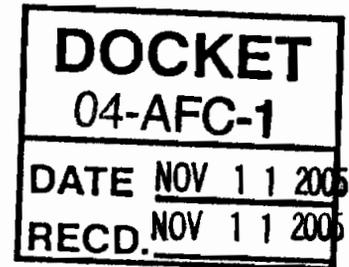




CH2M HILL
2485 Natomas Park Drive
Suite 600
Sacramento, CA 95833
Tel 916.920.0300
Fax 916.920.8463

November 11, 2005

Mr. William Pfanner
Siting Project Manager
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814-5504



RE: SFPUC Preliminary Staff Assessment Comments, Set 3
San Francisco Electric Reliability Project (04-AFC-01)

Dear Bill:

On behalf of the City and County of San Francisco, please find attached 12 copies and one original of the Additional Comments and Information of the City and County of San Francisco on the Preliminary Staff Assessment (PSA) dated September 12, 2005. This document updates and supplements Applicant's initial comments based on the results of discussion during the October 18, 2005 PSA Workshop. The City will be submitting additional comments and information as they become available.

Please call me if you have any questions.

Sincerely,

CH2M HILL

A handwritten signature in black ink, appearing to read "John L. Carrier".

John L. Carrier, J.D.
Program Manager

c: Project File
Proof of Service List

**San Francisco Electric Reliability Project (SFERP)
(04-AFC-1)**

PSA Comments, Set 3

Listed below, for CEC staff's consideration, is Set 3 of City and County of San Francisco's (Applicant or the City) additional comments and information related to the Preliminary Staff Assessment (PSA) for the San Francisco Electric Reliability Project (04-AFC-01).

ENVIRONMENTAL ASSESSMENT

SOIL AND WATER RESOURCES

45. Initial Comment: P. 4.9-9, Project Water Supply, 3rd paragraph, 1st sentence: The potable water connection will be to a 12-inch main in Cesar Chavez, not an 8-inch line in 23rd Street.

Update: During the workshop, it was determined that the will serve letter for the project water supply should be updated. An updated will serve letter is included in this filing as Attachment SW-45.

WASTE MANAGEMENT

71. Initial Comment. P. 4.13-14, WASTE-7: Applicant recently performed soil sampling and analysis at the proposed SFERP site. The results of that sampling and analysis exercise have been provided to the CEC under separate cover. Applicant maintains that the sampling results indicate constituents of concern in the soil that are consistent with levels shown in numerous previous sampling activities in and adjacent to the SFERP site. Therefore, Applicant maintains that a revised human health risk assessment is not necessary. Applicant is working with the San Francisco Bay RWQCB to have a deed restriction (consistent with the deed restrictions from the adjacent MUNI site) placed on the SFERP site and to also have the existing RMP/SMP for the MUNI site revised to also cover construction and operations activities at the SFERP site. Moreover, the Applicant will comply with Article 22A of the Public Health Code and will provide a site characterization and remediation plan to the Department of Public Health for review.

Update: As part of the City's continuing efforts to work with the CEC to identify and provide the information it requires to finalize its review of Waste Management, it is providing the following two documents:

- 1) Included in this filing, as Attachment WM-71A, is a copy of correspondence sent to Nancy Katyl of the California Regional Water Quality Control Board. Due to the size of this file five complete copies are being provided to the CEC. However, we are providing to the other parties only the letter to Ms. Katyl (Attachment A referenced in that letter was previously provided to the parties as Informal Data Response Set 6D-Addendum) and Attachment B (the statistical analysis by Fugro West, excluding their Appendix A). Complete electronic copies will be furnished to the parties upon request.
- 2) The City is also providing, as Attachment WM-71B, a copy of the Human Health and Ecological Risk Assessment for the former Western Pacific Property – Port Site. Due to the size of this document, five copies are being provided to the CEC. Electronic copies of the report will be furnished to the parties upon request.

