

# County of Santa Clara

Department of Planning and Development  
Planning Office

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April 7, 2021

MHC Morgan Hill Expansion L.P.  
Attn: Mike Sukel  
12895 Uvas Road  
Morgan Hill, CA 95037  
Email: mike\_sukel@equitylifestyle.com

**\*\*SENT VIA E-MAIL ONLY\*\***

**FILE NUMBER:** PLN21-032  
**SUBJECT:** Major Modification to existing Use Permit/Architecture & Site Approval  
**SITE LOCATION:** APN 756-43-024; Contiguous to 12895 Uvas Road, Morgan Hill  
**DATE RECEIVED:** March 8, 2021

Dear Mr. Sukel,

Your application for a Major Modification to an existing Use Permit and Architecture and Site Approval (ASA) for the property immediately south of 12895 Uvas Road and associated with the existing Thousand Trails RV Park in Morgan Hill near the intersection of Uvas Road and Watsonville Road (APN: 756-30-024) is **incomplete**.

Resubmittals are made via the internet, to do so, follow the instructions at the following URL: <https://www.sccgov.org/sites/dpd/Iwantto/Permits/Pages/Permits.aspx>. Before resubmitting please consult me as this process is dynamic and at the time you choose to resubmit the process may have changed and / or been enhanced. The resubmitted materials must include all requested information. Once the information is submitted, Planning Office personnel will distribute the plans, reports, etc. to the appropriate staff or agency for their review.

**AN APPOINTMENT IS REQUIRED FOR A RE-SUBMITTAL. PLEASE CALL OR EMAIL ME TO SCHEDULE AN APPOINTMENT AND TO DISCUSS THE PROCESS.**

Please submit electronic copies of the revised plans / resubmittal documents with a written response addressing the following items.

There are elements of the proposal that Staff cannot support, which are listed below under Additional Information / Issues of Concern. Staff recommends discussing additional design options with staff, to ensure the project is consistent with all County requirements, prior to a resubmittal in response to the Incomplete Comments outlined below.

**It is important to note that the County is currently updating the General Plan and the Zoning Ordinance related to RV Parks, that would limit the location of RV Parks to the Roadside Services (RS) zoning designation. As of this date, the General Plan and Zoning Ordinance revisions have been approved by the County Planning Commission and are**

**tentatively targeted for a public hearing before the County Board of Supervisors on June 8, 2021. If these changes are adopted, regulations related to your proposal will change. Due to these changes, some Use Permit and / or ASA findings or requirements may be altered, new findings or requirements may be added, and some findings or requirements may be eliminated. One key aspect of the proposed updates is eliminating RV Parks as an allowable use within the Rural Residential (RR) zoning designation.**

### **ADDITIONAL INFORMATION / ISSUES OF CONCERN**

1. Staff recommends consideration of the following issues of concern specifically relating to riparian corridors:
  - a. New uses shall not detract from the rural and residential nature of the area, particularly neighboring parcels.
  - b. Recreational Vehicle Parks are to be used for recreational purposes focused on serving the needs of the traveling public.
  - c. Impacts that new development may have on riparian corridors and flood plains. The impacts must be minimized to the greatest extent possible.
  - d. Impacts that new development may have on water resources and usage, wastewater impacts as well as traffic issues. These potential impacts must be minimized to the greatest extent possible.
2. Provide a density study comparing the existing density of the Thousand Trails RV Park with the proposed post-approval density of a revised Thousand Trails RV Park. The density study must also compare the current and post-approval densities when compared with the surrounding neighborhood. Staff recommends that the proposed expansion and its density maintain the density of the existing Thousand Trails RV Park.
3. The updated plans must be revised to: 1) reflect comments and requirements as determined by the County Department of Environmental Health and the Central Coast Regional Water Quality Control Board, and 2) reflect the need for an adequate and approved wastewater treatment facility and how that will be addressed.
4. Future development that affects any wildlife and / or plant species covered by the Habitat Plan, or any unmapped burrowing owl occupied nesting habitat riparian, stream, pond or wetland covers requires coverage under the Habitat Plan and will incur additional fees. See Fees & Conditions Worksheet and Fee Schedule for reference. HCP documents including the HCP Screening Form, Habitat Plan Application, and Fees information can be viewed at the following weblink: <https://scv-habitatagency.org/250/Private-Applicant>

### **INCOMPLETE COMMENTS**

Following are the incomplete comments on the submitted application, pursuant to Government Code Section 65943 and the County's Zoning Ordinance Section 5.20.080. If you have any questions about the information being requested below, you should first call the person whose

name is listed as the contact person for that item. He or she represents a specialty or office and can provide details about the requested information.

## **PLANNING**

Contact Carl Hilbrants at (408) 299-5781 / [carl.hilbrants@pln.sccgov.org](mailto:carl.hilbrants@pln.sccgov.org) regarding the following comments:

1. **Lot legality:** As APNs 756-19-024, 025, 034 and 035 are part of the overall project, to ensure lot legality of the project and the ability for the project to continue forward, provide pre-1969 deeds for APNs 756-19-024, 025, 034 & 035.
2. **Acknowledgements and Agreements Form:** Please provide documentation that the signatory, Jeff Kimes, on the currently provided Acknowledgment and Agreement Form represents the property owner(s).
3. **Photos:** Provide photographic evidence of the required on-site signage necessary to adhere to the necessary adopted Public Outreach Sign Guidelines. Along with the photograph, provide a site plan showing the location.
4. **Fencing:** Please clarify if any fencing is being proposed. The project description mentions perimeter trees, but no mention of fencing is made. If fencing is proposed, show the fencing on the site plan and provide an elevation of the fencing to scale showing the proposed height.
5. **Plans:** Please provide an updated plan set to include:
  - a. **Site Plan:** In addition to the currently provided site plan based on an aerial photograph, full details as demonstrated on the site plan sample located in the Documents Portlet of this record and labeled “Rural Sample Site Plan” must be included on the required site plan. On the site plan—above and beyond what is shown on sample site plan—ensure to provide details for: 1) easement location, 2) top-of-bank of Uvas Creek and the necessary riparian setback, 3) traffic flow and pattern within the entire RV Park, and, 4) required parking spaces for the proposed RV spaces as well as for the total number of RV spaces within the entirety of Thousand Trails RV Park. The current standard is one parking space for every RV space.

NOTE: The proposed standard per the pending RV Park General Plan and Zoning Ordinance amendments will be 1.5 parking spaces for each RV space.

