

**From:** [Greg R.](#)  
**To:** [Clerk of the Board](#)  
**Subject:** Fwd: Demand for Administrative Compliance  
**Date:** Monday, February 2, 2026 10:45:37 PM  
**Attachments:** [overview.jpg](#)

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

From: **Greg R.** <[hemet.net@gmail.com](mailto:hemet.net@gmail.com)>  
Date: Mon, Feb 2, 2026 at 10:35 PM  
Subject: Demand for Administrative Compliance  
To: <[cob@rivco.or](mailto:cob@rivco.or)>

**To:**  
Clerk of the Board of Supervisors

**Cc:**  
Board of Supervisors Chair  
Chuck Washington  
Office of County Counsel County of Riverside  
Director, Department of Environmental Health  
Director, Building & Safety

**From:**  
Gregory Reed  
44100 Ginger Circle  
Sage, CA 92544  
[greg@44100ginger.com](mailto:greg@44100ginger.com)  
(951) 767-4500

**Re: Demand for Administrative Compliance — Unpermitted Well Construction and Electrical Energization (APN 571-040-002)**

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## **I. PURPOSE OF THIS LETTER**

This correspondence constitutes a formal request for corrective administrative action regarding the drilling, electrical energization, and continued operation of a water well located on my fee simple **Assessor's Parcel Number 571-040-002**, for which County records **DEH file 571-040-002.pdf** confirm that **no permit to construct exists**.

This letter is submitted to afford the County an opportunity to identify lawful authorization or cure ongoing violations prior to judicial intervention. This request is submitted to satisfy administrative exhaustion requirements applicable to **Code of Civil Procedure section 1085**.

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## **II. UNDISPUTED FACTS (ESTABLISHED BY COUNTY RECORDS)**

### **1. Absence of Well Construction Permit**

By email dated **December 6, 2012**, Riverside County staff confirmed in writing:

“Within our database and files, a permit to construct a well on this parcel is not available.”

2. **Department of Environmental Health Admissions**

DEH inspection reports (including but not limited to **June 25, 2020** and **January 17, 2024**) expressly state:

- “This Department does not have construction records” for Well No. 1; and
- Well permit numbers were assigned “for inventory purposes only.”

3. **Electrical Service Not Authorized for APN 571-040-002**

the only electrical permit identified in County records (**Permit #186958**, issued December 29, 1970) applies exclusively to 44350 E. Benton Rd **APN 571-040-004**. That permit is limited to that property for a **single-family domestic well service**, and was subsequently canceled.

4. **Building and Safety records** confirm no permit authorizing electrical energization of a well on **APN 571-040-002** exists in County records.

5. **Operational Use despite Lack of Permits**

Notwithstanding the absence of required permits, the well on APN 571-040-002 has been physically energized, connected to a canceled distribution infrastructure, and treated administratively by **County departments** as part of a “State Small Water System.”

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### III. APPLICABLE NON-DISCRETIONARY LAW

1. **County Well Ordinance 682**

Riverside County ordinances in effect both before and after **December 31, 1989** require a permit to:

- drill a well,
- construct a well, and
- place a well into service.

These requirements are **mandatory**, not discretionary.

2. **Electrical Code Requirements**

Electrical service may not be installed, extended, or energized absent a valid permit authorizing service to the specific parcel and use.

3. **California Water Code §§ 64211–64216**

A State Small Water System may not lawfully operate without:

- a lawful water source; and
- a permit to operate issued by the local health officer.

4. **Title 22, California Code of Regulations**

Regulatory oversight presupposes lawful construction and authorization. Administrative inspection and water quality monitoring do not confer legality on an unlawfully

constructed or energized facility.

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#### **IV. LEGAL DEFICIENCY REQUIRING CORRECTIVE ACTION**

County records simultaneously establish:

- the absence of mandatory permits; and
- the continued operation and regulation of the well as part of a water system.

These positions are legally irreconcilable. A public agency lacks authority to waive or retroactively cure mandatory permitting requirements.

(*County of Sonoma v. Cohen* (2015) 235 Cal.App.4th 42, 48; *Morris v. County of Marin* (1977) 18 Cal.3d 901, 908.)

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#### **V. REQUESTED ACTION**

Accordingly, I respectfully request that the County provide, in writing:

1. Identification of the permit authorizing construction of the well on APN 571-040-002;
2. A final inspection date/signoff record of any permit 1990-1992 for APN 571-040-002
3. Identification of the permit authorizing electrical energization of that well; or
4. If no such permits exist:
  - A written explanation of how continued operation complies with mandatory County and State law; and
  - a timetable for corrective compliance or abatement.

Please provide the above information within **thirty (15) calendar days** of receipt of this correspondence.

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#### **VI. NOTICE**

Absent clarification or corrective action, I intend to pursue appropriate administrative and judicial remedies to enforce compliance with mandatory County and State requirements.

This letter is submitted in good faith and without waiver of any rights.

Respectfully,  
**Gregory Reed**



**44100 Ginger Circle**  
**Dec 20, 1968 Record of Survey 53/40 par2**  
**Assessor parcel number 571-040-002 -9**

**APN 571-030-039**  
**1992 tank**  
**Easement**

**Bob Franko & Deborah St Pierre**  
**44135 Perryman Lane**  
**January 9, 1969 Record of Survey 53/47 par3**  
**Assessor parcel number 571-030-037**  
**well permit #16245**

**Well 3**

**Well 1**

**(W2) Well #2**

**An electrical meter at**  
**APN 571-040-004**  
**is running 240V**  
**to APN 571-040-002**  
**(W3) well #3**  
**a total of 750+ foot**  
**to the well, plus 590'**  
**down to the pump.**