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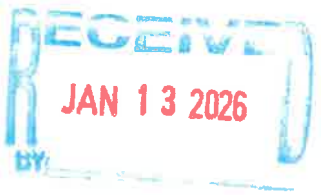
January 12, 2026



VIA FED EX

Alameda County Community Development Department
c/o Planning Department
224 W. Winton Ave., Room 111
Hayward, CA 94544

Re: Appeal of PLN2022-00193, Environmental Impact Report and Vesting Tentative Tract Map (TR-8423) Subdivision: "Arroyo Lago Residential Project"

Dear Sir or Madam:

On behalf of Zone 7 Water Agency (Zone 7), I submit this letter appealing the Planning Commission's decision of January 5, 2026, to certify an environmental impact report (EIR) and approve the vesting tentative tract map (TR-8423) Subdivision for the Arroyo Lago Residential Project (Project).

The Arroyo Lago Project is located immediately adjacent to the future Chain of Lakes (COLs)—a centerpiece of Zone 7's water management portfolio—and is situated immediately south of Lake I, a critical component in Zone 7's groundwater basin recharge program. Lake I represents exposed groundwater with a direct connection to the main groundwater basin. As such, any contaminants that go into Lake I will infiltrate into the groundwater basin and contaminate the groundwater resource.

Zone 7 has significant concerns regarding the proposed placement and operation of a sewage treatment plant, lined storage ponds, stormwater discharge, and recycled water spray fields (including moving the spray fields to the west of El Charro Rd) situated immediately adjacent to open water bodies (Lake I and Cope Lake). Although we understand that the Applicant has recently agreed to move the spray field to the west of El Charro Rd., Zone 7 has not had opportunity to review this change in detail. These locations, which are directly connected to Lake I and the groundwater basin, raise serious environmental and public health risks. The potential for contamination of both surface water and groundwater is alarming, and the proximity of these operations to critical water resources could have long-lasting, detrimental effects on local ecosystems, water quality, and public safety.

As an owner and operator of two water treatment plants and many other water management facilities in the Tri-Valley, and an entity committed to providing clean, safe and reliable water to the public, Zone 7 is uniquely qualified to comment on the intricacies of the potential impacts to local water quality. We work in this field every day and are familiar with the various vulnerabilities of treatment plants and distribution lines. We have been entrusted by the State to

safely manage the local groundwater basin. We also have 20 years of experience in the day-to-day management of Lake I and Cope Lake.

Throughout the County's process, Zone 7 has submitted numerous comment letters over many years regarding the Project. Unfortunately, Zone 7's key concerns surrounding the sufficiency of the EIR have not been adequately addressed.

We urge the Board of Supervisors to make a decision that prioritizes and protects the Tri-Valley's incredible water resources including Lake I, Cope Lake, and the Livermore Valley groundwater basin.

Specific concerns about the EIR include the following:

1. The EIR's water quality analysis is insufficient to enable the public to understand and meaningfully consider the impacts of the project.

An EIR must contain sufficient analysis to provide decisionmakers with the information required to make an intelligent judgment concerning a project's environmental impacts. (See 14 Cal Code Regs §15151.) Thus, an EIR should provide a reasonable, good faith disclosure and analysis of the project's environmental impacts. (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 392 [noting that an EIR is intended to "demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action (citation omitted)"].)

But the draft EIR and responses to Zone 7's concerns contained in the final EIR are insufficient; the EIR concludes that the Project "would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality" but provides insufficient analysis of potential impacts and disclosure of the same.

a. Risk of upset and associated impacts at the Wastewater Treatment Plant ("WWTP")