- b. **Grading and Drainage Plans:** Provide a detailed Grading and Drainage Plan prepared by a licensed professional. Include cut and fill amounts and the maximum height of those cuts and fills. Demonstrate those amounts in tabular format and broken down into amounts for driveway / parking improvements, structure pad improvements, proposed landscaping or other improvements. These calculations must be prepared by a licensed civil engineer or licensed land surveyor. Depending on the cut and fill quantities and depth, a Grading Approval may be required.

- c. **Floor Plans:** Provide a floor plan and at elevations of all four sides of the proposed bathroom building.
  - d. **Water tanks:** Provide size, including height, location, design, and capacity of existing and proposed water tanks.
6. Project Description: Submit a revised “Project Description,” to include the following information:
- e. Provide the breakdown of existing and proposed RV spaces by their length of stays. Define how this breakdown would be managed.
  - f. The number of existing and proposed employees, customers and residents. Specifically, clarify the number of users on-site at any given time, including employees, customers, residents, retreat participants, teachers, volunteers and caretakers managing the facilities. For clarity, any terminology used to describe the users should be consistent within reports, project description and other submitted documents.
  - g. Describe any existing and proposed outdoor-oriented recreational uses, including those primarily or exclusively within the existing RV Park.
  - h. List the square footage of all proposed structures.
  - i. If applicable, provide a daily and monthly schedule of activities for the site for a full calendar year. Provide a breakdown of the users associated with each activity within the project description.
  - j. Describe anticipated number of deliveries and where on the property those deliveries are anticipated to be made.
7. Color sample: Please provide material and color samples for the proposed bathroom building. Present the color samples pursuant to the color board as shown at the following URL:  
[https://www.sccgov.org/sites/dpd/DocsForms/Documents/DR\\_ColorMatBoard.pdf](https://www.sccgov.org/sites/dpd/DocsForms/Documents/DR_ColorMatBoard.pdf).
8. Lighting: Provide an exterior lighting plan indicating exterior light locations and proposed fixtures for individual RV spaces as well as for the overall RV Park improvements. Plan shall include a photometric plan to ensure that there is no glare onto neighboring properties. Due to the number of the RV spaces and their proximity to neighboring properties and a riparian corridor, lighting shall be carefully placed as to not impart glare over neighboring properties or Uvas Creek.
9. Landscaping Plan: Conceptual landscape plans shall include the total area of proposed landscaping in square feet and as a percentage of the entire site. Please provide the number and category (native/non-native) of trees, if any, proposed to be planted. Also, note on the plan any trees proposed for removal. Note that any landscaping proposed would be subject to the County’s Sustainable Landscape Ordinance and a landscape permit. The landscape plan must be relevant to the arborist report requested in item #13 below.
10. Tree Removal: The site contains an area that appears to be a Valley Oak Woodland. To accurately assess possible development impacts to these trees and trees on-site in the development area, a tree inventory will be required. The inventory must be conducted by a

licensed arborist and shall tally each tree within the development area along with an assessment of tree health, rationale for the tree rating and discussion of any impacts to trees both during and after construction. The arborist must also state whether the trees located along Uvas Creek are considered an oak woodland, and if so, whether the project will result in any loss of oak woodlands.

11. Land Cover Verification: Provide land cover verification mapping prepared by a qualified biologist to verify the habitat land covers impacted and species impacts within the proposed development area. HCP covered species include but are not limited to Tricolored Blackbird; and,
12. Creek—Top of Bank: Revise the provided site plan to show the proposed development including land cover types in the development area and any relevant landforms—including but not limited to: roads, water bodies, the creek top of bank and centerline, the edge of pavement, road shoulders, existing and proposed structures that will be impacted by the proposed project, and all proposed improvements (i.e. driveway, parking, structures, septic systems, drainage, landscaping). Note: If proposed development encroaches into the 150-foot Category 1 stream setback from top of bank of Uvas Creek, a Stream Setback Exception may be necessary.
13. California Environmental Quality Act (CEQA): Per the California Environmental Quality Act (CEQA); an Environmental Assessment would be required for the proposed project. The following studies are required:
  - a. Arborist. An Arborist Report is required in order to inventory all protected trees on site. The report must assess any potential impacts to tree health as a result of development and include any conditions or mitigations deemed necessary to lessen impacts to existing trees. See items 9 and 10 above.
  - b. Archaeologist Report. The submitted letter from Archaeological Resource Services identifies a higher than likely potential for presence of archaeological resources, Please provide a detailed archaeological report which surveys the development areas and related areas of potential effect, identifies any potential impacts, and recommends avoidance and mitigation measures. See comment below from the Northwest Information Center / Sonoma State University.
  - c. Biological Report. A full-biological report would be necessary in order to adequately review the CEQA impacts. The proposed location is in an area adjacent to a sensitive riparian habitat.
  - d. Noise. A Noise Study is required to evaluate noise impacts to neighboring parcels.
  - e. Traffic Study. A traffic study is required to evaluate safety impacts of the proposed project, as well as a Vehicle Miles Traveled analysis. Also, see comments from Roads and Airports below.
  - f. Water Supply Analysis. Please provide a Water Supply Analysis for the proposed water use for the proposed development and landscaping. See comments below from the Department of Environmental Health and from the California State Water Resources Control Board.

## **SANTA CLARA VALLEY HABITAT PLAN**

Contact Lara Tran at (408) 299-5759 or [lara.tran@pln.sccgov.org](mailto:lara.tran@pln.sccgov.org) regarding the following comments:

14. Revise the site plan to identify the distance between the proposed development and the top-of-bank of Uvas-Carnadero Creek. Note that the existing creek is a Category 1 creek under HCP which has a minimum 100-foot setback.
15. Provide a biology survey / report from a qualified biologist to confirm if the existing habitat land covers and / or wildlife species are impacted by the proposed development. HCP covered species include but are not limited to Least Bell's Vireo and Tricolored Blackbird.
16. Provide Land Cover Verification Mapping prepared by a qualified biologist to verify any habitat land covers impacted and / or species impacted by the proposed development area. Mapping shall identify the development area with permanent (50-foot buffer) and temporary (10-foot buffer) improvements. Permanent improvements which will create permanent land cover impacts include home, driveway, accessory structures, pool, patio, landscaping, utilities, etc. Temporary improvements which result in temporary land cover impacts during construction but will be returned to pre-project land cover type within one (1) year of completing construction include leach fields and well pipelines that do not result in permanent habitat disturbance.

