

**Appendix C:**  
**Updated Cemetery Plan and Wastewater Treatment**  
**Details; Cordoba Center Project**

February 18, 2019

David M. Rader, Senior Planner  
Santa Clara County Department of Planning and Development  
County Government Center, East Wing, 7<sup>th</sup> Floor  
70 W. Hedding St.  
San Jose, CA 95110

Subject: Updated Cemetery Plan and Wastewater Treatment Details;  
Cordoba Center Project, Santa Clara County

Dear Mr. Rader:

This letter summarizes our review of the updated Cemetery Plan and revised Wastewater Treatment System for the proposed Cordoba Center Project in Santa Clara County. This review is provided to assess and compare any new or updated project information in relation to the findings and recommendations presented in the following two Questa reports, which are contained in Appendix F of the Draft EIR:

- a. *"Draft - Cemetery Water Quality Impact Review for Cordoba Center Project, Santa Clara County"*. Questa Engineering Corporation. November 2017.
- b. *"Draft - Wastewater Facilities Review for Cordoba Center Project, Santa Clara County"*. Questa Engineering Corporation. November 2017.

### ***Revised Cemetery Plan***

The project plans available at the time of our November 2107 assessment and report on the cemetery water quality issues included a preliminary grading plan, general layout of the cemetery burial rows, and an accompanying narrative description of the burial process. The updated plans for the Cemetery consist of an April 2018 "Cemetery Grading Plan", including plan and cross-sections (Sheets C-1, C-2 and C-3) and a June 2018 drawing titled "Cemetery Plan Detail" (Sheet SK1.3).

**Grading.** Our review of the updated grading plans indicates the proposed cemetery grading to be substantially the same as shown in the preliminary plans, consisting of graded burial terraces conforming closely to the native hillside contours, with relatively small cut and fill slopes 1 to 2-feet high.

**Cemetery Burial Details.** The updated Cemetery Plan Detail shows the dimensions and spacing of typical burial plots, the planned layout of burials through-out the entire cemetery, and a proposed plan for phasing the burials over time. The preliminary plan for the cemetery available during preparation of the DEIR was diagrammatic and gave a general estimate of 1,200 burials per acre, or roughly 4,200 potential burials for the 3.5-acre cemetery. The updated plan shows the total number of burials to be approximately 1,600, grouped into five sequential phases. The notes on the plan indicate that each burial phase will be completed before beginning burials in

the next phase. Phases 1, 2 and 3 are all located east of the central access road, and contain just over 800 burial sites. Phases 4 and 5 are west of the access road, containing just under 800 burial sites. Based on our review, the new information provided in the Cemetery Plan Detail is consistent with the preliminary information on which Questa's prior review was based. Also, the proposed burial phasing plan agrees with the recommendations made by Questa to sequence the burials beginning in the northeastern corner of the cemetery, and proceeding downhill and westerly. This will maintain maximum buffer distance between the graves and the westerly property line during the initial years of operation, providing the opportunity to measure actual groundwater impacts of the burials, and make adjustments as needed going forward. No changes to the water quality impact analysis are warranted based on the updated plans for the cemetery.

### ***Revised Wastewater Treatment System***

The wastewater facilities proposed for the project and reviewed by Questa for the DEIR included the use of a Multi-Flo system to provide secondary treatment of effluent prior to drip dispersal. As indicated in our report of November 2017 (DEIR Appendix F), we determined that the proposed Multi-Flo system lacks the design features or demonstrated capability to provide the level of nitrogen removal we concluded to be appropriate for the project (20 mg-N/L average effluent concentration). Supplemental materials submitted by the applicant (Cypress Environmental letter of 12/3/18) included a proposal to replace the Multi-Flo unit with an AdvanTex (textile filter) treatment unit by Orenco Systems. We have reviewed the supporting technical information for the AdvanTex system and appurtenances. Based on the submitted materials along with our own experience and knowledge of the AdvanTex treatment system, we find that the revised plans for wastewater treatment are suitable for the project and capable of meeting the recommended 20 mg-N/L effluent limitation.

