



KITTITAS COUNTY COMMUNITY DEVELOPMENT SERVICES

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"Building Partnerships – Building Communities"

STAFF REPORT

ALLWEST LLC PERFORMANCE BASED CLUSTER PLAT

TO: Kittitas County Hearing Examiner
FROM: Kittitas County Community Development Services Staff
RE: Allwest LLC Performance Based Cluster Plat (CL-09-01)
DATE: December 8, 2011 Hearing

I. GENERAL INFORMATION

Requested Action: Chris Cruse, authorized agent for Allwest LLC, property owner, has applied for a performance based cluster plat to subdivide a 50.58 acre parcel into sixteen (16) one-acre lots and one 34.51 acre open space lot. The project is proposed to be served by a Group B water system and individual on-site septic systems.

Location: The subject property is one tax parcel in the Agriculture 3 zone, located north of Manastash Road, west of Midfield Drive and south of Susan Road, Ellensburg, WA in a portion of Section 7, T17N, R18E, WM, in Kittitas County. Assessor's map number: 17-18-07040-0019.

II. SITE INFORMATION

Total Project Size: 50.58 acres
Number of Lots: 16
Zoning District: Agriculture-3
Domestic Water: Group B water system
Sewage Disposal: Individual on-site septic systems
Power/Electricity: Puget Sound Energy
Fire Protection: Fire District #2 (Rural Ellensburg)
Irrigation District: Kittitas Reclamation District

Site Characteristics:

North: Residential

South: Residential

East: Vacant

West: Vacant

Access: The proposed project will have access from Manastash and Susan Road. The access road will be constructed to meet Kittitas County Road Standards. All required roadway improvements will be the responsibility of the developer. A second access route is not required.

Zoning and Development Standards: The purpose and intent of the agricultural (A-3) zone is to provide for an area where various agricultural activities and low density residential developments co-exist compatibly. The Ag-3 zone is predominately agricultural-oriented lands and it is not the intent of this section to impose further restrictions on continued agricultural activities therein.

KCC 16.09 allows for **Performance Based Cluster Platting** to assist in the implementation of Kittitas County's policy to provide tools to foster appropriate densities, while making development economically feasible, benefits to the greater community through an effort to conserve water resources by minimizing the development of exempt wells by encouraging group water systems, to protect public health by reducing the number of septic drain fields, by concentrating urban densities in urban growth areas and by minimizing the impact of "Rural Sprawl" in rural

lands, as designated in the Kittitas County Comprehensive Plan, Kittitas County finds that this "Performance Based Cluster Platting" technique would foster the development of urban and rural designated lands at appropriate densities, while protecting the environment and maintaining a high quality of life in Kittitas County. Public Benefit Rating System (PBRs) elements are items that are not already required by code. When a public benefit is demonstrated then bonus density points will apply. The density bonus is limited to use in the rural designations with a 100% bonus in the Rural -3, Agriculture -3, Rural -5 and Agriculture - 5 zones. There is no limit to density bonus within the Urban Growth Areas and the Urban Growth Nodes. A minimum of twenty five percent (25%) of the area within the project boundary must be set aside in open space prior to application of the Public Benefit Rating System contained in KCC 16.09.090.

The applicant has demonstrated the Public Benefit Rating System (PBRs) with the following elements. The Hearing Examiner can further condition these elements as necessary to meet the intent of the Ordinance for Performance Based Cluster Platting. These elements will be conditions of approval for the Allwest LLC Plat in order to qualify for the density bonus allowed through Performance Based Cluster Platting.

Element	Area	Bonus Points
Open space total	34.51 acres	0
Development Area	16.07	0
Group B water system		0
Total	50.58 acres	0 points

Total bonus density points = **0**

Calculations for project:

Current zone for project is Agriculture 3

Allowed density for the Agriculture 3 zone is 1 unit per 3 acres

Subject parcel is a total of 50.58 acres

Lots allowed under current zoning (Agriculture 3) = **50.58 acres/3acres = 16** lots

III. ADMINISTRATIVE REVIEW

Notice of Application: A complete long plat application was submitted to Community Development Services on August 15, 2011. The application was deemed complete on August 23, 2011. The Notice of Application for the preliminary plat application was issued on September 7, 2011. This notice was published in the official county paper of record and was mailed to jurisdictional government agencies, adjacent property owners and other interested parties. The last day to submit written comments was on September 22, 2011.