## **LAND DEVELOPMENT ENGINEERING:**

Contact Darrell Wong at (408) 299-5735 / [darrell.wong@pln.sccgov.org](mailto:darrell.wong@pln.sccgov.org) for information regarding the following items:

17. Please demonstrate by earthwork sections and calculations how a grading permit would not be required pursuant to the Santa Clara County Grading Ordinance, specifically Section C12-421. Should this project not be able to demonstrate the noted exceptions, please apply for a Grading Permit pursuant to Sections C12-410 to C12-412, inclusive.
18. Please provide earthwork calculations of the earthwork quantities shown on the plans.
19. Please show the limits of the disturbed area as a result of the proposed development. Include the disturbed areas of the septic field and any stockpile areas as well.
20. Identify the limits of the landscaping for the project. This should include all disturbed areas that are not hard scaped subtracting out all areas that are specifically identified as hydroseeded. The landscaping should also include the area of swimming pools. Provide an accounting on the plan sheet.
21. Please clearly identify all roads maintained and not maintained by the County.
22. Based on the plans provided, the proposed driveway may impair drainage flows, thereby not meeting the exemption requirements of Section C12-421 of the County Grading Ordinance. Please provide a Drainage Plan that demonstrates the following items:
  - a. the site can be adequately drained,

- b. the proposed development will not cause problems to the nearby properties,
  - c. the proposed development is not subject to significant damage from the one percent flood,
  - d. the on-site drainage will be controlled in such a manner as to not increase the downstream peak flow or cause a hazard or public nuisance. If this cannot be demonstrated, provide a detention system pursuant to the Design Guidelines in Section 6.3.3 of the 2007 Santa Clara County Drainage Manual.
23. Please demonstrate that the access road to the driveway shown on the plan conforms to County Standard Detail SD1 of 22' wide drivable surface. Please demonstrate that the access road from the county-maintained section to any parking space shown on the plan conforms to County Standard Detail SD1 with 22' of drivable surface. The Owner's engineer may be required to make a proposal to build a pro-rata portion of any shared access road based upon the fully developed use of the road.
  24. Based upon County policy, a right-of-way dedication of thirty feet measured perpendicularly from the road centerline would be required with this development. It appears that the proposed house will encroach on the proposed right-of-way. **Please review with Planning Department Staff about setbacks from the proposed right-of-way.**
  25. Please submit evidence of legal access to the site from the nearest publicly maintained road compiled and/or prepared by a Licensed Land Surveyor or Registered Civil Engineer who is authorized to practice land surveying. The easement references for the emergency exit to Heritage Way is helpful, but the primary legal rights of access to Uvas Road has not been established by this plan.
  26. Show all improvements required for the emergency access to Merriman Lane and Heritage Way.
  27. Please include all applicable easements affecting the parcel(s) with benefactors and recording information on the site plan. Please supply two copies of a preliminary title report, dated within 60 days of the day of submittal with the next submittal.
  28. Please provide a drainage system to adequately route flows from the site to the natural outfall.
  29. Show drainage system from parking lots and driveways on plan. Identify peak storm water mitigation improvements.
  30. Show location of flood plain on plan.
  31. This project is located within the Central Coast watershed and includes greater than 5000 square feet (non-SFR) of net new impervious area. Please provide Stormwater Treatment Measures per section E.12 of the Central Coast Regional Board requirements. Show any grading required to provide such treatment on the plans.

32. This project is located within the Central Coast watershed and may include greater than 15,000 square feet of new impervious area. Please provide Stormwater Treatment and Control Measures per section E.12 of the Central Coast Regional Board requirements. Show any grading required to provide such treatment on the plans.

**FIRE MARSHAL OFFICE:**

Contact Alex Goff at (408) 299-5763 / alex.goff@sccfd.org for information regarding the following items:

**Land Use**

33. Site Plan scale appears to be off, resubmittal to have a correctly scaled site plan.

NOTE: Additional comments may be made after measurements are re-evaluated.

34. As the proposed bathroom is greater than 500 square feet, fire sprinklers will be required.

NOTE: NFPA 13 fire sprinklers are to be shown as a deferred submittal.

35. Site plan to show interior turn radius of 50 feet.

36. Site plan shows new access overlaying an existing trash enclosure. What is the new location of the trash enclosure?

37. Fire hydrants to be labeled as standard or wharf hydrant.

38. Plans state a 200,000-gallon water tank exists on the neighboring parcel that will be merged with the subject parcel. The plans are to show the overall site and the existing water tank.

NOTE: The water tank may be used for both sites if the lots are merged and the tank is adequately sized.

**DEPARTMENT OF ENVIRONMENTAL HEALTH:**

Contact Nicole Jorgensen at (408) 918-3492 / nicole.jorgensen@cep.sccgov.org for information regarding the following items:

39. Per California State Water Resources Control Board, Division of Drinking Water. (SWRCB DDW):

“It is our understanding that your organization (Thousand Trails RV Park) is planning an extension to the existing park with new stalls for additional RVs. The County Environmental Health Department has shared some of this information with us. This is to inform you that this project will need to be reviewed by our office (CSWRCB DDW) before it gains clearance for County approval to move to construction. If any of the design is inconsistent with the California Waterworks Standards, it will require that you submit a permit application package. At this point, we are requesting your design plans and specifications for the project, specifically as it relates to the new water infrastructure. In addition, please provide a short technical report that discusses the project and how it complies with all applicable drinking water regulations.”



40. Per Central Coast Regional Water Quality Control Board (CC RWQCB):  
“This is to inform you that this project will need to be reviewed by our office (CC RWQCB) before it gains clearance for County approval to move to construction. The proposal for 57 RV units is inconsistent with the approved OWTS design that can handle an additional 54 RV sites. At this point, we (CC RWQCB) are requesting your design plans and specifications for the project, specifically as it relates to the OWTS.”
41. Resubmit project proposal to the Departments of Environmental Health and Planning and Development with 54 RV sites to be consistent with what the onsite wastewater treatment system (OWTS) design can support.

**Contact Eric Lacy at (510) 620-3474 regarding item #1 above and Cecile Blancarte at (805) 542-4782 regarding item #2 above.**

**COUNTY GEOLOGIST:**

Contact Jim Baker at (408) 299-5774 / jim.baker@pln.sccgov.org for information regarding the following item:

42. Submit a geotechnical investigation report that includes an evaluation of the potential for liquefaction-related ground deformation to occur at the northeastern portion of the parcel which is located within a County Liquefaction Hazard Zone. Pay the appropriate report review fee when uploading an unsecured pdf of the report into the Accela Documents portal.

