COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

PERMIT ISSUANCE FACT SHEET

Groundwater Withdrawal Permit Number: GW0078700
Application Date: November 14, 2018

The Department of Environmental Quality (Department or DEQ) has reviewed the application for a Groundwater Withdrawal Permit. Based on the information provided in the application and subsequent revisions, DEQ has determined that there is a reasonable assurance that the activity authorized by the permit is a beneficial use as defined by the regulations. Groundwater impacts have been minimized to the maximum extent practicable. The following details the application review process and summarizes relevant information for developing the Permit and applicable conditions.

Permittee / Legal Responsible Party

Name & Address:	Chickahominy Power LLC 13800 Coppermine Road, Suite 115 Herndon, Virginia 20171
Phone:	(703) 234-2223

Facility Name and Address

Name & Address:	Chickahominy Power Plant 6721 Chambers Road Charles City, VA 20203
Phone:	(704) 608-5822

Contact Information:

Name:	Jef Freeman
E-mail:	jeffreeman@balicollc.com
Phone:	(704) 608-5822

Proposed Beneficial Use: Chickahominy Power is an electric generating facility. Groundwater withdrawn under the terms of this permit will be utilized for non-potable uses during construction and startup of the facilities and for operational uses such as evaporative cooling, boiler makeup and other non-potable process needs.

Processing Dates

Processing Action	Date Occurred/Received
Pre-Application Meeting:	September 27, 2018
Application Received:	November 14, 2018
Special Exception Fee Deposited by Accounting:	November 15, 2018
Application Review Conducted:	January 25, 2019
Request for Additional Information Sent:	January 25, 2019
1st Response to Request for Additional Information Received:	February 25, 2019
2nd Response to Request for Additional Information Received:	May 29, 2019
Local Government Ordinance Form Received:	November 14, 2018
Application Complete:	January 25, 2019
Submit Request for Technical Evaluation:	July 10, 2019
Preliminary Technical Evaluation Received:	August 8, 2019
Draft Special Exception Package Sent:	September 18, 2019
Final Technical Evaluation Received:	October 31, 2019
Final Draft Special Exception Package Sent:	November 22, 2019
Submit Draft Special Exception for Public Notice:	Available December 6, 2019
Public Notice Published:	December 26, 2019
Public Hearing Held	January 28, 2020
End of 50-Day Public Comment Period:	February 14, 2020
Response to Public comment:	
State Water Control Board Meeting:	

Application

Application Information

Description:

Background / Purpose of Facility

Chickahominy Power, LLC is developing a 1,600-megawatt natural gas-fired combined cycle electric generating facility. The proposed facility will be located on a parcel off Chambers Road near the intersection with State Road 106. A groundwater withdrawal permit (GW0005400) was previously issued to a different owner to construct a power plant on the same site in 2002. However, that owner ultimately decided to cease development. Their production wells were abandoned in 2004 and the permit was terminated in 2005.

The facility proposes to construct two wells to supply the facility demand.

Location of Facility/Withdrawal:

Water Supply Planning Unit: Charles City County

County: Charles City

GWMA/Aquifer: Eastern Virginia Groundwater Management Area / Potomac Aquifer

Conjunctive Use Source: No conjunctive use

Withdrawal Use, Current Need, and Projected Demand:

Basis of Need:

The Chickahominy Power facility will use groundwater for non-potable purposes during construction and start-up and for supplying process and incidental facility operational water. Operational process water demands, in general terms, consists of service water to operate inlet air evaporative coolers for the gas turbine systems (significantly improving plant water efficiency on hot days) and to produce demineralized water used as boiler make up water. Incidental use includes water for maintenance and onsite fire protection if needed. Process water and incidental water uses have been combined for the facility water demand; however, process water represents the majority need for demand. Separately, potable water to serve the sanitary and safety needs of approximately 45 employees will be provided by Charles City County and will not be covered by this permit.

Water Demand Projection:

The water demands provided in the application are those anticipated over the permit term. No expansion beyond the initial project size or changes to the proposed water use are expected during the term of the permit. The applicant provided a water balance diagram with water flow processes depicting the average and peak flow rates through the facility's various processes.

