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August 7, 2017

Terrence Grindall, Assistant City Manager
City of Newark
37101 Newark Boulevard
Newark, CA 94560-3796

Dear Mr. Grindall:

Subject: Addendum to the Dumbarton Transit Oriented Development (TOD) Specific Plan Program Environmental Impact Report (PEIR) (State Clearinghouse No.2010042012) and the subsequent Initial Study/Mitigated Negative Declaration (IS/MND) for the SHH/FMC project (State Clearinghouse No. 2014012056), for a proposed five-story mixed-use hotel and retail space at 37445 Willow Street

The Alameda County Water District (ACWD) wishes to thank you for the opportunity to comment on the Addendum to the Dumbarton Transit Oriented Development (TOD) Specific Plan Program Environmental Impact Report (PEIR) (State Clearinghouse No.2010042012) and the subsequent Initial Study/Mitigated Negative Declaration (IS/MND) for the SHH/FMC project (State Clearinghouse No. 2014012056), for a proposed five-story mixed-use hotel and retail space at 37445 Willow Street (Project). ACWD previously reviewed and provided comments to the City of Newark that are still applicable, in letters dated: April 28, 2010, on the Notice of Preparation of a Environmental Impact Report for the Dumbarton TOD Specific Plan; June 29, 2011, on the Draft Environmental Impact Report for the Dumbarton TOD Specific Plan; March 8, 2013, on the Notice of Preparation of a Supplemental Environmental Impact Report for the Dumbarton Transit-Oriented Development Trumark Residential Development; February 6, 2014, on the Draft Supplemental Environmental Impact Report for the Dumbarton Transit-Oriented Development Trumark Residential Development; and February 26, 2014, on the Initial Study/Mitigated Negative Declaration for the Dumbarton TOD SHH/FMC Project. Enclosed is a copy of each letter for your consideration. The Project Proponent is encouraged to review all previous comments so that future submittals will address ACWD comments.

ACWD has reviewed the Addendum and would appreciate your consideration of the following comments:

1. Hazards and Hazardous Materials (pages 61-62):

Given that volatile organic compounds (VOCs) were detected in groundwater on the parcel, the ability to install a public water system within the project area would be conditioned upon confirmation that the soil or groundwater does not pose a risk to the health and safety of workers either during installation of the public water system or during long-term routine operation and maintenance of such a system. Any mitigation required to eliminate such hazards or potential

hazards, such that the soil or groundwater does not pose a risk to the health and safety of workers during installation, and during long-term routine operation and maintenance of utility systems, must be identified and described. The proposed mitigation should not rely on extraordinary measures by the utility to protect worker health and safety, such as unusual personal protective equipment, unusual soil or groundwater treatment or disposal requirements, or decontamination of tools and equipment required for potable water system maintenance. If specific measures are to be identified in a Risk Management Plan, the project proponent should require ACWD approval of the plan as part of the mitigation.

2. Appendix B, Mitigation, Monitoring, and Reporting Program (Page 12): Reference is made to Mitigation Measure 4.5-2. ACWD appreciates the inclusion of compliance with ACWD Ordinance No. 2010-01. Please note that any groundwater extracted during dewatering should be properly disposed of due to the presence of potential VOCs. In addition, any groundwater extracted during the project should be quantified and may be subject to a Replenishment Assessment Fee in accordance with the Replenishment Assessment Act of ACWD.
3. Utilities and Service Systems (page 100):
 - a. The Initial Study analysis asserts that, “[t]he SHH/FMC IS/MND concluded that compliance with the requirements provided in the WSA will ensure that there will be sufficient water supply to serve the Specific Plan area,” and that, “there would be a less than significant impact and no mitigation would be necessary. The proposed modified project would have no new impact.” However, since the document does not evaluate how the water demands for proposed Project compare to the water demands for the site originally evaluated in the WSA, the conclusion that the proposed Project would have no new water supply impact is not supported. ACWD requests the Initial Study be revised to include additional information on the water demands for the site as well as an evaluation of whether the proposed changes will result in a substantial increase in water demand than was considered in the WSA for the Project. If this additional analysis demonstrates that the proposed Project increases water demand substantially over what was considered in the WSA, an assessment of the water supply may be necessary.
 - b. The public water services must be designed per the District's *Standard Specifications for Water Main Installation* (Standard Specifications) and *Development Specifications for Public Water System Extensions* (Development Specifications).
 - c. If any modifications of existing water facilities or new water service to the property are required, the project proponent shall contact ACWD's Engineering Department. Any existing water services which will not be used in the new development must be removed by ACWD. The Project Proponent is strongly encouraged to meet with ACWD's Engineering Department early in the process to discuss the configuration of service connections.

- d. Each irrigation or other non-residential domestic service will, and the fire service may, require an approved above-ground reduced pressure backflow prevention device. Backflow prevention devices must be located in accordance with District Standard Drawings BP-1-08 through BP-3-08. The location and screening of these above-ground devices should be considered in the site design to address both District installation standards as well as aesthetic concerns of the development. Adequate space and access must be provided for the meter, meter box and the adjacent backflow prevention device.
 - e. Particular attention should be paid to any proposed work underneath existing District ACP water mains fronting the project site. ACWD has an existing 16 inch ACP water main located within Willow Street. No excavations or crossings under the ACP are allowed. If utility installations below the ACP are required for the project, the District may replace a portion of the existing main with PVC or steel pipe. Such replacement must be done by District forces at the developer's expense.
4. ACWD Contacts: The following ACWD contacts are provided so that the City can coordinate with ACWD as needed during the CEQA process:
- Michelle Myers, Groundwater Resources Manager, at (510) 668-4454, or by email at michelle.myers@acwd.com, for coordination regarding groundwater resources.
 - Juniet Rotter, Development Services Supervisor, at (510) 668-4472, or by email at juniet.rotter@acwd.com, for coordination regarding public water systems and water services and easements.