**ROADS & AIRPORTS:**

Contact Thomas Esch at (408) 573-2450 / thomas.esch@rda.sccgov.org for information regarding the following items:

43. Proposed project to provide a detailed site plan to include:
- a. Adjacent roadways.
  - b. Existing and proposed driveways, including any additional driveways for emergency vehicles.
  - c. Signs, landscaping, and other improvements, existing and proposed, within the County road right-of-way.
44. The proposed project is to submit a Traffic Study to include, at minimum, the following:
- d. Existing conditions,
  - e. Existing and project conditions,
  - f. Trip Generation Study for AM Peak Hour, PM Peak Hour, Peak Hour of Generator, Weekend Peak Hour,
  - g. Site Circulation Analysis,
  - h. Site Access Analysis, including adding left / right turn pockets.
  - i. Sight Distance Analysis for driveway(s),
  - j. Truck turning templates (use largest anticipated vehicle),
  - k. Queuing Analysis,
  - l. Feasibility of Acceleration / Deceleration lane,
  - m. Existing Transit, Ped / Bike facilities.

NOTE: It is recommended that the Roads and Airports Department review the scope of work for the Traffic Study prior to commencing work.

45. A Maintenance and Indemnification Agreement (MIA) is required for all existing and proposed structures (including signs), lighting, landscaping, and other non-standard improvements located within County road rights-of-way.

**CALIFORNIA STATE WATER RESOURCES CONTROL BOARD**

Contact Eric Lacy at (510) 620-3473 / [eric.lacy@waterboards.ca.gov](mailto:eric.lacy@waterboards.ca.gov) regarding the following items:

NOTE: See enclosed CSWRCB referral response.

**CALIFORNIA DEPARTMENT OF FORESTRY AND FIRE PROTECTION (Cal Fire)**

Contact Marcus Hernandez at (408) 310-4654 / [marcus.hernandez2@fire.ca.gov](mailto:marcus.hernandez2@fire.ca.gov) regarding the following comment:

NOTE: See enclosed CalFire referral response.

**NORTHWEST INFORMATION CENTER / SONOMA STATE UNIVERSITY**

Contact Jillian Guldenbrein at (707) 588-8455 / [nwic@sonoma.edu](mailto:nwic@sonoma.edu) regarding the following comments:

NOTE: See enclosed NWIC referral response.

**SANTA CLARA VALLEY WATER DISTRICT**

Contact Benjamin Hwang at (408) 630-3066 or [bhwang@valleywater.org](mailto:bhwang@valleywater.org) regarding the following comments:

NOTE: See enclosed SCVWD referral response.

**CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE—BAY DELTA REGION**

Contact Kristin Garrison at (707) 944-5534 / [kristin.garrison@wildlife.ca.gov](mailto:kristin.garrison@wildlife.ca.gov) regarding the following comment:

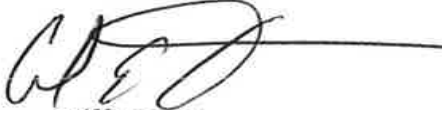
NOTE: See enclosed CDFW referral response.

Prior to resubmittal, feel free to contact me to schedule meet and discuss my comments regarding the project. Please make sure the requested changes are made for the revised plan sets and documents that are needed for the resubmittal. Resubmittals are only accepted via the internet. If the requested information is not submitted within 180 days, you will be required to pay a fee of 10% of the application fee at the time the information is submitted. All requested information must be submitted no later than one (1) year from the date of this letter. PARTIAL RESUBMITTALS WILL NOT BE PROCESSED. Fees required at the time of resubmittal will be those in effect at that time.

Please note that your Use Permit and Architecture and Site Approval application has been charged a minimum fee and will be charged additional fees to continue processing if the initial payment is exhausted. As of the date of this letter, less than 50 percent of the initial deposit has been expended.

If you have questions regarding this application, please contact me at (408) 299-5781 or [carl.hilbrants@pln.sccgov.org](mailto:carl.hilbrants@pln.sccgov.org).

Regards,



Carl Hilbrants  
Senior Planner

**cc:**

Valerie Negrete, Senior Planner  
Manira Sandhir, Principal Planner  
David Cheung, Engineering Technician  
Lara Tran, Associate Planner  
Michael Meehan, Senior Planner  
Darrell Wong, LDE  
Alex Goff, FMO  
Nicole Jorgensen, DEH  
Darrin Lee, DEH  
Jim Baker, County Geologist  
Thomas Esch, R&A  
Eric Lacy, CSWRCB  
Cecile Blancarte, CSWRCB  
Marcus Hernandez, Cal Fire  
Jillian Guldenbrein, NWIC  
Benjamin Hwang, SCVWD

Equa Engineering  
Attn: Monte Johnson  
960 McCourtney Road, Suite C  
Grass Valley, CA 95949

MHC Morgan Hill Expansion L.P.  
2 North Riverside Plaza, 8<sup>th</sup> Floor  
Chicago, IL 60606

**encl:**

Attachment A—Applicable General Plan Policies

Enclosures: Northwest Information Center referral response  
CalFire referral response  
SCVWD referral response  
CDFW referral response  
CSWRCB referral response

# ATTACHMENT B

## Use Permit Findings

\*underlined emphasis added for areas of concern. These findings would be further evaluated if an application is submitted, deemed complete, and reviewed for environmental impacts.

Finding Letter	General Plan Finding Language
A.	The proposed use conforms with the general plan, with the zoning ordinance, and with <u>all other standards and guidelines applicable</u> to the proposed use that have been adopted by the Planning Commission or Board of Supervisors;
B.	The site is adequate for the proposed use, including but not limited to being of adequate size and shape to accommodate all facilities and development features to <u>integrate the use into the surrounding area and to provide any necessary or appropriate buffers between the use and the surrounding area;</u>
C.	The proposed use, by its <u>nature, scale, intensity or design,</u> will not <u>impair the integrity and character of the zoning district or neighborhood,</u> and will not be <u>significantly detrimental to any important and distinctive features of the site's natural setting;</u>
D.	<p>The proposed use will not be detrimental to the public health, safety or general welfare. In this respect the Planning Commission shall further find, without limitation, that:</p> <ol style="list-style-type: none"> <li>1. Adequate off-street parking, <u>loading and unloading areas (if applicable), and handicapped access will be provided;</u></li> <li>2. <u>Appropriately designed site access will be provided, including safe and adequate access for fire and emergency vehicles (including secondary access where deemed necessary by the Fire Marshal);</u></li> <li>3. <u>The use will not adversely affect water quality.</u> Adequate wastewater treatment, disposal and sanitation facilities will be provided and will satisfy all applicable local, state and federal requirements;</li> <li>4. <u>The use will not be detrimental to the adjacent area because of excessive noise, odor, dust or bright lights;</u></li> <li>5. <u>The use will not substantially worsen traffic congestion affecting the surrounding area;</u></li> <li>6. Erosion will be adequately controlled; and</li> <li>7. <u>Adequate storm drainage management exists or will be provided</u> and will comply with all applicable local, state and federal requirements.</li> </ol>
Finding Number	Zoning Ordinance Finding Language
1.	Duration of Stays. The RV park is designed primarily to accommodate short-term occupancy stay (fewer than 30 days) At least 65 percent of all the spaces within an RV park shall be designed for and designated as short-term occupancy spaces. Not