We trust this is the information required at this time. Please let us know of any questions or needs for additional assistance.

Sincerely,



Norman Hantzsche, PE  
Principal/Managing Engineer

Ref: 1700037\_cemetery\_wastewater\_update



## LEGEND

	PRE-DEVELOPMENT		POST-DEVELOPMENT	
IMPERVIOUS AREA	0 SF		6,250 SF	
	10 y <sup>r</sup>	100 y <sup>r</sup>	10 y <sup>r</sup>	100 y <sup>r</sup>
Q (cfs)	0.31	0.44	0.51	0.73
C AVERAGE	0.16		0.27	
STORMWATER STORAGE (CF)			276	383

---

The diagram illustrates four proposed network architectures, each represented by a set of lines and shapes indicating connections and components:

- PROPOSED SWALE:** A single horizontal line with a black triangle pointing to the right at its right end.
- PROPOSED SD:** Two parallel horizontal lines with a black triangle pointing to the right at the right end of the bottom line.
- PROPOSED PERIMETER SD:** Two parallel horizontal lines with a black triangle pointing to the right at the right end of the bottom line, and a small circle positioned between the two lines near the left end.
- PROPOSED CB:** A single horizontal line with a small square positioned below it near the left end.

מדינת ישראל

LANDSCAPE BERM  
HEIGHT VARIES  
2' MIN MAX  
2'1" MAX SIDE  
SLOPES

1

56" X 5' WIDE X 3.5' DEEP  
UNDERGROUND RETENTION CHAMBER  
CHAMBER IS DESIGNED TO COLLECT  
STORMWATER FROM THE ADJACENT  
DWELLING AND DRIVEWAY AREA  
CHAMBER WILL DISCHARGE TO  
PREDEVELOPMENT FLOWLINE