The power plant has been specifically designed to minimize the overall water demand, most notably through the use of air-cooled condenser technology in lieu of a more conventional water-cooling technology. The facility also proposes extensive use of blowdown recapture and wastewater recovery systems. Typical evaporative coolers consume approximately 50% of makeup water via evaporation, with the remaining 50% rejected as blowdown waste to maintain the evaporative cooler water chemistry. Blowdown recovery systems will be employed wherever possible to capture steam that would normally be vented to the atmosphere. For this project, "wet cooling" would have consumed approximately 11,000 gallons per minute (5.8 billion gallons per year); approximately 80% of water consumption would be due to evaporative losses, and 20% would be process wastewater to control cooling water chemistry. In "dry cooling", the circulating water system is replaced by the air-cooled condenser (ACC). An ACC condenses the water vapor from the steam turbine directly via heat exchange to the ambient air. Using "dry cooling" in lieu of "wet cooling" eliminates water lost in the condensing process, reducing water consumption by 11,000 gallons per minute (or approximately 5.8 billion gallons per year).

The project also eliminated reverse osmosis technology from the design. This eliminates the need to use groundwater to backwash membranes to remove total dissolved solids (TDS) resulting from the demineralization process. Chickahominy Power proposes to recover the blowdown waste flow from the

evaporative coolers and remove excess chemical and mineral concentrations via a mixed bed ion exchange demineralization system. This water is then reused in the steam cycle, which requires highly purified demineralized water. The evaporative cooling system requires water quality that is typical of potable sources such as groundwater to prevent damage to turbine components. This state-of-the-art design reduces water consumption by 50% compared to a typical evaporative cooling system. On an annual average basis, water consumption will be reduced by an estimated 32.1 gallons per minute (16.9 million gallons per year) using this technology.

The applicant proposes a yearly maximum volume of 30,000,000 gal/y for both process demand and non-potable incidental uses. The requested maximum monthly withdrawal volume is 3,500,000 gallons. The applicant projects an average monthly withdrawal volume of 2,500,000 gallons.

Withdrawal Volumes Requested: The applicant requested the following withdrawal volumes based upon the projected groundwater demand.

Period of Withdrawal	Actual Volume (gal.)	Volume in MGD
Maximum Monthly:	3,500,000	112,903
Maximum Annual:	30,000,000	82,192

DEQ Evaluation

Historic Withdrawals:

Chickahominy Power is a new facility so no historic withdrawal information is available.

Analysis of Alternative Water Supplies:

Surface Water Alternative: The Chickahominy Power facility originally considered using conventional evaporative cooling technologies (wet cooling towers) and projected a use of approximately 14.4 million gallons of water per day for evaporation and blow-down. With such a significant volume, the project evaluated using surface water withdrawn from the James River at Shirley Plantation. In order to use surface water, the plant would need to include a water pretreatment process. The plant would also need to utilize reverse osmosis water treatment in the demineralization system in order to meet process requirements and to contend with fluctuations in total dissolved solids content and salinity. Wastewater would also be discharged to the James River. The applicant stated that this approach would require significant investments to address water quality and the additional complexity raised concerns regarding plant reliability. This alternative would require a pipeline from the James River intake to the plant, a distance of approximately 10 miles. Similarly, the large amount of wastewater generated by the boiler and cooling tower blowdown systems combined with the associated surface water treatment system would require discharge through a separate large diameter pipe to the James River. The applicant believes the environmental impacts associated with the construction of the required intake and discharge equipment in the river and the projected impacts to state waters from the dual pipelines would result in significant permitting challenges. Therefore, less impactful alternatives were pursued.

Chickahominy Power undertook a major redesign of its steam condensing system to reduce the overall water usage and wastewater generation. This major redesign eliminated the conventional evaporative cooling technology and adopted a dry cooling approach to minimize consumptive water losses. Initially, surface water from the James River was considered for this reduced water demand. Under this alternative, the plant would still need the same pretreatment equipment, as well as a reverse osmosis water treatment in the demineralization system to contend with fluctuations in total dissolved solids content and salinity. Also, impacts to state waters associated with the intake and pipelines would not be avoided. Therefore, this alternative was also not pursued further.

Purchased Water Alternatives: Charles City County was approached to determine if their Roxbury Industrial Park water system, located across Chambers Road from the Chickahominy Power project site, could satisfy the much-reduced water requirements associated with the use of air-cooled technologies. The Roxbury Industrial system utilizes wells and has permitted capacity of approximately 19,600 gallons per day, which is significantly below that required for the project. Therefore, this alternative was eliminated from further consideration.

