COUNTY OF SAN MATEO
PLANNING AND BUILDING

455 County Center, 2nd Floor | Mail Drop PLN 122
Redwood City, CA 94063
(650) 363-4161
planning.smcgov.org

November 20, 2026

SENT VIA EMAIL

Richard Liaw, Representative
Ocean Moon Corporation
405 El Camino Real, Unit 253
Menlo Park, CA 94025

SUBJECT: SB 330 / SB8 Applications
100 Shamrock Road ("Shamrock Ranch"), Unincorporated Pacifica
APNs 023-741-010 and 023-741-020; County File No. PLN2026-00232

Dear Richard:

Thank you for the opportunity to review your SB330/SB8 Major Subdivision, Planned Agricultural Development, and Coastal Development Permit applications, Cycle 2 submittal on October 22, 2026, for a proposed 347-unit residential development (previously 350 units), including a major subdivision, with a mix of single-family residences, townhomes, duets, and condominiums.

Staff has determined all applications **continue to be incomplete** and requests the following outstanding items to be addressed before completeness review can continue:

1. Application and Agency Review Fees (REPEAT COMMENT) –

   Applicant hand delivered check to office on October 21, 2026 that subsequently was returned by their bank as non-sufficient funds on November 2, 2026. An additional $25 returned check fee has been invoiced on the project (see Invoice #469137 attached to letter).

   Invoice #466183 for the Major Subdivision application, transmitted to applicant on July 16,2026 remains unpaid and is attached to this letter.

   Invoice #469646 (new and attached to letter) reflects a recalculation of fees for the additionally required permits for the project based on staff's determination of two applications (Resource Management Permit and Re-Zoning Permit) no longer required for the project.

   All fees are outstanding and now due.

2. Additional Required Applications (REPEAT COMMENT) – Based on the submittal items, staff has determined the following additional permits are required:

    a. Grading Permit – see https://www.smcgov.org/planning/grading-and-land-clearing-permits for more information regarding application forms and required submittal items

    ~~b. Resource Management Permit – see https://www.smcgov.org/planning/resource-management-permit for more information regarding application forms and required submittal items~~

    Staff has determined project no longer requires a Resource Management Permit

    ~~c. Re-Zoning Permit – see https://www.smcgov.org/planning/rezoning-planned-unit-development-permit for more information regarding application forms and required submittal items~~

    Staff has determined that project no longer requires a Resource Management Permit

    ~~d. See attached invoice#466442 for the applicable fees associated with the above-mentioned additionally required permits for this project.~~

    Staff has attached revised invoice #496646 based on the above-mentioned revisions. See also Comment #1 above.

3. Geotechnical Report (REPEAT COMMENT)– Provide report that contemplates the project proposal. Also provide any associated reports and recommendations as necessary from the project geotechnical consultant regarding the project proposal. Both subject parcels are in County identified landscape and liquefaction zones.

    Applicant did not provide requested report ; see attached applicant's response to comment letters received by staff on October 21, 2026

4. Sewer Service "Will Serve Letter" (REPEAT COMMENT) - Provide written confirmation from City of Pacifica, either on their letterhead or from their official email addresses, that there is sufficient sewage disposal connections and/or capacity, for the project.

    Applicant changed project to an on-site private septic system for entire project instead of pursuing annexation/connection to City of Pacifica. See attached applicant's response to comments letter received by Staff on October 21, 2026

    Size of system State Regional Water Quality Control Board (RWQCB) review. Attached is the initial review letter from State RWQCB.

NEW COMMENT: Applicant must work directly with and provide formal determination from RWQCB of the proposed on-site system in order for comment to be considered complete.

~~5.~~ Environmental Impact Report Deposit (REPEAT COMMENT) - Project will require the creation and processing of an environmental impact report, which requires payment of an initial $10,090 deposit to the County. ~~This deposit amount has also been included in Invoice#466442.~~

See Comment #1 above ; no application fees including the EIR deposit have been paid to date. Staff has attached revised invoice #496646 that shows this outstanding fees.

