation and the regulatory agency (Borough, State or Federal) officials get together and plan the mine. At some point they notify the people who live in the area what they are doing.

After the regulatory agency and the miners meet all the technical engineering requirements of the current regulations, in their minds, the project will go forward no matter what. This was obvious at the last borough meeting when Mr. Taylor opposed the delay vote because, according to him, "it would make no difference" the mine would go forward no matter what the public found. Notifying the public is just a courtesy as the public have limited involvement in the planning process.


This process leads to confusion and anger from the public as they are not given enough details to know exactly what is proposed. Seldom do the miner or the permitting agency model the impact to all adjacent property owners.

Example:

1. In this case McLane Consulting modeled impacts to only three wells and no wells in the direction of our private wells. The wells modeled are in the direction of water table rises due to water being stored upflow of those wells. No modeling was done for wells upflow of the gravel pit where lowering of the water table would be most likely.
2. After we expressed our concerns about the impact of dewatering on our wells, we were not provided any additional information to address those concerns until at the last Borough meeting about 30 minutes before the pending vote. Because of this lack of information from the borough and the miners, we were led to believe that the entire 33 acres would be dewatered at the same time.

Entering the meeting, I was concerned that my \$648,100.00 (KPB appraisal) property would be significantly reduced in real value if I lost my well and it could not be replaced. This could be most of my life savings as I spent 20 years building up my home on the river. It seems inappropriate to have a vote on the gravel pit mine 30 minutes after we are given the data on how the process will work. While I was pleased the borough passed the delay, I feel the delay may have been avoided if the local citizens had been provided enough information up front with enough time to evaluate the information and/or been provided an engineer or hydrologist to represent citizens instead of the gravel pit.

While I see the need to limit the back and forth between participants during the formal meeting where a vote will be taken, it is a difficult format to have questions answered. Perhaps a better process would be meetings with participants (citizens, mine, borough) prior to the formal Borough meeting where a vote will be taken? This would save the time of all the voting members while providing more information in a timely fashion to citizens. This might also avoid unexpected delays.


Michael E. Gravier


Ann Y. Gravier

From: [Taylor, Bryan](#)
To: [Shirnberg, Ann](#)
Subject: FW: <EXTERNAL-SENDER>Fwd: River Resources LLC Permit Modification
Date: Monday, May 24, 2021 9:10:25 AM
Attachments: [Signature pg 1.png](#)
[Signature pg 2.png](#)
[Foster permit modification response-.doc](#)
[Signature pg 45.pdf](#)
[Signatures pg 6.pdf](#)

Here is the email from Nolden with attachments. The signature page 3 appears to have been a corrupted file and will not open.

From: Taylor, Bryan <BTaylor@kpb.us>
Sent: Friday, May 14, 2021 9:02 AM
To: Taylor, Bryan <BTaylor@kpb.us>
Subject: FW: <EXTERNAL-SENDER>Fwd: River Resources LLC Permit Modification

From: Patrick Nolden <pnolden@alaska.edu>
Sent: Friday, May 14, 2021 8:22 AM
To: Fletcher, Sandra <sfletcher@kpb.us>
Subject: <EXTERNAL-SENDER>Fwd: River Resources LLC Permit Modification

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----- Forwarded message -----

From: Patrick Nolden <pnolden@alaska.edu>
Date: Fri, May 14, 2021 at 5:00 AM
Subject: River Resources LLC Permit Modification
To: <planning@kpb.us>, <bhibbert@kpb.us>, <wdunne@kpb.us>, <tysoncox@kpb.us>, <rderkevorkian@kpb.us>, <kcarpenter@kpb.us>, <jbjorkman@kpb.us>, <belam@kpb.us>, <lchesley@kpb.us>, Mike Pomplin <j3cubpilot@yahoo.com>, Dale McBride <dale.mcbride@nstar-tech.com>, <cpierce@kpb.us>, Aeschliman, Melanie <maeschliman@kpb.us>

- River Resource LLC Permit Modification Response - Attached
- Signatures opposing River Resource LLC Permit Modification - Attached

--

Regards, Pat Nolden
UAA Adjunct
NAEP Assessment Coordinator
907.252.7288

Re: River Resources LLC Permit Modification

Members of the Planning Commission:

Upon review of the document package on the above referenced Permit Modification, which was provided to the KPB Planning Commission for its 12 April 2021 meetings as it pertains to the Staff Report dated 12 April 2021, and which was online and available for public use about a week beforehand, we provide our comments.

The Staff Report, probably written by Brian Taylor, starts with the General Overview.

Paragraph one references the history and the Application attached thereto.

Paragraph two generally outlines the provisions of KPB 21.29.050 but ignores some of the requirements, i.e. well monitoring period and frequency, as well as qualification of engineer/hydrologist, as well as the requirement of submitting the monitoring data. The monitoring data submitted with the application includes data from May, July, October of 2020 and January 2021. The application and McLane state the well was drilled in APR 2020. The email from Brian Taylor on 5.3.21 states the monitoring requirement was met (one year at 3 month intervals). When Dale McBride spoke with Brian around 4 pm that day, he stated the wells were drilled in SEP 2019. Dale advised him that River Resources did not obtain title for the property until FEB 2020. (We cannot believe that Fosters drilled wells in SEP 2019 and began monitoring, because their permit application in DEC 2019 stated that they had no intentions to mine in the aquifer.)

Paragraph three states that McLane certified there will be no negative impact on water quality in the aquifer.

Paragraph four states the current application was filed on 3 MAR 2021. Code requires one year of monitoring before an application can be filed. Monitoring on a three month basis did not begin until JUL 2020, and even if you include the May 2020 data, monitoring lasted only 8 months, not a year. Foster needs to start the one year monitoring process over and then file the application. The current application needs to be thrown out.