Posting of Site: In accordance with Kittitas County code 15A.030.110, this project was accurately posted with the "Land Use Action" sign as provided by Community Development Services. The Affidavit of Posting was signed by the applicant and returned to the planner and is included as part of the record.

IV. COMPREHENSIVE PLAN

The Kittitas County Comprehensive Plan designates the subject property as Rural. Kittitas County has established the following goals and policies to guide future housing developments. These goals and policies were developed in response to existing housing conditions and identified needs within the county, and support the County Wide Planning Policies:

GPO 3.1 Provide a sufficient number of housing units for future populations in rural areas of Kittitas County.

GPO 3.6 Provide for future populations while protecting individual property rights.

GPO 3.17 Provide a sufficient number of housing units for future populations while maintaining the rural character of Kittitas County.

GPO 3.18 Provide sufficient housing units while maintaining environmental quality.

GPO 8.5 Kittitas County recognizes and agrees with the need for continued diversity in densities and uses on Rural Lands.

GPO 8.46 Residential development in rural lands must be in areas that can support adequate private water and sewer systems.

V. ENVIRONMENTAL REVIEW

Based upon review of the submitted application materials including an environmental checklist, correspondence received during this 15 day comment period and other information on file with Community Development Services, a Determination of Non-Significance (DNS) was issued on November 10, 2011. The appeal period ended on November 29, 2011 at 5:00 p.m. No appeals were filed.

VI. AGENCY AND PUBLIC COMMENTS

Applicable agencies have been given the opportunity to review this proposal. Agency comments have been included as Exhibits in the Hearing Examiner packet.

Several public comments were submitted on this proposal which have been included as exhibits in the Hearing Examiner packet.

VII. PROJECT ANALYSIS

In review of this proposal it is important to consider the goals and policies of the comprehensive plan, applicable county code, public and agency comments, any identified environmental concerns and state and federal requirements. Identified below is planning staff's analysis and consistency review for the subject application.

Comprehensive Plan Consistency:

The proposal is consistent with the goals and policies of the Kittitas County Comprehensive Plan, including those listed above in section IV of this report. The proposed subdivision will be adequately served by rural levels of service. The lots will be served by a Group B water system and individual onsite septic systems.

Consistency with the provisions of KCC 17A Critical Areas:

Staff has conducted an administrative critical area review in accordance with KCC 17A and found small wetlands, on the subject properties.

Consistency with the provisions of KCC 16.09: Performance Based Cluster Platting Code:

The application contained all required elements necessary to review this proposal with the exception of soil logs, which will be required prior to final plat approval. All proposed lots meet the dimensional standards of KCC 17.30A for lots zoned Agriculture 3. As conditioned, this proposal is consistent with the Kittitas County Subdivision Code for Performance Based Cluster Plats.

Consistency with the provisions of KCC 16.12: Preliminary Plat Subdivision Code:

The application contained all required elements necessary to review this proposal with the exception of soil logs and water availability, which will be required prior to final plat approval. All proposed lots meet the dimensional standards of KCC 17.30A for lots zoned Agriculture 3. This proposal is consistent with the Kittitas County Code 16.12.150 in making recommendation as to the adequacy of the proposed road system, the proposed sewage

disposal and potable water supply system and fire protection facilities within the subdivision.

Consistency with the provisions of KCC Title 12: Roads and Bridges:

All roads are required to meet all Kittitas County Road Standards as outlined in the memorandum issued by the Department of Public Works prior to issuance of a building permit. As conditioned, the proposal is consistent with the provisions of KCC Title 12.

Agency Comments:

The following agencies provided comments during the comment period: Department of Ecology, Department of Health, Kittitas County Department of Public Works, Fire Marshal’s Office and Environmental Health. These comments have been included as conditions of approval to address these agency concerns.

Public Comments:

Several public comments were submitted on this proposal which have been included as exhibits in the Hearing Examiner packet.

