



File No.: SS-RZ-2017.3

DATE OF MEETING: January 29, 2019
TO: Salt Spring Island Local Trust Committee
FROM: Seth Wright, Island Planner
Salt Spring Island Team
COPY: Stefan Cermak, Regional Planning Manager
SUBJECT: Rezoning for second dwelling unit
Applicant: Jamie Colligan & Robyn Kelln
Location: 2188 North End Rd

RECOMMENDATION

1. That the Salt Spring Island Local Trust Committee proceed no further with rezoning application SS-RZ-2017.3 (2188 North End Road).

REPORT SUMMARY

This application proposes the rezoning of a property at the corner of North End Road and Mariko Place to permit a second dwelling unit. The second dwelling unit was constructed subsequent to construction of the principal single family dwelling on the property and authorized for use on a short-term basis by the owner's parents. Despite a number of bylaw enforcement actions since 1998, the owner has continued to use the building as a rental cottage in contravention of the Salt Spring Island Land Use Bylaw. The application proposes to rezone the property to permit the use of the second dwelling unit as an affordable rental dwelling unit.



Figure 1: Context Map of Subject Property



Figure 2: 2017 Orthophoto of Subject Property

BACKGROUND

The application to rezone the subject property was initiated as a result of bylaw enforcement pertaining to the ongoing use of the unlawful dwelling unit. The principal single family dwelling (1540 square feet) was constructed in 1986. In 1992, the owner at that time proposed to construct a second 750 square foot dwelling unit, on a limited-term basis, by the owner's parents. The Salt Spring Island Local Trust Committee placed a covenant on the subject property requiring "that the building shall be used for no other residential purpose than as a dwelling for the parents of the [owner], and that within thirty (30) days of a parent ceasing to reside in the building for any reason whatsoever, the [owner] shall immediately convert the building to a non-residential use and disconnect all plumbing and cooking facilities including without limitation, toilets, sinks, bathtubs, showers, and 220 volt electrical service, and shall make no further use of the building for residential purposes."

In 1998, CRD Building Inspection staff sent a letter to the owner indicating that the building permit for the cottage was still open and either needed to be decommissioned as a dwelling unit and converted to an out building or have the property rezoned to permit two legal dwellings. In 2002, CRD Building Inspection staff sent a further letter requesting that the owner decommission the dwelling and address the outstanding issues. Islands Trust Bylaw enforcement sought voluntary compliance with the property owner from 1998 through to 2010.

In 2010, a court order (No. 993820) was issued to the owner of the property requiring that:

- "2. the [owner] is prohibited from using or allowing the use of the cottage on the Property as a dwelling;
3. the [owner] is required to render or maintain the cottage on the Property unusable as a dwelling by removing or causing to be removed all equipment and facilities designed for cooking and food preparation;"

Since that court order, Islands Trust bylaw enforcement staff further sought to achieve compliance with the owners, but have failed to find resolution. This rezoning application is the result of continued recent bylaw enforcement actions.

ANALYSIS

Policy/Regulatory

Islands Trust Policy Statement:

Staff have reviewed the Islands Trust Policy Statement (ITPS) and identified five policies that relate to the application:

- 4.4.2 Local Trust Committees and Island Municipalities shall, in their official community plans and regulatory bylaws, address measures that ensure neither the density nor intensity of land use is increased in areas which are known to have a problem with the quality or quantity of the supply of freshwater, water quality is maintained, and existing, anticipated and seasonal demands for water are considered and allowed for.
- 5.2.3 Local Trust Committees and Island Municipalities shall, in their official community plans and regulatory bylaws, address policies related to the aesthetic, environmental and social impacts of development.
- 5.2.4 Local Trust Committees and Island Municipalities shall, in their official community plans and regulatory bylaws, address any potential growth rate and strategies for growth management that ensure that land

use is compatible with preservation and protection of the environment, natural amenities, resources and community character.

- 5.2.5 Local Trust Committees and Island Municipalities shall, in their official community plans and regulatory bylaws, address means for achieving efficient use of the land base without exceeding any density limits defined in their official community plans.
- 5.8.6 Local Trust Committees and Island Municipalities shall, in their official community plans and regulatory bylaws, address their community's current and projected housing requirements and the long-term needs for educational, institutional, community and health-related facilities and services, as well as the cultural and recreational facilities and services.

Staff's preliminary review of the application and the supporting documentation considers that the proposal is not contrary to or at variance with the Island Trust Policy Statement. If the LTC resolves to proceed with the application, staff will provide a report assessing compliance with the Policy Statement based on the Directives Only Checklist as set out in section 1.9 of Trust Council Policy 1.3.

Official Community Plan:

Staff have reviewed the application for consistency with the Salt Spring Island Official Community Plan (OCP) and note the following:

- Affordable housing is strongly encouraged and supported to address a variety of housing needs within a framework that limits growth and protects the natural environment.
- Any application that proposes an increase in water use should include evidence that existing wells, springs, and neighbouring uses will not be affected.
- Rezoning applications that propose increased density should address climate change and include energy and water efficient features.

Land Use Bylaw:

Aside from the non-conforming second dwelling, the property conforms to its Rural (R) zoning.

If the LTC directs staff to draft a bylaw, staff consider that a new Rural zone variant could be established where the additional principal use of one affordable housing dwelling unit with a floor area maximum of 70 square metres. The Land Use Bylaw provides the following relevant definition:

“dwelling unit, affordable housing” is a deed restricted and/or a rent controlled dwelling unit that is secured by a housing agreement registered on title, and may include special needs housing and seniors dwelling units.

Issues and Opportunities

Affordable Housing Agreement

If the LTC chooses to proceed with rezoning, a housing agreement would need to be registered on title to ensure that the second dwelling unit is maintained as affordable. The OCP provides the following definition:

affordable housing – describes rental or owned housing that can be acquired with 30 per cent of the median gross income of families or individuals on Salt Spring Island.

Pursuant to this definition and according to Statistics Canada 2016 Census data, thresholds for affordable housing are calculated as follows:

	Annual	Monthly	x 30 percent
Median total individual income in 2015	\$29,978	\$2498	\$749
Median total household income in 2015	\$75,227	\$6269	\$1881

Table 1: Calculation of OCP affordable housing threshold

Pursuant to this calculation, affordable housing is housing that can be rented or purchased for less than \$1881 per month. Staff note that this definition, while commonly accepted as a suitable threshold, would result in a maximum rent that would place 58 percent of Salt Spring households in core housing need ([2016 Census, Statistics Canada](#)) – the portion of the population with a total household income that is less than the median household income - would be in core housing need if the housing cost is set at \$1881. Additionally, the size and layout of the dwelling unit (see Figure 3 below) is only suitable for a small family.

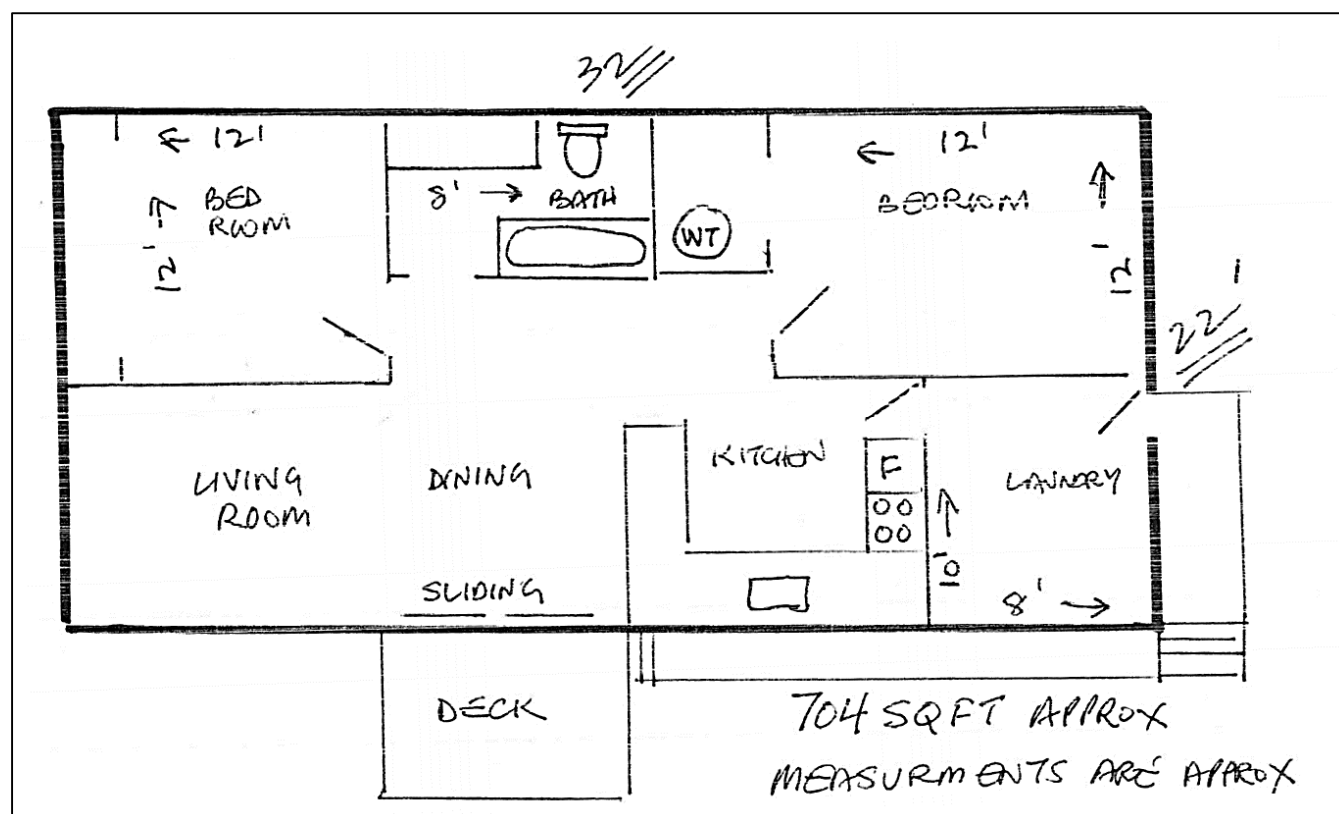


Figure 3: Rough sketch of dwelling layout – not to scale (provided by applicant)