The last paragraph in that section is superfluous.

Moving on to the "Findings of Fact."

1.C. Again, the original permit stated no intention to mine in the aquifer, ergo, no need to pay for well monitoring.

1.D. This states that the permit mod application was submitted on 26 FEB 2021, but Brian stated in prior section the application was received on 3 MAR 2021. Which date applies?

1.E. This section states some, but not all, of the conditions necessary for a permit. Omitted is the one year monitoring at three month intervals as a condition precedent to making application.

1.F. Staff stated McLane was contracted to monitor the wells. McLane is not independent or unbiased. We will send you the email from McLane wherein they stated that they could not represent Dale McBride because of a conflict of interest.

1.G. Staff states that McLane collected data as required "in three month intervals...over the course of a year." The data provided does not show that. It shows collection of data over an eight month period, not a year, and not at three month intervals. Furthermore, the application states that the wells were not drilled until APR 2020; therefore, Foster could not apply for a mod until after a year of monitoring.

1.H. & I. McLane is not independent and unbiased.

1.O. Makes references to the "mandatory" requirements but staff ignores them.

5.D. Makes reference to the bond of \$30,000 for liability "to potential accrued damages for dewatering activities." The dewatering will affect upstream people's wells before those downstream. Is this bond available for destroyed wells or septic systems impacted by mining within the aquifer and the attendant residual lake?

\$30,000 bond in 2021 dollars is woefully inadequate going out 40 years with all of the potential impacts. \$3,000,000 is probably closer.

6.C. Staff repeats that data shows one year of monitoring at three month intervals. More BS.

6.D. Independent engineer again. More BS.

13. Reclamation requires a bond. How much?

The staff goes on with its recommendations and findings of fact. Then they attach their resolution 2021-10 granting the Permit Mod. The resolution references the 12 APR 2021 meeting as if it had already occurred.

In light of the above stated facts, we respectfully request that the River Resources permit modification be denied.

We additionally request that any commission members engaged in quarrying, either currently or in the past, recuse themselves from voting on any River Resources permit modifications.

Regards,

Signatures attached

cc: Kenai Peninsula Borough Assembly members

KENAI PENINSULA BOROUGH PLANNING COMMISSION

RIVER RESOURCES LLC GRAVEL PERMIT MODIFICATION APPLICATION

SIGNATURES AND CONTACT INFORMATION OR PARTIES PROTESTING APPROVAL OF PERMIT

NAME	ADDRESS	PHONE NO.
James J. Bunge	34135 Quince Circle	907-398-1644
Robert Bunge	34135 Quince Circle	907-394-2248
John C. Bunge	41650 River Park Dr.	847-877-4635
Barbara Bunge	41650 River Park Dr.	847-877-5740
Lindsey Van Hook	34120 Snow Lane	480-433-3924
Jeremy Lechtel	34120 Snow Lane	509-823-0218
Cy Rein	41580 River Park Dr.	907-252-6613
Carol Bunge	41560 River Park Dr.	907-262-4162
Michael E. Bunge	34540 Marcus St	907-903-6574
David Bunge	34540 Marcus St	907-538-7078

KENAI PENINSULA BOROUGH PLANNING COMMISSION

RIVER RESOURCES LLC GRAVEL PERMIT MODIFICATION APPLICATION

SIGNATURES AND CONTACT INFORMATION OF PARTIES PROTESTING APPROVAL OF PERMIT

NAME	ADDRESS	PHONE NO.
Je Hardy	41937 River Park Drive	907-398-4868
Billie Hardy	"	907-398-9224
M/L	41918 River Park Dr.	907-953-3301
Kathleen Wagle	41876 River Park Dr.	907 741-0830
Dyan Weed	34054 Snowlane	(907) 262-2760
Rich Weed	34054 Snowlane	953-1585
Lindsey Herland	41750 River Park Dr	(907) 317-2605
Nate Herland	41750 River Park Dr	(907) 317 2605
Bob Slippin	34045 Snow Ln	(907) 953-2464
Donny	34085 Snow Ln	907-252-5562
Debra Roy	34228 Troy Ln	907-252 4065

KENAI PENINSULA BOROUGH PLANNING COMMISSION

RIVER RESOURCES LLC GRAVEL PERMIT MODIFICATION APPLICATION

SIGNATURES AND CONTACT INFORMATION OR PARTIES PROTESTING APPROVAL OF PERMIT

NAME	ADDRESS	PHONE NO.
Shannon McCloud	34809 Patson	690-2399
Tod McGillivray	34809 Patson	398-6054
Casey DeSiena	PO Box 2614 Kenai	776-8010
Joanne Wise	PO Box 504 Kenai	354-3449
Pat Harris	P.O. Box 215 Kodiak	741-9325
Joe Doshier	405 HALLER	982-4572
Star McCloud	405 Haller	283-7565
Kodi McGillivray	34809 Patson	598-6056
Kalyn McGillivray	34809 Patson	598-6055
Tyler McGillivray	902 Ank st. Kenai	953-3221
Kenney Yamada	1105 1st st unit A	398-4180

KENAI PENINSULA BOROUGH PLANNING COMMISSION

RIVER RESOURCES LLC GRAVEL PERMIT MODIFICATION APPLICATION

SIGNATURES AND CONTACT INFORMATION OF PARTIES PROTESTING APPROVAL OF PERMIT

NAME	ADDRESS	PHONE NO.
James Milburn	60 Box 2675 Kenai	282-0706
John KLM	560 Worthen St	262-9698
Shulbaker	53580 Gehen Ct	417 531-3671
Grisane Gacke	204 Norman St.	394-2686
Jennifer Thomsen	190 Standard Dr.	360-8109
Alea Perhovich	35780 Tara Circle	252-6741
Kimberly Carol	4420 K Beach Rd	398-0417
Travis Perhovich	35780 Tara Circle	394-1890
Sam Ambrosia	204 Norman St.	953-9421
LUKE CHAPMAN	PO Box 1155 Kasilof	907-260-7265
Tony Smith	PO box 997 Kenai AK	690-2294