VIII. RECOMMENDATION

As conditioned below, the application does not appear to be detrimental to the general public health, safety or welfare and meets the basic intent and criteria associated with Title 12 and Title 16.12 of the Kittitas County Code and the Kittitas County Comprehensive Plan. Staff recommends **approval** of the Allwest LLC Performance Based Cluster Plat; file number (CL-11-01), subject to the following findings of fact and conditions:

Suggested Findings of Fact

1. Chris Cruse, authorized agent for Allwest LLC property owner, has applied for a preliminary plat to subdivide a 50.58 acre parcel via a performance based cluster plat; sixteen one acre lots and one 34.51 acre lot. The project is proposed to be served by a Group B water system and individual on-site septic systems.
2. The subject property is one tax parcel in the Agriculture 3 zone, located north of Manastash Road, west of Midfield Drive and south of Susan Road, Ellensburg, WA in a portion of Section 7, T17N, R18E, WM, in Kittitas County. Assessor’s map number: 17-18-07040-0019.
3. Site Information:

Total Project Size:	50.58 acres
Number of Lots:	16
Zoning district	Agriculture 3
Domestic Water:	Group B water system
Sewage Disposal:	Individual on-site septic systems
Power/Electricity:	Puget Sound Energy
Fire Protection:	Fire District #2 (Rural Ellensburg)
Irrigation District:	Kittitas Reclamation District
4. Site Characteristics: The area is characterized as flat terrain used for agricultural purposes.
5. Surrounding Property:
 - North: Residential
 - South: Residential
 - East: Vacant
 - West: Vacant

6. The Comprehensive Plan designation is Rural.
7. The subject property is zoned Agriculture 3, which allows for one residential unit per 3 acres and one-half acres for platted cluster subdivisions served by public water and sewer systems. All subdivision lots under three acres in size must be served by public water and sewer systems (KCC 17.30.040).
8. A complete long plat application was submitted to Community Development Services on August 15, 2011. The application was deemed complete on August 23, 2011. The Notice of Application for the preliminary plat application was issued on September 7, 2011. This notice was published in the official county paper of record and was mailed to jurisdictional government agencies, adjacent property owners and other interested parties. The last day to submit written comments was on September 22, 2011.
9. In accordance with Kittitas County code 15A.030.110, this project was accurately posted with the “Land Use Action” sign as provided by Community Development Services. The Affidavit of Posting was signed by the applicant and returned to the planner and is included as part of the record.
10. Based upon review of the submitted application materials including an environmental checklist, correspondence received during this 15 day comment period and other information on file with Community Development Services, a Mitigated Determination of Non-Significance (MDNS) was issued on November 10, 2011. The appeal period ended on November 29, 2011 at 5:00 p.m. No appeals were filed.
11. The proposal is consistent with the goals and policies of the Kittitas County Comprehensive Plan. The proposed subdivision will be adequately served by rural levels of service. The lots will be served by a Group B water system and individual or community septic systems. Staff has conducted and an administrative critical area review in accordance with KCC 17A and found small wetlands on the subject properties.
12. This proposal is consistent with the Kittitas County Subdivision Code Chapter 16.09 for Performance Based Cluster Plats.
13. This proposal is consistent with the provisions of KCC 16.12:Preliminary Plat Subdivision Code: The application contained all required elements necessary to review this proposal with the exception of soil logs and water availability, which will be required prior to final plat approval. All proposed lots meet the dimensional standards of KCC 17.30A for lots zoned Agriculture 3. This proposal is consistent with the Kittitas County Code 16.12.150 in making recommendation as to the adequacy of the proposed road system, the proposed sewage disposal and potable water supply system and fire protection facilities within the subdivision.
14. All roads are required to meet all Kittitas County Road Standards as outlined in the October 3, 2011 memorandum issued by the Department of Public Works. As conditioned, the proposal is consistent with the provisions of KCC Title 12.
15. The following agencies provided comments during the comment period: Department of Ecology, Department of Health, Kittitas County Department of Public Works, Fire Marshal’s Office and Environmental Health. These comments have been included as conditions of approval to address these agency concerns

Suggested Conclusions:

1. As conditioned, the development meets the goals, policies and implementation recommendations as set forth in the Kittitas County Comprehensive Plan.

2. As conditioned, this proposal is consistent with applicable federal and state laws and regulations.
3. Public use and interest will be served by approval of this proposal.
4. As conditioned, the proposal is consistent with Kittitas County Code Title 16 Subdivision, Title 17 Zoning, Title 17A Critical Areas, Title 15 Environmental, and Title 12 Roads and Bridges.