PER SCCC  
STANDARD

### DETAIL B5

— —

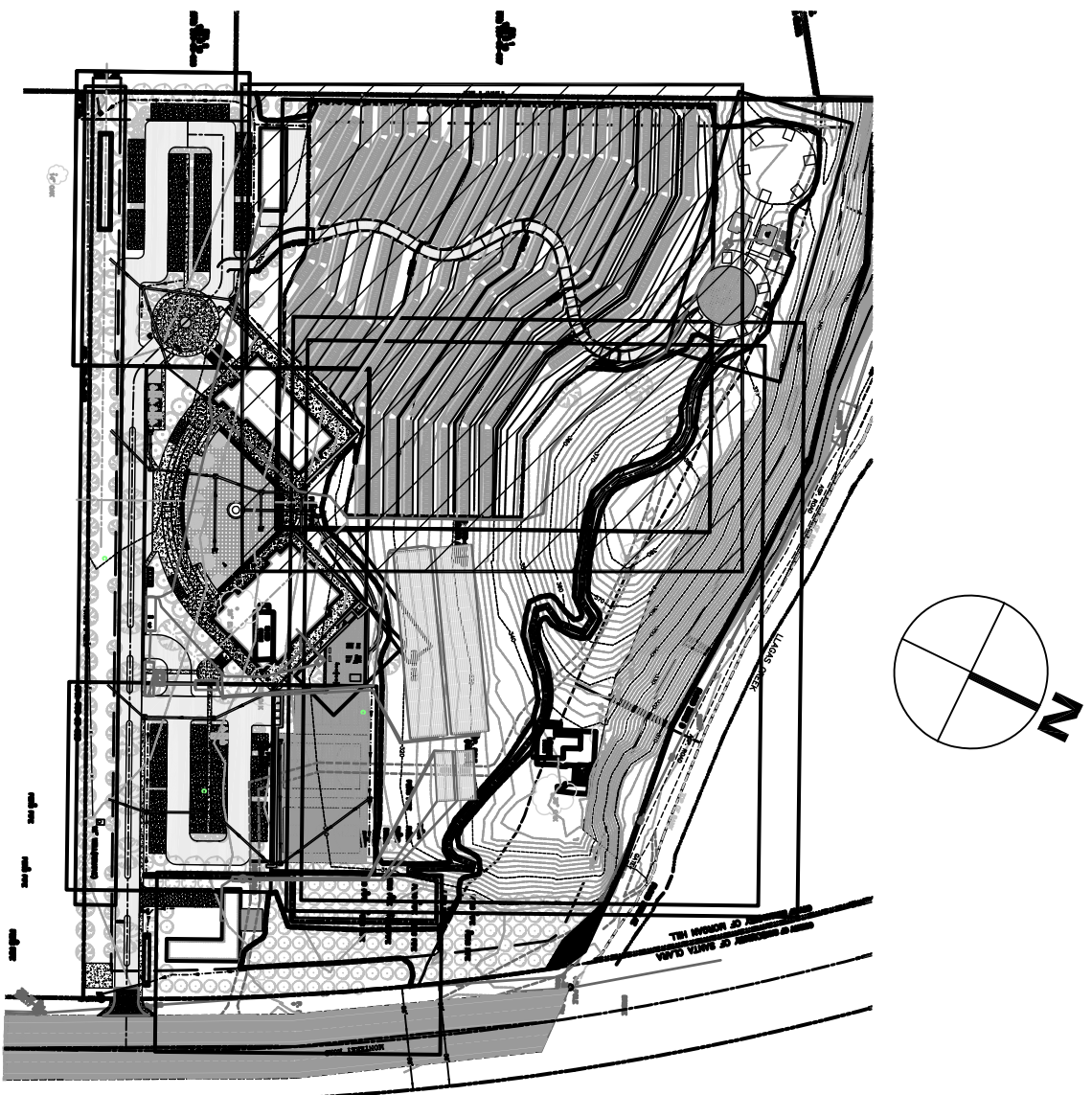
- |   |   |   |   |   |   |   |   |   |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |    |     |
|---|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|-----|
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | 20 | 21 | 22 | 23 | 24 | 25 | 26 | 27 | 28 | 29 | 30 | 31 | 32 | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | 41 | 42 | 43 | 44 | 45 | 46 | 47 | 48 | 49 | 50 | 51 | 52 | 53 | 54 | 55 | 56 | 57 | 58 | 59 | 60 | 61 | 62 | 63 | 64 | 65 | 66 | 67 | 68 | 69 | 70 | 71 | 72 | 73 | 74 | 75 | 76 | 77 | 78 | 79 | 80 | 81 | 82 | 83 | 84 | 85 | 86 | 87 | 88 | 89 | 90 | 91 | 92 | 93 | 94 | 95 | 96 | 97 | 98 | 99 | 100 |
|---|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|-----|

---

# PRELIMINARY

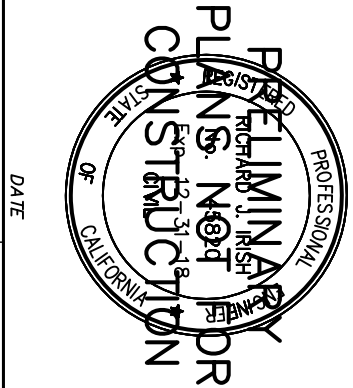






R.I Engineering, Inc.