KENAI PENINSULA BOROUGH PLANNING COMMISSION
RIVER RESOURCES LLC GRAVEL PERMIT MODIFICATION APPLICATION

SIGNATURES AND CONTACT INFORMATION PROTESTING APPROVAL OF PERMIT

NAME	ADDRESS	PHONE
<u>Paul Nolden</u>	<u>34827 Patson Circle</u>	<u>907-252-7288</u>
<u>Carole Nolden</u>	<u>34827 Patson Circle</u>	<u>907-252-3365</u>
<u>Molly Davis</u>	<u>37041 RAFFLE ST. SOLDOTNA</u>	<u>907-741-1483</u>
<u>Brian Hankins</u>	<u>37041 Raffle St Soldotna</u>	<u>907-963-1515</u>
<u>Dale McBride</u>	<u>34581 PATSON ROAD</u>	<u>304-677-8303</u>
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May 17, 2021

Re: River Resources dewatering permit opposition

Kenai Peninsula Borough Planning Commission:

I am presenting more information before you vote on River Resources dewatering permit application.

Kyle Foster email to me, Patrick Nolden: I wish you would have contacted me with your concerns prior to letters to the Mayor. Can you tell me what your concerns are? Dozens of material sites on the peninsula are doing the same thing I am requesting. I will be granted permission to dig below water table no matter the planning commission decision on dewatering. I am requesting permission to dewater on-site to make gravel extraction easier. There is about 12 feet of gravel below water table that I am trying to extract. If I lower the water in the immediate area, then my excavator bucket and arm won't have to be submerged in water. By relocating the water I will be able to see what I am mining, I would think that the least amount of exposure the equipment has to the water the better.....

Pat Nolden replied to the above email: If you pump for a day, pumping 1000 gal/minute, that is 1.2 million gallons in a 20 hour **day**. The problem with a concentrated dewatering outlet will be septic systems flooded. Groundwater flow may also change. What will happen to my septic if the water table is raised 1 foot, how about 2, 3? This is a very real possibility. \$30,000 bond, and it is earmarked for 3 wells west of me. Is that how bonds work?

Commission Members, let's focus on septic issues. I have one neighbor who brought in over 200 loads of fill to avoid using a lift system for their septic. I'm relatively sure both of our septic tank elevations are below the gravel pit.

Kyle Foster also said in his email above, "I will be granted permission to dig below water table no matter the planning commission decision on dewatering." **Who is the person who can grant this permission?** "Dozens of materials sites are doing it." Yet another head on this monster that needs to be addressed. I wonder how many other applicants have been granted dewatering permits that were incomplete, unopposed, and a danger to neighboring septic/well systems.

Agenda item 6A reads on River Resources initial permitting, "The applicant has not proposed to excavate in the water table." True at the time, but every intention was to excavate under the water table after one year(8 ½ months). I bet this is standard practice for this industry. This needs to be addressed by the Planning Commission and Borough Assembly to know long term intentions.

I signed up for a property near a gravel pit, yes. River Resources also signed up for the gravel pit knowing they would be in close proximity to housing. We were all in the same LLC as we purchased our properties. River Resources has a responsibility to stick to their representation when the deal was made and not seek permitting that will endanger housing in the vicinity and that were part of their LLC. Regardless, River Resources should not be granted a dewatering permit at this site.

I also did not know this industry has carte blanche on the Kenai Peninsula.

Regards, Pat Nolden

cc: Mayor Charlie Pierce
Kenai Peninsula Borough Assembly

19 May 2021

Kenai Peninsula Planning Borough Department

144 North Binkley

Soldotna, AK 09669

RE: PC Resolution 2019-39

River Resources Conditional Land Use Permit Modification

Dear Mr. Taylor:

River Resources LLC has applied for a modification to its permit to operate a gravel quarry on property adjacent to property that I own on Patson Road at the Northwest corner of the proposed site. Applicant is seeking to mine gravel within the water table of the upper aquifer that exists under the proposed site and the surrounding area which is owned by several parties, many of whom utilize the water from that aquifer as their primary domestic water source. Most of the households in that category are on the South and East side of the proposed mining site and upgradient within the aquifer (based upon the limited data provided by the applicant and their long-time engineering consultants). Breaching the water table for mining activities will jeopardize the water source for those residents.

In addition, the applicant is seeking permission to “de-water” its mining pits by pumping as much as 15 feet of water from its pits in volumes approaching 1.5 million gallons in a 24 hour period. (These figures are derived from statements and “data” provided by applicant and its consultants.) That aquifer is in the range of 15 to 25 feet in thickness. (The log for my well shows 25 feet below ground level to the clay substrate.) Applicant’s consultant, McLane Consulting, Inc., states in their letter in support of the application that mining will not exceed 32 feet, that “dewatering temporarily depresses shallow groundwater, but will recover upon cessation of de-watering operations”. This de-watering activity, in conjunction with the breaching of the water table, will result in the permanent reduction of the water table by approximately two feet on the up-gradient side (Southeast) side of the aquifer, the temporary (and quite possibly permanent) loss of water in the wells in that area, the permanent increase of approximately two feet in the height of the water level on the north and west side of the proposed mining site. With the capillary rise on the North and West sides of the site caused by breaching the water table and creating a higher pool of water, and then repeatedly inundating the surface with more than a million gallons of water over a few hours, all of the septic systems, including mine, will be flooded, causing much cost and inconvenience to the owners thereof and potentially causing environmental damage to the fragile Kenai River. Several of the septic systems are already marginal and have been in place for less than a year. Any increase in the water table will cause damage.