The project plans to use a package wastewater treatment plant. These WWTPs are prone to fail and the failures stem from maintenance neglect, mechanical/electrical issues, operational errors, and influent variations, which can lead to environmental pollution, health risks for workers, and financial penalties. According to the memorandum to the Tennessee Advisory Commission on Intergovernmental Relations dated September 11, 2024, the most common and difficult challenge these systems face is the hydraulic overload of the soil profile—when incoming wastewater flow exceeds the system's design limiting the soil's ability to drain properly and the system's ability to adequately treat the effluent. TDEC observed and documented non-compliance in 51% of the surveyed systems. They noted the instances of non-compliance ranged from wastewater completely bypassing the system to lack of maintenance resulting in overgrown conditions preventing access to the land application area. (See https://www.tn.gov/content/dam/tn/environment/water/land-based-systems-unit/wr_lbs_report-performance-of-wastewater-systems-utilizing-drip-dispersal-tn.pdf Report of the Tennessee Advisory Commission on Intergovernmental Relations, at p. 9.)

A 2024 Report on the Performance of Wastewater Systems Utilizing Drip Dispersal in Tennessee on rural wastewater systems noted that half of the state's drip dispersal systems were out of compliance, with 26% of these systems having major problems and 25% having minor problems. Key risks include the release of untreated sewage, which contaminates water and harms ecosystems. Indeed, the Report stated that these issues were "critical as in many cases the wastewater flows onto adjacent properties, residential yards, or drainageways and surface waters, but is not treated to levels or sampled at frequencies that are required for discharging systems." (https://www.tn.gov/content/dam/tn/tacir/2024publications/2024_Wastewater.pdf#:~:text=Staff%20added%20information%20to%20the%20report%20from.comprehensive%20evaluation%20of%20its%20kind%20in%20Tennessee; at p. 1.)

The following figures are from the Report and demonstrate the frequency with which issues arise.

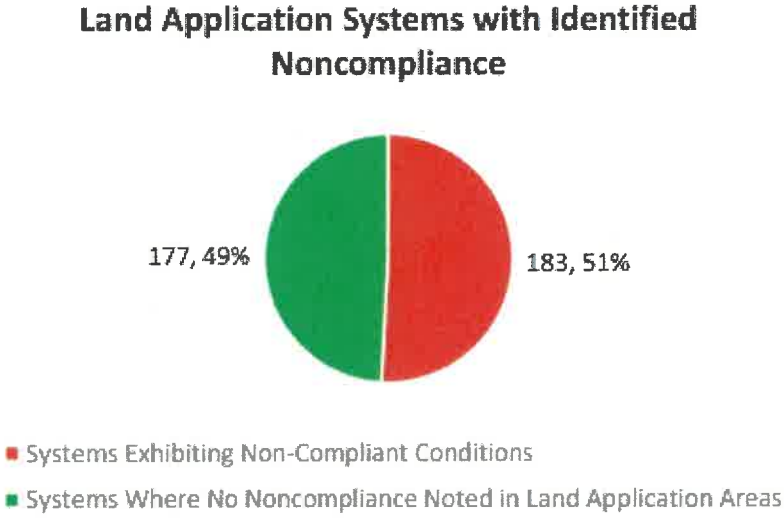


Figure 4. Systems with observed noncompliant conditions vs. Systems with no observed noncompliant conditions.

Of the previously listed subpopulations, three are indicative of major noncompliance: X2, X3, and A2b. Of the 360 systems actively managing wastewater, 94 (26%) exhibited conditions indicative of those subpopulations; 89 (25%) exhibited relatively minor indications of noncompliance (A2a, A3); 177 (49%) exhibited no observations of noncompliance (A1) (Figure 5).