Obtaining water from the Henrico County treatment facility was considered impractical and not pursued because it is located approximately 20 miles from the proposed site. New Kent County, located immediately adjacent to and to the north of Charles City County, was approached to determine if their current or projected water system expansions could accommodate the reduced water requirements of the Chickahominy Power project.

New Kent County has an existing groundwater withdrawal permit for a withdrawal near the project (GW0007300). The water quality is considered equivalent to the water quality that would be obtained from onsite wells, except for any additives introduced by New Kent County's water treatment program that would need to be removed. All off-site options require the procurement of easements to allow the construction of the requisite pipeline infrastructure. Delivery of water to the project from New Kent would require the construction of a new pipeline of approximately 5 miles along a route that is being evaluated to determine the need to secure easements for crossings, such as the CSX rail line and the Chickahominy River, as well as avoidance or minimization of impacts to wetlands or historic resources.

As New Kent County is currently obtaining groundwater from the Potomac Aquifer and has sufficient capacity to supply Chickahominy Power, connecting to this system would not result in an additional long term allocation from the Potomac Aquifer beyond what is currently permitted. Additionally, on December 1, 2018, New Kent County was issued a permit from DEQ to obtain surface water (VWP 16-0763) from the Pamunkey River to reduce the County's reliance upon groundwater. Once complete, this system will further reduce demand on the aquifer as New Kent becomes a conjunctive use system. Therefore, connection to New Kent will be a significant benefit to the preservation of the Potomac Aquifer resource. As this is a viable long-term alternative for the power plant, the Permittee is required to implement this connection within the permit term.

Public Water Supply:

The proposed beneficial use does not contain a public water supply component. Potable water to serve the sanitary and safety needs of approximately 45 employees will come from the Roxbury Industrial Park water system owned by Charles City County.

Water Supply Plan Review:

Incorporating the consideration of the local water supply plan (WSP) and the State Water Resources Plan (SWRP) in the withdrawal permitting process is required per § 62.1-44.15:20 C of the State Water Control Law and 9VAC25-610, Groundwater Withdrawal Regulations. Charles City County submitted a water supply plan to DEQ in 2011. The Charles City Water Supply Plan (WSP) has a general concern with increased use of groundwater, as the county is located within the vicinity of a number of Potomac, Piney Point, and Aquia Aquifer critical cells. The county has no existing groundwater users with unused capacity that could be an alternative source of supply for this proposed facility. The 2013 WSP projected the County's population and demand to increase through the 2040 planning period. However, growth did not occur as originally anticipated and they no longer anticipate a deficit in municipal system supply by the end of the planning period. The WSP considers multiple alternatives including groundwater wells and surface water intakes, as well as possible interconnection with a neighboring locality. Interconnection seems most feasible for development areas within Charles City County that are close to a neighboring locality's water main.

DEQ Recommended Withdrawal Limits:

Staff reviewed the demand justification and found the calculations and methodologies sufficient to justify the requested limits. The facility documented significant efforts to reduce the requested limits to the minimum amount necessary to operate the plant. DEQ recommends the following withdrawal volumes based upon evaluation of the groundwater withdrawal application.

Period of Withdrawal	Actual Volume (gal.)	Volume in MGD
Maximum Monthly:	3,500,000	112,903
Maximum Annual:	30,000,000	82,192

Technical Evaluation:
Aquaveo, LLC, completed a Technical Evaluation and submitted it to DEQ on October 31, 2019. Sydnor Hydro completed 48-hour and 72-hour aquifer tests to support the previous groundwater withdrawal permit at the site in 2002. Aquaveo, LLC incorporated site specific aquifer parameters based on that test data into this evaluation. The objectives of this evaluation were to determine the areas where any of the aquifers will experience at least one foot of water level decline due to the proposed withdrawal (the Area of Impact or AOI), to determine the potential for the proposed withdrawal to cause saltwater intrusion, and to determine if the proposed withdrawal meets the 80% drawdown criteria. The technical evaluation also evaluated water levels in the VAHydroGW-VCPM regional model compared to measured field values. The evaluation estimated impacts associated with the proposed withdrawal over a 7 year period, which is the term authorized for the withdrawal under this permit.