I am requesting that the Planning Commission dismiss this application by River Resources for a modification to its existing mining permit for the following reasons:

1. As evidenced by the application and the letter from McLane attached thereto, as well as other available information and data as set forth herein, River Resources has not met the statutory requirement mandating a minimum of at least one year of well monitoring and data collection prior to filing an application for the mining of gravel below the water table.
2. As evidenced by the letter from McLane in support of the application, the well monitoring and data collection does not meet the mandatory requirement of data collection and measurement in three month intervals. The supporting data shows collection periods ranging from 2 months 11 days to three months over a period of 8.5 months, not 12 months.
3. The staff has not qualified McLane as a “qualified independent civil engineer or professional hydrogeologist” to certify that excavation within the water table “will not negatively impact the quantity of water serving existing water sources”. While McLane’s qualifications are not being questioned, the independent status is not present as required. Furthermore, their letter of 2 MAR 2021 in support of this application clearly states that dewatering will impact the groundwater, but tempered that with “waffle words” of “temporarily”, “depresses”, “shallow groundwater”, etc.
4. The staff has not qualified McLane as “a duly licensed and qualified impartial civil engineer” as required by 21.29.050.A.4.d in support of an exemption for dewatering. In this case and in their support of this application, McLane is anything but independent and unbiased. McLane is a longtime consultant for the Fosters and their various companies.
5. The staff has not adequately or accurately calculated the bond as set forth and mandated in the code “for liability for potential accrued damages”. The amount was determined by wrongfully assuming that the proposed mining and dewatering activities will only affect the two wells at the city maintenance building and the well on my property, calculated at three wells replaced at a cost of \$10,000 each in 2021 dollars. (The amount of \$10,000 is also the approximate cost of replacing a septic system, assuming that one can do so without the recurring cost of a tank and regular pumping. These mining and dewatering activities have the possibility of “potential accrued damages” to approximately 20 well sites on the southeast side of the proposed mine site, 2 wells on the west and 9 on the north side of the mine site. In addition, the 9 septic systems on the north side of the site has the real potential of being destroyed by the proposed mining and dewatering activities. These 40 wells and septic systems, in 2021 dollars of \$10,000 each, have the potential accrued cost of replacement of \$400,000 in today’s dollars, if in fact they can be replaced for that amount. The applicant has documented statements that these mining activities will occur for 40 years. Taking the historical and prospective inflation rate of 2.37%, the cumulative cost of the “potential accrued damages” in 40 years will be \$1,228,160. To meet code requirements, the bond required to be posted should be in the range of \$600,000 (20 year life) and \$1.25M (40 year life).
6. Lastly, the Alaska Department of Environmental Conservation includes within its list of “Best Mining Practices” the advocacy of mining or gravel quarries to NOT be conducted within the water table. Alaska has enough scars from gravel mines scattered throughout the state that need to be reclaimed by someone other than time and Mother Nature.

This Planning Commission should terminate consideration of this application for failure to meet the mandatory requirements set forth above and have River Resources retain the services of a truly independent and unbiased civil engineer or hydrogeologist to monitor the wells and provide data for at least a year and then begin the application process according to the statutes. The initial permit as approved by this body in DEC 2019 stated that there was no intention to mine gravel within the water table. River Resources has already commenced mining activities and has apparently been selling product from this site. Denying this application will cause no unnecessary harm to River Resources and its operations because they will be generating revenue utilizing operations above the water table as they initially requested in 2019. No harm, no foul. KPB 21.29 uses the word “mandatory” for the compliance with this section. The staff should strictly follow the code for the benefit of all of its citizens.

I have been spending time in Alaska since coming here more than 20 years ago. I purchased the property located on the Northwest corner of the proposed mining site more than 10 years ago and built a house thereon. I have met many wonderful people here in Alaska, all of whom cherish the beauty and resources that the Alaska experience has to offer. I have introduced many friends and family to the unique opportunities for recreation and enjoyment that are available. And, I have spent enough time here to meet the residency on site requirements to be a permanent resident, but have not yet made that leap. I have not had issues with either my well or septic system during that period of time, and I am hopeful that the same continues.

Following is the detail and explanation for the positions asserted by me. I am not questioning the acumen and capabilities of McLane, but their independence and lack of bias is not present based upon their current and historical relationship with the applicant. Rest assured that I am a vested party in the outcome of this application, and while I do have a bias, I am willing to look at the data, facts and perceptions with an open mind. While I am not a hydrogeologist or civil engineer by training, my work experiences since my youth have exposed me to and have caused me to have an understanding of those fields of expertise. I worked my way through college working for the USDA on flood control dam projects, starting on the survey crew and quickly becoming the project manager for two dam projects. I spent more than 20 years in the coal industry which included managing projects from the permitting stage through processing and shipping of the coal. I spent several years as General Manager for an international company whose first surface mine employed over 200 employees and contractors, covered more than 650 acres, removed over 300 feet of mountaintop, and moved 1.5 million tons of earth together with 150,000 tons of coal each month. All of the water in, on and within that strata was controlled and managed. Both state and federal awards for reclamation and environmental impacts were received for that mine. I do understand hydrogeology and civil engineering.