The [CRD's Regional Housing Affordability Strategy \(2018\)](#) provides a more targeted and regionally-specific approach to rental targets established for the establishment of affordable housing in the Capital Region:

Income Range	Threshold (% of Area Median Income)*	Annual Income	Affordable Monthly Rental Target	2016 Income Distribution	Unit Demand Estimate
VERY LOW	< 30%	Less than \$20,000	Less than \$500	11%	4,564
LOW	30% to 50%	\$20,000 to \$35,000	\$500 to \$875	13%	5,124
LOW TO MODERATE	50% to 80%	\$35,000 to \$55,000	\$875 to \$1,375	15%	7,419
MODERATE AND ABOVE	Above 80%	Over \$55,000	More than \$1,375	61%	17,060
TOTAL ESTIMATED RENTAL DEMAND				100%	34,167
* Based on 2015 Median Household Income for Capital Regional District					

Table 2: Rental Targets & Demand Estimates by Income Ranges (Source: [CRD Regional Housing Affordability Strategy](#))

The applicant has indicated that the unit is currently rented at a monthly rate of \$1050, but that they propose to increase the rent to \$1350 upon installation of new energy efficient plumbing fixtures (toilet and bathroom faucet) and appliances (refrigerator, dishwasher, washer, and dryer) which would provide an additional \$3600 of annual rent. An internet survey of prices for these goods totals approximately \$3600. As the applicant is likely to own the rent for a period longer than a single year, staff consider that the costs of the new appliances and fixtures should be amortized over a period longer than a single year. Staff have calculated a number of rents according to various thresholds and provided the corresponding income so that the household is not deemed in core housing need.

	Monthly Rent	Hourly	Required Income Monthly	Annual
OCP Threshold	\$1,881	\$36.18	\$6,270	\$75,240
Current Rent	1,050	20.19	3,500	42,000
Potential Rent A	1,150	22.12	3,833	46,000
Potential Rent B	1,250	24.04	4,167	50,000
Proposed Post-Rezoning Rent	1,350	25.96	4,500	54,000

Table 3: Potential monthly rents and corresponding required income

Islands Trust is currently in the process of establishing capacity to more effectively administer housing agreements on behalf of local trust committees. It will be necessary to have the administrative capacity in place prior to final reading of the bylaw since the proposed affordable dwelling unit is privately owned (i.e., not by a non-profit or government agency). Senior staff have indicated that enforcement of housing agreements may be tenuous due to the cost of legal action. As this housing agreement is for a single unit the benefit of legal action would obviously be limited to a single household.

Water Quantity

A report was submitted from Steven M. Carballeria, P.Geo. dated June 5, 2018 to confirm supply of potable water and to address the following OCP policy pertaining to groundwater supplies:

C.3.3.2.2 When considering rezoning applications, the Local Trust Committee should consider the impacts of the proposed new use on existing wells, springs, or other water supplies. If the proposed use is expected to need more water than the uses already allowed on the property, then the Committee should ask for evidence that wells or other water supplies in the neighbourhood would not be depleted. The Committee should also consider whether water use would affect agricultural activities or deplete any springs necessary to maintain fish habitat. Should a zoning change be proposed where groundwater supplies are not adequate, the applicant could be encouraged to find other means of supplying water. Rainwater catchment or a water conservation program could be considered.

The report indicates that the well on the subject property “has a good yield and a moderate recovery rate” and “meets and significantly exceeds the 3,200 litres per day requirements”. The OCP provides no volumes for evaluation of water supply; however, at time of subdivision, an applicant “must provide written certification under the seal of an engineer with experience in groundwater hydrology that there is sufficient available groundwater to provide the required amount of potable water on a continuous basis, and that the extraction from the groundwater table of that amount of water is not reasonably expected to adversely affect the quantity or quality of water obtainable from any existing well or surface water that is used as a source of potable water. The volumes for the subject property would be calculated as follows:

Use	Volume (litres per day per lot)
<i>Dwelling unit</i>	1600
<i>Bed and breakfast home-based business</i>	775
<i>Commercial or industrial use</i>	900
<i>Secondary dwelling unit</i>	1600
Total	4875

Table 4: Calculation of uses for supply of potable water

The applicant provided a further report Crystal Campbell, Environmental Technician, which was concurred by Chris Zamora, R.P.Bio., dated July 8, 2018, confirming that “no surface watercourses/waterbodies were found within the area that would be impacted by well use within the subject property” (see Appendix 3). Based on this report, staff have no concerns that use of the well for the second dwelling would significantly impact any springs necessary to maintain fish habitat.

However, planning staff have reviewed the June 5, 2018 Carballeria report in consultation with Senior Freshwater Specialist William Shulba and have the following concerns:

- Pump tests were conducted in May 23, 2018 – a time of year when groundwater level are near peak, prior to a considerable drop through the summer.
- The pump tests were carried out for a duration of four hours – the minimum commonly accepted duration, which may not be sufficient to identify flow rates over time.
- No neighbouring wells were monitored, so the report does not address impacts on neighbouring wells.
- The analysis does not consider summer drought that may worsen from climate change nor the impact of cumulative summer drawdown by all groundwater users in that aquifer.
- The report did not provide an assessment of the state of the well head.
- The report was carried out by third parties rather than the professional.

If the LTC resolves to proceed with the application, staff have provided a resolution at the end of this report to request a further engineer report to demonstrate that the lot can be developed in complete accordance with OCP policy C.3.3.2.2.

Consultation

No referrals have been conducted to date. If the LTC directs staff to draft a bylaw, staff will provide a list of referral agencies for consideration in a subsequent staff report.

Rationale for Recommendation

This application is the result of protracted bylaw enforcement regarding the presence of an illegal dwelling unit on the property. As such, there is a risk that favourable consideration of this proposal may signal that lack of compliance with the Salt Spring Island Bylaw No. 355 regarding illegal dwelling units is acceptable provided the landowner is prepared to eventually submit an application for rezoning. Moreover, the owners choice to not comply with various bylaws and court orders offers caution if the application is to be subject to a difficult to enforce housing agreement.

Given the current deficit of affordable housing, the LTC may consider that providing an additional affordable dwelling unit outweighs the negative effect of signalling acceptance of non-compliance in this particular case. It is noted that each rezoning is evaluated on its own merits and approval of one application does not predetermine approval of another application despite potential similarities. However, if the LTC determines that the application has merit and wishes to proceed with drafting a bylaw, alternate recommendations to provide confirmation of sufficient water and direction to pursue a housing agreement and covenant to ensure affordability and require energy efficient appliances and water efficient plumbing fixtures are provided below.

ALTERNATIVES

The LTC may consider the following alternatives to the staff recommendation:

1. Direct Staff to Draft a Bylaw

If the LTC considers that the benefit of permitting an illegal dwelling on this lot exceeds the risk of signalling non-compliance is acceptable, the LTC may direct staff to draft a bylaw. Recommended wording for the resolution is as follows:

That the Salt Spring Island Local Trust Committee request staff to prepare a draft bylaw to amend Salt Spring Island Land Use Bylaw, 1999 to rezone Lot 3, Section 7, Range 1, North Salt Spring Island, Cowichan District, Plan 34166 from Rural to a new Rural zone variant in order to permit a second dwelling unit for affordable housing.

a. Request Further Confirmation of Water Quantity

If the LTC chooses to proceed with the application, but considers that the provided reports do not demonstrate compliance with the OCP that there is sufficient supply of potable water and that use of water will not impact neighbouring wells, the LTC may request a further report. Recommended wording for the resolution is as follows:

That the Salt Spring Island Local Trust Committee request that the applicant provide a report from a Professional Engineer or Professional Geoscientist with relevant experience containing the following:

- a. A new pump test conducted between July 15th and September 20th confirming adequate supply of potable water with a minimum duration of 12 hours. The pump test should have automatic water level readings during pumping and recovery using a data logger. At least one neighbouring well should be monitored during the entirety of the pump test, including during the recharge period.
- b. A qualified professions should confirm that the well head meets the Groundwater Protection Regulation - including that it is appropriately sealed from surface water intrusion, that surface water drains away from the well head, and that the well is not vulnerable to contamination.

b. Request Staff to Enter Into a Cost Recovery Agreement to develop a Housing Agreement and Water and Energy Efficiency Covenant

If the LTC chooses to proceed with the application, a housing agreement and covenant requiring compliance with OCP policies is required. Recommended wording for the resolution is as follows:

That the Salt Spring Island Local Trust Committee request staff to enter into a cost recovery agreement with J. Colligan and R. Kellyn for Islands Trust legal review of a Housing agreement and Land Title Act Section 219 covenant providing the following requirements:

- a. provision of affordable housing in the dwelling unit at a rate of \$1150 per month plus increases in accordance with the Consumer Price Index for Greater Victoria;
- b. installation and continued use of EPA WaterSense® certified plumbing fixtures, including bathroom faucet, showerhead, and toilet; and
- c. installation and continued use of EnergyStar® certified appliances, including washer, dryer, dishwasher, refrigerator.