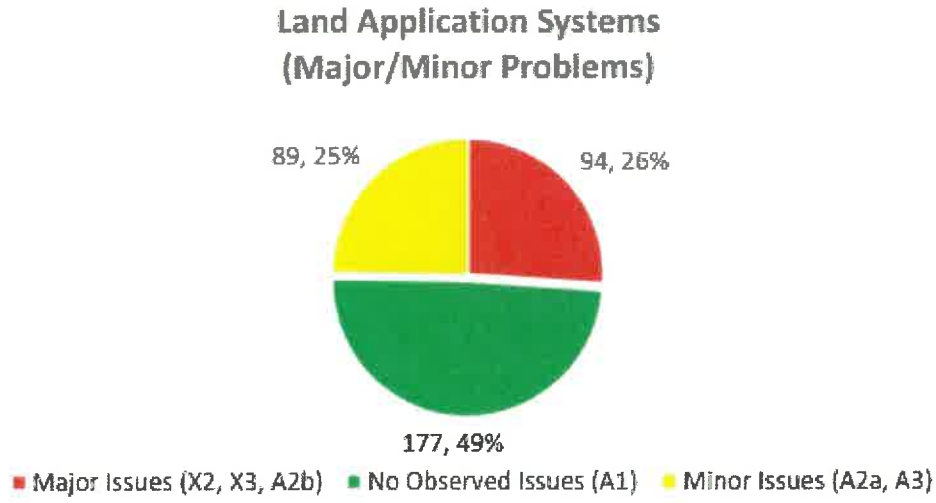


Figure 5. Major Issues Observed/Minor Issues Observed/No Observed Issues

Common failures

- Inadequate maintenance: Skipping regular service leads to clogged filters, sludge buildup, and component wear, reducing efficiency.
- Mechanical and electrical breakdowns: Pump failures, sensor malfunctions, and power fluctuations can cause the plant to shut down.
- Operational errors: Untrained staff can make mistakes like incorrect chemical dosing or irregular aeration, negatively affecting microbial processes.
- Influent fluctuations: Unexpected changes in the volume or quality of wastewater, such as a sudden increase in organic load or toxic chemicals, can overwhelm the system.
- Poor design or installation: Incorrect placement of aeration and filtration units can lead to structural issues and leaks.

Risks of failure

- Discharging poorly treated water can contaminate receiving waters with organic matter, nutrients, and pathogens, leading to eutrophication and harm to aquatic life.
- Contaminated water can harm ecosystems, while odors can cause nuisance complaints.

Zone 7 previously noted its concern that the Project—most notably the proposed bioretention areas, sewage treatment plant, recycled water storage and associated spray fields—is located adjacent to the Chain of Lakes (COLs), a centerpiece of Zone 7's water management portfolio, and is situated immediately south of Lake I. As those sites are reclaimed, the resulting lakes will be interconnected by a series of conduits and used by Zone 7 for local water management functions, thereby enhancing the resiliency and flexibility of Zone 7's water supply functions. Zone 7 currently owns Lake I and Cope Lake and expects Lake H to be transferred to Zone 7 within the next few years. Thus, Zone 7 is concerned that the EIR does not adequately address the risk and potential impacts of sewage and/or effluent directly or indirectly entering the lakes through runoff or infiltration.

Master Response 11 in the final EIR, which is intended to address these concerns, simply notes that the COL is not currently interconnected.[1] But, an EIR must disclose and analyze all that is reasonably foreseeable. (See 14 Cal Code Regs §15144.) Because it is reasonably foreseeable that the COL will be connected in the near future, these impacts must be analyzed. Further, these impacts are potentially significant—the EIR's analysis does not sufficiently demonstrate otherwise—and therefore those impacts must be reviewed. (*League to Save Lake Tahoe v. County of Placer* (2022) 75 Cal.App.5th 63, 96 [noting that if substantial evidence in the record shows that an environmental impact may be significant, the impact must be described and analyzed in the EIR].)

Moreover, neither of the Master Responses referred to in the agency's response to Zone 7's concerns—Responses 10 and 11—nor the draft EIR, address the potential impacts of an

[1] This assertion is not entirely accurate. Although not all of the COL are connected, there are connections between Lakes H and I and between Cope Lake and Lake I. Further, Lakes H and I are connected to the groundwater basins. So the three lakes in the Project area are connected to each other and the groundwater basin.

upset/release at the WWTP, nor the potential impacts as it relates to the reasonably foreseeable interconnected nature of the COL. **Because the WWTP is proposed to be located adjacent to Lake I, any failure, upset, or release—which is reasonably foreseeable, given the previously-cited studies—would have catastrophic and potentially permanent impacts to a critical drinking water supply for hundreds of thousands of people.** Because this impact is potentially significant, it must be further analyzed.