Reviewing the application filed on this matter, the McLane letter states that the monitor wells were drilled in April 2020 and the monitoring began on 5 MAY 2020, with subsequent data acquired midmonth in JUL and OCT of 2020. The date of the last data set was JAN 2021. Monitoring of wells occurred for 8.5 months, not the mandated 12 months before application. The record shows that the application was filed on 26 FEB 2021 and received by the staff on 3 MAR 2021. Clearly, the one year of well monitoring before filing an application, as mandated by the code, was not followed. When the staff was questioned by Mike Pomplin regarding that issue, the staff sent him an email stating that the wells were drilled in SEP 2019. An inquiry by me elicited a response that the wells were drilled in SEP 2019

and that the data in the application was “not exclusive” of all of the data acquired. I was further advised that McLane made a mistake in its letter regarding the date the wells were drilled . Was there an issue with the undisclosed data? If McLane got the date wrong, what else were they wrong about? Where are the drill logs showing the data and date? The staff then called Pat Nolden and apologized stating that they were wrong on the SEP 2019 drilling date. And in a subsequent telephone call with the staff, I was advised that the actual drilling date was SEP 2019. Their story keeps changing, but I know that on 1 OCT 2019, with respect to monitor well 1, it was not drilled. Furthermore, River Resources did not obtain title to their property until FEB 2020, and was barred by their partners and the partnership attorney from conducting any activities on the property until title passed.

The initial permit for this operation was granted in DEC 2019 and during the public hearing for that permit, statements were made by the applicant that post mining reclamation would include a housing development. There was discussion regarding the reservation of one half of a street running east and west along the section line to provide access for the proposed housing development. An email from Becky Foster on 21 OCT 2019 stated that there would be “no building planned for several years”. The reason that I know that with respect to monitor well 1, the closest to my property, that well was not drilled in SEP 2019 because I have seen the site of well 1 both before and after the it was installed. Immediately after preliminary approval of the Patson Properties subdivision on Patson circle was granted, equipment owned by the Fosters moved in to clear the extension of Patson Road through to Patson Circle. On 21 SEP 2019, the sound of equipment clearing trees caused me to take a walk along my property line which was well marked with flagging and stakes. I discovered multiple encroachments by the Fosters, one of which was 15 feet wide and 170 feet long. While then searching for the equipment, I followed the sounds of the excavator which had its way to the site of the current well 1 before turning south. By the time I caught up to the equipment, the operator was departing the site. The Fosters admitted fault and we reached an amicable settlement for the damages. Before I left Alaska on 1 OCT 2019, I again walked that area and there was no well present at that time. A drill truck could not pass that “road” in the then condition.

There are too many communications and there is a plethora of objective data that negates the position that the wells were drilled in SEP 2019. What other “facts” and “data” have been misrepresented? If the monitoring began in SEP 2019 when the wells were drilled, why did the Fosters not file the current application in SEP 2020 after meeting the mandatory time period? If there is other data from well monitoring, why was it not disclosed? Any experienced real estate agent will tell you that the majority of septic tank issues occur during the spring thaw. Why did the applicant not supply data for the March/April time period?

The code requires well monitoring and data analysis, with attendant certification, by an independent, qualified engineer or hydrogeologist. The language relating to dewatering requires a certification by an unbiased civil engineer. The professional qualifications for McLane are not being questioned. But, McLane is neither independent nor unbiased.

1. Common knowledge on the Peninsula is that McLane Consulting is the exclusive engineering and consulting group for the Foster's many entities.
2. The staff should have made a "finding of fact" that McLane was independent and unbiased. The staff avoided that determination completely, and in conversations with the staff, McLane Consulting and River Resources were used interchangeably.
3. In a conversation in mid-April 2021 with Carole Nolden, Mr. Kyle Foster, in an effort to deflect responsibility from himself regarding mining within the water table, stated that he was "only doing what McLane tells him to do". That is not an independent or unbiased engineer.
4. McLane has indirectly represented the multiple parties owning properties along both sides of Patson Circle through the subdivision process in 2019. McLane has represented me in 2020 as we navigated the subdivision process through the Planning Commission. In an effort to obtain engineering and hydrogeologic information relative to mining within the water table and the attendant de-watering associated therewith, I contacted McLane as the independent and unbiased engineering consultant. By email of 23 APR 2021, Ms. Gina Debardolaban advised me that their firm could not provide unbiased and independent opinions to me because of a conflict of interest, stating: "We have been working with the Fosters on the permit application." Where is the independent and unbiased engineer?
5. By email of 14 MAY 2021, Kyle Foster wrote: "I will be granted permission to dig below the water table no matter the decision on dewatering. I am working with McLane's to present a de-watering plan at our next meeting." Attached to the staff report on this matter which was made available to the public a week before the 12 APR 2021 public hearing was Resolution 2021-10 ready for signature. That resolution made reference to the decision of this Planning Commission as if it had already occurred, and set forth dates that support the arguments above regarding the applicant not meeting the statutory requirements mandated in order to grant this permit. Having been involved in similar proceedings similar to this in other jurisdictions, I have never seen a resolution referencing a decision by a body from a public hearing that has not yet occurred until a week after the publication of the resolution. The document had already been assigned the number 2021-10. If the decision to grant this permit has already been made, and apparently Mr. Foster and the staff report indicate so, why waste everyone's time going through the public hearing process? Let's ignore one more requirement of the code and not have the public hearing.
6. An independent and unbiased civil engineer would respond to the following questions:
 - a. When mining below the water table and the hydraulic pressure of the upper aquifer is released, what is the resulting permanent impact on the "upgradient" (to the southeast) side of this quarry? This response is based upon the limited data which shows the gradient across the proposed pit running down from the southeast toward the northwest. An independent consultant's calculation is that the water table supporting the wells on that side will be permanently lowered by almost two feet. Some of the wells within that direction are only 30 feet deep. One must recognize that the water flowing into and out of the pit site will also have an effect on the water table laterally, because water flows in the direction of least resistance. Dewatering near the south end of the property will drop the water table an additional 15 feet on average and the wells to the southeast are proximate enough to be negatively impacted and may not recover once the pits are filled with water.