NEXT STEPS

If the LTC chooses to proceed no further, staff will reimburse the applicant in accordance with the fees bylaw and the bylaw enforcement will consider further action. If the LTC chooses to direct staff to draft a bylaw, staff will work with the applicant to proceed with the application.

Submitted By:	Seth Wright, Island Planner	January 17, 2019
Concurrence:	Stefan Cermak, Regional Planning Manager	January 18, 2019

ATTACHMENTS

- 1. Site Context
- 2. Policies
- 3. Photographs
- 4. Water Quantity Report
- 5. Surface Waterbody Report
- 6. Septic Field Certification and VIHA Filing

ATTACHMENT #1 – SITE CONTEXT

LOCATION

Legal Description	Lot 3, Section 7, Range 1, North Salt Spring Island, Cowichan District, Plan 34166
PID	000-276-901
Civic Address	2188 North End Rd

LAND USE

Current Land Use	1 dwelling unit and 2 accessory buildings (1 of which is being used illegally as a dwelling unit)
Surrounding Land Use	The surrounding lands are zoned Rural and are within the Rural Neighbourhoods OCP Designation. Surrounding properties range in size from about 0.2 to 3.9 ha.

HISTORICAL ACTIVITY

File No.	Purpose
None	None

POLICY/REGULATORY

Official Community Plan Designations	<i>Rural Neighbourhoods (RL)</i> : The objective of the RL land use designation is “to provide adequate land zoned for medium density residential use and other traditional and compatible rural land uses.” The subject property does not contain any Development Permit Areas (DPAs).
Land Use Bylaw	<i>Rural (R)</i> : The Rural zone permits a number of uses, which include one single-family dwelling. On lots with an area of 1.2 hectares or more, a seasonal cottage with a maximum floor area of 56 m ² is permitted. The subject property is 2.48 acres (1.00 ha).
Covenants	<i>Covenant EF117631</i> : This covenant authorized the use of a second dwelling unit for the parents of the property owner at that time. Islands Trust signed release of Covenant EF117631 on December 15, 1995 and forwarded the release to the property owner for processing at the Land Title and Survey Authority. The release was never registered. Judgement CA5621471 (Helmut Hoeller) 2016
Bylaw Enforcement	<i>SS-BE-2005.39</i> : The application for rezoning was initiated on April 7, 2017 as a result of bylaw enforcement action pertaining to the unlawful use of a second dwelling unit. There is a long history of bylaw enforcement related to the unlawful second dwelling unit. Between June 2003 and December 2010, a court order was issued to the previous property owner stating that the accessory building could not be used as a dwelling. The file was closed in December 2010 when it appeared that the building had been decommissioned as a dwelling unit. In the intervening years, the current landowner has recommissioned the

	building as a dwelling unit and used it for rental housing. This use resulted in the complaint that generated the most recent enforcement activity. (SS-BE-2005.39)
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SITE INFLUENCES

Islands Trust Fund	Islands Trust mapping indicates no Islands Trust Fund properties within the vicinity of the subject property and no sensitive ecosystems are present.
Regional Conservation Strategy	Not applicable
Species at Risk	Islands Trust mapping does not indicate the presence of species at risk.
Sensitive Ecosystems	Islands Trust mapping does not indicate the presence of sensitive ecosystems.
Hazard Areas	Islands Trust mapping does not indicate the presence of hazardous areas.
Archaeological Sites	N/A. The proposal will not result in additional development.
Climate Change Adaptation and Mitigation	The application does not address climate change. It is not located in proximity to a riparian area or the shoreline. The property is about 2.5 km to the nearest transit stop (about a 31 minute walk or 8 minute cycle).
Shoreline Classification	Not Applicable
Shoreline Data in TAPIS	Not applicable

ATTACHMENT #2 – POLICIES

ISLANDS TRUST POLICY STATEMENT

ITPS Policy
<p>4.4.2 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, address measures that ensure:</p> <ul style="list-style-type: none"> • neither the density nor intensity of land use is increased in areas which are known to have a problem with the quality or quantity of the supply of freshwater, • water quality is maintained, and • existing, anticipated and seasonal demands for water are considered and allowed for.
<p>5.2.3 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, address policies related to the aesthetic, environmental and social impacts of development.</p>
<p>5.2.4 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, address any potential growth rate and strategies for growth management that ensure that land use is compatible with preservation and protection of the environment, natural amenities, resources and community character.</p>
<p>5.2.5 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, address means for achieving efficient use of the land base without exceeding any density limits defined in their official community plans.</p>
<p>5.8.6 Local trust committees and island municipalities shall, in their official community plans and regulatory bylaws, address their community's current and projected housing requirements and the long-term needs for educational, institutional, community and health-related facilities and services, as well as the cultural and recreational facilities and services.</p>

If the Local Trust Committee resolves to proceed with the application, staff will follow up with a report analysing compliance with the Policy Statement and the Directives Only Checklist in accordance with Section 1.9 of the "Policy Statement Implementation" portion of the Islands Trust Policy and Procedures Manual.

SALT SPRING ISLAND OFFICIAL COMMUNITY PLAN BYLAW 434, 2008

OCP Objective/Policy	Complies	Planner Comments
A.6.2.2 The LTC will consider the energy attributes and climate change adaptation and mitigation impacts in all rezoning applications that propose an increase in density or significant change of use.	No	The applicant has not submitted any proposals to mitigate greenhouse emissions, such as energy efficiency upgrades. Aside from potential reduction in groundwater supply, staff consider the property to be at low risk of climate change impacts.
A.6.2.5 The LTC will consider supporting rezoning applications for affordable housing that incorporate climate change mitigation and adaptation measures such as energy efficient features and shared facilities, such as co-housing.	No	The applicant has not submitted any proposals to address climate change.
B.2.1.1.2 To develop zoning that allows many different types of housing and accommodates a diverse population.	Yes	The proposed dwelling unit would add to the supply of housing on the island. Through a housing agreement, the second dwelling may meet the OCP's definition of affordable housing, which is defined as "rental or owned housing that can be acquired with 30 per cent of the

OCP Objective/Policy	Complies	Planner Comments
		median gross income of families or individuals on Salt Spring Island.”
B.2.2.1.1 To provide opportunities for the creation of affordable, rental and special needs housing.	Yes	The application proposes to create affordable housing and enter into an affordable housing agreement requiring that the second dwelling unit be maintained as affordable housing in perpetuity.
<p>B.2.2.2.3 All rezoning applications for affordable housing projects should include evidence of:</p> <p>a. need for housing</p> <p>b. an adequate water supply for potability and for fire protection</p> <p>c. means of sewage disposal</p> <p>d. energy and water efficient design</p> <p>e. not degrading a sensitive ecosystem</p> <p>f. not being sited in an area subject to hazardous conditions</p>	<p>a. yes</p> <p>b. yes</p> <p>c. yes</p> <p>d. no</p> <p>e. yes</p> <p>f. yes</p>	<p>a. The Salt Spring Island Affordable Housing Needs Assessment (IWAV 2015) identifies that “there is an ongoing critical need for almost all types of affordable housing for low to moderate income households.”</p> <p>b. The applicant has submitted two letters from Steven M. Carballeira, P.Geo., dated June 5, 2018 and August 31, 2018, stating that “the well can provide sufficient water for [both dwelling units].”</p> <p>c. The applicant has submitted a letter from Cormac Nolan, P.Eng., dated May 22, 2018, indicating that “both dwellings...have a septic system that meets the design intent of the Building Code.”</p> <p>d. Energy and water efficient design (TBA) – require low-flow plumbing fixtures and energy efficient appliances</p> <p>e. The subject lands are not within a sensitive ecosystem area.</p> <p>f. The lands are not subject to hazardous conditions.</p>
B.2.5.2.2 Zones within the Rural Neighbourhoods Designation will continue to allow medium density residential development and other rural uses allowed by existing zoning..... Existing zones that allow higher densities, smaller lots and multifamily use will also remain.	Yes	The proposed rezoning would result in a residential density on the subject property of approximately one dwelling per 0.5 hectare, which is consistent with the OCP’s definition of medium density as where the density of dwellings is between one per 0.10 ha and one per 2 ha. The proposed second dwelling is not allowed by existing zoning.
C.2.2.2.15 When considering rezoning applications, the LTC should ensure that the proposed zoning change supports the development of non-automotive transportation and public service.	No	The subject property not served by public transit, is 10 km from the Ganges core (2 hours walking; 30 min. cycling). Therefore, staff consider that the rezoning does not support the development of non-automotive transportation and public service.
C.3.3.2.2 When considering rezoning applications, the LTC should consider the impacts of the proposed new use on existing wells, springs, or other water supplies. If the proposed use is expected to need more water than the uses already allowed on the property, then the Committee should ask for evidence that wells or other water supplies in the neighbourhood would not be depleted. The Committee should also consider whether water use would affect agricultural activities or deplete springs necessary to maintain fish habitat. Should a zoning change be proposed where groundwater supplies are not adequate, the applicant could be encouraged to find	No	<p>The applicant has submitted letters from Steven M. Carballeira, P.Geo., dated June 5, 2018 and August 31, 2018, stating that “the well can provide sufficient water for [both dwelling units].”</p> <p>Staff consider that the reports do not provide suitable evidence that wells would not be depleted and that water use would not affect agricultural activities. Further analysis and discussion is provided in the body of the Staff Report.</p>