Aquaveo, LLC reviewed the USGS regional observation network wells closest to the applicant's proposed wells. Aquaveo, LLC reviewed and compared simulated 2017-2018 water levels from the reported use to measured water levels closest to the applicant's withdrawal for the same year. The water level graphs for

the Potomac Aquifer show a steady decline in water levels from the time of the earliest available records (1965) to approximately 2009. These observed water levels drop by more than 60 feet over the same period. Water levels from 2009 to present are observed to recover slightly. The observed water levels in the nearest monitoring wells are generally in agreement with those simulated by the regional model.

The simulation of the proposed withdrawal using the regional model did not produce a foot of drawdown in three or more cells. Using the regional model to calculate drawdown in these cases can overestimate the size of the resulting AOI and often results in drawdown that is not representative of the withdrawal spatially due to the confines of the model cells. As discussed above, Aquaveo was provided existing aquifer pump test data which allowed incorporation of site specific values for transmissivity, storage, and leakance into the evaluation. Given the inclusion of these data, the Hantush-Jacob best fit aquifer parameters obtained by Aquaveo were selected to simulate drawdown for the source aquifer because the Hantush-Jacob parameters reproduce the drawdown observed during the onsite aquifer pump tests more accurately than the Theis or Cooper-Jacob parameters. The drawdown resulting from the proposed withdrawal was therefore calculated using the Hantush and Jacob (1955) 2-dimensional analytical solution for leaky, confined aquifers.

The AOI for an aquifer is the area where the additional drawdown due to the proposed withdrawal exceeds one foot. The Hantush-Jacob analytical simulation was executed as outlined above and the results of the simulation show one foot of drawdown occurs at a maximum of approximately 540 feet from each production well.

The regional model does not indicate any changes to regional flow patterns that would increase the potential for reduced water quality.

The proposed withdrawal did not result in a simulated potentiometric surface below 80% of the distance between the top of the aquifer and the land surface. Therefore, it meets the 80% drawdown criteria. Additional information regarding this simulation can be found in the attached Technical Evaluation.

Based on the results of the Technical Evaluation, DEQ concluded that the proposed withdrawals meet the technical criteria for permit issuance (9VAC25-610-220). A map of the AOI is included in the attached Mitigation Plan.

Part I
Operating Conditions

Authorized Withdrawals:

Owner Well Name	DEQ Well #	Aquifer	Type	Pump Intake Limit (ft. bls)
CP-1	118-00185	Potomac	Production	*260
CP-2	118-00186	Potomac	Production	*260

*The wells have not been constructed at the time of permit issuance. Therefore, the pump intake limit is based on an aquifer determination provided on June 7, 2002 by the DEQ Groundwater Characterization Program for DEQ Well # 118-

00172, constructed for the previous permit (GW0005400). This limit is subject to change based on interpretation of data collected during construction of wells 118-00185 and 118-00186.

Abandoned Wells:

Owner Well Name	DEQ Well #	Aquifer
*PW-1	118-173	Potomac
*PW-1	118-174	Potomac
*PW-1	118-178	Potomac
*OW-1	118-172	Potomac
*OW-2	118-175	Potomac
*OW-3	118-176	Potomac
*OW-4	118-177	Potomac

*Wells were constructed and then abandoned as part of a previous project at the site (GW0005400) that was cancelled.

Pump Intake Settings:

Since the wells have not been constructed at the time of the permit, the permit requires a modification to include the specific depth based on the aquifer pick made after drilling the well. Upon receipt of the required geophysical log and well construction documentation, a minor modification to the permit will be completed to incorporate the specific pump intake depth limits based on the site-specific aquifer top determination. The permit requires that the pumps be placed no lower than the top of the uppermost confined aquifer that a well utilizes as a groundwater source in accordance with 9VAC25-610-140 A 6.

Withdrawal Reporting:

Groundwater withdrawals are to be recorded monthly and reported quarterly on reporting forms provided by DEQ.