- b. The same question relative to the impact on the northern and eastern side of the proposed mine site. And the answer would be an approximate permanent increase in the water table of almost two feet. To this two foot increase in the level of the water table, one must add the capillary rise where water defies gravity due to surface tension and the molecular attraction of water molecules which cause water to wick upwards. (Google capillary rise to find basic demonstrations. The same process by which trees supply water to leaves to the top of a tree.) Fine sand can have a capillary rise of up to 30 feet. Sand/gravel can reach ten feet, depending upon the grain size and compaction of the material. McLane makes reference to a “coarse” sand gravel layer. Those two factors will permanently increase the level of the water table to the north by more than 12 feet. The limited data supplied by McLane indicates that the interval between the ground level and the bottom of the top aquifer decreases as you travel north across the pit. That permanent increase in the water level will most likely cause the septic tanks along that end to be flooded and to fail, causing potential pollution issues. Several of the septic systems are marginal under current conditions due to the attendant ground water level.
- c. Since the dewatering plan is to pump the pits to the north ahead of mining, once operations approach that end of the mine site, temporary inundation of those septic systems will occur. The Fosters state that they may have to run their 1000gpm pumps occasionally for a day or two. A 24-hour pumping dewatering cycle will discharge 1.44 million gallons per day. While they state that the dewatering will not extend more than 200 feet from the pit, and will not affect the water table, simple math and common sense indicates otherwise. Maybe the discharge hose will be 200 feet away, but the discharge must be far enough away so the water does not flow back into the pit. By pumping the dewatering discharge to the north, the majority of the water will move in the direction of the gradient toward the Kenai River. That volume of water, if capable of being stacked (which it cannot be) would inundate one acre (208 feet by 208 feet) with 33 gallons of water per square foot over 24 hours, or more than 4 feet of water per square foot over an entire acre. Double that for a two-day pumping operation.
- d. The dewatering operation will permanently destroy wells on the south side of the proposed mining site and the septic systems to the north and west.

For all of the above reasons—failure to follow mandatory code requirements for the filing of the application, the lack of an independent or unbiased civil engineer or hydrogeologist, the impact of the operations on the wells and septic systems near the mine site, this application needs to be denied. The operations need to be limited to what they asked for when the underlying permit was granted, which was based upon staying at least two feet above the bottom of the upper aquifer and for a post mining reclamation plan which included residential housing. That reclamation plan would keep River Resources in compliance with their commitments to their former partners who now own the properties on both sides of Patson Circle and prevent potential litigation, which has been discussed by some of those owners. I doubt seriously whether this permit process for its modification would be validated by judicial review. If in fact the decision has already been made to grant the permit, at a minimum, make the reclamation bond meet the requirement to cover the potential damages, namely at least \$1.25 million.

Respectfully submitted,

Dale McBride

May 21, 2021

Kenai Peninsula Borough Planning Department
144 North Binkley
Soldotna, Alaska 99669

SUBJECT: PC Resolution 2019-39
KPB Tax Parcel No. 135-243-13 & 135-243-29

RE: Conditional Land Use Permit Modification Application

Dear Mr. Taylor & Planning Commission:

River Resources, LLC, the property owner of KPB 135-243-13 & 135-243-29, is applying for modification of CLUP approved by PC Resolution 2019-39. The modification would allow for excavation in the water table on approximately 31.2 acres of the permitted property. River Resources has met all four (4) criteria set forth in KPB 21.29 to excavate within the water table.

Please excuse the error on the letter submitted April 12, 2021 regarding the date of monitor well installation. The five groundwater monitor wells were installed in *September 2019*, not April 2020. Attached is a copy of field survey notes from September 17, 2019 when the MCI field crew initially the monitor wells. The monitor wells are also shown on the original CLUP application site exhibit which is part of the public record at the November 25, 2019 Planning Commission Meeting. Since initial submittal of the CLUP Modification, the monitor wells have been measured again on April 23, 2021 in accordance with KPB 21.29.

Per KPB 21.29050.A.4.d, excavation is only proposed within the upper unconfined aquifer, not to exceed approximately 32' below original ground (approximate elevation 68.0). On May 7, 2021, Smith Well Drilling installed a water well on the permit property. According to the well log (Log ID 836), the confining layer is 35' below existing ground, deeper than the proposed depth of excavation. Attached is Well Log 836.

If approved to excavate below the water table, this site will utilize a manmade lake as final reclamation. This is a recognized form of reclamation in the City of Soldotna and the City of Kenai material site permitting codes. Attached are photos of two material sites owned by the applicants' family that are reclaimed as manmade lakes. The Riverbend material site is still active and the Anglers Drive material site is fully reclaimed and subdivided with lots selling and being residentially developed.

River Resources has proposed to utilize dewatering during the lower limits of excavation within the groundwater table. Dewatering will be conducted on an as needed, temporary basis while extracting below the groundwater table. Attachment D is a dewatering plan that includes a representative dewatering layout, dewatering equipment sizing, drawdown, and recharge calculations.

MCLANE

CONSULTING, INC.

Per KPB 29.10.050.A.5, the groundwater data has been evaluated by a licensed, qualified civil engineer. The excavation and dewatering plan included in the CLUP Modification Application will not negatively impact the quantity of the aquifer serving the existing water sources.

If you have questions, please contact me.