Again, thank you for the opportunity to comment on the Addendum to the Dumbarton Transit Oriented Development (TOD) Specific Plan Program Environmental Impact Report (PEIR) (SCH#2010042012) for a proposed five-story mixed-use hotel and retail space project.

Sincerely,



FOR

Ed Stevenson
Manager of Engineering and Technology Services

jr/jm

Enclosures

cc: Steven Inn, ACWD
Michelle Myers, ACWD
Leonard Ash, ACWD
Juniet Rotter, ACWD



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ROBERT SHAVER
Engineering Manager

April 28, 2010

Terrence Grindall
Community Development Director
City of Newark
37101 Newark Boulevard
Newark CA 94560-3796

Dear Mr. Grindall:

Subject: Notice of Preparation of an Environmental Impact Report for the Dumbarton Transit-Oriented Development Specific Plan

The Alameda County Water District (ACWD) wishes to thank you for the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Dumbarton Transit-Oriented Development Specific Plan.

ACWD has reviewed the Notice of Preparation of an Environmental Impact Report (EIR) and would appreciate your consideration of the following comments:

1. Water Supply:

- a. Water Supply Assessment: Senate Bill 610 (California Water Code Sections 10910 - 10915) requires that any land use project that is subject to CEQA and has 500 residential units or more will require a water supply assessment. Because the proposed project exceeds the 500 unit threshold, a water supply assessment will need to be included in the DEIR. Pursuant to the Water Code, ACWD will prepare this assessment within 90 days of receiving a formal request from the City of Newark (City). The water supply assessment will include an estimation of the project's water demands, and an evaluation of the sufficiency of ACWD's water supplies to meet these demands.
- b. Recycled Water: The proposed project is within the area that could be served by a future recycled water project in accordance with a joint ACWD and Union Sanitary District Recycled Water Master Plan. Accordingly, the DEIR should include provisions for use of recycled water for non-potable uses such as irrigation of large landscape areas.

These provisions should include: 1) installation of recycled water distribution system ("purple pipe") within the project area designed to accommodate a future recycled water supply and 2) commitments to utilize recycled water once this supply becomes available.

- c. Water Use Efficiency: In order to minimize additional demands on potable water supplies, the DEIR should plan for development of the Project with the latest technology in water efficient plumbing fixtures and irrigation systems at both residential and non-residential developments, including but not limited to those listed in the attached tables for water efficiency measures for new development. Check with ACWD water conservation staff at the time of project development for the most up-to-date measures.

Many of these technologies will actually be legal requirements under the pending Plumbing Code and already are in effect under the Model Water Efficient Landscape Ordinance revisions, effective January 1, 2010.

2. Groundwater: Local and imported water is percolated into the Niles Cone Groundwater Basin through percolation both in Alameda Creek and the adjacent recharge ponds in the Quarry Lakes Regional Recreational Area. The water is subsequently recovered through ACWD's groundwater production wells and provided as a potable supply to a population of over 330,000 in the cities of Fremont, Newark, and Union City. Therefore, it is imperative that ACWD protects the water quality and ensures the continued use of the groundwater basin for water supply for ACWD's customers. ACWD requests that the following potentially significant impacts to the protection of groundwater be addressed by the EIR:

- a. Well Protection/Destruction: In order to protect the groundwater basin, all wells must be identified within the project area and each well must be either protected or properly destroyed prior to or during construction activities. If the well(s) are to remain, a letter so indicating must be sent to ACWD. If the well(s) are: 1) no longer required by any regulatory agency; 2) no longer monitored on a regular basis; or 3) damaged, lost, or the surface seal is jeopardized in any way during the construction process, the wells must be destroyed in compliance with the City of Newark Well Ordinance. In addition, any abandoned wells located within the project area must be properly destroyed prior to construction activities.
- b. Drilling Permit Requirement: As the enforcing agency for the City of Newark's Well Ordinance, ACWD requests that the EIR include the requirement of obtaining a drilling permit from the ACWD prior to the start of any subsurface drilling activities. Application for a permit may be obtained from ACWD's Engineering Department, at 43885 South Grimmer Boulevard, Fremont or online at http://www.acwd.org/engineering/drilling_permit.php5. Before a permit is issued, the applicant is required to deposit with ACWD, cash or check in a sufficient sum to cover the fee for issuance of the permit or charges for field investigation and inspection. All permitted work requires scheduling for inspection; therefore, all drilling activities must be coordinated with ACWD prior to the start of any field work.

- c. Cleanup Sites: The EIR should acknowledge that as part of ACWD's Groundwater Protection Program, ACWD entered into Cooperative Agreements with the California Regional Water Quality Control Board – San Francisco Bay Region (Regional Board), the City of Newark, and the Alameda County Department of Environmental Health which allow ACWD to provide the technical oversight of investigation and remediation at Leaking Underground Fuel Tank (LUFT) and the majority of the Spills, Leaks, Investigation, and Cleanup (SLIC) sites. The project area includes properties where at least eight (8) known Spills, Leaks, Investigation, and Cleanup sites exist. Therefore, any proposed development that includes LUFT or SLIC sites should be coordinated with ACWD and the Regional Board (when the Regional Board is the lead agency at SLIC sites). In addition, the EIR should address the potential impacts that dewatering activities and construction may have on the investigation and cleanup of those sites.
- d. Dewatering: Since groundwater is an important component of ACWD's water resources, the EIR should address temporary and permanent dewatering activities and the potential impact of the project on the local drinking water supply. It is critical that the amount of water that may be extracted by dewatering be estimated and documented in the EIR. Alternative designs should be evaluated that would minimize the amount of dewatering required during and subsequent to construction. Groundwater losses due to dewatering should be measured and may be subject to a replenishment assessment fee. Mitigation measures should be proposed to replace all significant losses of ACWD's water supplies.

ACWD regulates the installation and destruction of dewatering wells by working with licensed drilling contractors and agencies that require dewatering wells for the installation of their facilities. ACWD permits are required for dewatering well installations and destructions within the City of Newark; however, dewatering wells are currently exempt from permit fees.