Suggested Conditions of Approval:

1. The project shall proceed in substantial conformance with the plans and application materials which was deemed complete on August 23, 2011 except as amended by the conditions herein.
2. The applicant is responsible for compliance with all applicable local, state and federal rules and regulations, and must obtain all appropriate permits and approvals.
3. It is the responsibility of the applicant to contact the Kittitas County Assessor's and Treasurer's offices to confirm all taxes are current prior to final plat approval.
4. Soil logs need to be scheduled and dug at a mutually convenient time. The developer/owner shall provide soil logs as per Chapter 246-272 WAC or as amended. The information obtained will be recorded and placed in the plat file for future reference. The information obtained from these soil logs is for plat approval purposes only and does not constitute a site evaluation in conjunction with the issuance of a permit for any specific lot.
5. Proof of potable water must be shown prior to final plat approval.
6. A plat note discussing the spread of noxious weeds shall be shown on the plat and shall read: "Per RCW 17.10.140 Landowners are responsible for controlling and preventing the spread of noxious weeds, accordingly, the Kittitas County Noxious Weed Board recommends immediate reseeding of areas disturbed by development to preclude the proliferation of noxious weeds."

Platting Standards and Zoning Code:

1. Certificate of Title: A certificate of title of the property proposed to be platted shall be submitted with the final plat.
2. Lot Closures: It is the responsibility of the Professional Licensed Surveyor (PLS) to ensure the lot closures are correct and accurate.
3. Conditions, Covenants, and Restrictions: Prior to final plat approval, a copy of the proposed final Conditions, Covenants, and Restrictions shall be submitted to Community Development Services for review and approval.
4. Open Space Tracts: Prior to final plat approval, all areas not included in development lots shall be labeled as individual tracts. Tracts shall not be further subdivided or altered. All tracts, except the tract(s) containing the private road area, shall be labeled "Open Space."
5. Open Space Tract Ownership and Maintenance: Open space tracts shall be jointly owned and maintained by the developer or legally responsible owner or homeowner's association or other legal entity made up of all benefited property owners.

Stormwater and Drainage

6. This project will require a NPDES Construction Stormwater General Permit from the Washington State Department of Ecology. This permit requires that the SEPA checklist fully disclose anticipated activities, including building, road construction, and utility placements. Obtaining a permit is at least a 38 day process and may take up to 60 days if the original SEPA does not disclose all proposed activities.
7. The NPDES permit requires that a Stormwater Pollution Prevention Plan (Erosion Sediment Control Plan) is prepared and implemented for all permitted construction sites. These control measures must be able to prevent soil from being carried into surface water (this includes storm drains) by stormwater runoff. Permit coverage and erosion control measures must be in place prior to any clearing, grading, or construction.
8. Erosion control measures must be in place prior to any clearing, grading or construction. These control measures must be effective to prevent soil from being carried into surface water by storm water runoff. Sand, silt, and soil will damage aquatic habitat and are considered pollutants.
9. Any discharge of sediment-laden runoff or other pollutants to waters of the state is in violation of Chapter 90.48, Water Pollution Control, and WAC 173-201A, Water Quality Standards for Surface Waters of the State of Washington, and is subject to enforcement action.
10. Best management practices must be used to prevent any sediment, oil, gas, or other pollutants from entering surface or ground water.

Transportation and Infrastructure

Timing of Improvements: This application is subject to the latest revision of the Kittitas County Road Standards, dated 9/6/05. The following conditions apply and must be completed prior to the issuance of a building permit for any of the structures within this plat. A Performance Bond or acceptable financial guarantee may be used, in lieu of the required improvements, per the conditions outlined in the current Kittitas County Road Standards.

Private Road Certification: Private roads serving any of the lots within this development shall be inspected and certified by a licensed professional engineer for conformance with current Kittitas County Road Standards, 9/6/05 edition. Kittitas County Public Works shall require this road certification to be completed prior to the issuance of a building permit for any of the structures within the proposed plat.

Road Name: Midfield Drive shall be labeled on the final plat.

Private Road Improvements – Midfield Drive: Access from Manastash Road to the final cul-de-sac shall be constructed to meet or exceed the conditions of a High-Density Private Road that serves 15-40 tax parcels. See current Kittitas County Road Standards, 9/6/05 edition.

- a. Access easements shall be a minimum of 60' wide. The roadway shall have a minimum width of 22', with 1' shoulders, for a total width of 24'.
- b. Minimum centerline radius shall be 60'.
- c. Surface requirement BST/ACP.
- d. Maximum grade is 12%.
- e. Stopping site distance, reference AASHTO.
- f. Entering site distance, reference AASHTO.
- g. Maintenance of driveway approaches shall be the responsibility of the owner whose property they serve. The County will not maintain accesses.
- h. Any further subdivision or lots to be served by proposed access may result in further access requirements.