Water Conservation and Management Plan:

A Water Conservation and Management Plan (WCMP) meeting the requirements of 9VAC25-610-100 B was submitted and reviewed as part of the application process. The accepted Plan is to be followed by the permittee as an operational Plan for the facility/water system. In addition, the permit includes conditions requiring a leak detection and repair program that includes the following:

- Documentation that the leak detection and repair program defined in the WCMP has been initiated is due one year after the initiation of withdrawals.
- A result of an audit of the total amount of groundwater used in the distribution system and operational processes is due by the end of the second year after the start of withdrawals.
- A report on the plan's effectiveness in reducing water use, including revisions to those elements of the WCMP that can be improved and addition of other elements found to be

effective based on operations to date shall be submitted after four years from the start of groundwater withdrawals

Mitigation Plan:

The predicted AOI resulting from the Technical Evaluation extends beyond the property boundaries in the Potomac Aquifer. Given this prediction, a Mitigation Plan to address potential claims from existing well owners within the predicted area of impact is included in the permit by reference. Since the Mitigation Plan is incorporated into the permit, the Plan shall remain in effect until the expiration or termination of the permit, whichever comes first.

Well Tags:

Well tags will be transmitted with the final permit.

Part II
Special Conditions

Geophysical Borehole Log Data Collection:

Geophysical log information is needed to evaluate the top of the aquifer in use and the permitted pump intake limit. While the previous permit at this site identified the top of the Potomac Aquifer, the top of the aquifer typically varies by well location over the same site. The Department requires collection of a geophysical log for each new well to be included in a Groundwater Withdrawal Permit. The Permittee must contact DEQ at least two months prior to scheduling the geophysical logs to allow for Department scheduling.

The collection of geophysical log data requires a borehole to be drilled at least to the depth of the deepest facility well, or an alternative depth at the discretion of the Department, and the logging equipment run down the full depth of the hole. Geophysical logging is to include Spontaneous Potential, Single Point Resistance, 16/64 Short and Long Normal, Natural Gamma at a scale of 20 feet per inch. Department staff must be present for the geophysical logging to evaluate the log and well cuttings.

Well Abandonments:

This permit contains a special condition that requires agreement by the permittee that the permit cannot be renewed. At the end of the permit term or upon connection to the New Kent County Public Water Supply System, whichever comes first, the permit requires Wells CP-1 (DEQ # 118-00185) and CP-2 (DEQ# 118-00186) to be abandoned in accordance with Department of Health guidelines. Documentation must be submitted to the DEQ within 30 days of abandonment.

Pump Intake Determination and Setting:

The Permitee shall set the pump intake for Wells CP-1 (DEQ # 118-00185) and CP-2 (DEQ# 118-00186) no lower than the top of the Potomac Aquifer as determined by Department staff based on new geophysical log data submitted by the Permittee in accordance with Part III K.3 of this permit. The

Permittee shall notify the Department of the work schedule and to submit written documentation of the pump setting within 30 days of the work.

Alternative Source Development Report:

By April 1 of each year, Chickahominy Power shall submit to the Department an annual progress report summarizing all completed, ongoing, and future efforts to connect to the New Kent County conjunctive use water supply prior to the expiration of the permit.

Part III
General Conditions

General Conditions are applied to all Groundwater Withdrawal Permits, as stated in the Groundwater Withdrawal Regulations, 9VAC25-610-10 *et seq.*

Public Comment

Relevant Regulatory Agency Comments:

Summary of VDH Comments and Actions:

This facility is not a public water supply so soliciting comments from VDH was not required.

Public Involvement during Application Process:

Local and Area wide Planning Requirements:

The Charles City County Administrator indicated on November 9, 2018 that the facility's operations are consistent with all ordinances.

Public Comment/Meetings:

The public comment period on a draft special exception from the State Water Control Board for the temporary withdrawal of groundwater in Charles City County, Virginia ran from December 26, 2019, through February 14, 2020, and was initially announced at the December 5, 2019, information meeting. The official public notice to seek public comment and announce the public hearing was advertised in the Richmond Times-Dispatch on December 26, 2019, and the New Kent-Charles City Chronicle on December 27, 2019. Additionally, in accordance with 9VAC25-610-250 B, DEQ sent a public notice and announcement of a public hearing to each local governing body located within the Eastern Virginia Groundwater Management Area and to representatives of the Chickahominy Indian Tribe, Chickahominy Indians Eastern Division, Upper Mattaponi Tribe, Nansemond Indian Nation, Pamunkey Indian Tribe, and Rappahannock Tribe. The advertised public comment period was December 26, 2019 through

February 14, 2020. The public hearing was advertised and held at Charles City County High School at 10039 Courthouse Road, Charles City, VA on January 28, 2020 beginning at 6:30 p.m. The Hearing Officer for the public hearing was Mr. Robert Wayland of the State Water Control Board.