	more than 25 percent of the total park spaces may accommodate stays up to 180 days. Not more than ten (10) percent of the total number of park spaces may accommodate stays up to 360 days. Furthermore, the park shall be designed to provide for all the needs and amenities of the long-term occupancy of families with and without children.
2.	General Health and Safety. The RV park is designed to accommodate health and safety concerns as required by state law and appropriate local regulations. This may include facilities such as public restrooms, showers and laundry facilities. Long-term spaces will be provided with a connection to an adequate sewage system, potable water, electrical hookups and individual closed trash containers or a common closed trash container as approved by the health department. The RV park is not located in the 100-year floodplain unless the plans show appropriate mitigation.
3.	Amenities. The RV park is designed to provide for convenience and recreation as required by state law and appropriate local regulations. The RV park may include facilities such as a public telephone(s), mail drop(s), a children's play area(s) separated from vehicle traffic, active recreation facilities (which may include a recreation room), lawn area for outdoor activities, an outdoor all weather surfaced (could be grass) patio space, and may include a small grocery store.
4.	Fire Safety. The RV park is designed to accommodate fire safety concerns as required by state law and appropriate local regulations. The site is fully accessible throughout the RV park to emergency vehicles and provides adequate fire protection facilities, including water supply through hydrants, or other methods as approved by the County fire marshal. Driveways are at least surfaced with oil and screenings, or preferably asphalt or concrete, and are designed to County standards to sustain 35,000 pounds of weight or more. Driveways are named with signs placed at intersections, and individual sites are numbered with the number displayed in a conspicuous location facing the driveway.
5.	Access and Parking. The RV park is designed to provide for adequate access and parking as required by state law and appropriate local regulations. Individual RV spaces are designed with an all-weather surface (preferably asphalt or concrete). Each space should have a minimum width of 20 feet and an area of at least 750 square feet. As a guideline, a parking space for an extra vehicle should be provided every 100 feet, and a small parking lot(s) (one space for every 10 RV spaces as a guideline) for guests.
6.	School District Review. The school district in which the project is located has indicated in writing that the school impact fee requirements will be met to its satisfaction or that the school district is not impacted.
7.	Unoccupied RV Storage. The RV park may set aside specific designated spaces for short-term or long-term storage of RVs with the approval of the County Department of Environmental Health. These spaces shall be shown on the approved site plan.
8.	Screening. The RV park is designed to provide adequate perimeter landscaping and fencing to minimize off-site visibility, potential noise, lighting and glare, and other activities that could be a nuisance to neighboring properties. On-site signs

	advertising the park shall be designed in conformance with the provisions of Chapter 4.40, Signs, and consistent with the rural setting.
<b>9.</b>	Manager/Employee Housing. Manager and employee housing, if any, shall be shown on the site plan and approved as part of the use permit.

Note: If all the required findings cannot be made, the application shall be denied.

**From:** [Cheung, David](#)  
**To:** [Hilbrants, Carl](#)  
**Subject:** RE: Santa Clara County E-Referral : Record No. PLN21-032, Comments Due March 25, 2021  
**Date:** Tuesday, March 23, 2021 6:12:31 PM

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Hello Carl,

- **APN 756-43-024 is a legal lot** (Parcel 3 of PM 749-M-45). This is the project area.
- **APN 756-19-033 is a legal lot** (Parcel 2 of PM 333-M-49). This is the parcel adjacent to the project area, and was under a use permit for RV park.
- APNs 756-19-024, 025, 034, & 035 were under the same use permit of APN 756-19-033 (the RV park). However, no pre-1969 deeds were submitted for the verification of lot legality.

APNs 756-19-024, 025, 033, 034, 035 together were within the area of a use permit for the RV park (Planning file #1651 & #658). We should have verified lot legality prior to that use permit.

I have no comments for the merging of APN 756-43-024 & APN 756-19-033. However, lot legality verification are required if they want to include APNs 756-19-024, 025, 034, & 035 in that same Lot Merger process. Please request the applicant to submit pre-1969 deeds to APNs 756-19-024, 025, 034 & 035 prior to the approval of the use permit.

**David Cheung**  
(408) 299-5782

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**From:** Hilbrants, Carl <Carl.Hilbrants@PLN.SCCGOV.ORG>  
**Sent:** Wednesday, March 10, 2021 8:29 AM  
**To:** marcus.hernandez2@fire.ca.gov; Baker, Jim <Jim.Baker@pln.sccgov.org>; Bazhaw, Greg <Greg.Bazhaw@pln.sccgov.org>; Yvonne Arroyo <yarroyo@valleywater.org>; Cheung, David <David.Cheung@pln.sccgov.org>; Garrison, Kristin@Wildlife <kristin.garrison@wildlife.ca.gov>; EXT.Alex.Goff <alex.goff@sccfd.org>; Camacho, Leo <Leo.Camacho@rda.sccgov.org>; Lee, Darrin <Darrin.Lee@cep.sccgov.org>; melissa.gunter@waterboards.ca.gov; Martinez01, Michelle <michelle.martinez01@pln.sccgov.org>; nwic@sonoma.edu; ryan\_olah@fws.gov; Farr, Jeremy <jeremy.farr@PRK.SCCGOV.ORG>; Thompson, Matthew <Matthew.Thompson@pln.sccgov.org>; Wong, Darrell <Darrell.Wong@pln.sccgov.org>; Hilbrants, Carl <Carl.Hilbrants@PLN.SCCGOV.ORG>  
**Subject:** Santa Clara County E-Referral : Record No. PLN21-032, Comments Due March 25, 2021

Dear Referral Agencies/Divisions:

This is an electronic review for a planning application.

Please provide your comments/conditions on the following project to Carl Hilbrants by March 25, 2021.