OCP Objective/Policy	Complies	Planner Comments
other means of supplying water. Rainwater catchment or a water conservation program could be considered.		
C.3.3.2.8 All users that rely on groundwater are encouraged to conserve water.	No	The applicant has not proposed any water conservation measures.

ATTACHMENT #3 – PHOTOGRAPHS



Figure 1: Front of secondary dwelling unit From Mariko Pl



Figure 2: Rear of secondary dwelling unit



Figure 3: Driveway to main house from North End Road



Figure 2: Accessory Building



Figure 5: Main House on Property



3060 Lake Road, Denman Island, BC V0R 1T0
Tel : (250) 335-1864 Fax: (250) 335-1846
Email: envh2o@island.net

June 5, 2018

H₂O File: 18-43

Robyn Kelln

**Re: Water Quality Evaluation - Drilled Well
Well Tag # 44431, 2188 North End Road**

Introduction

H₂O Environmental Ltd. (H₂O) was retained by you, the property owner, to conduct a groundwater quality evaluation for the on-site well at the above referenced property (Site). This letter report covers the analytical results of the well sampling completed by others.

A sample of the well water was submitted by Streamline Plumbing to MB Labs Ltd. on May 23, 2018, for general drinking water parameters listed under the Guidelines for Canadian Drinking Water Quality (GCDWQ) documentation.

Two different types of parameters, aesthetic objectives and health related guidelines, are outlined in the CDWQG. The aesthetic objectives are not health related in that they are concerned with taste, color, amount of suspended solids, etc. These are subjective parameters with suggested allowable concentrations but tolerances will vary according to individual preferences. Treatment of these parameters is optional and left to the homeowner, if desired.

The health related parameters are associated with maximum allowable concentrations (MAC). The MACs for substances are set by the Canadian government and are considered to be the highest levels at which those substances can be consumed over long time periods without adverse effects. Substances with concentrations found to be over the associated MAC must be treated to safe levels.

The definition of “potable” from the Oxford English Dictionary is “drinkable”, which H₂O interprets to mean that concentrations of health related parameters are at or below the concentrations listed in the CDWQG and will not cause harm to the user. Additionally, potability is assumed to be at the tap, not necessarily in the well.

Analytical Results

Health Related Analytes

All health related parameters were found to be within CDWQG acceptable concentrations.

Aesthetic Related Analytes

All aesthetic related parameters, with the exception of manganese, were found to be within CDWQG acceptable concentrations.

Discussion and Treatment

Manganese is a common element in rocks. It can stain fixtures or create a metallic taste in the water.

Commonly available water softeners can reduce the levels of manganese to within the CDWQG concentrations.

Conclusions

All health related parameters were found to be within CDWQG acceptable concentrations in this well.

Elevated manganese concentrations were found to be present in the water sample. This can be easily reduced by an inexpensive water softener.

Closure

This report has been prepared by H₂O exclusively for the property owner and Islands Trust and is intended to provide an evaluation of the analytical results of laboratory testing of a groundwater sample collected from the well #44431 at 2188 North End Road on Salt Spring Island.

Evaluation and conclusions do not preclude the existence of substances other than those identified herein. No other warranty, expressed or implied, is made. Any use which a third party makes of this report, or any reliance on or decisions to be made or actions based on it, are the responsibility of such third parties. H₂O accepts no responsibility for damages, if any, suffered by a third party as a result of decisions made or actions based on this report.

We appreciate the opportunity to provide our services to you. Please do not hesitate to call if you have any questions or comments concerning this report.

Sincerely,
H₂O Environmental Ltd.

Per: 

Steven M. Carballeira, P. Geo.

Attachments:
Laboratory results

Client/Code

Streamline Plumbing
1650 Fulford-Ganges Rd
Salt Spring Island, BC
V8K 2A8

Date 24May18 1:25p
Source Well
Type of Sample water
No. of Samples 1

No. W140338

TEL: (250) 653-2026

streamlineplumbing@shaw.ca

Comments Arrival temp.: 10.0C

Sample: Robyn Kellin

Site Code	Date	Time	CFU/100 ml		CFU/100 ml		CFU/100 ml
			TC	T-NC	FC	F-NC	E.coli
Well Tag 44431 2188 North End Rd, SSI	23May18		0	0	0	0	0

TC = total coliform bacteria

FC = fecal coliform bacteria (aka thermotolerant coliforms)

NC = non-coliform bacteria

CFU/100 ml = colony forming units per 100 milli-litres

Results may be adversely affected if samples are submitted to the laboratory more than 24 to 30 hours after collection.

E. coli = Escherichia coli, FDA/BAM 8th ed, 1995 + Revision A, 1998

Bergey's Manual of Systematic Bacteriology vol 1, AOAC 1984; J.Clin.Micro.,
J.Intern.Systm.Bact.

Comments:

For Interpretation of Results:

Total or Fecal Coliforms present greater than 0 CFU/100mL (0 CFU/mL):

IF Coliform numbers exceed safe limits for drinking water-
water is not suitable for drinking without treatment.

Total Non-coliform bacteria (=Lactose Fermentors) equal to or greater than
200 CFU/100mL (2.0 CFU/mL):

IF the number of organisms present exceed recommended guidelines for
drinking water; treatment is strongly recommended.

- see following page for chemistry results -

M. Milholm
Microbiologist

W. Riggs
Sr. Microbiologist



Client/Code

Streamline Plumbing
1650 Fulford-Ganges Rd
Salt Spring Island, BC
V8K 2A8

Date 24May18 1:25p
Source Well
Type of Sample water
No. of Samples 1

No. W140338 pg2

TEL: (250) 653-2026

CommentsArrival temp.: 10.0C

streamlineplumbing@shaw.ca

Sample: Robyn Kelln - Well Tag 44431; 2188 North End Rd, SSI 23May18

ELEMENTS		SAMPLE	UNITS	Maximum Limits Permissible In Drinking Water*
1) Aluminium	Al	0.203	mg/L	no limit listed
2) Antimony	Sb	<0.500	ug/L	6.00 ug/L
3) Arsenic	As	<0.500	ug/L	10.0 ug/L
4) Barium	Ba	0.070	mg/L	1.00 mg/L
5) Beryllium	Be	<0.003	mg/L	no limit listed
6) Boron	B	0.698	mg/L	5.00 mg/L
7) Cadmium	Cd	<0.100	ug/L	5.00 ug/L
8) Calcium	Ca	15.0	mg/L	200 mg/L
9) Chromium	Cr	<0.010	mg/L	0.050 mg/L
10) Cobalt	Co	<0.020	mg/L	no limit listed
11) Copper	Cu	<0.008	mg/L	1.00 mg/L
12) Gold	Au	<0.040	mg/L	no limit listed
13) Iron	Fe	0.106	mg/L	0.300 mg/L
14) Lanthanum	La	<0.020	mg/L	no limit listed
15) Lead	Pb	<0.500	ug/L	10.0 ug/L
16) Magnesium	Mg	2.39	mg/L	50.0 mg/L
17) Manganese	Mn	0.101	mg/L	0.050 mg/L
18) Molybdenum	Mo	<0.020	mg/L	no limit listed
19) Nickel	Ni	<0.050	mg/L	no limit listed
20) Phosphorus	P	0.184	mg/L	no limit listed
21) Potassium	K	1.10	mg/L	no limit listed
22) Scandium	Sc	<0.050	mg/L	no limit listed
23) Silicon	Si	8.02	mg/L	no limit listed
24) Silver	Ag	<0.010	mg/L	0.050 mg/L
25) Sodium	Na	132	mg/L	200 mg/L
26) Strontium	Sr	0.596	mg/L	no limit listed
27) Titanium	Ti	<0.010	mg/L	no limit listed
28) Tungsten	W	<0.050	mg/L	no limit listed
29) Vanadium	V	<0.010	mg/L	no limit listed
30) Zinc	Zn	<0.001	mg/L	5.00 mg/L
Hardness (mg/L CaCO ₃)		47.3	mg/L	0-75 mg/L = soft
pH		7.41	units	6.5 to 8.5

* As per Canadian or B.C. Health Act Safe Drinking Water Regulation BC Reg 230/92,
& 390 Sch 120, 2001. Task Force of Canadian Council of Resource & Envir. Ministers
Guidelines for Canadian Drinking Water Quality, 2014.