- i. All roads located within this development or roads that provide access to this development shall be constructed to current county road standards unless any other maintenance agreements, forest service road easements or state easements require higher road standards. The higher of the road standards shall apply.
- j. All easements shall provide for AASHTO radius at the intersection with a county road.
- k. A paved apron shall be constructed at the intersection of the proposed private intersection and the county road right-of-way.

Private Road Improvements – Susan Road:

- a. To serve lots 1 and 2, the road must be extended and a new cul-de-sac constructed in the vicinity of lot 2. No more than two lots can be served by a driveway off the end of a cul-de-sac.
- b. Per the findings of Road Variance 11-08, the private portion of Susan Road must be verified to be 20' wide, including gravel and pavement, through the road certification process. The road extension may be constructed to 20' wide.

Cul-de-Sac: A cul-de-sac turn-around having an outside right-of-way or easement diameter of at least 110 feet shall be constructed at the closed end of all dead-end roads serving 3 or more lots. The driving surface shall be at least 96 feet in diameter. Cul-de-sacs must also conform to the requirements specified by the 2009 International Fire Code. Contact the Fire Marshal regarding any additional cul-de-sac requirements.

Plat Notes: Plat notes shall reflect the following:

- a. Entire private road shall be inspected and certified by a civil engineer licensed in the State of Washington specifying that the road meets Kittitas County Road Standards as adopted September 6, 2005, prior to the issuance of a building permit. Any future subdivision or land use action will be reviewed under the most current road standards.
- b. Kittitas County will not accept private roads for maintenance as public streets or roads until such streets or roads are brought into conformance with current County Road Standards. This requirement will include the hard surface paving of any street or road surfaced originally with gravel.
- c. Maintenance of the access is the responsibility of the property owners who benefit from its use.
- d. An approved access permit will be required from the Department of Public Works prior to creating any new driveway access or performing work within the county road right-of-way.
- e. Any further subdivision or lots to be served by proposed access may result in further access requirements. See Kittitas County Road Standards.
- f. A public utility easement 10 feet in width is reserved along all lot lines. The 10 foot easement shall abut the exterior plat boundary and shall be divided 5 feet on each side of interior lot lines. Said easement shall also be used for irrigation.

Joint-Use Driveway: A joint-use access shall serve no more than two tax parcels. See Kittitas County Road Standards, 9/6/05 edition.

- a. Access easements shall be a minimum of 20' wide. The roadway width shall have a minimum width of 12'.
- b. The surface requirement is for a minimum gravel surface depth of 6".
- c. Maintenance of driveway approaches shall be the responsibility of the owner whose property they serve. The County will not maintain accesses.
- d. Any further subdivision or lots to be served by proposed access may result in further access requirements.

Single-Use Driveway: A single-use access shall serve no more than one lot. See Kittitas County Road Standards, 9/6/05 edition.

- a. The roadway shall be a minimum of 8' wide with gravel surface.
- b. Maintenance of driveway approaches shall be the responsibility of the owner whose property they serve. The County will not maintain accesses.
- c. Any further subdivision or lots to be served by proposed access may result in further access requirements.

Plat Approvals: All plats must show the acceptance signature of the County Engineer. The acceptance block shall be as follows (per KCC 16.24.170):

EXAMINED AND APPROVED
This ____ day of ____, A.D., 20__.

Kittitas County Engineer

Private Road Maintenance Agreement: The applicant shall meet all applicable conditions of any pre-established or required Private Road Maintenance Agreements.

Lot Closure: It is the responsibility of the Professional Licensed Surveyor (PLS) to ensure the lot closures are correct and accurate.

Access Permit: An approved access permit shall be required from the Department of Public Works prior to creating any new driveway access or performing work within the county road right of way.

Addressing: Contact the Kittitas County Rural Addressing Coordinator at (509) 962-7523 to obtain addresses prior to obtaining a building permit. A parcel cannot receive a building permit or utilities until such parcel is identified with a 911 address.

Fire Protection: Contact the Kittitas County Fire Marshal regarding any additional access requirements for Emergency Response.

Mailbox Placement: The U.S. Postal Service requires that private roads with 6 or more residences install USPS approved Cluster Box Units (CBUs) at a safe location at the mouth of the private road. Contact your local Post Office for location and additional design requirements before beginning construction.