Project description: Use Permit for the expansion of the Thousand Trails RV Park

See project plans attached for your review. If you need further information, contact project planner Carl Hilbrants at [carl.hilbrants@pln.sccgov.org](mailto:carl.hilbrants@pln.sccgov.org).

# DEH LAND USE SURVEY - COUNTY PLANNING REFERRALS

Received: 3/18/21	Due: 3/36/21	Co. File#: PLN21-032	SR#: SR0865550
Location: 12411 Merriman Crt, Gilroy		APN: 756-43-004	Proposal: Use Permit
Owner: Thousand Trails		Phone #:	
Applicant: EQUA Engineering - Monte Johnson		Phone #:	

<b>Existing:</b> <input checked="" type="checkbox"/> Wells? # active:      # inactive:      Use: Public Water System <input checked="" type="checkbox"/> Septic Tanks (describe, permits): <input checked="" type="checkbox"/> Structures:	<b>Referral Needed:</b> <input type="checkbox"/> Solid Waste <input type="checkbox"/> HazMat <input type="checkbox"/> Vector <input type="checkbox"/> Other
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<b>Sewage Disposal:</b> <input type="checkbox"/> Not Applicable			
Sewered?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If no, distance to sewer (miles):	District: CC RWQCB System
Soil Profile:	Required? <input type="checkbox"/> Yes <input type="checkbox"/> No	Date completed:	Depth (feet):
Perc Test:	Required? <input type="checkbox"/> Yes <input type="checkbox"/> No	Date completed:	Average Adjusted Stabilized Rate:
System Requirements:	Tank (gal):	Drainfield:	Design Flow (gpd/bed):
Drainfield Slope:	<input type="checkbox"/> 0-10% <input type="checkbox"/> 10-20% <input type="checkbox"/> 20-30% <input type="checkbox"/> 30-50% <input type="checkbox"/> >50%		Geotech report: <input type="checkbox"/> Required <input type="checkbox"/> Approved
Features near Drainfield:	<input type="checkbox"/> Creeks <input type="checkbox"/> Drainage Channel <input type="checkbox"/> Cut/Steep Bank <input type="checkbox"/> Wells		Wet Weather Testing Required? <input type="checkbox"/> Yes <input type="checkbox"/> No

<b>Water Supply:</b> <input type="checkbox"/> Not Applicable	
Public/Mutual Waster System (Name): Public Water System with SWRCB DDW	Shared (# connections):
Private Supply: <input checked="" type="checkbox"/> Well <input type="checkbox"/> Spring <input type="checkbox"/> Other (describe)	Distance to public supply (miles):

## Miscellaneous Info:

**Recommendation:** ☐ No objection   ☐ Complete/Approved with conditions   ☒ Incomplete   ☐ Disapproved

Per SWRCB DDW:

It is our understanding that your organization is planning an extension to the existing park with new stalls for additional RVs. The County Environmental Health Department has shared some of this information with us. This is to inform you that this project will need to be reviewed by our office before it gains clearance for County approval to move to construction. If any of the design is inconsistent with the California Waterworks Standards, it will require that you submit a permit application package. At this point, we re requesting your design plans and specifications for the project, specifically as it relates to the new water infrastructure. In addition, please provide a short technical report that discusses the project and how it complies with all applicable drinking water regulations.

Eric Lacy, PE  
District Engineer

Specialist: Nicole Jorgensen Date: 3/25/21 Supervisor: \_\_\_\_\_ Date: \_\_\_\_\_





**APPLICATION EVALUATION AND PRELIMINARY CONDITIONS**  
for  
**SANTA CLARA COUNTY REFERRALS**

<b>For the Proposed:</b> Thousand Trails RV Park Expansion			
<b>County File Number:</b> PLN 21-032		<b>Valley Water File Number:</b> 34392	
<b>Owner/Applicant:</b> Equa Engineering		<b>Site Location:</b> 12895 Uvas Road, Morgan Hill	
<b>APN:</b> 756-43-024		<b>Map No:</b> 227	
<b>SCVWD Contact:</b> Benjamin Hwang		<b>(408) 630-3066</b>	<b>Date:</b> 3-24-2021
<b>Comment Due Date:</b> 3-25-2021			
<input checked="" type="checkbox"/> <b>Facility:</b> Uvas Creek	<input type="checkbox"/> <b>Cross Facility:</b>	<input type="checkbox"/> <b>Watershed:</b>	

<input checked="" type="checkbox"/> <b>The Subject Application is Incomplete. The applicant needs to submit the following:</b> <ul style="list-style-type: none"><li><input type="checkbox"/> See evaluation dated: _____</li><li><input checked="" type="checkbox"/> Topography of the site, including the creek. Topography of the creek should delineate the existing top of both banks and the bottom of channel.</li><li><input checked="" type="checkbox"/> Hydraulic    <input checked="" type="checkbox"/> Hydrologic    <input type="checkbox"/> Geotechnical    - Analysis as described:<ul style="list-style-type: none"><li>• A floodplain impact analysis should be submitted to demonstrate that the proposed development will not result in increases to the BFE, or to the lateral extent of flooding.</li><li>• Pervious and impervious areas should be calculated for both pre- and post-development conditions; subsequently, the resulting runoff (volume and rate) should be calculated for both conditions. Post-development runoff should not exceed those under pre-development conditions for storm events ranging from the 2/3-year to 100-year event. If necessary, mitigation measures (in addition to the proposed drainage swales) should be implemented to prevent increased flows into Uvas-Carnadero Creek and to avoid increased flooding downstream of the development.</li></ul></li><li><input checked="" type="checkbox"/> Revised plans showing all existing and proposed well(s) on the plan per Valley Water Ordinance 90-1.</li><li><input checked="" type="checkbox"/> Revised plans showing that septic system meets county regulations as follows:<ul style="list-style-type: none"><li>• Minimum horizontal setback from general watercourses (from top of bank).</li></ul></li><li><input checked="" type="checkbox"/> Other:<ul style="list-style-type: none"><li>• Uvas-Carnadero Creek, which traverses the easterly portion of the development, is subject to flooding and the proposed development site is within FEMA Special Flood Hazard Area AE. Furthermore, the site is subject to approximate Base Flood Elevations between 350-ft. and 351.3-ft. (NAVD 88). Development plans should delineate the limits of FEMA's Special Flood Hazard Area. Please also provide the BFEs across the development site.</li><li>• The proposed development is partially within a FEMA Regulatory Floodway, an area which is prohibited from encroachment in order to discharge the base flood (i.e. 100-year or 1% annual chance flood event), without cumulatively increasing the water surface elevation (WSEL) above the Base Flood Elevation. Please delineate the limits of the Regulatory Floodway in the development plans.</li><li>• Please provide a cross section of Uvas-Carnadero Creek adjacent to the proposed development. The top of bank and the 150-ft. riparian setback should be shown and clearly labeled in the cross section.</li><li>• Please show the Onsite Wastewater Treatment System (OWTS) to which the proposed 6-inch sewer lines will connect to. Additionally, please include details indicating whether the existing OWTS is adequate, will need to be expanded, or if an alternate OWTS will be required to support the proposed development.</li></ul></li></ul>
--