Sincerely,

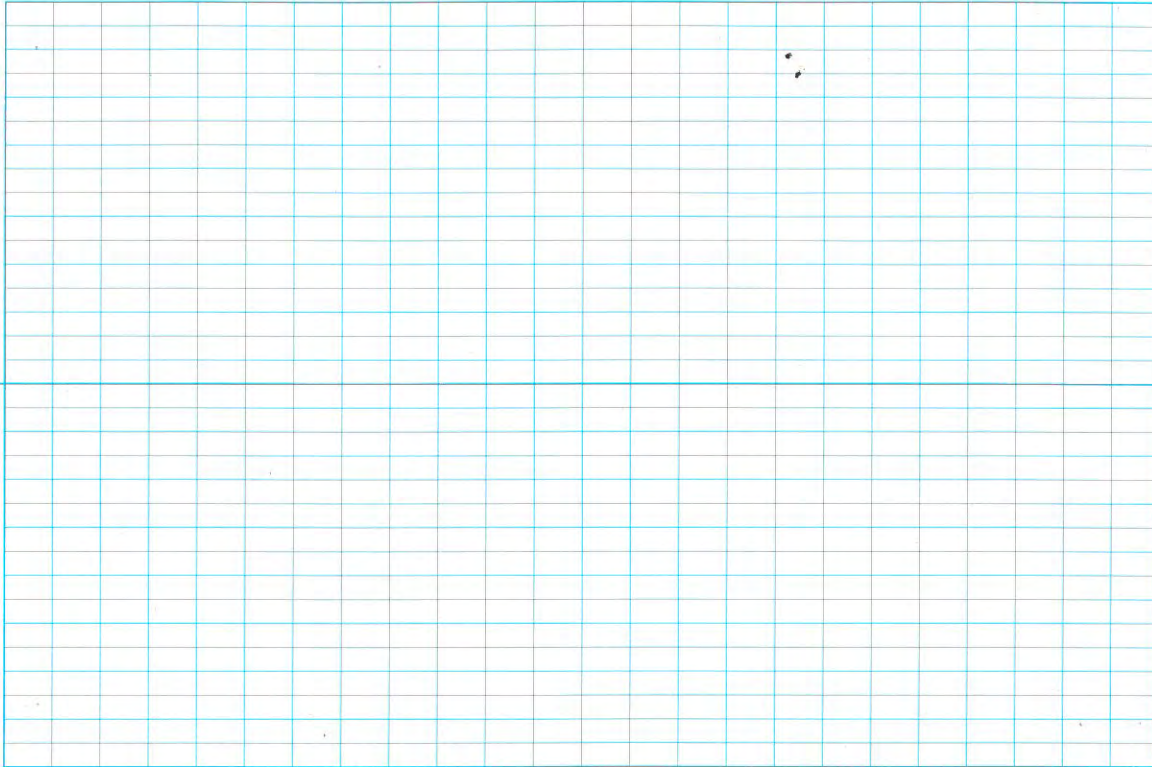


Gina DeBardelaben, PE
McLane Consulting, Inc.

Attachments:

- A. McLane Consulting Survey Field Notes 9-17-2021
- B. Smith Well Drilling Material Site Water Well Log Well ID 836 5-7-2021
- C. Photos of reclaimed manmade lake material sites, Riverbend & Anglers Drive.
- D. River Resources, LLC. Site Specific Dewatering Plan 5-19-2021

19-11-29



Rate in the Rain

EC AIX	19-17-19	19-2016P	19-4035
	Foster CLUP		
	APPROACH	LINE OF SIGHT	
	EAST	+ 1000'	
	WEST	+ 500'	
413	TOP 4" PVC	TEST HOLE	"
414	GRND @ PVC		"
415	TEST HOLE		"
416	TOP 4" PVC		"
417	GRND @ PVC		"
418	TOP 4" PVC		"
419	GRND @ PVC		"
420	TOP 4" PVC		"
421	GRND @ PVC		"
	• export all POINTS		
	• IXL		

Smith Well Drilling

35876 Isbell St.
Soldotna, Ak 99669
Ph(907)-262-3970

Water Well Construction Log**Log ID** 836**Well Owner:** Foster Construcion**Date Completed:** 05/07/2021**NearestCommunity:** Soldotna**Driller:** Tyler Smith**Well Location:** Patson Rd.-Funny River

Use of Well:	Commercial	Depth of Well:	180ft	Static Water Level:	Above Ground Level	
Depth of Casing:	165ft	Casing Stickup:	2ft	Pumping Level:	160ft	Duration: 4hr(s)
Casing Type:	Steel	Casing Dia:	6in.	Flow Rate:	300GPM	Testing Method: Air
Casing Thickness:	0.250in.	Finish of Well:	Screen	Development Method:	Air	Drilling Method: Air Rotary
Intervals and Size:	12 Slot Stainless Steel Screen			Drilling Fluid:	Water	
From: 165ft	To: 180ft					

Drillers Material Log

(Description of strata penetrated)

Depth Below Top
Of Casing In Feet

From	To	Material
0	— 35	Brown Gravel
35	— 116	Blue Clay and Gravel
116	— 128	Blue Clay
128	— 140	Blue Silt and Sand
140	— 165	Blue Sand and Gravel
165	— 170	Blue Sandstone
170	— 180	Blue Sand

Attachment C

Riverbend Material Site (PID 04912003). Currently active material extraction site in City of Kenai.



Attachment C

Angler Drive (PID 04949054-9). Reclaimed & subdivided material site in City of Kenai.