6. Landscape Plans (REPEAT COMMENT) – Provide landscape plan that include the following information within the plan set:

    a. Landscape Design Plan
    b. Irrigation Design Plan
    c. WELO Worksheet
    d. Planting Schedule
    e. Fence and Retaining Wall details and sections
    f. Tree protection plan as recommended by the project arborist
    g. Project arborist's report (can be a separate document or within the plan set)
    h. See County's WELO webpage for additional information

Applicant did not provide requested plans ; see attached applicant's response to comment letters received by staff on October 21, 2026

7. Updated Civil Plans (REPEAT COMMENT) – Provide updated civil plans that include the following information:

    a. Grading Plan
        i. Include cut and fill quantity tables
    b. Utility Plan
    c. Drainage / Stormwater Plan
        i. Include C3C6 Development Review Checklist as separate document or within plan set
    d. Erosion/Sediment Control Plan
    e. Site Distance Study by Civil Engineer
    f. Driveway/Access Road Profile
        i. Please note turnarounds may be required by County Fire ; profiles should be designed in contemplation of this requirement
    g. Access Plans for portions of project that are greater than 150 ft. from a public road

Applicant did not provide requested plans ; see attached applicant's response to comment letters received by staff on October 21, 2026

8. Updated Architectural Plans (REPEAT COMMENT) – plans should be updated to include the following information:

    a. Plan scale – staff identified several sheets, particularly elevation sheets, that did not include a scale

    b. Enlarge details, elevations, etc. – staff identified several sheets of the submitted plan set where hard to read details, elevations, etc. were provided on pages where sufficient blank space remaining on the sheet to enlarge items.

    Applicant did not provide requested plans ; see attached applicant's response to comment letters received by staff on October 21, 2026

9. ~~Current Title Report – Provide a title report that dated no later than two months from this letter's date~~.

    COMPLETED – Applicant provided current title report in their October 21st Cycle 2 submittal.

Conclusion

As part of your resubmittal, please follow these instructions:

- Include one transmittal memos that clearly indicates responses to each comment provided and indicate what submittal items are provided in the response
- All revisions to plans must include revision clouds and revision triangles
- All electronic files must be in PDF format and reduced in size as much as possible
- All electronic files must use a naming convention that is clearly identifiable
    - Example : "PLN2026-01234__Response to Comments Letter_Cycle1"
- All resubmittals should be directly emailed to me as attachment or fileshare link

Thank you again for the opportunity to review this application.

Regards,

Dylan Parker

Dylan Parker, AICP
Planner III

Attachments:
1. Invoices #466184, #469137, and #469646
2. Regional Water Quality Control Board Review Letter dated November 16, 2026
3. Applicant's response to Cycle 1 completeness comments, received October 21, 2026

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PLANNING AND BUILDING

County Government Center
455 County Center, 2nd Floor
Redwood City, CA 94063
650-363-4161 T
650-363-4849 F
planning.smcgov.org

Invoice

Invoice #:	469646
Date:	11/20/2026
Applicant:	RICHARD LIAW
Applicant Address:	405 EL CAMINO REAL #253, MENLO PARK, CA 94025-0000
Project Address	
Project Parcel #:	023741010
Owner:	VOSKES DANA DENMAN TR
Owner Address:	18477 CRYSTAL ST, GRASS VALLEY, CA 95949-8727

Case Number	Description	Amount Due
PLN2026-00232	CDP - Public Hearing	$4,530.75
	CEQA - EIR Processing	$9,796.00
	Grading Permit	$5,093.25
	Planned Agricultural District Permit	$7,347.00
	Drainage Review	$9,180.00
	Technology Fee	$1,437.88
	Legal Counsel Surcharge Fee	$1,797.35
	Document Storage Fee	$718.94
	Invoice Total:	$39,901.17
	Balance Due:	**$225,336.46**

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650-363-4849 F
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Invoice

Invoice #:	466183
Date:	7/16/2026
Applicant:	RICHARD LIAW
Applicant Address:	405 EL CAMINO REAL #253, MENLO PARK, CA 94025-0000
Project Address	
Project Parcel #:	023741010
Owner:	VOSKES DANA DENMAN TR
Owner Address:	18477 CRYSTAL ST, GRASS VALLEY, CA 95949-8727

Case Number	Description	Amount Due
PLN2026-00232	Major Subdivision	$165,844.00
drainage review fees	Manual Fee	$495.00
	Department of Public Works - Review	$400.00
	County Fire Review - Multi Family	$374.00
	IT Surcharge	$6,653.56
	Legal Counsel Surcharge	$8,316.95
2% document storage surcharge	Manual Fee	$3,326.78