303 Potrero St., Suite 42-202, Santa Cruz, CA 95060  
831-425-3901 www.riengineering.com



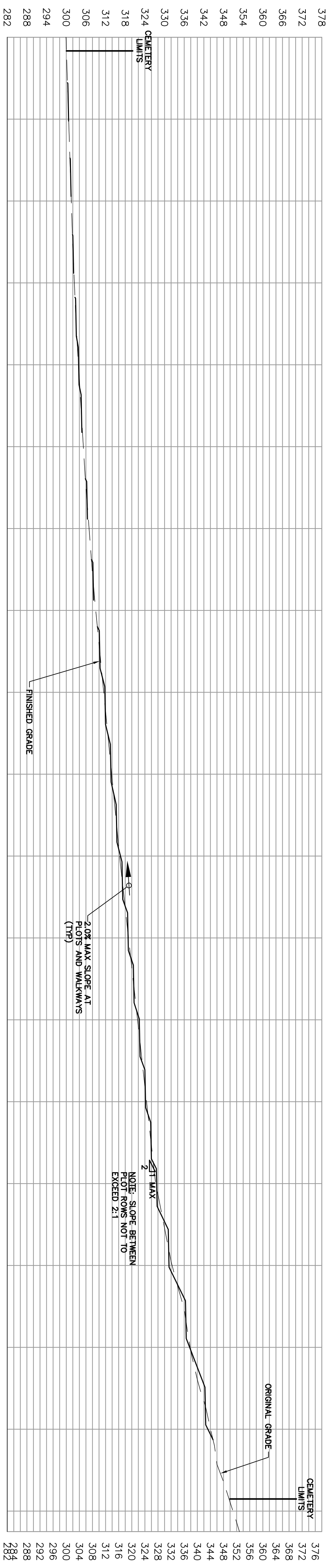
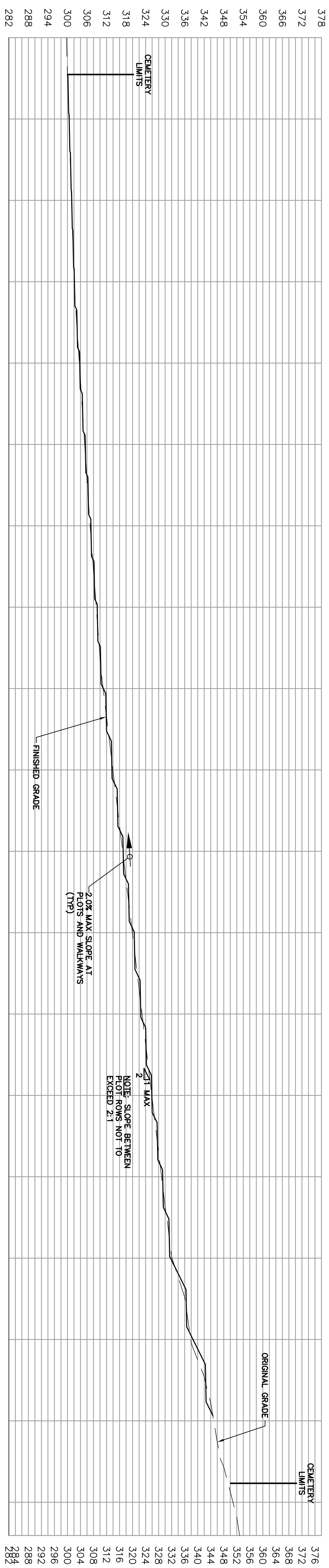
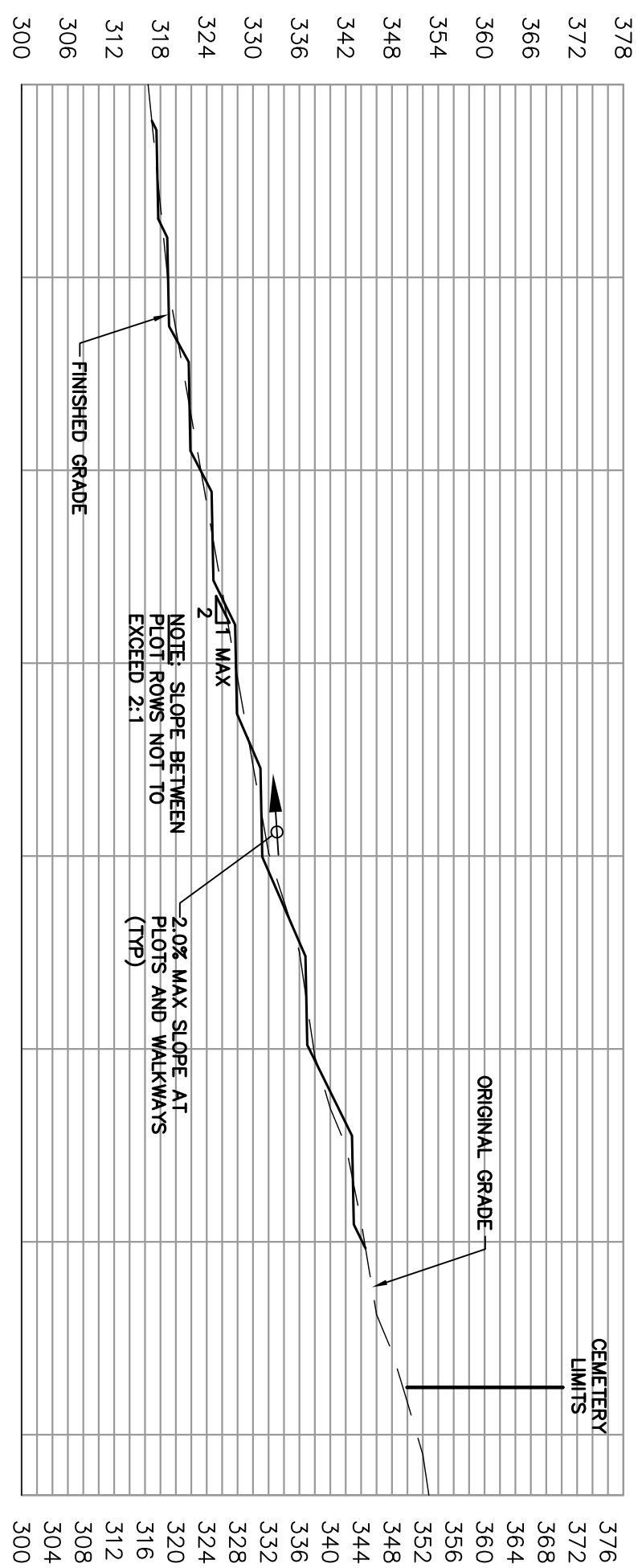
project no.	10-036-1
date	APRIL 2018
scale	AS SHOWN
dwg name	CIVIL5.DWG