Water and Sewer

11. The final plat notes shall include the following statements:

The approval of this division of land includes no guarantee that there is a legal right to withdraw groundwater within the land division. The approval of this division of land provides no guarantee that use of water under the ground water exemption (RCW 90.44.050) for this plat or any portion thereof will not be subject to curtailment by the Department of Ecology or a court of law.

AND

Metering will be required on all new residential well connections and metering results shall be recorded in a manner consistent with Kittitas County and Washington State Department of Ecology requirements.

12. Adequate Potable Water Supply Statement: Final approval is conditioned upon the developer/owner of the plat providing proof of potable water. Proof of potable water can be provided through several different ways depending on the source of water proposed as described and outlined in the Board of County Commissioners Resolution 2010-082.

The application states that residences will utilize a Group B Public Water System; therefore, the following information is required prior to final plat approval:

- Applicants shall have a well site inspection performed by KCPHD staff; complete and submit a Group B Public Water System Workbook to either KCPHD for water systems with 3-9 connections or Washington State Department of Health (DOH) for water systems with 10-14 connections or as amended by DOH; have the well(s) drilled; and submit a copy of an agreement with an approved Kittitas County Satellite Management Agency. All infrastructure for the Group B Water System including the well/pump house and storage tanks must be completed or the developer/owner can bond for completion. Final approval of the Group B Public Water System including issuance of the public water system ID number from DOH is required prior to recommendation by KCPHD for final approval. If a bond is in place, final approval will still be recommended but all infrastructure must be completed before issuance of the first building permit within the subdivision.
13. The proponent shall apply to Ecology for a permit to appropriate public groundwater, if seeking to use the groundwater exemption shall submit to Ecology a request for determination that the proposed exempt use would be water budget neutral. No new exempt uses under RCW 90.44.050 may commence unless Ecology has approved a request for determination that the proposed exempt use would be water budget neutral. Chapter 173-150 WAC provides for the existing rights against impairment, i.e. interruption or interference in the availability of water. If water supply in this area becomes limited the use could be curtailed by those with senior water rights. Ecology believes the Allwest LLC Cluster Plat which proposes to provide water through two group B water systems, is one project and is entitled to one groundwater exemption of 5,000 gallons per day and, therefore, requires a water right.
 14. Water for Dust Suppression. The Department of Ecology States: water use from road construction and dust suppression will likely be necessary given that new roads and grading are planned. Water use for construction and dust compression are not listed uses eligible for appropriation under RCW 90.44.050. Therefore, a water right will be required for water used for short term and long term construction and dust suppression needs. Temporary permits may be obtainable in short time-periods.

Fire Safety

15. Approved water storage of 30,000 gallons, with a private fire hydrant system shall be installed. This amount may be reduced by 50% when the plat note requires all residences to provide residential sprinkler systems, defensible space setbacks and non-combustible exterior building materials.
16. Water storage and hydrant spacing shall comply with the International Fire Code.
17. No fire apparatus access lane shall have a slope greater than 12%. A variance permit will be required for any slopes or grades greater than allowed by County Code.
18. “No Parking—Fire Lane” signs must be posted per Fire Marshal requirements on all cul-de-sacs.
19. All bridges shall be required to be certified.

20. All development, design and construction shall comply with Kittitas County Code Kittitas County Zoning and the 2006 International Fire and Building Codes.
21. A separate permit is required for any private water storage or hydrant system. The hydrant system shall be subject to plan review through the Fire Marshal's Office and shall be subject to an annual Operational Permit.

Air Quality

22. WAC 173-400-040 requires that reasonable precautions be taken to prevent dust from leaving the site. Dust is prohibited from interfering unreasonably with the use and enjoyment of property, causing health impacts, or damaging property or business.
23. The applicant should create a site-specific Fugitive Dust Control Plan (FDCP) before starting this project, and then follow the plan for construction of the project and duration of activity on the property. The FDCP should include, but is not limited to, the following components:
 - Identify all potential fugitive dust emission points.
 - Assign dust control methods.
 - Determine the frequency of application
 - Record all dust control activities.
 - Train personnel in the FDCP.
 - Shut down during windy conditions.
 - Follow the FDCP and monitor dust control efforts.
24. According to County standards, a water truck shall be available during construction to minimize dust emissions.