3. Water System Infrastructure: In order to extend the public water distribution system to meet project water service requirements and adequately integrate the project into ACWD's water system, significant offsite improvements will be required. At least one additional water main connection between the North side of the existing railroad right-of-way and the project site at either Willow Street or Hickory Street will be required. In addition, one or more new water mains will need to be constructed across the existing San Francisco Public Utilities Commission (SFPUC) right-of-way. The construction of such railroad and SFPUC crossings may result in impacts to the environment. The EIR should include these connections and address any associated environmental impacts that may arise from their construction. Other onsite and offsite water system extensions and/or improvements may similarly be required in order to meet fire flow requirements or other ACWD standards and requirements. ACWD requests early and close coordination with the City and all project proponents.
4. ACWD Contacts: The following ACWD contacts are provided so that the City can coordinate with ACWD as needed during the CEQA process:

Terrence Grindall

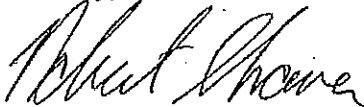
Page 4

April 28, 2010

- Eric Cartwright, Water Resources Planning Manager, at (510) 668-4206, or by e-mail at eric.cartwright@acwd.com, for coordination regarding water supply issues.
- Steven Inn, Groundwater Resources Manager at (510) 668-4441, or by e-mail at steven.inn@acwd.com, for coordination regarding ACWD's groundwater resources.
- Michelle Myers, Well Ordinance Supervisor, at (510) 668-4454, or by e-mail at michelle.myers@acwd.com for coordination regarding groundwater wells and drilling permits.
- Ed Stevenson, Development Services Manager, at (510) 668-4472, or by e-mail at ed.stevenson@acwd.com, for coordination regarding public water systems and water services.

Thank you for the opportunity to comment on the Notice of Preparation of an Environmental Impact Report for the Dumbarton Transit-Oriented Development Specific Plan at this time.

Sincerely,



Robert Shaver
Engineering Manager

la/tf

Attachments

By e-mail

cc: Eric Cartwright, ACWD
Ed Stevenson, ACWD
Steven Inn, ACWD
Michelle Myers, ACWD



DIRECTORS

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ALTARINE C. VERNON
Manager of Administrative Services

June 29, 2011

Terrence Grindall
Community Development Director
City of Newark
37101 Newark Boulevard
Newark CA 94560-3796

Dear Mr. Grindall:

Subject: Draft Environmental Impact Report for the Dumbarton Transit-Oriented Development Specific Plan

The Alameda County Water District (ACWD) wishes to thank you for the opportunity to comment on the "Draft Environmental Impact Report (DEIR) for the Dumbarton Transit-Oriented Development Specific Plan."

ACWD has reviewed the DEIR and would appreciate your consideration of the following comments:

1. Groundwater:

- a. Drilling Permit Requirement: As required by ACWD's Well Ordinance No. 2010-01, drilling permits are required prior to the start of any subsurface drilling activities for wells, exploratory holes, and other excavations. Application for a permit may be obtained from ACWD's Engineering Department, at 43885 South Grimmer Boulevard, Fremont or online at http://www.acwd.org/engineering/drilling_permit.php5. Before a permit is issued, a cash or check deposit is required in a sufficient sum to cover the fee for issuance of the permit or charges for field investigation and inspection. All permitted work requires scheduling for inspection; therefore, all drilling activities must be coordinated with ACWD prior to the start of any field work.
- b. Geotechnical Investigation: Reference is made to Mitigation Measure 4.5-1 (page 4.5-11). The mitigation measure requires future developers to have a design-level geotechnical investigation performed. As previously mentioned, ACWD regulates the construction, repair, and destruction of wells, exploratory holes, and other excavations located within the City of Newark under ACWD Ordinance No. 2010-01.

- c. Soil Improvements: Reference is made to Mitigation Measure 4.5-1 (pages 4.5-11 to 4.5-12). The mitigation measure lists a number of possible soil improvement techniques that may be employed depending on recommendations of the design-level geotechnical engineering investigation. Some of the techniques include supporting structures on deep foundations, such as piles or piers, installing wick drains, and injecting grout.

Piers, piles, and grout are frequently installed similar to wells and exploratory holes. If the annular space between the excavation or borehole wall and the support pier or pile is not properly sealed, it can act as a vertical conduit and may create preferential pathways that allow pollutants to rapidly infiltrate the subsurface and impact groundwater. Wick drains can also create preferential pathways that can impact groundwater since they remain in place after the dewatering activities are completed.

Soil improvement techniques that intersect an aquifer or may impact the integrity of any aquitard located directly above an aquifer are regulated as other excavations under ACWD's Ordinance No. 2010-01. Therefore, ACWD requests that the project geotechnical engineer(s) coordinate with ACWD prior to beginning any soil improvement measures to ensure compliance with ACWD Ordinance No. 2010-01.

- d. Cleanup Sites: Reference is made to section 4.7.12, Hazards and Hazardous Materials, Existing Conditions (pages 4.7-1 to 4.7-22). The project area includes properties where at least seven (7) known major Spills, Leaks, Investigation, and Cleanup sites exist. To date, the risk posed to human health and the environment from the contamination at these sites is not fully assessed and work is in progress. ACWD provides assistance and local oversight for the cleanup and restoration of these sites in coordination with the Regional Water Quality Control Board – San Francisco Bay Region under a Cooperative Agreement. Therefore, any proposed development in the vicinity of these sites should be coordinated with ACWD and the Regional Board. Accordingly, we request that Mitigation Measure 4.7-1a in the DEIR be modified to recognize ACWD's involvement in the investigation and cleanup of these sites.
- e. Grading Permit: Reference is made to Mitigation Measure 4.7-1b (page 4.7-29). ACWD's records indicate the existence of over 150 wells located within the project area. Therefore, ACWD requests a mitigation measure that requires project proponents to develop a plan for the protection of wells that must be reviewed and approved by ACWD prior to issuance of demolition and grading permits to ensure compliance with ACWD Ordinance No. 2010-01.
- f. Dewatering: Reference is made to Section 4.8, Hydrology, Drainage and Water Quality (pages 4.8-1 to 4.8-28). The DEIR acknowledges that groundwater is very shallow within the project area; however, the DEIR does not address any temporary or permanent dewatering activities that may be required. ACWD requests that the following potentially significant impacts related to dewatering activities be addressed by the EIR:

- 1) The project area includes areas where known Spills, Leaks, Investigation, and Cleanup sites exist. The EIR should address the potential impacts that dewatering activities and construction may have on the investigation and cleanup of those sites.
 - 2) Since groundwater is an important component of ACWD's water resources, it is critical that the amount of water that may be extracted by dewatering be estimated and documented in the EIR. Alternative designs should be evaluated that would minimize the amount of dewatering required during and subsequent to construction. Groundwater losses due to dewatering should be measured and may be subject to a replenishment assessment fee. Mitigation measures should be proposed to replace all significant losses of ACWD's water supplies.
 - 3) ACWD regulates the installation and destruction of dewatering wells under ACWD's Ordinance No. 2010-01. ACWD permits are required for dewatering well installations and destructions.
- g. Groundwater Quality: Reference is made to section 4.8.1.4, Water Quality, Groundwater Quality (pages 4.8-4 to 4.8-5). The DEIR should be updated to reflect that production from the Newark Desalination Facility has been increased to approximately 12.5 million gallons per day beginning on August 24, 2010. Also, review of water quality data by ACWD in this area indicates that groundwater in the proposed redevelopment area has a potential beneficial use, contrary to what is stated in the DEIR. The DEIR should recognize that protecting the shallow water bearing zone is also critical for protecting the Newark Aquifer, in which ACWD operates high capacity production wells for potable water supply and aquifer reclamation. This increased use of groundwater for a beneficial use further emphasizes the need to restore impacted groundwater at cleanup sites.
- h. Well Protection/Destruction: Reference is made to section 4.8.1.4, Water Quality, Groundwater Quality (page 4.8-4). The DEIR states that groundwater is "currently monitored by 32 wells" in the specific plan area. ACWD records indicate there are over 150 wells in the project area. Therefore, ACWD requests a mitigation measure that requires project proponents to develop a plan for the protection of wells that must be reviewed and approved by ACWD prior to issuance of demolition and grading permits to ensure compliance with ACWD Ordinance No. 2010-01.

In order to protect the groundwater basin, each well located within the property must be in compliance with ACWD Ordinance No. 2010-01. If the well(s) are to remain, a letter so indicating must be sent to ACWD and will require a permit for inactive classification if the wells will not be used for a period of twelve (12) months. If the well(s) are: 1) no longer required by any regulatory agency; 2) no longer monitored on a regular basis; or 3) damaged, lost, or the surface seal is jeopardized in any way during the construction process, the well must be destroyed in compliance with ACWD Ordinance No. 2010-01. In addition, any abandoned wells located within the project area must be properly destroyed prior to construction activities.

2. Recycled Water: Reference is made to the draft Dumbarton TOD Specific Plan, Recycled Water (pages 128 to 131). As the proposed project is within the area that could be served by a future recycled water project in accordance with a joint ACWD and Union Sanitary District Recycled Water Master Plan, the Specific Plan correctly includes provisions for use of recycled water for non-potable uses such as irrigation of large landscape areas. However, the Specific Plan should also state that the installation of recycled water distribution system ("purple pipe"), designed to accommodate a future recycled water supply, within existing and new streets within the project area may be a condition of water service to the project. Such recycled water infrastructure, if required, shall be installed at the time of the development of the project site, and in the interim period before recycled water supply becomes available, this separate recycled water distribution system may be supplied using potable water via connections to ACWD's distribution system. The EIR should also address any potential environmental impacts, if any, which may result from the installation of the recycled water infrastructure along with the project.


3. Potable Water:
 - a. Water System Infrastructure: Reference is made to the draft Dumbarton TOD Specific Plan, Potable Water (pages 126 to 127). In order to extend the public water distribution system to meet project water service requirements and adequately integrate the project into ACWD's water system, significant offsite improvements will be required. While the draft Specific Plan indicates a water transmission main connection of the existing railroad right-of-way may be required, ACWD has stated that at least one additional water main connection between the North side of the existing railroad right-of-way and the project site at either Willow Street or Hickory Street will be required. Based on the information provided in the draft Specific Plan, it appears that a connection within Willow Street is most likely. In addition, one or more new water mains will need to be constructed across the existing San Francisco Public Utilities Commission (SFPUC) right-of-way. The construction of such railroad and SFPUC crossings may result in impacts to the environment. The EIR should include this required connection and address any associated environmental impacts that may arise from its construction. Other onsite and offsite water system extensions and/or improvements may similarly be required in order to meet fire flow requirements or other ACWD standards and requirements. The City and project proponents should coordinate closely with ACWD throughout the planning and development of the project.

Also on page 127, the draft Specific Plan identifies specific diameter sizes for water mains to be installed within the project's "backbone streets" and local streets. However, ACWD shall determine the water main sizing at the time of improvement plan review. In general, well-graded "backbone streets" typically would be provided with 12-inch diameter distribution mains, while well-graded residential streets typically would be provided with 8-inch diameter distribution mains.