SITE IMPROVEMENT  
FOR  
CORDOBA CENTER  
MONTEREY ROAD  
SANTA CLARA COUNTY, CA  
APN # 779-06-02

CEMETERY GRADING PLAN







## Central Coast Regional Water Quality Control Board

January 3, 2019

Donald L. Walsh & Lucy M. Walsh  
People's Coalition for Government Accountability (PCGA)  
P.O. Box 23  
Gilroy, CA 65021

*via US Mail*

Dear Mr. and Ms. Walsh:

### **CORDOBA CENTER PROJECT, 14065 MONTEREY ROAD, SAN MARTIN, SANTA CLARA COUNTY – RESPONSE TO CONCERNS REGARDING PROJECT AND WATER QUALITY**

Central Coast Regional Water Quality Control Board (Central Coast Water Board) staff reviewed your facsimile dated October 1, 2018 (received on October 4, 2018), which included various documents pertaining to the proposed Cordoba Center project (15.8 acres) in San Martin. Central Coast Water Board staff reviewed the information you provided, Ascent Environmental Inc.'s Draft Environmental Impact Report (Draft EIR) dated May 30, 2018<sup>1</sup> prepared for Santa Clara County, and Department of Planning and Development (County Planning) and Santa Clara County, Environmental Health's (County Health) Onsite Systems Manual dated May 2014<sup>2</sup>, and the Local Agency Management Program (LAMP) for Onsite Wastewater Treatment Systems<sup>3</sup>. Central Coast Water Board staff also reviewed the Total Maximum Daily Loads (TMDL) for Nitrogen Compounds and Orthophosphate in Streams of the Pajaro River Basin (Pajaro River Basin TMDL)<sup>4</sup>.

The majority of the information you provided and other files we currently have available for this project, focus on the project's potential impacts to both surface water and groundwater quality. After thorough consideration and technical evaluation of the available information from a water quality perspective, Central Coast Water Board staff reaffirms that the Cordoba Center project poses minimal to no threat to surface water or groundwater resources when constructed as described in the County Planning's Draft EIR and in accordance with the County's LAMP.