Comments:

Manganese: not considered to be toxic; high amounts of Manganese can cause staining
of laundry, porcelain and plumbing fixtures; may produce an undesirable taste.



R. Bilodeau
Analytical Chemist

H. Hartmann
Sr. Analytical Chemist

Client/Code

Streamline Plumbing
1650 Fulford-Ganges Rd
Salt Spring Island, BC
V8K 2A6

Date 24May18 1:25p
Source Well
Type of Sample water
No. of Samples 1

No. W140338 pg3

TEL: (250) 653-2026

streamlineplumbing@shaw.ca

Comments Arrival temp.: 10.0C

Sample: Robyn Kellin - 2188 North End Rd. SSI

SAMPLE	DATE	TIME	Alkalinity (mg/L)	Cl ⁻ (mg/L)	Cl ₂ (mg/L)	E.C. (uS/cm)	F ⁻ (mg/L)
Well Tag 44431	23May18		310	31.4	0.280	703	0.376
Lab Blank			ND	ND	ND	ND	ND
S _o			0.100	0.015	0.015	0.300	0.007
REF. VALUE			100	100	0.200	147	1.00
STD ± 2SD			107 ± 8.72	99.6 ± 6.92	0.206 ± 0.016	152 ± 14.0	1.02 ± 0.085

SAMPLE	DATE	TIME	NO ₃ -N (ug/L)	NO ₂ -N (ug/L)	TPD ₄ ³⁻⁻ -P (ug/L)	SO ₄ ²⁻ (mg/L)	TDS (mg/L)
Well Tag 44431	23May18		62.7	11.1	41.3	19.2	408
Lab Blank			ND	ND	ND	ND	ND
S _o			0.160	0.300	0.150	0.075	0.700
REF. VALUE			100	100	25.0	10.0	200
STD ± 2SD			98.5 ± 9.01	95.4 ± 10.1	25.3 ± 1.84	10.1 ± 0.813	196 ± 16.8

SAMPLE	DATE	TIME	Turbidity (NTU)	UVI (%)
Well Tag 44431	23May18		6.93	90.5
Lab Blank			ND	ND
S _o			0.015	0.003
REF. VALUE			5.00	90.0
STD ± 2SD			4.88 ± 0.410	90.1 ± 0.105

SD = standard deviation

STD = secondary standard calibrated to primary standard reference material

S_o = standard deviation at zero analyte concentration; method detection limit is generally considered to be 3x S_o value

ND = none detected n/a = not applicable

R. Bilodeau
Analytical Chemist

H. Hartmann
Sr. Analytical Chemist





July 8, 2018

Robyn Kell

Via Email:

**RE: ENVIRONMENTAL ASSESSMENT
2188 NORTH END ROAD, SALT SPRING ISLAND**

1.0 INTRODUCTION AND BACKGROUND

Aquaparian Environmental Consulting Ltd (Aquaparian) was retained by Robyn Kelln to provide Environmental Assessment services for the property at 2188 North End Road on Salt Spring Island, BC. The legal description of the property is as follows:

- Lot 3, Section 7, Range 1 North, North Salt Spring Island, Cowichan District, Plan 34166.

The subject parcel is developed with a single-family residence and secondary small cabin and is currently zoned Rural (R). As understood, a rezoning application is being submitted with the Salt Spring Island Trust to bring the current legally non-conforming secondary cabin into legal conformity for parcels under three acres. The 25 year-old cabin was constructed under Covenant EF117631. A private well located on the property provides water supply to the main residence and secondary cabin.

Under Section C.3.3.2.2 of the Salt Spring Island Official Community Plan Bylaw No. 434, "when considering rezoning applications, the Local Trust Committee should consider the impacts of the proposed new use on existing wells, springs, or other water supplies. If the proposed use is expected to need more water than the uses already allowed on the property, then the Committee should ask for evidence that wells or other water supplies in the neighbourhood would not be depleted. The Committee should also consider whether water use would affect agricultural activities or deplete any springs necessary to maintain fish habitat" (as requested by Susan Palmer; Islands Trust).

This report is intended to assess the presence or absence of any surface watercourses/waterbodies and drainages on the subject property and within the area that may be impacted by the use of the existing well. This letter report should be submitted in conjunction

with the hydrologist report that is required by the Local Trust Committee to assess any potential impacts on neighbouring wells, fish habitat and/or agricultural activity for rezoning applications.

A site location map is included with this report as Figure 1 and a site plan is included as Figure 2. A map of surface drainages has been included as Figure 3. A selection of photos taken by Aquaparian during the site survey completed on July 5, 2018 are included in Appendix A.

2.0 RESULTS

The rectangular-shaped parcel is approximately 2.5 acres. The parcel is developed with a single-family residence and garage with a shed at the back of the lawn area and a small cabin (approximately 83m²) in the southern corner of the lot facing Mariko Place. The in-ground septic field for the main residence is behind the house and the septic field for the cabin is to the east of the cabin. The property's original well was decommissioned several years due to its proximity to the septic field. The well in current use is located adjacent to the driveway near the access to North End Road.

The developed portion of the lot is surrounded by undeveloped second-growth forest. The tree canopy is comprised of Douglas fir (*Pseudotsuga menziesii*), western redcedar (*Thuja plicata*), bigleaf maple (*Acer macrophyllum*), red alder (*Alnus rubra*) and arbutus (*Arbutus menziesii*). The understory is dominated by oceanspray (*Holodiscus discolor*), snowberry (*Symphoricarpos albus*), nootka rose (*Rosa nutkana*), red huckleberry (*Vaccinium parvifolium*), willow, bracken fern (*Pteridium aquilinum*), sword fern (*Polystichum munitum*), salal (*Gaultheria shallon*), dull-Oregon grape (*Mahonia nervosa*), tall Oregon grape (*Mahonia aquifolium*), thimbleberry (*Rubus parviflorus*), western trumpet honeysuckle (*Lonicera ciliosa*) and trailing blackberry (*Rubus ursinus*). Invasive species include Himalayan blackberry (*Rubus armeniacus*), English holly (*Ilex aquifolium*), Scotch broom (*Cytisus scoparius*) and bamboo.

A small wet depression (approximately 10m x 10m) exists in the forested eastern corner of the site near the intersection of North End Road and Mariko Place. The soils within the depression were moist at the time of the assessment and the vegetation was comprised of red alder, sword fern, slough sedge (*Carex obnupta*), common rush (*Juncus effusus*), Indian plum (*Oemleria cerasiformis*), skunk cabbage (*Symplocarpus foetidus*), water parsley (*Oenanthe sarmentosa*) and giant vetch (*Vicia nigricans*).

The topography of the site is gently rolling with a general slope towards the ocean in the east. The soils are well-drained sandy loam. No sensitive eagle or heron nests were identified within the property.

The wet depression is a topographic low point within the property and likely a groundwater seepage area that drains into the Mariko Place ditch on the north side of the road, which then

drains east to the ditch along North End Road. The North End Road ditch on the southwest side of the road flows southeast for approximately 210m before it meets a culvert under North End Road that drains east into residential properties. The culvert appears to drain along North End Road to a tributary of McFadden Creek located at 2085 North End Road. The tributary flows northeast to the confluence with McFadden Creek south of North Beach Road.

The wet depression on the subject property does **not** provide fish habitat and drains into a ditch system that was installed in the community decades ago to collect stormwater runoff. No watercourses are present on the subject property and the closest watercourse is approximately 340m to the southeast of the property which is a true tributary to McFadden Creek. The surrounding properties are also considered rural residential. The nearest agricultural field appears to be approximately 300m to the northeast.

3.0 CONCLUSION

Aquaparian was retained to complete an assessment of surface watercourses and drainages within the subject property in support of a rezoning application with the Salt Spring Island Land Trust. This letter report is to be submitted in conjunction with a hydrologist report to determine the potential impacts of a private well use on neighbouring wells, on fish habitat and/or agricultural activity. No surface watercourses/waterbodies were found within the area that would be impacted by well use within the subject property.

Aquaparian trusts that the information provided in this report meets your requirements. Any questions regarding information provided in this document, please contact the undersigned at (250) 591-2258.