- b. Hazards and Hazardous Materials: The DEIR identifies several hazards and hazardous materials sites within the project area. The ability to install a public water system within the project area would be conditioned upon confirmation that the soil or groundwater does not pose a risk to health and safety either during installation of the public water system or during long-term operation and maintenance of such a system. Any mitigations required to eliminate such hazards or potential hazards, such as clean fill corridors or other mitigations, need to be identified and described in the EIR.
4. ACWD Contacts: The following ACWD contacts are provided so that the City can coordinate with ACWD as needed during the CEQA process:
- Eric Cartwright, Water Resources Planning, at (510) 668-4206, or by e-mail at eric.cartwright@acwd.com, for coordination regarding water supply issues.
 - Steven Inn, Groundwater Resources Manager at (510) 668-4441, or by e-mail at steven.inn@acwd.com, for coordination regarding ACWD's groundwater resources.
 - Rangarajan Sampath, Groundwater Resources Engineer at (510) 668-4411, or by e-mail at rangarajan.sampath@acwd.com for coordination regarding cleanup sites.
 - Michelle Myers, Well Ordinance Supervisor, at (510) 668-4454, or by e-mail at michelle.myers@acwd.com for coordination regarding groundwater wells and drilling permits.
 - Ed Stevenson, Development Services Manager, at (510) 668-4472, or by e-mail at ed.stevenson@acwd.com, for coordination regarding public water systems and water services.

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the Dumbarton Transit-Oriented Development Specific Plan at this time.

Sincerely,



Robert Shaver
Assistant General Manager - Engineering

rs/lf

By PDF

cc: Steven Inn, ACWD
Eric Cartwright, ACWD
Ed Stevenson, ACWD
Michelle Myers, ACWD
Rangarajan Sampath, ACWD



DIRECTORS

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ALTARINE C. VERNON
Manager of Administrative Services

March 8, 2013

Terrence Grindall
Community Development Director
City of Newark
37101 Newark Boulevard
Newark, CA 94560-3796

Dear Mr. Grindall:

Subject: Notice of Preparation of a Supplemental Environmental Impact Report for the Dumbarton Transit-Oriented Development Trumark Residential Development

The Alameda County Water District (ACWD) wishes to thank you for the opportunity to comment on the "Notice of Preparation (NOP) of a Supplemental Environmental Impact Report (SEIR) for the Dumbarton Transit-Oriented Development (TOD) Trumark Residential Development."

ACWD has reviewed the NOP and would appreciate your consideration of the following comments:

1. Water System Infrastructure: As ACWD commented on the Draft Environmental Impact Report for the Dumbarton TOD Specific Plan, in order to extend the public water distribution system to meet water service requirements of the Dumbarton TOD Project and adequately integrate the project into ACWD's water system, significant public water system improvements will be required. At least one additional water main connection between the North side of the existing railroad right-of-way and the project site at either Willow Street or Hickory Street will be required. Based on the information provided in the draft Specific Plan for the Dumbarton TOD, it appears that a connection within Willow Street is most likely. Whichever particular development within the Dumbarton TOD Project area performs improvement work adjacent to the railroad right-of-way at either Willow Street or Hickory Street will be responsible for installing this water main connection and obtaining any necessary permits and approvals from the railroad. In addition, one or more new water mains will need to be constructed across the existing San Francisco Public Utilities Commission (SFPUC) right-of-way. Similarly, those particular developments within the Dumbarton TOD Project area performing improvement work adjacent to the SFPUC right-of-way will be responsible for installing the water main connection(s) crossing SFPUC right-of-way and obtaining any necessary permits and approvals from SFPUC. The construction of such railroad and SFPUC crossings may result in impacts to the environment. The SEIR should include this required connection and address any associated environmental impacts that may arise from its construction.

Other onsite and offsite water system extensions and/or improvements may similarly be required in order to meet fire flow requirements or other ACWD standards and requirements. Any public water system extensions necessary to serve developments within the Dumbarton TOD Project area must meet ACWD public water system installation and design standards, including ACWD's *Standard Specifications for Water Main Installation* and *Development Specifications for Public Water System Extensions*. ACWD requests that the City and project proponents coordinate closely with ACWD throughout the planning and development of the Dumbarton TOD Project.

Terrence Grindall

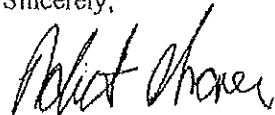
Page 2

March 8, 2013

2. Hazards and Hazardous Materials: The SEIR should adequately identify the hazards and hazardous materials sites within the project area. The ability to install a public water system within the project area would be conditioned upon confirmation that the soil or groundwater does not pose a risk to health and safety either during installation of the public water system or during long-term operation and maintenance of such a system. Any mitigation required to eliminate such hazards or potential hazards, such as clean fill corridors or other mitigations, need to be identified and described in the SEIR.
3. Climate Action Plan: Reference is made to the City of Newark's Climate Action Plan, January 2010 Initial Framework. ACWD agrees with the City that planning related to sea level rise is important for the region and for ACWD, and recommends the City address the potential impacts of sea level rise and adaptation in the SEIR.
4. ACWD Contacts: The following ACWD contacts are provided so that the City can coordinate with ACWD as needed during the CEQA process:
 - Steven Inn, Groundwater Resources Manager at (510) 668-4441, or by e-mail at steven.inn@acwd.com, for coordination regarding ACWD's groundwater resources.
 - Rangarajan Sampath, Groundwater Resources Engineer at (510) 668-4411, or by e-mail at rangarajan.sampath@acwd.com, for coordination regarding cleanup sites.
 - Michelle Myers, Well Ordinance Supervisor, at (510) 668-4454, or by e-mail at michelle.myers@acwd.com, for coordination regarding groundwater wells and drilling permits.
 - Ed Stevenson, Development Services Manager, at (510) 668-4472, or by e-mail at ed.stevenson@acwd.com, for coordination regarding public water systems and water services.

Thank you for the opportunity to comment on the Notice of Preparation of the Supplemental Environmental Impact Report for the Dumbarton Transit-Oriented Development Trumark Residential Project at this time.

Sincerely,



Robert Shaver

Assistant General Manager - Engineering

la/jm

By PDF

cc: Steven Inn, ACWD
Ed Stevenson, ACWD
Michelle Myers, ACWD
Rangarajan Sampath, ACWD



DIRECTORS

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February 6, 2014

Terrence Grindall
Community Development Director
City of Newark
37101 Newark Boulevard
Newark, CA 94560-3796

Dear Mr. Grindall:

Subject: Draft Supplemental Environmental Impact Report for the Dumbarton Transit-Oriented Development Trumark Residential Development

The Alameda County Water District (ACWD) wishes to thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Report (SEIR) for the Dumbarton Transit-Oriented Development (TOD) Trumark Residential Development.