Additionally, the final EIR states that the Sewage Treatment Facility will be operated by contract licensed operators. It also states that the facility will primarily be operated remotely and autonomously. The lack of an operator on site 24/7 creates additional risk of a plant upset, or other malfunction. Moreover, it creates uncertainty in the responsiveness to any problem or alarm at the plant. It is not known how close the remote operator will be and what the response time will be if there is a malfunction. This poses additional risk to Zone 7 and the local water supplies as an onsite operator is not present to verify sensor readings, and if a plant malfunction does occur, it will not be able to be addressed immediately. Additionally, there will be no one onsite to monitor the recycled water spray field, which is unlikely to have as much remote monitoring as the plant. The irrigation components of the spray field are susceptible to breaks and malfunctions, which would likely result in direct runoff flowing towards Cope Lake along the existing topography. Although a new location has been proposed by the Project proponent, this does not resolve Zone 7's concerns because overspray and slope conditions now present a risk to Lake I.

Relatedly, the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) is the Regional Water Quality Control Board's (Water Board) master water quality control planning document. Section 4.18.1 addresses on-site wastewater treatment and dispersal systems. The policy states "The Water Board also requires that a public entity must assume legal authority and responsibility for the planning, design, financing, construction, operation, and maintenance of any new community wastewater treatment and dispersal system".[2] The applicant should describe the applicability of this requirement and how this requirement will be met.

It should also be noted that the reliability of the proposed MBR systems is unclear. Page 2-31 of the Final EIR describes MBR systems as "a more innovative process" but then later describes MBR systems having "a long track record of trouble-free and odor-free operation." Generally, an innovative technology is not usually described as having a long-track record and the EIR fails to provide specific examples of sites where MBR systems have been implemented. Instead, the EIR only provides a geographic reference to some Counties where MBR facilities are located. Vague, unverifiable, references are not adequate to assert a long track record of trouble free operation for an "innovative" technology.

Lastly, Page 2-31 of the Final EIR identifies that "physical screens are used to remove rags and similar material which would clog downstream mechanical equipment." Zone 7 is concerned about what happens to effluent if these screens become plugged (which could occur for multiple reasons including equipment failure). This is especially concerning given the proposed remote

[2] https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/planningtmdls/basinplan/web/docs/ADA_compliant/BP_chapter_4.pdf

operations of this plant. In this event, it is not clear if containment is in place that would prevent the water from reaching the groundwater basin, Lake I, or Cope Lake. And this is just one of many potential failure modes of a wastewater treatment plant.

b. Risk of contaminants entering the COL through stormwater and recycled wastewater

The Project anticipates that stormwater will be directed to a bioretention basin within the lower elevation portion of the Project area adjacent to Cope Lake. Stormwater from the development is at risk of containing PFAS, pesticides, nitrates, and TPH, among other contaminants, which, if inadequately treated, may enter the Lake through groundwater infiltration or surface runoff. Zone 7 raised this concern in its comment on the Project's draft EIR, however, aside from noting that there are no PFAS regulations that currently apply to the bioretention area, the response to Zone 7's comments in the final EIR did not address these significant issues. (See Final EIR, p. 3-109–3-111.) This is contrary to the law: responses to comments must address the significant environmental issues raised in comments on the draft EIR. (See Pub. Resources Code, § 21091(d)(2)(B); 14 Cal. Code Regs. §§ 15088(c), 15132(d), 15204(a).) The EIR thus provides an insufficient analysis of the risk that contaminants from Project stormwater and recycled wastewater may enter the COL.

Additionally, the EIR's analysis of potential PFAS contamination is inadequate and dismisses the threat of PFAS from the effluent. On behalf of the Bay Area Clean Water Agencies, San Francisco Estuary Institute completed the report, titled "Study of Per- and Polyfluoroalkyl Substances in Bay Area Publicly-Owned Treatment Works (POTWs)". The major study question was whether residential dischargers are a major source of PFAS. Through Phase 2 sewershed investigations, the study found PFAS from residential discharges to be highly variable, with concentrations ranging from non-detect to 80 ng/L via target analysis and 4–850 ng/L via TOP analysis.[3] Thus, potential mishandling and/or seepage of sprayed effluent into the lakes is a threat to water quality.