Sincerely,

AQUAPARIAN ENVIRONMENTAL CONSULTING LTD

Prepared by:

Reviewed/Revised by:



Crystal Campbell
Environmental Technician

Chris Zamora B.Sc., R.P.Bio
Biologist/Principal

\\AQUAPARIAN-NAS\Documents\Projects\Projects\N421 2188 North End Rd Saltspring\North End Road EA Letter Report.docx



203-321 Wallace Street, Nanaimo, BC V9R 5B6
SARAH BONAR 250-714-8446 CHRIS ZAMORA 250-714-8864

FIGURE 1
SITE LOCATION MAP

Figure 1. Site Location Map
2188 North End Road, Salt Spring Island, BC

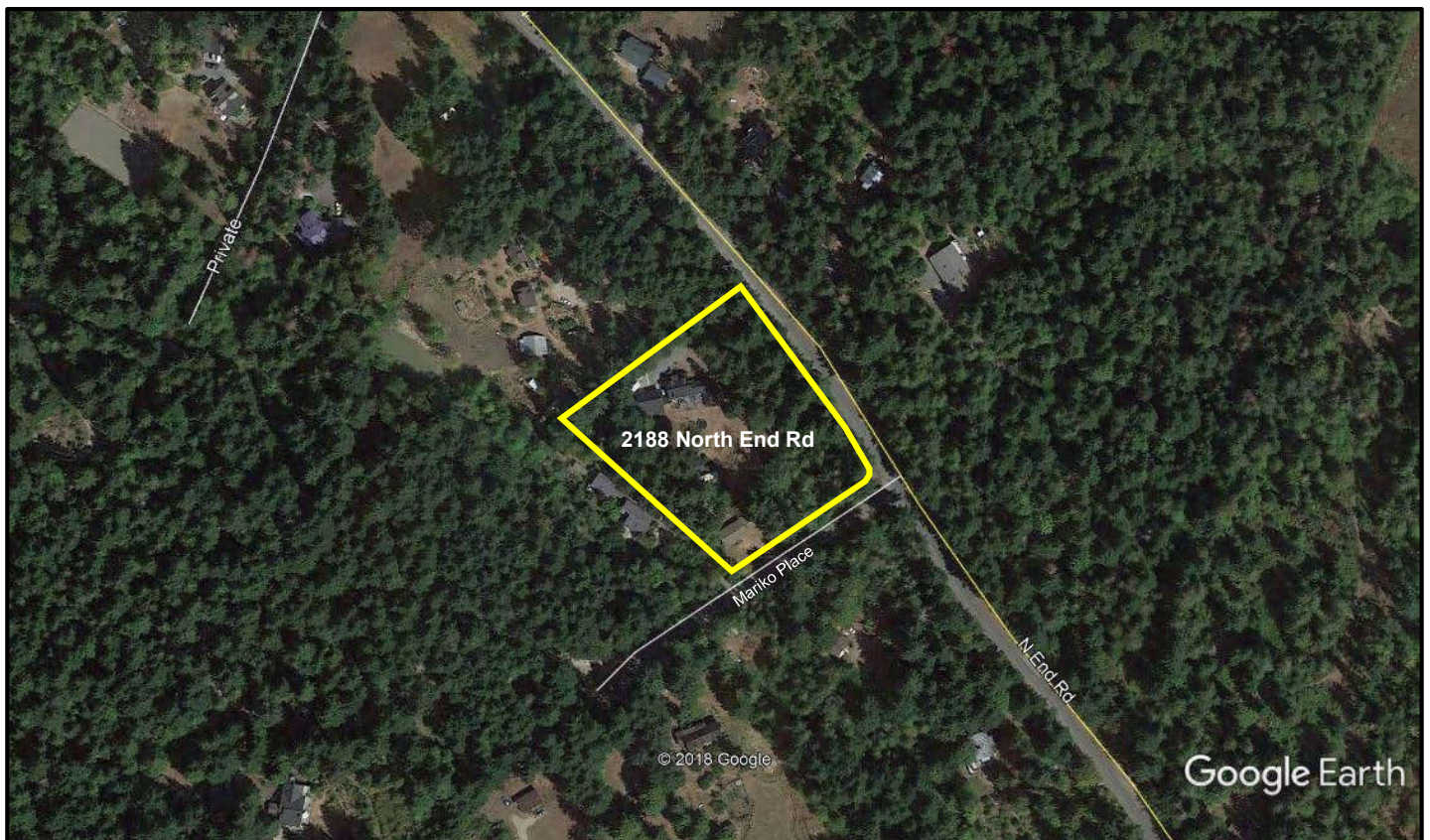
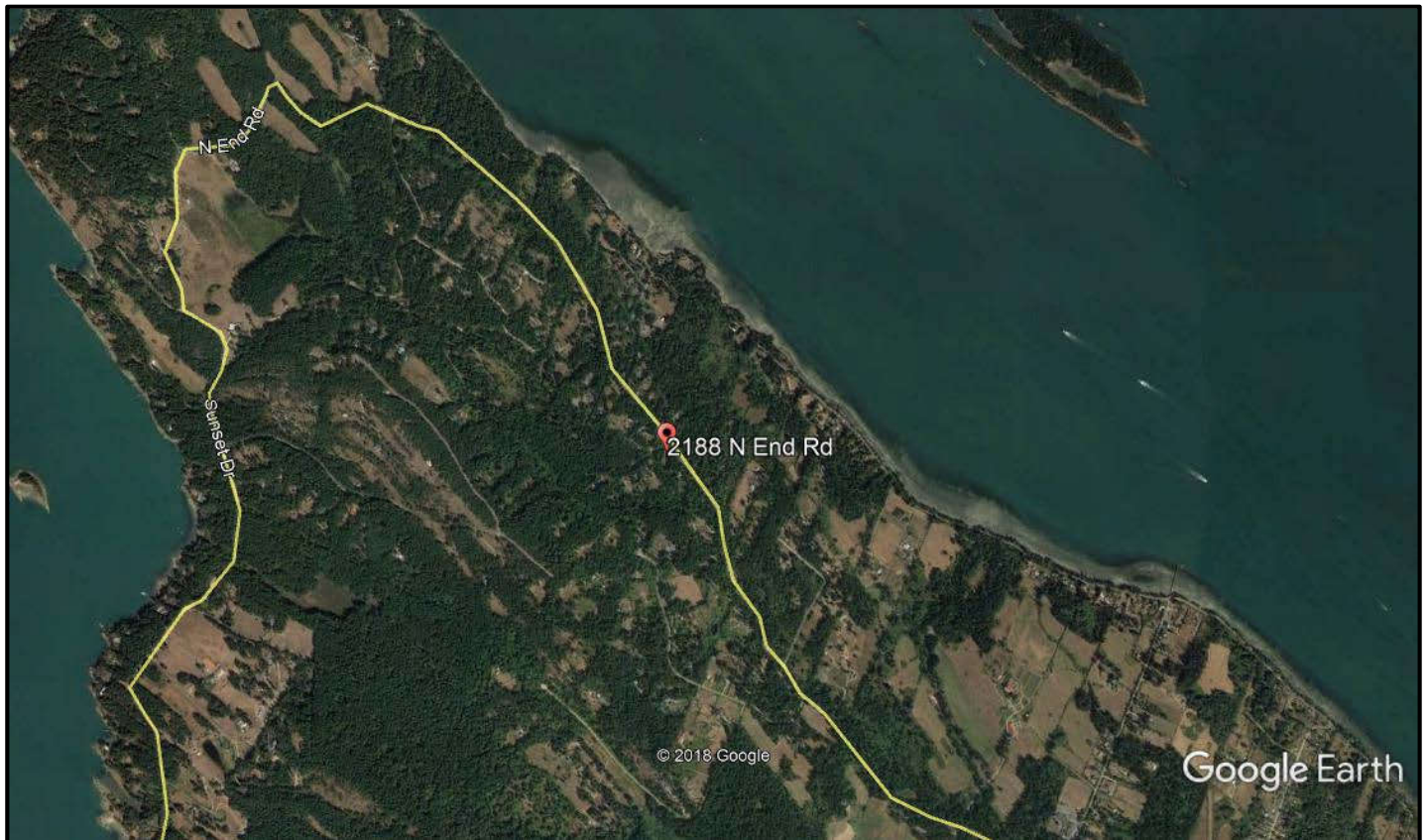