ACWD has reviewed the Draft SEIR and would appreciate your consideration of the following comments:

1. Water System Infrastructure: As ACWD commented on the Draft Environmental Impact Report for the Dumbarton TOD Specific Plan and on the Notice of Preparation for this SEIR, in order to extend the public water distribution system to meet water service requirements of the Dumbarton TOD Project and adequately integrate the project into ACWD's water system, significant public water system improvements will be required. At least one additional water main connection between the North side of the existing railroad right-of-way and the project site at either Willow Street or Hickory Street will be required. Based on the information provided in the draft Specific Plan for the Dumbarton TOD, it appears that a connection within Willow Street is most likely. Whichever particular development within the Dumbarton TOD Project area performs improvement work adjacent to the railroad right-of-way at either Willow Street or Hickory Street will be responsible for installing this water main connection and obtaining any necessary permits and approvals from the railroad. In addition, one or more new water mains will need to be constructed across the existing San Francisco Public Utilities Commission (SFPUC) right-of-way. Similarly, those particular developments within the Dumbarton TOD Project area performing improvement work adjacent to the SFPUC right-of-way will be responsible for installing the water main connection(s) crossing SFPUC right-of-way and obtaining any necessary permits and approvals from SFPUC.

Given the location and proposed development of Site "A" shown on the Figure 3-4 of the Draft SEIR, the District will require the project to install both a water main extension crossing of the SFPUC right-of-way and a water main connection extending from the project into Willow Street to connect to the existing 16-inch water main within Willow Street on the North side of the railroad right-of-way. In lieu of the requirement for both water mains to be installed for system looping, the District

may consider requiring only one connection across either SFPUC or railroad right-of-way if the project proponents can secure a perpetual, irrevocable easement dedicated to ACWD for the water system across either right-of-way.

The construction of such railroad and SFPUC crossings will require significant trenching, excavation and dewatering and may result in impacts to the environment stemming from pumping and discharge of contaminated groundwater (including the effects of plume migration resulting from such pumping), production and handling of contaminated excavation spoils, construction noise, dust and other factors. **The SEIR should address any associated environmental impacts that may arise from construction of these required connections.**

Other onsite and offsite water system extensions and/or improvements may similarly be required in order to meet fire flow requirements or other ACWD standards and requirements. Any public water system extensions necessary to serve developments within the Dumbarton TOD Project area must meet ACWD public water system installation and design standards, including ACWD's *Standard Specifications for Water Main Installation and Development Specifications for Public Water System Extensions*. ACWD requests that the City and project proponents coordinate closely with ACWD throughout the planning and development of the Dumbarton TOD Project.

2. **Hazards and Hazardous Materials:** The installation, long-term operation, and maintenance of utilities to serve the project may include, but is not limited to, significant dewatering, disposal of groundwater, deep soil excavation, transportation and disposal of excavated soil, utilities submerged in groundwater, and worker exposure to soil and groundwater. The Draft SEIR does not adequately identify the hazards or hazardous materials sites remaining within the project area, after remediation activities are completed, that may continue to pose a risk to the health and safety of workers during the installation, long-term operation, or maintenance of all utilities required to serve the project. **This analysis should be included in the SEIR.** The ability to install a public water system within the project area would be conditioned upon confirmation that the soil or groundwater does not pose a risk to the health and safety of workers either during installation of the public water system or during long-term routine operation and maintenance of such a system. **Any mitigation required to eliminate such hazards or potential hazards, such that that the soil or groundwater does not pose a risk to the health and safety of workers during installation, and during long-term routine operation and maintenance of utility systems, must be identified and described in the SEIR.** The proposed mitigation should not rely on extraordinary measures by the utility to protect worker health and safety, such as unusual personal protective equipment, unusual soil or groundwater treatment or disposal requirements, or decontamination of tools and equipment required for potable water system maintenance. If specific measures are to be identified in a Risk Management Plan, the SEIR should require ACWD approval of the plan as part of the mitigation.
3. **Well Protection/Destruction:** Reference is made to Section 3.5.2, Pollutant Remediation and Site Preparation (pages 40 thru 43). ACWD's records indicate the existence of 47 wells in Site A and 24 in Site B (not 22 as reported in the SDEIR). **Therefore, ACWD requests a mitigation measure that requires project proponents to develop a plan for the protection or destruction of wells that must be reviewed and approved by ACWD prior to issuance of grading permits to ensure compliance with ACWD Ordinance No. 2010-01.**

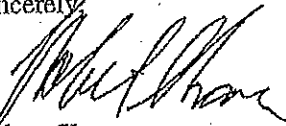
In order to protect the groundwater basin, each well located within the property must be in compliance with ACWD Ordinance No. 2010-01. If the well(s) are to remain, a letter so indicating must be sent to ACWD and will require a permit for inactive classification if the wells will not be used for a period of twelve (12) months. If the well(s) are: 1) no longer required by any regulatory agency; 2) no longer monitored on a regular basis; or 3) damaged, lost, or the surface seal is

jeopardized in any way during the construction process, the well must be destroyed in compliance with ACWD Ordinance No. 2010-01.

4. Climate Action Plan: Reference is made to the City of Newark's Climate Action Plan, January 2010 Initial Framework. ACWD agrees with the City that planning related to sea level rise is important for the region and for ACWD. **ACWD recommends the SEIR more thoroughly address the potential impacts of sea level rise and adaptation.**
5. ACWD Contacts: The following ACWD contacts are provided so that the City can coordinate with ACWD as needed during the CEQA process:
 - Steven Inn, Groundwater Resources Manager at (510) 668-4441, or by e-mail at steven.inn@acwd.com, for coordination regarding ACWD's groundwater resources.
 - Rangarajan Sampath, Groundwater Resources Engineer at (510) 668-4411, or by e-mail at rangarajan.sampath@acwd.com, for coordination regarding cleanup sites.
 - Michelle Myers, Well Ordinance Supervisor, at (510) 668-4454, or by e-mail at michelle.myers@acwd.com, for coordination regarding groundwater wells and drilling permits.
 - Ed Stevenson, Development Services Manager, at (510) 668-4472, or by e-mail at ed.stevenson@acwd.com, for coordination regarding public water systems and water services.