In response to Zone 7's comment on the draft EIR about concerns that PFAS could enter Cope Lake and affect water quality, the final EIR noted that PFAS is not removed through standard wastewater treatment technology and that "[a]t present, there are no effluent standards for PFAS in recycled water or treated wastewater that is discharged to natural water bodies." (Final EIR, p. 2-34.) This response impermissibly avoids addressing the risk of PFAS entering Lake I, Cope Lake and the COL through surface runoff or groundwater infiltration. While there are currently no standards for PFAS discharges in recycled wastewater, the EIR must nonetheless analyze the significance of potential impacts by identifying a significance threshold above which PFAS degrades water quality. (14 Cal Code Regs §§15064(b), 15064.7 [discussing thresholds of significance].) Further, the significance threshold for this Project is whether it would "[v]iolate any water quality standards or waste discharge requirements or *otherwise substantially degrade surface or ground water quality*." (Draft EIR, p. 3.9-23 [emphasis added].) As such, it is immaterial whether there is a mandated water quality standard for PFAS if Project impacts from the same would substantially degrade water quality.

[3] See Section 4.1 of the SFEI BACWA PFAS Study 2024 Final Report with Appendices.

Further, the EIR does not address the proximity of the bioretention basins to Cope Lake and Lake I and, thus, the reasonably foreseeable risk that inundation and flooding would lead to contaminated stormwater runoff entering the Lake and impacting water quality. The bioretention basin is within the flood plain of Cope Lake and could be fully inundated. Further, Exhibit 1 shows the groundwater gradients of the basin and how any contaminants flow into Cope and Lake I would disperse into the basin. The draft EIR concludes, without providing support, that "potential flooding of the proposed bioretention facilities, including the one proposed under Design Option B, the agricultural spray fields, and the water storage and booster pump facility would likely not result in the release of any pollutants." (Draft EIR, p. 3.9-32.) Flooding of the bioretention facilities would result in the release of contaminated stormwater and, given the low elevation location of the basins adjacent to Cope Lake, result in runoff into the Lake, thereby jeopardizing water quality - a potential point source of contamination to Waters of the State. Thus, it is unclear upon what basis the EIR determined that flooding would likely not result in the release of any pollutants.

Moreover, the EIR does not adequately address how the bioretention basins will treat stormwater and thereby function to prevent the introduction of stormwater containing contaminants into the groundwater. Rather, it provides the conclusory statement that "[t]he bioretention area would be protected by an 8-foot berm and would treat all incoming stormwater from the project site." (Draft EIR, p. 2-33, 3.17-24.) No response was provided in the final EIR to Zone 7's prior comment regarding this issue. (See Final EIR, p. 3-109–3-111.) As noted above, this violates the requirement for an adequate response to a public comment that raises a significant environmental issue. (See Pub. Resources Code, § 21091(d)(2)(B); 14 Cal. Code Regs. §§ 15088(c), 15132(d), 15204(a).)

Lastly, the EIR lacks information about the construction of recycled water storage ponds. It is not known if there will be percolation from these ponds which could reach Lake I or the groundwater basin. Given the close proximity of the pond to Lake I, there is material and reasonably foreseeable risk of an embankment failure, or a rodent burrowing through the embankment, causing water to reach Lake I or Cope Lake.

c. Ongoing maintenance needs for the WWTP, bioretention basins, percolation and spray fields

The Project plans to disperse treated sewage via bioretention basins and spray fields. This approach will allow treated sewage to accumulate on the surface and percolate or evaporate in place. Once accumulated, this collected effluent will seep into the ground or become a source for overflow and surface runoff to flow into the designated drinking water lakes (Cope Lake and Lake I). These lakes are to become storage for imported State Water Project water to recharge the basin and/or pump back to Del Valle Water treatment plant for treatment and distribution as potable water supply. Exhibit 2 shows the alignment of the large diameter pipeline. Zone 7 is planning to use these lakes as the centerpiece of the local storage program.