<input type="checkbox"/> <b>The Subject Application is Complete. The following are preliminary condition(s) of approval:</b> <ul style="list-style-type: none"><li><input type="checkbox"/> All previous conditions or comments still apply. See evaluation dated: _____</li><li><input type="checkbox"/> Valley Water requests right of way as described: _____</li><li><input type="checkbox"/> A Valley Water permit is required for this project per Valley Water's Water Resource Protection Ordinance. Make a separate application in writing to Valley Water for an encroachment permit for any modification or use of a Valley Water facility, property or easement. Project clearance from Valley Water is required prior to _____</li><li><input type="checkbox"/> Additional Comments: _____</li></ul>
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☐ **Informational Items to be included in the conditions of approval:**

- ☐ A Valley Water permit is not required.
- ☐ This project will not modify or use a Valley Water facility or easement, however; \_\_\_\_\_ is/are located on or next to the site. Valley Water staff is interested in reviewing and providing consultation on the project because of impacts the proposed project may have on Valley Water's adjacent facility or on water resources. Please consider the comments below and send revised drawings for our review and comment.
- ☐ The site may be subject to flooding in the event of a 1% or 100 year flood. For more information please contact the County's flood plain administrator.
- ☐ Valley Water records indicate the site contains \_\_\_\_ well(s). Any abandoned wells, or wells that are no longer in use, must be properly destroyed. Any wells in use that will be impacted by project activities must be protected. As required by Valley Water Ordinance 90-1, an application must be filed with Valley Water for a permit to construct or destroy any well or to drill any exploratory borings deeper than 45 feet. Contact Valley Water's Wells and Water Measurement Unit at (408) 630-2660, for more information.
- ☐ Additional Comments/Recommendations:

**From:** [Hernandez, Marcus@CALFIRE](mailto:Hernandez, Marcus@CALFIRE)  
**To:** [Hilbrants, Carl](#)  
**Cc:** [EXT.Alex.Goff](#)  
**Subject:** [EXTERNAL] Re: Santa Clara County E-Referral : Record No. PLN21-032, Comments Due March 25, 2021  
**Date:** Friday, March 19, 2021 9:55:37 AM  
**Attachments:** [Record No. PLN21-032.png](#)

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This project (Record No. PLN21-032) is located within the State Responsibility Area (SRA) and is recommended to follow all minimum wildfire protection standards of **California Code of Regulations Title 14 Natural Resources Division 1.5 Department of Forestry Chapter 7 - Fire Protection Subchapter 2 SRA Fire Safe Regulations Articles 1-5.**

With that being said, these plans appear to meet all requirements. One comment related to maintaining vegetation clearance.

**1)** Maintain vegetation clearance requirements of Public Resource Code (PRC) 4291.

**§ 1276.01. Setback for Structure Defensible Space.**

(c) Structures constructed in the SRA are required to comply with the defensible space regulations in Title 14. Natural Resources Division 1.5. Department of Forestry and Fire Protection Chapter 7. Fire Protection Subchapter 3. Fire Hazard.

*Best Regards,*

**Marcus Hernandez**

Morgan Hill Fire Department

**CAL FIRE**

**Battalion 1608**

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**From:** Hilbrants, Carl <Carl.Hilbrants@PLN.SCCGOV.ORG>  
**Sent:** Wednesday, March 10, 2021 8:28 AM  
**To:** Hernandez, Marcus@CALFIRE <Marcus.Hernandez2@fire.ca.gov>; Baker, Jim <Jim.Baker@pln.sccgov.org>; Bazhaw, Greg <Greg.Bazhaw@pln.sccgov.org>; Yvonne Arroyo <yarroyo@valleywater.org>; Cheung, David <David.Cheung@pln.sccgov.org>; Garrison, Kristin@Wildlife <Kristin.Garrison@wildlife.ca.gov>; EXT.Alex.Goff <alex.goff@sccfd.org>; Camacho, Leo <Leo.Camacho@rda.sccgov.org>; Lee, Darrin <Darrin.Lee@cep.sccgov.org>; Gunter, Melissa@Waterboards <Melissa.Gunter@waterboards.ca.gov>; Martinez01, Michelle <michelle.martinez01@pln.sccgov.org>; nwic@sonoma.edu <nwic@sonoma.edu>; ryan\_olah@fws.gov <ryan\_olah@fws.gov>; Farr, Jeremy <jeremy.farr@PRK.SCCGOV.ORG>; Thompson, Matthew <Matthew.Thompson@pln.sccgov.org>; Wong, Darrell <Darrell.Wong@pln.sccgov.org>; Hilbrants, Carl <Carl.Hilbrants@PLN.SCCGOV.ORG>  
**Subject:** Santa Clara County E-Referral : Record No. PLN21-032, Comments Due March 25, 2021

**Warning:** this message is from an external user and should be treated with caution.

Dear Referral Agencies/Divisions:

This is an electronic review for a planning application.

Please provide your comments/conditions on the following project to Carl Hilbrants by March 25, 2021.

Project description: Use Permit for the expansion of the Thousand Trails RV Park

See project plans attached for your review. If you need further information, contact project planner Carl Hilbrants at [carl.hilbrants@pln.sccgov.org](mailto:carl.hilbrants@pln.sccgov.org).

If you are not/no longer the correct person to receive this referral, please inform us by replying to this email.

# County of Santa Clara

## Parks and Recreation Department

298 Garden Hill Drive  
Los Gatos, California 95032-7669  
(408) 355-2200 Fax (408) 355-2290  
Reservations (408) 355-2201

[www.parkhere.org](http://www.parkhere.org)



March 10, 2021

Santa Clara County  
Planning Office  
Attn: Carl Hilbrants  
70 W Hedding St, 7<sup>th</sup> Floor  
San Jose, CA 95110

### **SUBJECT: Thousand Trails RV Park Expansion- PLN21-032**

Dear Carl Hilbrants,

The applicant seeks approval for a Use Permit for the expansion of the Thousand Trails RV Park at 12895 Uvas Road in Morgan Hill. The project proposes 57 full RV-sites with a new bathroom and landscaping.