Thank you for the opportunity to comment on the Draft Supplemental Environmental Impact Report for the Dumbarton Transit-Oriented Development Trumark Residential Project at this time.

Sincerely,



Robert Shaver
Assistant General Manager - Engineering

la/ps

cc: Steven Inn, ACWD
Ed Stevenson, ACWD
Michelle Myers, ACWD
Leonard Ash, ACWD



DIRECTORS

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JUDY C. HUANG

STEVE PETERSON
Manager of Operations and Maintenance

JOHN H. WEED

February 26, 2014

Terrence Grindall
Community Development Director
City of Newark
37101 Newark Boulevard
Newark, CA 94560-3796

Dear Mr. Grindall:

Subject: Initial Study/Mitigated Negative Declaration for the Dumbarton Transit Oriented Development SHH/FMC Project

The Alameda County Water District (ACWD) wishes to thank you for the opportunity to comment on the Initial Study/Mitigated Negative Declaration (IS/MND) for the Dumbarton Transit Oriented Development (TOD) SHH/FMC Project (Project).

ACWD has reviewed the IS/MND and would appreciate your consideration of the following comments:

1. Geology and Soils Mitigation Measures (pages 66-70): Reference is made to Appendix B (page 31). Mitigation Measures 4.5-2 and 4.5-3 from the Dumbarton TOD Specific Plan are crossed out and a note states the reason is the "measures [are] not relevant to the SHH/FMC Project." ACWD does not support this finding and requests the following:
 - a. Page 67 of the IS/MND states "it is unknown whether the project site contains liquefiable soils; however, geotechnical investigations conducted on other properties in preparation of the EIR (RBF 2011) identified liquefiable soils in other areas of the Specific Plan. Therefore, the project site has a potential to contain liquefiable soils." Since the project site may contain liquefiable soils, soil improvement measures may be necessary and would require coordination with ACWD to ensure compliance with ACWD Ordinance No. 2010-01 as required by mitigation measure 4.5-2 in the Dumbarton TOD Specific Plan. In addition, since groundwater is shallow within the project area dewatering may also be required. As a result, ACWD requests Mitigation Measure 4.5-2 from the Dumbarton TOD Specific Plan be included in the SHH/FMC Project IS/MND.
 - b. ACWD has identified 18 monitoring wells within the project area. In order to protect the groundwater basin, each well located within the property must be in compliance with ACWD Ordinance No. 2010-01. If the well(s) are to remain, a letter so indicating must

be sent to ACWD and will require a permit for inactive classification if the wells will not be used for a period of twelve (12) months. If the well(s) are: 1) no longer required by any regulatory agency; 2) no longer monitored on a regular basis; or 3) damaged, lost, or the surface seal is jeopardized in any way during the construction process, the well must be destroyed in compliance with ACWD Ordinance No. 2010-01. Therefore, ACWD requests Mitigation Measure 4.5-3 from the Dumbarton TOD Specific Plan be included in the SHH/FMC Project IS/MND.

2. Hazards and Hazardous Materials (pages 82-86): The installation, long-term operation, and maintenance of utilities to serve the project may include, but is not limited to, significant dewatering, disposal of groundwater, deep soil excavation, transportation and disposal of excavated soil, utilities submerged in groundwater, and worker exposure to soil and groundwater. The IS/MND does not adequately identify the hazards or hazardous materials sites remaining within the project area, after remediation activities are completed, that may continue to pose a risk to the health and safety of workers during the installation, long-term operation, or maintenance of all utilities required to serve the project. This analysis should be included in the IS/MND.

The ability to install a public water system within the project area would be conditioned upon confirmation that the soil or groundwater does not pose a risk to the health and safety of workers either during installation of the public water system or during long-term routine operation and maintenance of such a system. Any mitigation required to eliminate such hazards or potential hazards, such that the soil or groundwater does not pose a risk to the health and safety of workers during installation, and during long-term routine operation and maintenance of utility systems, must be identified and described in the IS/MND. The proposed mitigation should not rely on extraordinary measures by the utility to protect worker health and safety, such as unusual personal protective equipment, unusual soil or groundwater treatment or disposal requirements, or decontamination of tools and equipment required for potable water system maintenance. If specific measures are to be identified in a Risk Management Plan, the IS/MND should require ACWD approval of the plan as part of the mitigation.

3. Utilities and Service Systems - Water Supplies (page 125-129): While ACWD has prepared a Water Supply Assessment for the Dumbarton TOD Specific Plan which indicates adequate water supply would be available for normal and dry-year scenarios, the ACWD service area and the State of California are currently experiencing a severe water supply shortage. ACWD has taken steps to encourage water use reductions throughout the service area. In addition, ACWD may impose broad water use restrictions which may include restrictions on existing water use for purposes other than domestic use, public health, and fire protection, restrictions on new water service connections, or other measures. Such restrictions would remain in place through the end of the water supply shortage.
4. Climate Action Plan: Reference is made to the City of Newark's Climate Action Plan, January 2010 Initial Framework. ACWD agrees with the City that planning related to sea level rise is important for the region and for ACWD. ACWD recommends the IS/MND address the potential impacts of sea level rise and adaptation.

Terrence Grindall

Page 3

February 26, 2014

5. ACWD Contacts: The following ACWD contacts are provided so that the City can coordinate with ACWD as needed during the CEQA process:

- Steven Inn, Groundwater Resources Manager at (510) 668-4441, or by e-mail at steven.inn@acwd.com, for coordination regarding ACWD's groundwater resources.
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- Ed Stevenson, Development Services Manager, at (510) 668-4472, or by e-mail at ed.stevenson@acwd.com, for coordination regarding public water systems and water services.