FIGURE 2
SITE PLAN

Figure 2. Site Plan

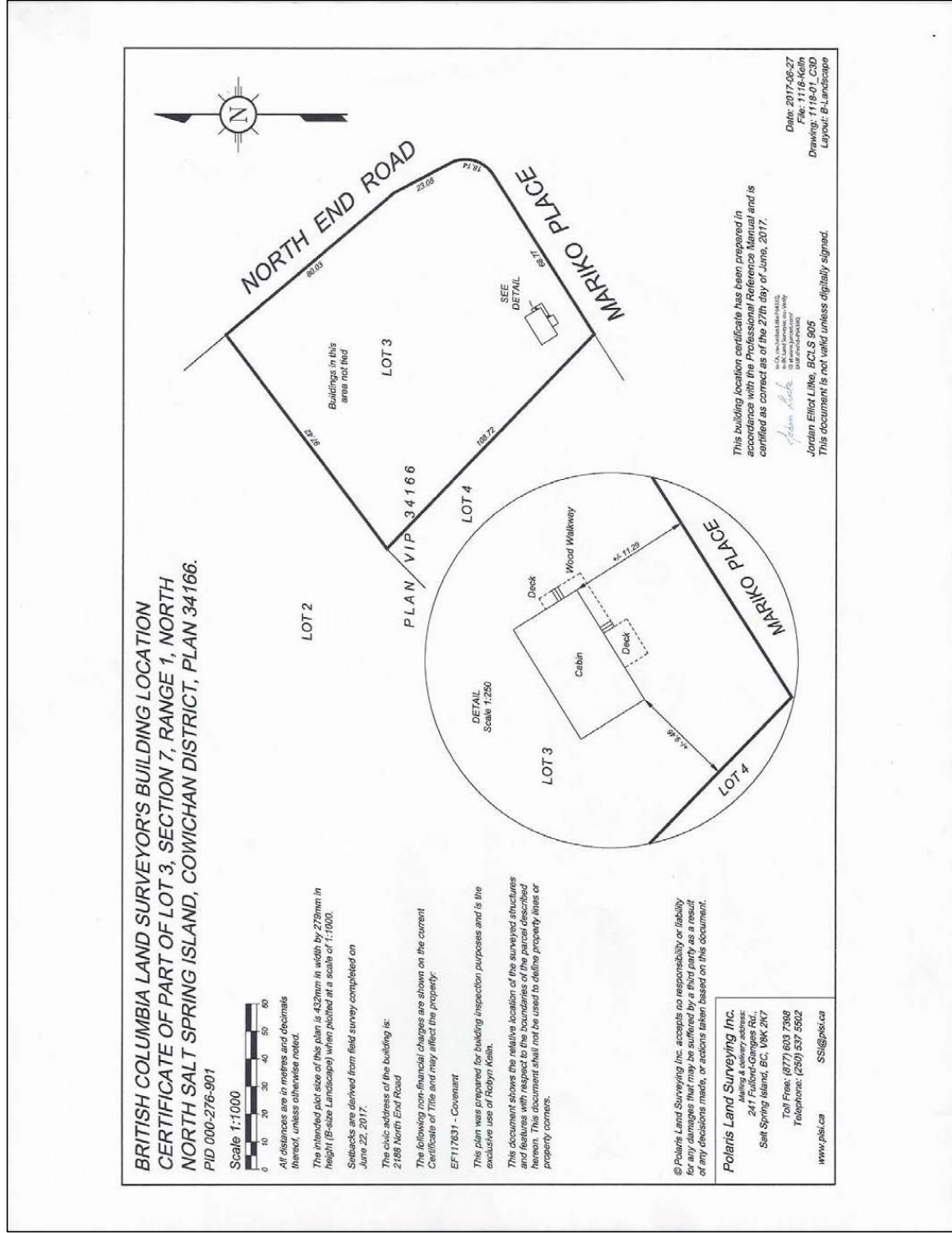
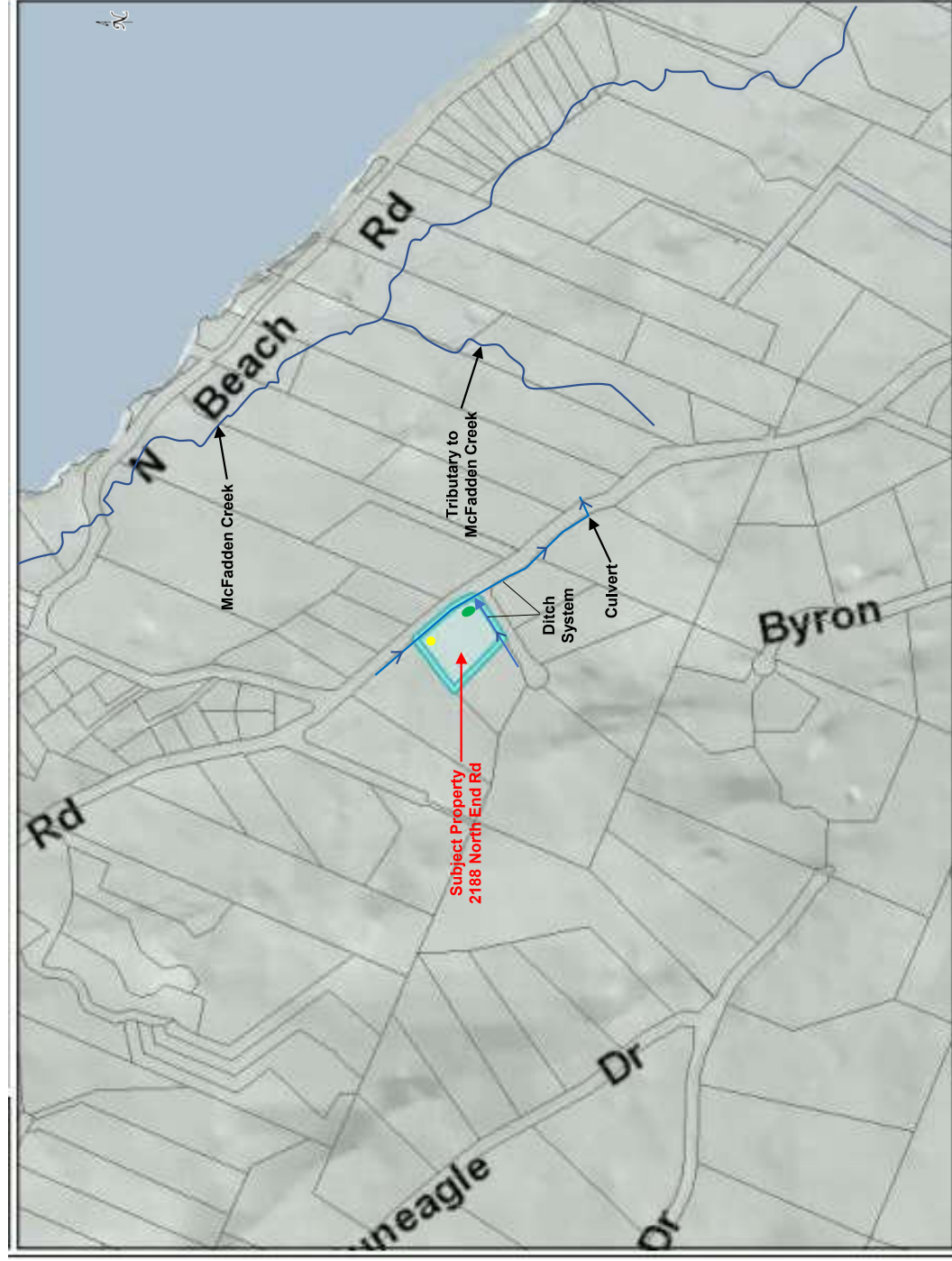


FIGURE 3
SURFACE DRAINAGE MAP

Figure 3. Surface Drainage Map
2188 North End Road, Salt Spring Island



APPENDIX A

SITE PHOTOGRAPHS

2188 North End Road, Salt Spring Island, BC
Photo Sheet 1



Photo 1. Showing the front of the main single-family residence of the property at 2188 North End Road, Salt Spring Island.



Photo 2. The backyard of the main residence where the septic field is located. A shed is located to the left of the photo. The property's original well was decommissioned in the middle of the lawn.



Photo 3. Showing the front of the secondary residence (small cabin) on the subject property that will be using the water supply from the well. The cabin fronts onto Mariko Place.



Photo 4. The water well is located in the pump house shown adjacent to the driveway that accesses North End Road.



Photo 5. Showing the second-growth forest located along North End Road with a tree canopy dominated by Douglas fir, western redcedar, red alder and arbutus.



Photo 6. Showing the vegetated portion of the property along the southwest border. A split rail fence runs along the driveway.



Photo 7. Showing the wet depression within the forested eastern corner of the lot near the intersection of North End Road and Mariko Place. Slough sedge, common rush, skunk cabbage and water parsley wetland vegetation is present in the small depression.



Photo 8. The wet depression drains south into the ditch system along Mariko Place which drains east to the North End Road ditch system.



Photo 9. Showing the Mariko Road ditch on the left side of the road flowing east towards North End Road.



Photo 10. The ditch along the southwest side of North End Road flows southeast across the driveway of the subject property.



Photo 11. Showing McFadden Creek and the inflow of the culvert the spans under North Beach Road 530m north of the subject parcel. McFadden Creek flows through residential and commercial properties along the south side of North Beach Road.



Photo 12. The outflow of the culvert for McFadden Creek under North Beach Road.

Islands Trust

May 22, 2018

Salt Spring Island, BC

TO: Karol Kudyba


RE: 2188 North End Road, Salt Spring Island, BC
Lot 3, Sec 7, Range 1, N. Salt Spring Island, Cowichan District Plan 34165
SEPTIC SYSTEM

We are writing this letter in reference to the requirements for a rezoning application. We confirm, that based on our site observations and in our opinion, both dwellings located at 2188 North End Road and 108 Mariko Place (Lot 3, Range 1, North Salt Spring Island, CDP 34165), have a septic system that meets the design intent of the Building Code.

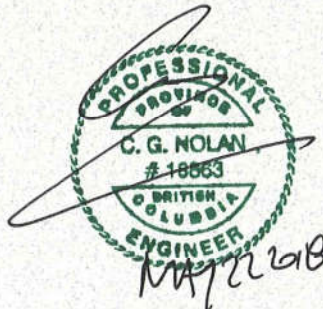
Please note that Core Group Civil Consultants Ltd did not provide design or construction monitoring services for the installation of these systems and our opinion is solely based on our field observations of the existing system. Please note that all unused water wells on the property should be abandoned.

We trust that this satisfies your requirements at this time.