Invoice Total:	$185,410.29
Balance Due:	**$185,410.29**

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Invoice

Invoice #:	469137
Date:	11/2/2026
Applicant:	RICHARD LIAW
Applicant Address:	405 EL CAMINO REAL #253, MENLO PARK, CA 94025-0000
Project Address	
Project Parcel #:	023741010
Owner:	VOSKES DANA DENMAN TR
Owner Address:	18477 CRYSTAL ST, GRASS VALLEY, CA 95949-8727

Case Number	Description	Amount Due
PLN2026-00232	Returned Check	$25.00
	Invoice Total:	$25.00
	Balance Due:	**$225,336.46**

San Francisco Bay Regional Water Quality Control Board

Sent via email; no hardcopy to follow

November 16, 2026

County of San Mateo, Planning and Building Department
Attn: Dylan Parker, AICP, Planner III
455 County Center, 2nd Floor
Redwood City, CA 94063
Sent electronically to: jparker1@smcgov.org

Subject: Water Board Staff Comments on Planning Permit Application Referral for Shamrock Ranch Project

Dear Dylan Parker:

Thank you for the opportunity to comment on the application to San Mateo County (County) by Ocean Moon Corporation (Applicant) for the Shamrock Ranch project (Project) located on 100 Shamrock Ranch Road (APNs 023-741-010 and 023-741-020) in unincorporated San Mateo County near the City of Pacifica (City).

San Francisco Bay Regional Water Quality Board (Water Board) staff have reviewed the Project documents that were uploaded to the County's website,[1] and this letter provides our high-level overview and comments on these documents, based on the Water Board's jurisdiction over discharges of wastewater to surface and ground waters within our region.

Comments on the Concept of Onsite Wastewater Treatment

We understand the Applicant is proposing the Project be served for wastewater treatment and disposal via a single community-scale packaged treatment plant and leachfield disposal. As detailed below, County policy and Water Board practice would encourage connection to a nearby sanitary sewer for municipal wastewater treatment and discharge instead.

Based on the City's 2021 Collection System Master Plan Phase 2 Update,[2] the Project site appears to be located within 200 feet of existing City sewer lines. County Code Section 4.84.040 requires structures within that distance of an "approved available sanitary sewer" to connect "in the most direct manner possible, provided a right-of-way

[1] https://www.smcgov.org/planning/shamrock-ranch-sb330sb8-builders-remedy-project-application
[2] https://www.cityofpacifica.org/home/showpublisheddocument/2518/637839773773270000

and any necessary approval from the appropriate sewer authority and the San Mateo County Local Agency Formation Commission [LAFCo] is first obtained."[3] We understand the Project is not within the City's current sewer service area, and the City has determined they cannot serve the Project for wastewater conveyance and treatment. Nevertheless, it is not clear that the Applicant has exhausted analysis of connection to the City's sewer, and pivoting to a proposed onsite treatment and disposal is inconsistent with the County requirement.

No evidence has been provided that the Applicant has formally applied to the City for annexation as a prerequisite to connection to City services. As part of any application for an onsite wastewater system, the Applicant should include evidence of application to the City for annexation, and that its annexation application has been either approved or denied. If the Applicant's annexation application is approved by the City, the application should additionally include evidence that the City's annexation application to LAFCo has been either approved or denied.

We acknowledge Section 9.52.010 of the County's Subdivision Ordinance[4] may alternatively require onsite wastewater treatment systems (OWTS) for each lot within rural land areas, such as the Project site. However, given the proximity of the Project site to an available sanitary sewer, the Water Board would encourage reliance on County Code Section 4.84.040 to support a requirement to connect to a centralized, municipal conveyance and treatment system.

In addition to local prohibitions against an onsite wastewater system, the State Water Board's OWTS Policy[5] also does not allow the Water Board to approve installation of new OWTS where existing public sewer is on a lot within 200 feet of any proposed building. The proposed Project is too large to be permitted under the State and local OWTS standards; nevertheless, it has long been the Water Board's position, the position of other regional water boards, and the position of the State Water Resources Control Board (State Water Board) that projects which can feasibly connect to sanitary sewer should do so in lieu of constructing new small onsite wastewater systems. The primary reasons for this position include:

- the economies of scale of the treatment works to which they discharge,
- the challenges of funding small wastewater systems in the long term,
- the challenges of operating and maintaining advanced treatment systems,
- the challenges of securing dedicated full-time onsite operational staff, and
- concerns about new discharges containing high mass loads of parameters of concern such as nutrients to groundwater basins that are already impaired by those parameters.