Again, thank you for the opportunity to comment on the Initial Study/Mitigated Negative Declaration for the Dumbarton Transit-Oriented Development SHH/FMC Project at this time.

Sincerely,



Robert Shaver

Assistant General Manager - Engineering

la/ps

By Email

cc: Steven Inn, ACWD
Ed Stevenson, ACWD
Michelle Myers, ACWD
Rangarajan Sampath, ACWD

**CITY OF NEWARK, CALIFORNIA**

37101 Newark Boulevard • Newark, California 94560-3796 • (510) 578-4000 • FAX (510) 578-4306

August 18, 2017

Ed Stevenson, Manager of Engineering and Technology Services
Alameda County Water District
43885 South Grimmer Boulevard
Fremont, CA 94538

SUBJECT: Comments on the Addendum to the Dumbarton Transit Oriented Development (TOD) Specific Plan Program Environmental Impact Report (PEIR) (SCH No. 2010042012) and the subsequent Initial Study/Mitigated Negative Declaration (IS/MND) for the SHH/FMC project (SCH No. 2014012056), for a proposed five-story mixed-use hotel and retail space at 37556 Willow Street (APN 092-0115-011-03).

Dear Mr. Stevenson,

Thank you for your comments on the addendum to the Dumbarton Transit Oriented Development (TOD) Specific Plan Program Environmental Impact Report (PEIR) (SCH No. 2010042012) and the subsequent Initial Study/Mitigated Negative Declaration (IS/MND) for the SHH/FMC project (SCH No. 2014012056), for a proposed five-story mixed-use hotel and retail space at 37556 Willow Street (APN 092-0115-011-03).

HELIX has reviewed and noted the comment letter received from you (ACWD) on August 7, 2017. Per part a. of ACWD's comment on Utilities and Service Systems, HELIX has prepared water demand comparison tables to evaluate whether the proposed project changes would result in a substantial increase in water demand than was considered in the Water Supply Assessment prepared for the Dumbarton TOD project in 2010. The comparison tables and references are provided in the attachment, and the evaluation concluded that the water demand for the current projected buildout of the Dumbarton TOD project is approximately 200 AF/yr less than what was estimated for the project buildout in 2010.

In addition, we incorporated the following conditions of approval into the project resolution for the project, which should address the comments presented in your August 7, 2017 letter:

- ii. Prior to any soil improvement measures and/or dewatering activities, the project geotechnical engineer(s) shall coordinate with ACWD to ensure compliance with ACWD Ordinance No. 2010-01. Any groundwater extracted during dewatering should be properly disposed of due to the presence of potential VOCs. In addition, any groundwater extracted during the project should be quantified and may be subject to a

Replenishment Assessment Fee in accordance with the Replenishment Assessment Act of ACWD.

- pp. Prior to the issuance of any grading permit, all water wells within the project boundary shall be identified on the plans to be protected or properly destroyed. If the well(s) are to remain, a letter so indicating must be submitted to ACWD for review and approval. If the well(s) are: 1) no longer required by any regulatory agency; 2) no longer monitored on a regular basis; or 3) damaged, lost, or the surface seal is jeopardized in any way during the construction process, the wells must be destroyed in compliance with the Well Ordinance. In addition, any abandoned wells located within the project area must be properly destroyed prior to construction activities.
- qq. Prior to the start of any subsurface drilling activities for wells, exploratory holes, and other excavations, the developer shall apply and obtain a drilling permit from ACWD's Engineering Department at 43885 South Grimmer Boulevard, Fremont.
- rr. Prior to issuance of a building permit, specific measures shall be identified in a Risk Management Plan describing routine operation and maintenance of utility systems so that soil or groundwater does not pose a risk to the health and safety of workers during installation and post-construction operations and maintenance. The Risk Management Plan shall be subject to review and approval of the City Engineer, ACWD, and USD.

Please contact us if you have any further questions or comments.

Sincerely



Terrence Grindall
Community Development Director/Assistant City Manager

Attachments

Table 1. Water Demand for full build out of Dumbarton TOD Project 2010

Element	Planning Units	Measurement	GPD/Unit ¹	Demand Estimate (AF/yr)
Retail/Commercial	230,000	Building Area	0.282	73
Residential (MFR)	430	Dwelling Units	150	72
Residential (2,000 s.f. Lots)	1,176	Dwelling Units	179	236
Residential (3,000 s.f. Lots)	726	Dwelling Units	247	201
Residential (4,000 s.f. Lots)	168	Dwelling Units	247	46
Open Space	17	Acres	4,630	88
Estimated Total Project Demand (rounded)				720
Water Supplies Required (8.4% Unaccounted for Water)				780
Approximate peak day demand in mgd (1.6x peaking factor)				1.11

Source: Water Supply Assessment for the Dumbarton Transit Oriented Development Project prepared by Alameda County Water District in October 2010 (Table 5, Page 28).

¹Demand units from the 2009 Water Demand Forecast

Table 2. Updated Water Demand Estimate for full buildout of Dumbarton TOD area 2017

Element	Planning Units	Measurement	GPD/Unit ¹	Demand Estimate (AF/yr)
Retail/Commercial	230,000	Building Area	0.282	73
Residential (MFR)	978	Dwelling Units	150	164
Residential (2,000 s.f. Lots)	603	Dwelling Units	179	121
Residential (3,000 s.f. Lots)	245	Dwelling Units	247	68
Residential (4,000 s.f. Lots)	84	Dwelling Units	247	23
Open Space	17	Acres	4,630	88
Estimated Total Project Demand (rounded)				537
Water Supplies Required (8.4% Unaccounted for Water)				582

Source: Full buildout estimates provided by City of Newark, August 2017.

¹Demand units from the 2009 Water Demand Forecast