Zone 7 is concerned that ongoing maintenance needs for the bioretention areas for the standard treatment of stormwater are not addressed in the EIR. The agency's response in the final EIR to Zone 7's prior comment on this topic does not answer this question. Instead, the agency simply notes that "[t]he maintenance of the bioretention areas would be managed by the proposed

project's HOA." (Final EIR, p. 3-110.) Given the assumed lack of expertise of an HOA in management matters pertaining to stormwater management, the EIR does not anticipate, nor does it account for, how management will be structured to ensure ongoing concerns about impacts to the lakes stemming from monitoring and maintenance of the bioretention areas will be addressed. Thus, the EIR does not adequately explain how ongoing maintenance will occur and how it will ensure that the impact of the bioretention areas remains less than significant during operation of the Project. This is a violation of CEQA. (See 14 Cal Code Regs §15151 ["[a]n EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences"].)

Moreover, the Final EIR, on Page 2-41, states without support that recycled water

> *"applied to the proposed project's agricultural spray fields would not be hydraulically connected to surface or groundwaters in the Livermore Amador Valley. Such connection would be precluded....[by] application of recycled water at agronomic rates that prevents the recycled water from migrating into the groundwater."*

Page 2-39 of the Final EIR similarly states recycled water will be applied to "agricultural spray fields at agronomic rates as detailed in the EKI Technical Memorandum dated February 2024 (Appendix J of the Draft EIR)."

However, any discussion of these referenced agronomic rates is absent from Appendix J. Without disclosure, the public can only guess as to how the operation will work. A simple calculation between the gallons per day and estimated size of the spray field indicates an application rate of 4.5 Acre Feet per Acre per year. This is much higher than the agronomic rate of many common crops. Moreover, the consumption rate of agricultural crops varies throughout the year, with the highest water demands in the hot summer months and limited water demands in the winter months. The Final EIR estimates 32,677 Gallons per Day of recycled water. This amount of effluent would not have much variation seasonally. Thus, the temporal discrepancy between seasonal agronomic water uptake and a consistent daily flow will likely not prevent percolation, especially in the winter months. Additionally, precipitation must be factored into the percolation modeling. Percolation of recycled water is of great concern to Zone 7 and could imperil the region's drinking water supplies.

Moreover, Page 2-38 of the Final EIR states "in accordance with standard practices, recycled water application would be prohibited immediately before, during and immediately after a rainfall event when the soil is anticipated to be or would be saturated." It also states that recycled water would not be applied in the event of high winds. Therefore, in the event of high winds, or a long duration storm, it is presumed that recycled water would be held in the storage pond until it could be applied pursuant to the aforementioned standard practices. However, the EIR does not disclose the volume of the pond, or how many days of storage it would provide given the projected flow at full buildout (excluding any direct rainfall from a storm event). Without this, it cannot be determined whether this is a feasible approach. If a long duration storm event were to occur and the soil is too saturated for application per the standard practices, where the water will go? Will the decision be made to apply the water to the agricultural fields resulting in percolation, will the storage pond overflow, will recycled water be discharged elsewhere

somehow? These situations are reasonably foreseeable and pose significant risk to critical drinking water supplies. All of these unanswered questions are of critical concern to Zone 7.

Lastly, Page 2-37 of the Final EIR states that the wastewater facilities would be owned by the Homeowner's Association and that the HOA would be empowered "to enter into contracts, borrow funds, and impose assessments to fully cover the operations and maintenance of all covered facilities and improvements, including the wastewater." This ownership of the facilities by the HOA brings the feasibility of the project into question. As required by CEQA, all mitigation measures must be feasible—meaning "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors." (CEQA Guidelines, § 15364.)