[3] https://library.municode.com/ca/san_mateo_county/codes/code_of_ordinances?nodeId=TIT4SAHE_CH4.84INSEDISY_ART4OWSIDE
[4] https://www.smcgov.org/media/103871/
[5] https://www.waterboards.ca.gov/water_issues/programs/owts/docs/adopted_owts_policy.pdf

In summary, the statewide and County policies discourage if not outright prohibit Water Board approval of onsite sewer treatment for the Project.

For purposes of the rest of this letter, it will be assumed the Project is not able to secure connection to an existing sanitary sewer. In that case, our understanding is the Applicant may submit an application to the Water Board for the issuance of waste discharge requirements for a new community onsite wastewater system that would provide domestic wastewater treatment and disposal service to the Project. The rest of this letter delineates the information that would need to be included in such an application, referred to as a Report of Waste Discharge (ROWD).

Major Comments on Information Provided

An ROWD should include sufficient analysis and technical information for the Water Board to evaluate the Project's potential impacts to groundwater and surface water quality, including from both construction and long-term operations. This letter is primarily focused on the Project's proposed onsite wastewater collection, treatment, and disposal systems, but the Project will also need to comply with other State Water Board water quality standards, including, but not limited to, the following:

- Applicable requirements of the Municipal Regional Stormwater NPDES Permit,[6] and particularly Provisions C.3 (New Development and Redevelopment), C.6 (Construction Site Control), and C.11 (Mercury Controls – depending on the area soils).
- Statewide Dredge or Fill Procedures and applicable sections of our Basin Plan for any proposed fill or other impacts to creeks, wetlands, or other waters of the state.[7,8] Those may influence project designs including the placement of infrastructure such as roads, parking, and storm drain outfalls, and structures such as residential buildings and appurtenant structures.

An ROWD for an onsite wastewater system should also consider the following:

- **Basin Plan:** The ROWD should demonstrate compliance with applicable Basin Plan requirements, including Basin Plan section 4.18.1 Policy on Discrete Sewerage Facilities, which requires a **public entity**[9] to "assume legal authority and responsibility for the planning, design, financing, construction, operation, and maintenance of any new community wastewater treatment and dispersal system," and to "prepare acceptable operation, maintenance, revenue, and contingency plans for the wastewater treatment and dispersal facility. These plans shall be included in the application submitted to local agencies for systems covered by the [State Water Board's Onsite Wastewater Treatment System] Policy[10] conditional waiver or, if not covered by the conditional waiver, in the

[6] https://waterboards.ca.gov/sanfranciscobay/water_issues/programs/stormwater/
[7] https://waterboards.ca.gov/sanfranciscobay/water_issues/programs/stream_and_wetland_protection.html
[8] https://waterboards.ca.gov/sanfranciscobay/water_issues/programs/dredging.html
[9] Emphasis added. "Public entity" is as defined in California Government Code section 16271(d).
[10] https://www.waterboards.ca.gov/water_issues/programs/owts/

[ROWD] submitted to the Water Board. In the absence of acceptable plans, the discharge will be prohibited."

When issuing waste discharge requirements, the Water Board must implement the Basin Plan (Water Code, § 13263, subd. (a).). The simplest path to compliance with Basin Plan section 4.18.1 would be for the Project applicant to pursue options to find or form a local agency or special district to assume legal authority and responsibility to plan, design, finance, construct, operate, and maintain the system.