#### **Summary**

Central Coast Water Board staff reviewed the information in context with County Planning's Draft EIR, prepared as part of the County Planning's California Environmental Quality Act (CEQA) process. Central Coast Water Board staff reviewed "Appendix F (Groundwater Studies)" of the

<sup>1</sup> Draft EIR: <https://www.sccgov.org/sites/dpd/Development/Current/Pages/2145.aspx>

<sup>2</sup> Onsite Systems Manual: [https://www.sccgov.org/sites/cpd/programs/LU/Documents/LU\\_Onsite\\_Systems\\_Manual.pdf](https://www.sccgov.org/sites/cpd/programs/LU/Documents/LU_Onsite_Systems_Manual.pdf)

<sup>3</sup> See: <http://www.co.monterey.ca.us/home/showdocument?id=64073>

<sup>4</sup> USEPA approved the Parajo River Basin TMDL on October 6, 2016. For text, see California Code of Regulations: [https://govt.westlaw.com/calregs/Document/I99D49A0B810542CF8BBDBB8361D189E4?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)&bhcp=1](https://govt.westlaw.com/calregs/Document/I99D49A0B810542CF8BBDBB8361D189E4?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1)



Draft EIR related to the proposed project<sup>5</sup> as well as County Health's LAMP. Central Coast Water Board staff also previously and independently evaluated similar water quality concerns raised regarding the proposed onsite wastewater treatment systems and cemetery in our letters dated February 19, 2013 and July 26, 2018<sup>6</sup>.

Since 2013, County Planning has required the Cordoba Center applicants to perform multiple studies to further evaluate potential impacts of the project to surface water and groundwater resources on the project property and surrounding parcels. The project applicants also considered other development proposals. These studies are part the Draft EIR in Appendix F and provide further site-specific engineering and geologic information. The site-specific studies detail investigatory findings and conclusions related to the proposed center's operations (cemetery, orchard, caretaker's residence, event center, etc.) including project location, soil type, depth to groundwater, distance to Llagas Creek, site topography, flood zones, irrigation and landscape management, and local climatology. Most importantly, Draft EIR, Appendix F includes calculations of nutrient, pathogen, and total dissolved solids (i.e. salts) loading relative to soil conditions and depth to groundwater from onsite wastewater treatment facilities (for the event center and caretaker's residence) and burial activities. In all cases, the nitrate loading to groundwater is localized and will not cause detrimental effects on groundwater quality in the Llagas Subbasin.

In addition, the County will need to require the Cordoba Center to install an onsite wastewater treatments system in accordance with the County's LAMP, which requires the septic tank and the dispersal field to be at least 100 feet from a watercourse. We understand that the Cordoba Center's onsite wastewater treatment system, which includes supplemental treatment, is proposed to be located at least 150 feet from the top of the bank of Llagas Creek. Supplemental treatment is a device or system used in an onsite wastewater treatment systems that performs additional wastewater treatment functions, beyond primary treatment, and is capable of reliably producing wastewater effluent of secondary quality or better, prior to discharge to the dispersal system. Therefore, the proposed system will be installed in accordance with the requirements of the LAMP.

### **Total Maximum Daily Load**

As shown in Attachment 1, the Cordoba Center location is not located adjacent to a Llagas Stream reach that has been identified as impaired for nutrient water quality criteria and biostimulation indicators (see Pajaro River Basin TMDL<sup>7</sup>). Additionally, for those impaired reaches identified in the Pajaro River Basin TMDL, onsite wastewater treatment systems were considered negligible sources of pollution and irrigated agriculture was identified as contributing the majority of the controllable nutrient loads to streams. The Cordoba Center location is located adjacent to a Llagas Stream reach that is considered high quality waters.