There were 36 oral comments received during the public hearing. There were approximately 100 citizens in attendance, but not all in attendance signed up to speak. In addition to the comments received during the public hearing, there were 1,366 written public comments, for a total of 1,402 total public comments. A total of 1,199 individuals participated in the joint public comment and public hearing process. Only the applicant and two others provided comments in support of this draft groundwater withdrawal special exception.

Changes in Permit Part II Due to Public Comments

Change from special exception to groundwater withdrawal permit. During the public comment period, some commenters asserted that the use of a special exception to authorize the withdrawal was not appropriate under applicable statute and regulation. DEQ's rationale for issuing a groundwater withdrawal special exception (§ 62.1-267 of the Code of Virginia) was that eliminating any potential future use of the Potomac aquifer for human consumption in the area of the withdrawal through the issuance of a renewable groundwater withdrawal permit was an unusual situation and contrary to the Act because of the potential impact on public health and the environment (aquifer). The use of a non-renewable special exception would provide an incentive for the applicant to reduce the overall amount of the withdrawal, benefitting the aquifer and the authorization to withdraw under the special exception would be a bridge to an alternative source of supply from New Kent, which, if interconnected, would further benefit the environment (aquifer) over the long term. In response, the applicant actively reduced its requested withdrawal volume from 106 MGY to 30 MGY by evaluating and committing to innovative water saving cooling technologies, and entered into a contract with New Kent County to establish a water supply and connection.

In addition, DEQ's rationale was based on the fact that DEQ was not aware of any previous program precedent for issuing a groundwater withdrawal permit for less than the statutory maximum term or issuing a groundwater withdrawal permit with a special condition prohibiting renewal upon expiration of the permit. While § 62.1-266 A of the Code of Virginia gives the Board broad discretion in establishing permit conditions, DEQ was concerned that this could be seen as contrary to § 62.1-266 C, which provides that "the permit shall expire at the end of the term unless a complete application for a new permit has been filed in a timely manner as required by the regulations of the Board, and the Board is unable, through no fault of the permittee, to issue a new permit before the expiration date of the previous permit." Also, 9VAC25-610-96 A of the regulation establishes the permit holder's duty to reapply and a request could be made to administratively continue the permit.

Upon review of public comments and the arguments presented concerning use of the groundwater withdrawal special exception instead of the usual groundwater withdrawal permit, DEQ agrees that the proposed activity may not be contrary to the Act and sufficiently unusual. In addition, DEQ has determined that the § Va. Code § 62.1-266 (A) provides the Board with requisite authority to limit the term of a permit to a period less than 15 years and eliminate the possibility of an administrative continuance. With the reduced groundwater withdrawal request, and the Board's ability to establish a non-renewable permit condition pursuant to § 62.1-266 A, the use of a groundwater withdrawal permit is most appropriate authorization instrument under applicable statute and regulation. Since the groundwater withdrawal special exception for Chickahominy Power, LLC was processed following the same regulatory requirements and procedures for, and includes the same conditions as, a groundwater withdrawal permit a non-renewable, 7-

year, groundwater withdrawal permit for Chickahominy Power, LLC may be issued pursuant to § 62.1-266 A of the Code of Virginia.

The Groundwater Withdrawal Permit includes a Special Condition (Part II) that authorizes the withdrawal of groundwater for a term not to exceed 7 years or completion of an interconnection to the New Kent County Public Water Supply System, whichever comes first, and a provision that, notwithstanding Va. Code § 62.1-266(C) or any provision of the Board's Regulations, including 9 VAC 25-610-96, the permit will not be administratively continued under any circumstances.

Staff Findings and Recommendations

Based on review of the permit application, staff provides the following findings.

- The proposed activity is consistent with the provisions of the Ground Water Management Act of 1992, and will protect other beneficial uses.
- The proposed permit addresses minimization of the amount of groundwater needed to provide the intended beneficial use.
- The effect of the impact will not cause or contribute to significant impairment of state waters.
- This permit includes a plan to mitigate adverse impacts on existing groundwater users.

Staff recommends Groundwater Withdrawal Permit Number GW0078700 be issued as proposed.

Attachments

1. **Technical Evaluation**
2. **Water Conservation Plan**
3. **Mitigation Plan**
4. **Public Comment Sheet**

Approved: _____
Director, Office of Water Supply

Date: _____