- **Groundwater Impacts:** The Project's proposed onsite wastewater treatment and disposal system would constitute a significant new load of domestic wastewater to the underlying groundwater and to the San Pedro Valley basin which the Project appears to overlay. The ROWD should therefore evaluate all potential impacts to water quality and beneficial uses of the underlying groundwater and San Pedro Valley basin, including from pathogens, salts, nutrients, and other domestic wastewater constituents of concern such as per- and polyfluoroalkyl substances (PFAS).
- **Onsite Wastewater Treatment and Disposal System Details:** An ROWD for an onsite wastewater system should include the following discussion of the proposed system, at a minimum:
    - explanation of why on onsite wastewater system is proposed,
    - evaluation of whether reliance on such a system could contribute to cumulative groundwater quality degradation for the Project area or create long-term management and enforcement challenges compared to connection to centralized municipal wastewater treatment,
    - evaluation of whether connection to sanitary sewer could avoid or substantially lessen potentially significant impacts to groundwater, hydrology, water quality, and public health, and
    - Detailed description and evaluation of the proposed onsite wastewater system, including the following:
        - technical feasibility and infrastructure requirements, including descriptions of wastewater generation, treatment, storage, and disposal;
        - percolation testing to support proposed effluent application rates;
        - capacity constraints;
        - short-term and cumulative long-term impacts to groundwater quality, surface water quality, and sensitive receptors;
        - long-term operational reliability and resilience;
        - lifecycle operations, maintenance, and monitoring requirements;
        - risks associated with system failure, climate change, flooding, and power outages; and
        - consistency with regional wastewater and water quality policies.

- The Water Board has been requiring recent ROWDs to include a climate change adaptation analysis that considers potentially changing conditions (e.g., precipitation depth, duration, and frequency, groundwater levels, changes to surface water flows, including run-on and any open channel flows) and how the project will be resilient to them over time. This requirement is consistent with a 2024 Basin Plan amendment focused on climate change and our California Water Code discretion to require additional information from project applicants that is reasonably needed to protect water quality.

Similar types of wastewater systems in our region have been permitted under the State Water Board General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems, or SDGO.[11] Attachment B1 of the SDGO provides a recommended ROWD outline and general guidance on ROWD contents, and is included with this letter as Attachment 1.

- **Consideration of Impairment for San Pedro Creek.** For the reasons set forth below, the ROWD should explain how the proposed wastewater treatment and disposal system will effectively eliminate any risk of bacteria reaching San Pedro Creek.

  The Project is located within 100 feet of San Pedro Creek. San Pedro Creek and Pacifica State Beach are listed on the federal Clean Water Act 303(d) list of impaired water bodies due to high indicator bacteria levels (e.g., total coliform, fecal coliform, enterococcus, and E. coli). High indicator bacteria levels signify the presence of pathogenic organisms that are found in warm-blooded animal (e.g., human) waste. Pathogens pose potential health risks to people who recreate in contaminated waters. The Water Board developed a Total Maximum Daily Load (TMDL) for indicator bacteria in San Pedro Creek and Pacifica State to address the impairment of recreational beneficial uses in these water bodies.[12]

  Per County Code Section 4.84.170.a(2)-(3), the Project site is subject to the County's Advanced Protection Management Program (APMP) because of the bacteria TMDL and because of the Project's proximity to the San Pedro Creek (i.e., within 600 feet).

  Finding 20 of the SDGO states that "In general, wastewater systems located within the geographic area of an APMP are not eligible for coverage under this General Order unless the Regional Water Board's Executive Officer determines the discharge is acceptable based on site-specific conditions, the level of wastewater treatment, and/or total maximum daily load (TMDL) implementation plan requirements."

  The TMDL for San Pedro Creek identifies wasteload allocations for sanitary sewer systems, horse facilities, and stormwater runoff. It does not identify a wasteload allocation for wastewater disposal activities. Therefore, the allowable

[11] https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0153_dwq.pdf

[12] https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/pacificabacteriatmdl.html

load of bacteria to San Pedro Creek from onsite wastewater disposal to San Pedro Creek is effectively zero. The level of wastewater treatment provided should reflect strict control of pathogens, including robust disinfection.

- **Technical Appendices:** All supporting technical studies that are referenced in an ROWD should be included as appendices to allow for meaningful public and agency review. These include, but are not limited to, hydrogeologic investigations, wastewater feasibility analyses, nutrient loading analyses, stormwater studies, and groundwater modeling.

Comments on the Water Board Application Process

Attachment B1 of the SDGO provides a recommended ROWD outline and general guidance on ROWD contents (see Attachment 1). However, the Applicant is invited to reach out directly to the Water Board prior to submittal of a permit application to the Water Board. One goal of such communication would be to confirm relevant ROWD components for this Project, which can vary depending on site-specific details. Please refer to my contact information at the end of this letter.