### **Conclusion**

It is Central Coast Water Board staff's professional opinion that County Planning, as the lead regulatory agency for CEQA, has adequately considered the Cordoba Center's proposed project's ability to impact and impair surface water and groundwater quality. Additionally, the county of Monterey Health Department will permit the septic system in accordance with the Local Agency

---

<sup>5</sup> Draft EIR, Appendix F, Groundwater Studies

[https://www.sccgov.org/sites/dpd/DocsForms/Documents/2145\\_ApdxF\\_Groundwater.pdf](https://www.sccgov.org/sites/dpd/DocsForms/Documents/2145_ApdxF_Groundwater.pdf)

<sup>6</sup> See Central Coast Water Board staff letters dated February 19, 2013 and July 26, 2018:  
[http://geotracker.waterboards.ca.gov/profile\\_report.asp?global\\_id=T10000011833](http://geotracker.waterboards.ca.gov/profile_report.asp?global_id=T10000011833)

<sup>7</sup> Pajaro River Basin TMDL

[https://www.waterboards.ca.gov/centralcoast/water\\_issues/programs/tmdl/docs/pajaro/nutrients/](https://www.waterboards.ca.gov/centralcoast/water_issues/programs/tmdl/docs/pajaro/nutrients/)



Management Program that is approved by the Central Coast Water Board. Currently, Central Coast Water Board staff continue to concur with the technical analyses, recommendations, and conclusions of the Draft EIR. This determination is consistent with previous Central Coast Water Board staff analyses in response to concerns raised for the proposed project related to potential impacts to surface water and groundwater quality.

If you have any questions please contact Thea Tryon at (805) 542-4776 or at [thea.tryon@waterboards.ca.gov](mailto:thea.tryon@waterboards.ca.gov).

Sincerely,

for John M. Robertson  
Executive Officer

Attachment 1: Map of Stream Reaches Exhibiting Biostimulatory Impairments in the Pajaro River Basin

cc:

David M. Rader, County Planning, [david.rader@pln.sccgov.org](mailto:david.rader@pln.sccgov.org)  
Colleen Tsuchimoto, County Planning, [colleen.tsuchimoto@pln.sccgov.org](mailto:colleen.tsuchimoto@pln.sccgov.org)  
Christopher Hoem, County Planning, [christopher.hoem@pln.sccgov.org](mailto:christopher.hoem@pln.sccgov.org)  
Sylvia Quast, USEPA, [Quast.sylvia@Epa.gov](mailto:Quast.sylvia@Epa.gov)  
Matthew Mitchell, USEPA, [Mitchell.matthew@Epa.gov](mailto:Mitchell.matthew@Epa.gov)  
Stephanie Yu, State Water Board, [stephanie.yu@Waterboards.ca.gov](mailto:stephanie.yu@Waterboards.ca.gov)  
Mary Adams, Central Coast Water Board, [jennifer.epp@waterboards.ca.gov](mailto:jennifer.epp@waterboards.ca.gov)  
Thea Tryon, Central Coast Water Board, [thea.tryon@waterboards.ca.gov](mailto:thea.tryon@waterboards.ca.gov)  
Cecile DeMartini, Central Coast Water Board, [cecile.demartini@waterboards.ca.gov](mailto:cecile.demartini@waterboards.ca.gov)  
Dan Niles, Central Coast Water Board, [dan.niles@waterboards.ca.gov](mailto:dan.niles@waterboards.ca.gov)  
Harvey Packard, Central Coast Water Board, [Harvey.packard@waterboards.ca.gov](mailto:Harvey.packard@waterboards.ca.gov)  
Sheila Soderberg, Central Coast Water Board, [sheila.soderberg@waterboards.ca.gov](mailto:sheila.soderberg@waterboards.ca.gov)

r:\rb3\shared\ldu\facilities\nonpermitted sites\cordoba project\2019 letters\1-03-2019\_ldu\_cordoba\_rsp.doc

CR#: n/a

GeoTracker global id: T10000011833



Source: Total Maximum Daily Loads for Nitrogen Compounds and Orthophosphate in Streams of the Pajaro River Basin

Note: Cordoba Center Project location is depicted on the map as a star. ★