Yours truly,
CORE GROUP CIVIL CONSULTANTS LTD



Cormac Nolan, P Eng



COMPLETE TOP SECTION ONLY

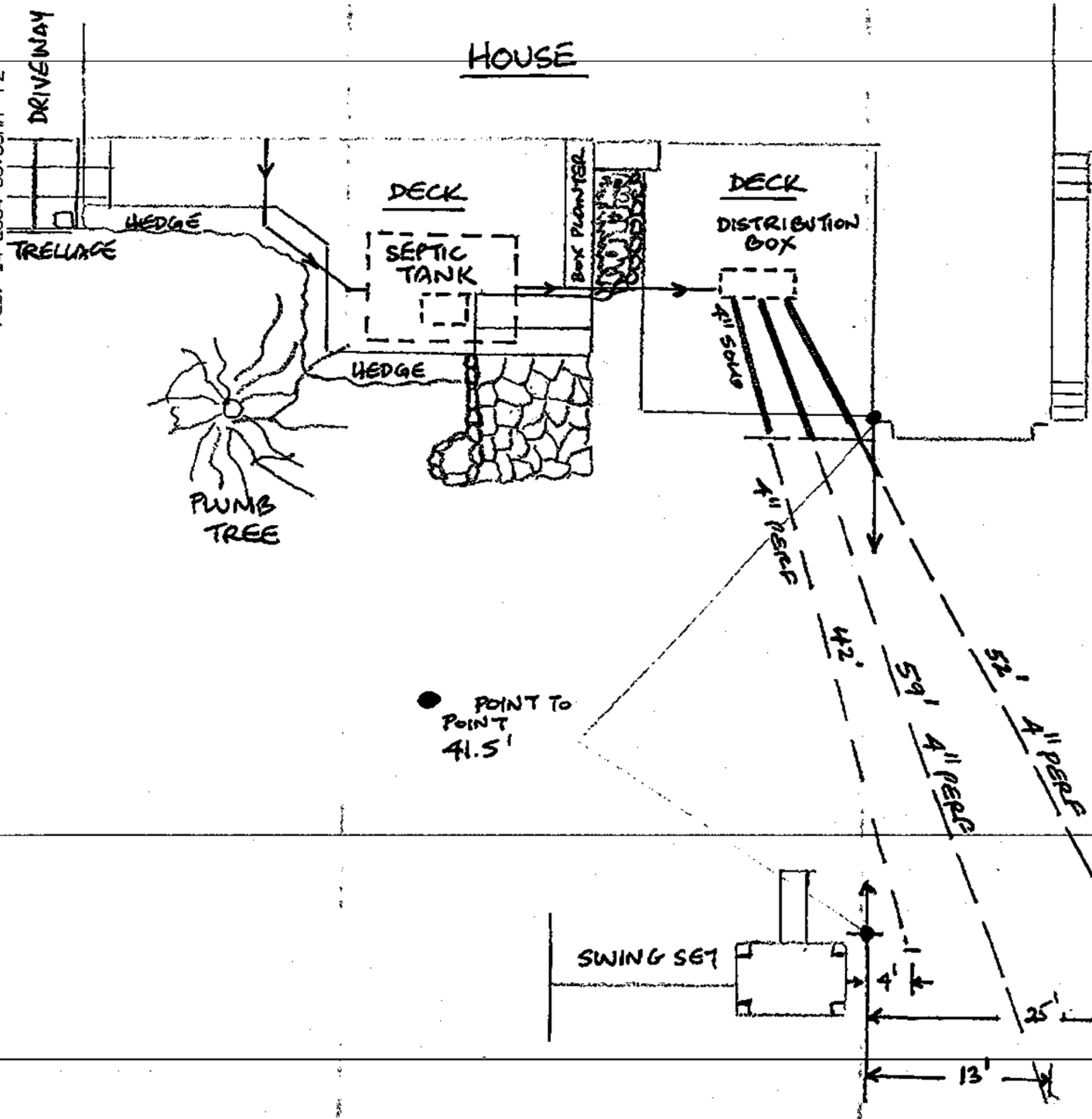
☐ NEW CONSTRUCTION☒ ALTERATION☐ REPAIR

LOT/PARCEL INFORMATION	LEGAL DESCRIPTION OF PROPOSED DISPOSAL SYSTEM LOCATION		
	PLAN 34166	LOT 3	SECTION 7
OWNER INFORMATION	STREET ADDRESS / GENERAL LOCATION 2188 N.E. RD 551		DISTRICT NSS1
	NAME SUZANNE GUINNESS		TELEPHONE NUMBER
APPLICANT INFORMATION	NAME ROBYN KEUN		TELEPHONE NUMBER
	MAILING ADDRESS BOX 299 551 V8K 2J9		POSTAL CODE
PREMISES INFORMATION	SEWAGE DISPOSAL SYSTEM WILL SERVE:		NUMBER OF BEDROOMS 3
	<input checked="" type="checkbox"/> SINGLE FAMILY DWELLING <input type="checkbox"/> DUPLEX <input type="checkbox"/> OTHER SPECIFY		GARBURATOR <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
SYSTEM INFORMATION	METHOD OF EFFLUENT DISTRIBUTION		IF PACKAGE TREATMENT PLANT IS PROPOSED
	<input checked="" type="checkbox"/> GRAVITY <input type="checkbox"/> PRESSURE <input type="checkbox"/> SERIAL <input type="checkbox"/> OTHER		MAKE
SITE INFORMATION	AREA OF LOT: 2.38 ACRES		SOURCE OF DOMESTIC WATER: WEL
	DISTANCES OF PROPOSED DISPOSAL FIELD TO SOURCES OF DOMESTIC WATER:		
RESTRICTIVE COVENANTS AND/OR EASEMENTS	ARE THERE ANY RESTRICTIVE DESIGN OR LOCATION OF THE:		WHICH WILL AFFECT THE
	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		DOCUMENTS.
APPLICANT SIGNATURE	THE INFORMATION		THE BEST OF MY KNOWLEDGE:
	SIGNATURE		DATE AUG 13/96
ATTACH THREE SCALED SITE PLANS			
PERMIT TO CONSTRUCT	PURSUANT TO THIS PERMISSION IS HEREBY GRANTED FOR THE CONSTRUCTION OF A SEWAGE DISPOSAL SYSTEM. THIS PERMIT MAY BE CANCELLED IF VARIATIONS ARE MADE TO THESE PLANS AND SPECIFICATIONS.		
CONDITIONS	Alternative method. Standard trench [24" wide x 24" deep (maximum)] (12" rock). Final system plan required.		
APPLICATION REJECTED			
REASONS			
OFFICE USE ONLY	PAID \$100		
AMOUNT	57238		
# OF RECEIPT	Aug 16/96		
DATE	W.O.		
FOLIO NUMBER	BACKFILLING AND USE AUTHORIZED <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		
FINAL	COMMENTS MAINTAIN ACCESS TO SEPTIC TANK		
	SIGNATURE M. Keun		DATE FEB 16/04

Feb. 14 2004 08:03AM P2

FAX NO. :

FROM :



GUINNESS
HOUSE
2188 NORTH END
SALTSPRING
ISLAND
SEPTIC SYSTEM
AS-BUILTS

M. Riefman
FEB 16/04

TOTAL P.02

16041219-4205



HEALTH PROTECTION & ENVIRONMENTAL SERVICES
**DECLARATION REQUEST
FOR FINAL INSPECTION OF
SEWAGE DISPOSAL SYSTEM**

**THE SEWAGE DISPOSAL SYSTEM
AT ADDRESS:**

2188 NORTH END RD SALTSPRING ISLAND BC

LEGAL DESCRIPTION:

Plan 34166 Lot 3 Section 7 District Cowichan
DISTRICT

Is ready for final inspection.

The installation has been completed in accordance with the Sewage Disposal Regulations of British Columbia, Capital Health Region Guidelines and conditions specified on the permit.

WAIVER OF INDEMNITY:

The undersigned, applicant, developer, contractor, or owner, assumes all risks or hazards incidental to health inspection services and agrees to release, dissolve, save harmless and keep indemnified the Capital Health Region and its officials, agents, servants and representatives, from and against all claims, actions, costs, expenses and demands in respect to death, injury, loss or damage to the person or property of the applicant, developer, contractor or owner, howsoever caused, arising out of or in conjunction with the health inspection services, notwithstanding that the same may have been contributed to, caused or occasioned by the negligence of the Capital Health Region, its officers, employees, officials, agents, servants and representatives. It is understood that no warranty is implied for health inspection services of the Capital Health Region and that this agreement is to be binding on my self, my heirs, executors and assigns.

DATE

NOV 18/03

SIGNATURE (OWNER/APPLICANT/INSTALLER)

CONTRACTOR/INSTALLER

DREW JORY / ROBYN KELN

PRESENT ADDRESS

TELEPHONE NUMBER

**A FINAL INSPECTION WILL NOT BE CARRIED OUT UNTIL THIS
DECLARATION IS COMPLETED AND SUBMITTED.**

DECLARATION REQUEST FOR FINAL INSPECTION OF SEWAGE DISPOSAL SYSTEM - KIRKHOFF FORM - NOVEMBER 1999

Nov. 16 2003 12:31PM PT
P.02/02

VIA SPRING HEALTH

FAX NO. :

NOV-18-2003 11:17

FROM :