The EIR makes no estimates of the financial costs of these wastewater facilities and their ongoing maintenance, nor demonstrates that the HOA, with 189 homes at full buildout, will be able to financially support the facilities. Furthermore, it is also important to evaluate the financial viability of this in the event that full build-out is never reached. Unfortunately, this reality often plagues developments as was the case during the 2008 recession. When subdivisions are never completed, it creates substantial hardship on the homeowners who are already living in the subdivision, as currently is the case with the Diablo Grande Subdivision in Stanislaus County which is currently facing huge funding shortfalls for their water supplies, and a possible loss of supplies. It is not prudent to assume a small HOA can fund and operate such a critical facility.

Finally, even in their current state, without any neighboring development, Zone 7 has encountered numerous areas of slope erosion or damages at Lake I and Cope Lake resulting from seemingly small issues including sink holes caused by rodents and leaking or improperly installed drainage pipes. More infrastructure in the area, especially at the proximity proposed, is likely to exacerbate these problems.

d. Compliance with Zone 7's Alternative Groundwater Sustainability Plan

As designated in the Sustainable Groundwater Management Act, Zone 7 is the exclusive Groundwater Sustainability Agency for the Livermore Valley Groundwater Basin, and it is implementing the Alternative Groundwater Sustainability Plan for the basin. As required by the California Water Code, Zone 7 is responsible to manage basin water quality and to the extent possible protect the basin from water quality degradation. The proposed project's wastewater and stormwater management schemes have significant potential to degrade the basin water quality, including the wastewater introducing an estimated 35 tons of salt into the basin per year, threatening the water quality of the Livermore Valley Groundwater Basin. It should be noted that protection of the local water supplies for current and future generations in the Tri-Valley is a paramount interest of Zone 7.

Zone 7 has thus far provided comments regarding this potential degradation of local water supplies throughout the development review process and several of our concerns remain. Proceeding with this project, as it is proposed, effects the rights of users of the groundwater basin, including Zone 7, and is unlawful and inconsistent with the California Water Code.

Given the above identified inadequacies in the Project's discussion of risks and impacts to water quality, the EIR prematurely concludes that the Project's impacts on water quality will not be significant. The agency has conducted insufficient analysis to support that conclusion.

2. The EIR does not adequately evaluate public health and safety impacts from overspray from the treatment plant.

The EIR does not address the possibility of overspray from the spray fields, and therefore insufficient information is provided for the public to assess potential impacts. The EIR simply states that the sprinklers will be positioned so that prevailing winds will not carry spray beyond the area to be irrigated, and that operations will be halted in high wind conditions. But there is no analysis to explain when this cessation of operations will occur. Further, it is reasonably foreseeable that failures will occur; sprinklers might be adjusted incorrectly or not timely halted. These types of reasonably foreseeable events would have significant contaminating effects on the public drinking water and must be avoided or mitigated via an alternative to spray or a new location for the fields that is farther from critical drinking water supplies (both Cope Lake and Lake I).

***

In sum, the Project's proposed location of and treatment of wastewater in close proximity to public drinking water supplies poses significant risks and needs to be better addressed. For these reasons, Zone 7 appeals the Planning Commission's decision.