Along with an ROWD, the Project applicant must also submit an application fee that would serve as the first annual permit fee. Fees are based on threat and complexity ratings, and the treatment technology employed. Threat and complexity ratings are defined in the annual fee schedules.[13]

In addition, the Water Board cannot authorize waste discharges to land (i.e., issue a discharge permit) prior to the completion of the California Environmental Quality Act process for a project.

Finally, the Water Board's issuance of waste discharge requirements does not preempt or supersede the authority of local agencies to prohibit, restrict, or control discharges of waste subject to their jurisdictions; does not relieve dischargers from their responsibility to obtain other necessary local, state, or federal permits to construct facilities necessary for compliance with those waste discharge requirements; and does not preclude the imposition of additional standards, requirements, or conditions by any other agency.

Closing

If you have any questions about this letter, please contact me at charles.hardy@waterboards.ca.gov or 510-622-2375.

Sincerely,

Charles Hardy

Charles Hardy, P.E.
Senior Water Resources Control Engineer
NPDES Wastewater Division

[13] The most recent fee schedule is available here: https://www.waterboards.ca.gov/resources/fees/stakeholder/docs/2026/fy2627-wq-feeschedule.pdf

Attachment 1:

State Water Board General Waste Discharge Requirements for Small Domestic Wastewater Treatment Systems (SDGO) Attachment B1

ATTACHMENT B1 – INFORMATION SHEET
RECOMMENDED REPORT OF WASTE DISCHARGE FORMAT
STATE WATER RESOURCES CONTROL BOARD
ORDER WQ 2014-0153-DWQ
GENERAL WASTE DISCHARGE REQUIREMENTS FOR SMALL DOMESTIC WASTEWATER TREATMENT SYSTEMS
GENERAL INFORMATION FOR DISCHARGER

The information presented in the Report of Waste Discharge (ROWD) is relied upon by staff to prepare the Notice of Applicability (NOA) for coverage by this General Waste Discharge Requirements for Order (General Order). The Discharger shall ensure that the information presented in the ROWD is accurate. Misstatements, errors, or omissions that exist in the ROWD may be included in the NOA and become enforceable.

Waste Discharge Requirements (WDRs) are generally updated at 10 or 15 year intervals depending on the waste's potential to impact water quality. The ROWD shall state realistic growth projections. Underestimating growth may result in additional or more frequent permitting requirements. Overestimating growth will result in the need for the Discharger to prepare more treatment, storage, and disposal capacity than might otherwise be immediately required.

The ROWD outline presented below is intended to provide general guidance for Dischargers and consultants. Submitting an ROWD consistent with the format will help the Discharger include all of the information that Regional Water Quality Control Board (Regional Water Board) staff need and will expedite review of the document and speed the permitting process. Contacting your Regional Water Board representative to discuss the project before preparing the ROWD is recommended.

1. BACKGROUND
   - 1.1. Wastewater system description
     - 1.1.1. Briefly, describe what the wastewater system is and how wastewater is generated.
     - 1.1.2. Provide a site location map and a site plan.
     - 1.1.3. Provide information on the location of wastewater system buildings, wastewater treatment system components, groundwater wells, and surface water bodies.
     - 1.1.4. Provide the Assessor's Parcel Number(s), section number(s), and Township and Range.
     - 1.1.5. Describe the water supply to the residence(s), business(es), and/or other facilities being served by the wastewater system.
   - 1.2. Service area description
     - 1.2.1. Describe the proximity of the wastewater system to an existing regional collection system; if nearby, discuss why connection to the regional system cannot be accomplished. If located within a regional system service area, or in close proximity to a collection system, provide written documentation that a good faith effort to connect to the regional system was made and that the request was not approved.

1.2.2. Wastewater collection system (describe the following). For collection systems subject to State Water Board Order No. 2006-0003-DWQ, reports prepared to comply with the State Water Board Order No. 2006-0003-DWQ satisfies this requirement and may be submitted as part of the ROWD technical report.

1.2.2.1. Age and condition of collection system.

1.2.2.2. Piping construction and layout (show on map).

1.2.2.3. Lift stations and backup pumping systems.

1.2.2.4. Failure warning system.

1.2.2.5. Inflow and infiltration (I/I) estimates (and any control that is necessary).

1.2.2.6. Maintenance of collection system and spill response.

1.2.3. Storm water collection system

1.2.3.1. Storm water collection area (show on map).

1.2.3.2. Storm water disposal area in relation to wastewater disposal area.

1.2.3.3. Storm water disposal permit (if needed).

2. WASTEWATER CHARACTERIZATION AND TREATMENT

2.1. Domestic wastewater characterization (untreated wastewater).

2.1.1. Describe the generation of wastewater (retirees, families, recreational vehicle [RV], institution, etc.).[9] If RV waste is allowed, describe educational and institutional controls in place to minimize the potential for deleterious RV waste constituents to be discharged to the wastewater system.