The Santa Clara County Parks and Recreation Department's (County Parks Department) functions to provide a sustainable system of diverse regional parks, trails, and open spaces that connects people with the natural environment and supports healthy lifestyles while balancing recreation opportunities with natural, cultural, historic, and scenic resource protection. The County Parks Department is also charged with the planning and implementation of the *Santa Clara County Countywide Trails Master Plan Update* (Countywide Trails Plan), an element of the Parks and Recreation Section of the County General Plan (adopted by the Board of Supervisors on November 14, 1995).

The proposed project does not impact the Countywide Trails Plan and therefore the County Parks Department has no comments at this time. If you have any questions, please email me at [kelly.gibson@prk.sccgov.org](mailto:kelly.gibson@prk.sccgov.org)

Sincerely,

*Kelly Gibson*

Kelly Gibson  
Assistant Planner

**Board of Supervisors:** Mike Wasserman, Cindy Chavez, Otto Lee, Susan Ellenberg, S. Joseph Simitian

**County Executive:** Jeffrey V. Smith



CALIFORNIA  
HISTORICAL  
RESOURCES  
INFORMATION  
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NAPA  
SAN BENITO

SAN FRANCISCO  
SAN MATEO  
SANTA CLARA  
SANTA CRUZ  
SOLANO  
SONOMA  
YOLO

**Northwest Information Center**  
Sonoma State University  
150 Professional Center Drive, Suite E  
Rohnert Park, California 94928-3609  
Tel: 707.588.8455  
nwic@sonoma.edu  
<http://www.sonoma.edu/nwic>

March 23, 2021

File No.: 20-1759

Carl Hilbrants, Project Planner  
County of Santa Clara  
Department of Planning and Development  
70 West Hedding Street  
San Jose, CA 95110-1705

re: PLN21-032 / Thousand Trails at 12895 Uvas Road, Morgan Hill

Dear Carl Hilbrants,

Records at this office were reviewed to determine if this project could adversely affect cultural resources. **Please note that use of the term cultural resources includes both archaeological sites and historical buildings and/or structures. The review for possible historic-era building/structures, however, was limited to references currently in our office and should not be considered comprehensive.**

**Project Description: Use Permit for the expansion of Thousand Trails RV Park**

**Previous Studies:**

XX This office has record of two previous cultural resource covering approximately 100% of the proposed project area (*see recommendation below*).

ReportNum	DocAdd/CitLetter	Authors	CitYear	CitTitle
S-005222		Thomas F. King and Patricia P. Hickman	1973	Archaeological Impact Evaluation: San Felipe Division, Central Valley Project, Part I; The Southern Santa Clara Valley, California: A General Plan for Archaeology
S-005222	a	Thomas F. King	1973	Archaeological Impact Evaluation: San Felipe Division, Central Valley Project, Part II: The Direct Impact of San Felipe Division Facilities on Archaeological Resources
S-005222	b	Gary S. Breschini and Trudy Haversat	1978	A Preliminary Archaeological Surface Reconnaissance of the San Felipe Division, Central Valley Project, Santa Clara and San Benito Counties, California
S-005222	c	David M. Van Horn	1980	Archaeological and Historical Investigations in Portions of the Central Valley Project, San Felipe Division
S-015564		William Roop	1993	A Cultural Resources Evaluation of the Lands of Grant, APN 756-43-10, Santa Clara County, California

### **Archaeological and Native American Resources Recommendations:**

- XX The proposed project area has the possibility of containing unrecorded archaeological site(s). Due to the passage of time since the previous surveys (see table above) and the changes in archaeological theory and method since that time, we recommend a qualified archaeologist conduct further archival and field study for the entire project area to identify cultural resources. A study is recommended prior to commencement of project activities.
- XX We recommend the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values. For a complete listing of tribes in the vicinity of the project, please contact the Native American Heritage Commission at (916)373-3710.

### **Built Environment Recommendations:**

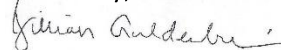
- XX Since the Office of Historic Preservation has determined that any building or structure 45 years or older may be of historical value, if the project area contains such properties, it is recommended that prior to commencement of project activities, a qualified professional familiar with the architecture and history of Santa Clara County conduct a formal CEQA evaluation.

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the California Historical Resources Information System (CHRIS) Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

For your reference, a list of qualified professionals in California that meet the Secretary of the Interior's Standards can be found at <http://www.chrisinfo.org>. If archaeological resources are encountered during the project, work in the immediate vicinity of the finds should be halted until a qualified archaeologist has evaluated the situation. If you have any questions please give us a call (707) 588-8455.

Sincerely,



Jillian Guldenbrein  
Researcher

**From:** [Lacy, Eric@Waterboards](mailto:Lacy.Eric@Waterboards)  
**To:** [Hilbrants, Carl](#)  
**Subject:** [EXTERNAL] Re: Santa Clara County E-Referral : Record No. PLN21-032, Comments Due April 14, 2021  
**Date:** Thursday, April 1, 2021 3:47:55 PM

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My comments should be sufficient for DDW

Cecile will be more interested on the wastewater side.

Sent from my iPhone

On Apr 1, 2021, at 3:26 PM, Hilbrants, Carl <Carl.Hilbrants@pln.sccgov.org> wrote:

EXTERNAL:

Eric,

Do you anticipate additional or different comments from the Central Coast representative?

Should I wait for Cecile or are your comments sufficient?

Thanks,  
Carl

---

**From:** Hilbrants, Carl  
**Sent:** Thursday, April 1, 2021 10:23 AM  
**To:** Lacy, Eric@Waterboards <Eric.Lacy@waterboards.ca.gov>  
**Subject:** RE: Santa Clara County E-Referral : Record No. PLN21-032, Comments Due April 14, 2021

Sounds good. Thanks.

I'll place the following into my incomplete letter. "Insufficient information has been provided to demonstrate compliance with applicable regulations found the Waterworks Standards (WWS), Chapter 16, California Code of Regulations (CCR) and flushing and sampling requirements found in Chapter 15, CCR. Project proponent must pursue a permit and/or waiver of the WWS from the State Water Resources Control Board Division of Drinking Water at 850 Marina Bay Parkway, Building P, 2<sup>nd</sup> Floor, Richmond CA 94804-6403."