Sincerely,

DOWNEY BRAND LLP

Andrew M. Skanchy

cc: Alameda County Clerk of the Board of Supervisors

Encl. – Check in the Amount of $250

5182877

Exhibit 1

Groundwater gradients indicating dispersal into the basin

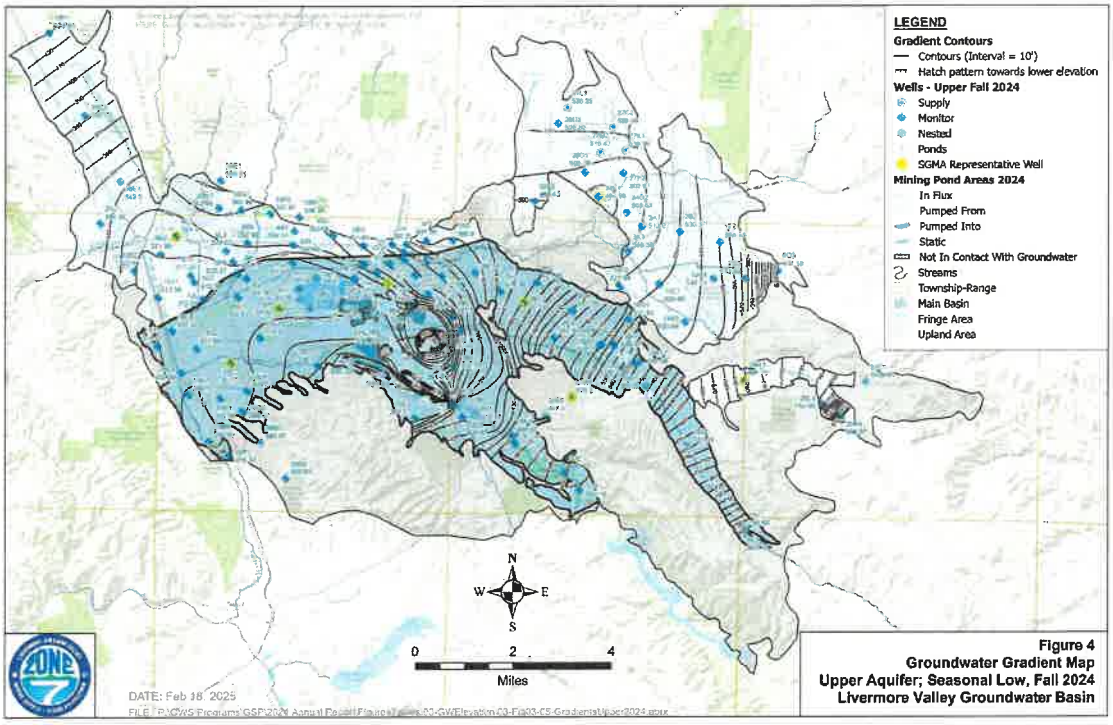


Exhibit 2
Zone 7's Planned Water Pipeline

THIS DOCUMENT INCLUDES AN ORIGINAL WATERMARK - ORIGINAL DOCUMENT IS PRINTED ON CHEMICAL REACTIVE PAPER & HAS A MICROPRINTED BORDER

DOWNEYBRAND

Five Star Bank
California

GAF

324552

90-4303/1211

621 Capitol Mall, 18th Floor
Sacramento, CA 95814

January 12, 2026

PAY ****Two hundred fifty and 00/100********** ****250.00 DOLLARS $

TO THE ORDER OF
Alameda County Treasurer
1221 Oak Street, #131
Oakland, CA 94612

VOID AFTER 120 DAYS
COUNTERSIGNATURE REQUIRED OVER $20,000

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DOWNEYBRAND

FSB - General Account

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.

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Vendor ID: 25395

Check #: 324552
Check Date: 01/12/2026

Invoice Date	Invoice #		Narrative	Disb Invoice Amount	G/L Acct	Invoice Total
01/12/2026	1/12/2026	Client Disbursements - Hard Costs	VENDOR: Alameda County Treasurer; INVOICE#: 1/12/2026; DATE: 1/12/2026 - Fee for Appeal of PLN2022-00193	$250.00	104.06	$250.00
					Invoice Totals:	$250.00

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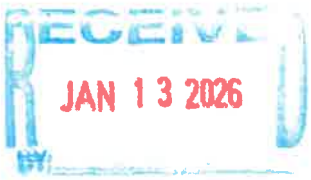

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LINDA CORTEZ
DOWNEY BRAND LLP
621 CAPITOL MALL
EIGHTEENTH FLOOR
SACRAMENTO, CA 95814
UNITED STATES US

SHIP DATE: 12JAN26
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CAD: 1539078/INET4535

BILL SENDER

TO **PLANNING DEPARTMENT**
ALAMEDA COUNTY COMM DEV. DEPARTMENT
224 W. WINTON AVE.
ROOM 111
HAYWARD CA 94544
(510) 670-5400 REF: 41005-00000/1800
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PO: DEPT:

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