



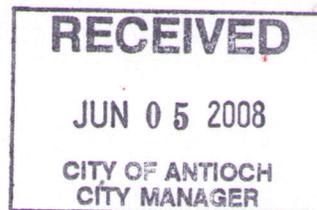
Contra Costa County
Flood Control
& Water Conservation District

Julia R. Bueren,
ex officio Chief Engineer

R. Mitch Avalon,
Deputy Chief Engineer

June 4, 2008

Victor Carniglia
City of Antioch
Community Development Department
P.O. Box 5007
Antioch, CA 94531-5007



File No.: 3056-00 (general)
2035 eBART, Bailey to Hillcrest
060-01-01 (City of Antioch)

Dear Mr. Carniglia:

We received the notice for the *Existing Conditions, Opportunities, and Constraints for the Hillcrest Station Area Specific Plan* prepared by Dyett & Bhatia for the City of Antioch dated May 2008 and Notice of Preparation letter (NOP) dated May 22, 2008, that is written in advance of the Draft Environmental Impact Report (DEIR). We were first informed of this Specific Plan effort on January 10, 2008, when you presented the potential need for the Contra Costa County Flood Control and Water Conservation District (FC District) Drainage Area 56 (DA 56) Oakley and Trembath detention basins to be relocated or redesigned to accommodate the development in the Specific Plan Document. At that time, the City requested that the FC District place our preliminary design efforts for the Oakley Detention Basin and Trembath Detention Basin Expansion Projects (Basin Expansion Project) on hold while the City prepared the specific plan.

We are pleased that we were provided early notification of this project, that we were able to participate in the stakeholder informational meeting on March 7, 2008, and that our issues are presented in this document. On May 15, 2008, we provided a letter regarding the BART District Notice of Preparation (NOP), which contains many of our comments, some of which are repeated in this letter. We submit the following comments, numbered for ease of reference and response, that should be incorporated into the forthcoming DEIR:

1. We recommend that the DEIR provide a map of the watersheds where the project is located, including watershed boundaries. The Hydrology section should identify and show all existing watercourses, tributaries, and man-made drainage facilities within the project site that might be impacted by this project. The discussion should include an analysis of the capacity of the existing watercourses.
2. The Hydrology Section of the DEIR should demonstrate conformance with existing studies and should quantify the amount of runoff that would be generated by the project and discuss how the runoff entering and originating from the site would be distributed between the natural watercourses and the man-made drainage facilities.

3. If improvements or work within the natural watercourses or other drainage facilities are proposed, the DEIR should discuss the scope of improvements.
4. We recommend that the DEIR address the design and construction of storm drain facilities to adequately collect and convey stormwater entering or originating within the development to the nearest adequate man-made drainage facility or natural watercourse, without diversion of the watershed, per Title 9 of the County Ordinance Code.
5. The DEIR should discuss the adverse impacts of the runoff from the project site to the existing drainage facilities and drainage problems in the downstream areas.
6. On page 65, Section 6.1, paragraph 5, it is specifically noted that a construction easement would be needed over the First Family Church property for the Basin Expansion Project. Please remove the reference to the Church, as this specific transaction is not confirmed and may not be needed. Instead, we would prefer that the DEIR state more generally that the FC District will acquire permanent and temporary rights near the basins and portions of East Antioch Creek.
7. In the DEIR, paragraph 7 of Section 6.1 can be repeated, but should be expanded by adding the following information regarding the Basin Expansion Project. The conceptual design for the Oakley and Trembath basins have been in place by County Board of Supervisor Action since 1982. In 1986, the first phase of the Basin Expansion Project was constructed, and since that time, the FC District has secured funding through DA 56 development fees for the next phase of basin expansion per the 1982 plan. Our schedule and financing for the Basin Expansion Project will be adversely affected by any delays or changes proposed by the City as part of this Specific Plan. We are concerned that the moneys collected from DA 56 fees are not adequate for a redesign and are not an effective use of collected fees. Therefore, if the Basin Expansion Project cannot proceed as envisioned by the 1982 plan, it must to be funded by other sources.
8. Our current schedule proposes that construction of the Oakley and Trembath Basins would be in 2010-11. Delays and changes required by the City Specific Plan will cause schedule for delivery of required flood protection to City residents to be delayed. The DEIR should address this delay as a project impact.
9. We recommend that the City consider the following options and address them in the DEIR:
 - Allow the FC District's Basin Expansion Project to move forward as proposed by the 1982 plan prior to construction of the Specific Plan development to minimize construction impacts.
 - Coordinate our construction efforts on the 1982 plan and specific plan infrastructure requirements, which may prove advantageous to both our agencies.

- Require the developers in the specific plan areas to bear the cost of basin redesign and construction. The impacts to the Basin Expansion Project schedule and administration would need to be addressed in the DEIR.
10. On page 75, please correct the last sentence of the paragraph about the FC District. The DA 56 fees provide funds for the design and construction of facilities, including administration. The DA 56 fees do not fund maintenance, and the City will own and maintain these facilities once completed.
 11. The DEIR should address the perpetual funding for maintenance of new drainage facilities proposed for developments within the specific plan area, including the source of maintenance funding for the Oakley and Trembath Basins. The Oakley Basin is presently owned by the City, and the Trembath Basin will be transferred to the City once the FC District's construction project is complete.

We appreciate the opportunity to review plans involving the drainage matters that affect drainage area facilities and welcome continued coordination. If you have any questions, please contact me by e-mail at cstan@pw.cccounty.us or by phone at (925) 313-2018; alternatively, you can reach Tim Jensen at tjens@pw.cccounty.us or (925) 313-2390.

Sincerely,



Craig M. Standafer
Civil Engineer
Flood Control Engineering

CS:cw

G:\FldCt\CurDev\CITIES\Antioch\Hillcrest eBART, Utilities File 2035\Letters\Letter Hilcrest Area Specific Plan.doc

c: Greg Connaughton, Flood Control
Tim Jensen, Flood Control
Paul Detjens, Flood Control
Joe Brandt, City of Antioch
Ellen Smith
The San Francisco Bay Area Rapid Transit District
300 Lakeside Drive, 16th Floor
Oakland, CA 94612