2.1.2. Domestic wastewater flow rate (describe how determined). Describe any special events or seasonal variations that cause high wastewater flow rates or other sources of wastewater (e.g. swimming pool filter, potable water treatment backwash water, well attended festivals, etc.).

2.1.3. Characterize domestic wastewater for Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS), electrical conductivity, nitrogen, sodium, chloride, and specific constituents of concern as needed based on site activities. Characterize wastewater for holding tank chemicals identified in the General Order (and others as appropriate) if RV waste is discharged to the system.

2.2. Wastewater treatment system

2.2.1. Provide a wastewater treatment schematic.

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[9] Recreational vehicle (RV) holding tank connections, RV waste dump stations, etc. create special conditions for treatment and monitoring. Please refer to the General Order for more information.

2.2.2. Describe wastewater pretreatment components.

2.2.2.1. Domestic wastewater pretreatment systems (e.g. septic tank effluent pump system, grease traps, etc.).

2.2.2.2. Describe storage, treatment, and disposal of pretreatment residuals.

2.2.3. Describe preliminary treatment activities (e.g., screening, comminution, grit removal).

2.2.3.1. Describe storage, treatment, and disposal of preliminary treatment residuals.

2.2.4. Describe primary treatment activities (remove settleable/flotable matter)

2.2.4.1. Describe storage, treatment, and disposal of primary treatment residuals.

2.2.5. Describe treatment technology (e.g., activated sludge, membrane biological reactor, aerated lagoon, oxidation ditch, Imhoff tank, septic tank, etc.) include engineered design capacity in description.

2.2.5.1. Describe storage, treatment, and disposal of treatment residuals (e.g. sludge, septage, etc.).

2.2.6. Size and location of treatment equipment (e.g. septic tank volume, package treatment plant, membrane biological reactor, pond size include acreage and storage capacity, pond liners, and number and horsepower of aerators, etc.).

2.2.7. Disinfection system equipment

2.2.8. Storage facilities

2.2.8.1. If wastewater will be stored prior to disposal, describe the size and location of wastewater storage ponds, include a map showing all the ponds and describe them as lined or not. Describe the materials, age, and condition of any liners.

2.2.9. Predicted wastewater effluent quality

2.2.9.1. Characterize the wastewater for TSS, BOD, total coliform organisms (if needed), and specific constituents of concern as needed. If RV waste is discharged to the system, characterize for holding tank chemicals identified in the General Order (and others as appropriate).

2.2.10. Treated effluent disposal method

2.2.10.1. Describe how treated wastewater will be dispersed (land application area, leach field, percolation pond).

2.2.10.2. Describe the proposed disposal area (and the 100-percent replacement area when needed, such as for a leach field disposal system) include acreage, surrounding land use, depth to groundwater, and the proximity of drainage ways, surface waters, and municipal, industrial, or agricultural wells.

2.2.10.2.1. If land application is proposed, describe how storm water that falls on the land application area (LAA) is handled. If storm water is allowed to run off the LAA, contact your Regional Water Board representative to discuss wastewater disinfection requirements.

2.2.10.2.2. Provide a water balance that demonstrates adequate storage/disposal capacity. Identify the safety factors used in the calculations. Please contact your Regional Water Board representative to determine the precipitation values to be included in the water balance. Typically, the 100-year return annual total precipitation value, distributed monthly in accordance with average (mean) precipitation values monthly is required. Some exemptions for existing ponds or sites that develop an acceptable *Spill Prevention and Emergency Response Plan* may apply. Rainfall depth duration frequency data is available on the Department of Water Resources Internet web page at:

<http://www.water.ca.gov/floodmgmt/hafoo/hb/csm/engineering/>

2.2.10.2.3. Support the assumptions and calculations in the water balance with adequate information. Information may include published infiltration values, site-specific percolation tests, application rates, or other sources. Cite the information source used; if a site-specific investigation, provide a copy of the report.