River Resources, LLC
Funny River - Patson Properties Conditional Land Use Permit
Excavation Dewatering Plan

River Resources has proposed to utilize dewatering during the lower limits of excavation within the groundwater table. Excavation dewatering will be utilized on an as-needed basis during material extraction within the groundwater table. This plan is to provide information and parameters for that process. Dewatering parameters are as follows:

Pump Intake: 6" diameter maximum
Rate of Pump: 2200 GPM (4.901620 cfs)
Length of Dewatering: 10 day maximum

Excavation dewatering temporarily depresses shallow groundwater within the immediate area of the dewatering, but the groundwater level will recover to pre-dewatering elevations upon termination of dewatering. If dewatering was removed from the site, the aquifer would experience the well drawdown shown in Table A.

TABLE A. Well Drawdown without Immediate Adjacent Discharge
(if dewatering was removed from site)

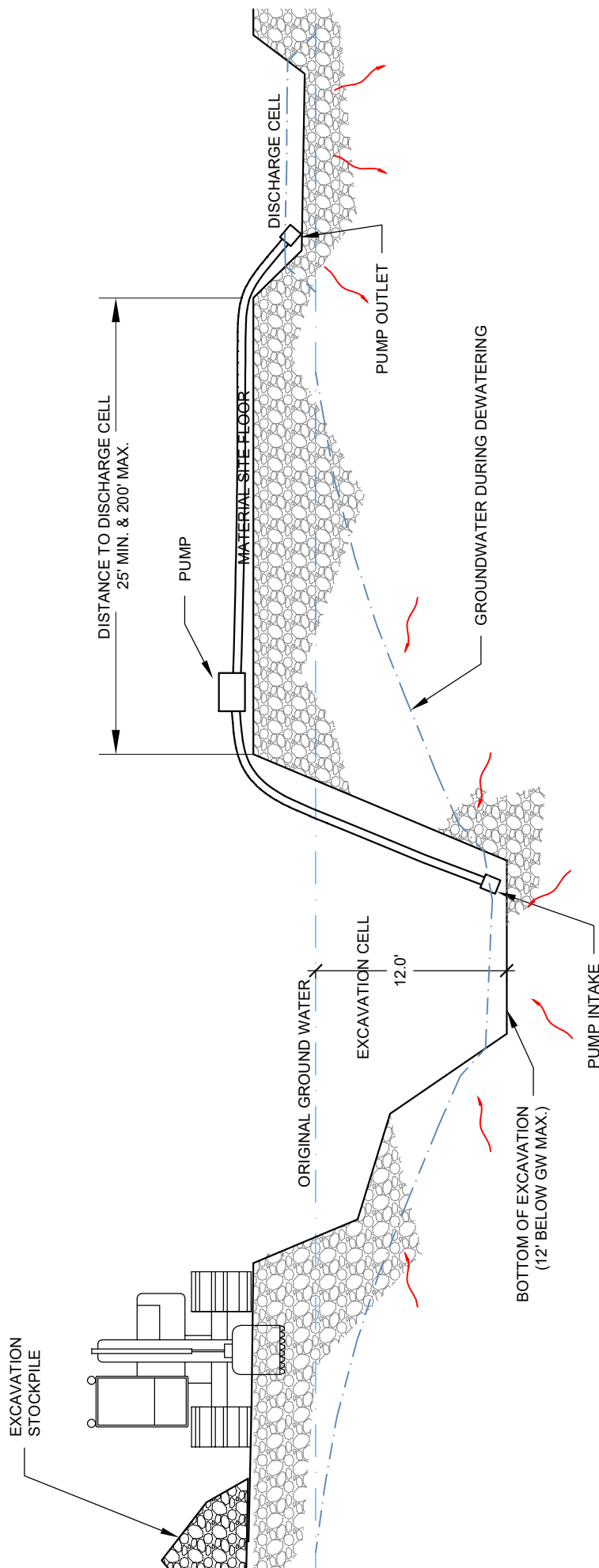
Distance from Dewatering Point	Length of Dewatering		
	1-day	7-day	10-day
300 feet	1.22 ft	1.98 ft	2.12 ft
0.25 mile	0.22 ft	0.84 ft	0.97 ft
0.50 mile	0.02 ft	0.40 ft	0.51 ft
1.0 mile	0.0 ft	0.07 ft	0.12 ft

Dewatering will not be removed from the subject property. Waters from the dewatering process will be discharged within the permit property to re-enter the groundwater table, therefore providing rapid recharge to the aquifer which negates the effects on surrounding groundwater elevations. Therefore, the aquifer would experience the well drawdown shown in Table B.

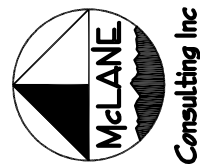
TABLE B. Well Drawdown with Immediate Adjacent Discharge
(dewatering is discharged adjacent to removal dewatering location)

Distance from Dewatering Point	Length of Dewatering		
	1-day	7-day	10-day
300 feet	0.0 ft	0.04 ft	0.10 ft
0.25 mile	0.0 ft	0.0 ft	0.0 ft
0.50 mile	0.0 ft	0.0 ft	0.0 ft
1.0 mile	0.0 ft	0.0 ft	0.0 ft

An exhibit of the proposed pumping layout is included on Sheet 1.



227.45



McLANE CONSULTING INC.

ENGINEERING - TESTING
SURVEYING - MAPPING
P.O. BOX 468
SOLDOTNA, AK 99669
VOICE: (907) 283-4218
FAX: (907) 283-3265
WWW.MCLANECG.COM

PROJECT

DEWATERING PLAN EXHIBIT

LOCATION

FUNNY RIVER - PATSON PROPERTIES

CLIENTS

RIVER RESOURCES, LLC
SOLDOTNA, ALASKA 99669

REVISION: 1

DATE: 5/19/2021

DRAWN BY: GMD

SCALE: NTS

PROJECT NO. 204014

BOOK NO. 19-11

SHEET

1