2.2.10.2.4. The use of subsurface disposal including leach fields and/or seepage pits serving more than 20 people, or systems that accept non-sanitary waste (generated by manufacturing, contains biocidal agents such as RV or portable toilets, etc.) must comply with the United States Environmental Protection Agency Underground Injection Control requirements. Please refer to General Order Requirement B.6.g and http://www.epa.gov/region9/ water/groundwater/uic.html to determine if federal requirements apply to the proposed project. If registration is required, documentation of registration shall be provided in the ROWD.

2.3. Recycled Water Projects

2.3.1. If treated wastewater will be applied for beneficial uses (such as those described in title 22 water recycling criteria), provide a title 22 Engineering Report and the State Water Board Division of Drinking Water (DDW) (formerly the California Department of Public Health (CDPH) review/approval letter. Guidance for preparation of a title 22 Engineering Report is available on the Internet at: http://www.cdph.ca.gov/certlic/drinkingwater/Documents/Recharge/ERGUIDE2001.PDF

2.3.1.1. Describe how any DDW requirements will be implemented in the project.

2.3.1.2. If needed, describe the disinfection requirements for the planned reuse.

2.4. Operation and Maintenance

2.4.1. Describe routine operation and maintenance procedures

2.4.2. Treatment operator training and qualifications requirements

2.4.3. Contingency plans for repairs/spills/treatment issues

3. GROUNDWATER QUALITY

3.1. Depending upon the threat to groundwater quality, groundwater monitoring may be required. Please contact your Regional Water Board representative to determine if groundwater monitoring is required.

4. CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

4.1. Some existing Small Domestic Systems will be determined to be categorically exempt from the California Environmental Quality Act (CEQA) under Title 14, section 15301 (ongoing or existing projects), section 15302 (replacement or reconstruction of existing utility systems), and section 15303 (new construction or conversion of small structures). The potential for categorical exemptions shall be examined and discussed with the Regional Water Board representative prior to submitting an ROWD.

4.2. New or expanding Small Domestic Systems will likely require CEQA evaluation that should be performed by local agencies. The CEQA evaluation shall be submitted with the ROWD. At a minimum, the evaluation shall include the Initial Study, a list of any adopted mitigation measures related to water quality, and the Notice of Determination.

4.2.1. The ROWD must include a description of how any water quality related mitigation measures will be implemented.

5. ADDITIONAL TECHNICAL REPORTS

5.1. If required by the General Order, a *Sludge Management Plan* shall be submitted with the ROWD.

5.1.1. Estimate the amount of sludge and scum that will be generated.

5.1.1.1. Describe how sludge, scum, and supernatant will be stored and disposed of to protect groundwater quality.

5.1.1.2. If sludge will be subject to further treatment, describe the treatment and storage requirements.

5.1.1.3. Describe cleaning of digesters or storage vessels and the treatment and disposal of the residuals. If drying of residuals is planned, describe how that will be performed to prevent nuisance odors, prevent vectors, and protect groundwater quality.

MH engineering Co.
16075 Vineyard Blvd. Morgan Hill, CA 95037 - (408) 779-7381

Date: 10/22/2026 Job#: 225028

To: County of San Mateo
Planning and Building
455 County Center
2nd Floor
Redwood City, CA 94063

Re: Responses to incomplete letter dated July 24, 2026
Project Address: 100 Shamrock Ranch Road ("Shamrock Ranch")
Unincorporated Pacifica
APNs 023-741-010 and 023-741-020
County File No. PLN2026-00232

1. Fees have been paid via check.
2. Noted; applicant is in the process of obtaining Grading Permit and Resource Management Permit. Re-Zoning Permit should not be required under SB-330.
3. The requested Geotechnical Report will be provided.
4. City of Pacifica has denied the applicant a will-serve letter. The plans have been updated to show that the project now proposes a private sanitary sewer system instead of connection to the City of Pacifica sewer system.
5. Requested fee has been paid via check.
6. Landscape Plans will be provided.
7. Utility Plan has been added to the Civil Plans. The remaining requested items are under review and will be.
8. Architectural Plans will be updated with any specified inconsistency.
9. Current Title Report is included with this submittal.

Please let me know if you have any questions or need any additional information.

Kevin O'Halloran
MH engineering Co.
Office: (408) 779-7381
kevino@mhengineering.com