ATTACHMENT SW-45



SAN FRANCISCO PUBLIC UTILITIES COMMISSION

Kevin Barry, Division Manager, City Distribution Division



October 31, 2005

GAVIN NEWSOM
MAYOR

RICHARD SKLAR
PRESIDENT

ANN MOLLER CAEN
VICE PRESIDENT

E. DENNIS NORMANDY
ADAM WERBACH
RYAN L. BROOKS

SUSAN LEAL
GENERAL MANAGER

Subject: Availability of Water
1251 Illinois Street
Block 4175, Lot 003

Ms. Karen Kubick, Manager
Infrastructure Development
Power Enterprise
1155 Market Street, 4th floor
San Francisco, Ca. 94103

Dear Ms. Kubick:

This is in response to your request for a will serve letter for your project at the above referenced address.

We have an existing 8-inch main in Illinois Street and a 12-inch main in Cesar Chavez Street. Our records show two existing standard domestic services for block 4175, lot 003: a 1-inch standard service and a 6-inch standard service.

We can provide additional domestic and fire services upon request. Fire service size, if required, must be approved by the Department of Building Inspection.

Potable water will be furnished subject to Water Department rules and regulations governing water service to customers.

Sincerely,

Jerry Lyons
Operations Manager, CDD

JL:kr
cc: CDD File, Chron.

RECEIVED

NOV 01 2005

M.H.W.P.



SAN FRANCISCO PUBLIC UTILITIES COMMISSION
POWER ENTERPRISE

1155 Market Street, 4th Floor, San Francisco, CA 94103 • Tel. (415) 554-0725 • Fax (415) 554-1854



November 8, 2005

GAVIN NEWSOM
MAYOR

RICHARD SKLAR
PRESIDENT

ANN MOLLER CAEN
VICE PRESIDENT

E. DENNIS NORMANDY
ADAM WERBACH
RYAN L. BROOKS

SUSAN LEAL
GENERAL MANAGER

Ms. Nancy L. Katyl
Engineering Geologist
California Environmental Protection Agency
California Regional Water Quality Control Board
San Francisco Bay Region
1515 Clay Street, Suite 1400
Oakland, CA 94612

Dear Ms. Katyl:

As discussed during our meeting of September 16, 2005 at the Port of San Francisco, the City and County of San Francisco (City) is proposing to construct the San Francisco Electric Reliability Project (SFERP) on City-owned land near Pier 80. The SFERP will be located on 4 acres of land that is part of the Former Western Pacific Property, directly east of the MUNI Metro East Light Rail Vehicle Maintenance and Operations Facility. The SFERP is currently undergoing review by the California Energy Commission (CEC). The CEC is the State agency with CEQA jurisdiction and licensing authority for power plants over 50 megawatts in size.

In order to support review of the SFERP, the City performed soil sampling and analysis. Fifteen soil borings, which ranged in depth from 30 to 150 feet, were drilled with environmental soil samples for laboratory analyses being collected from 8 of the 15 soil borings. Attachment A contains the results of the soil sampling and includes a layout of the SFERP showing soil boring and sampling locations. Attachment A also includes a table (referred to as Table 1) that provides environmental soil sampling results. Table 2 of Attachment A provides the results of composite sampling that was used to characterize (for disposal) investigation derived waste generated during the geotechnical investigation.

The City recently retained the services of Fugro West in order to undertake a statistical evaluation of the sampling results contained in Attachment A with sampling results collected during previous site characterization studies conducted at the MUNI Metro East Light Rail Vehicle Maintenance and Operations Facility location. The purpose of Fugro West's evaluation was to determine whether the data recently collected from the SFERP site was similar and consistent with findings from the MUNI Metro East Light Rail Maintenance Yard. Attachment B contains a copy of the Fugro Statistical Analyses of Data. As noted in Attachment B, it is Fugro's opinion that the total lead and arsenic values

Ms. Nancy L. Katyl
Page #2

detected in the soil samples from the SFERP site are similar to the data generated from the adjacent 13-acre MUNI parcel.

Should you need any additional information, please do not hesitate to contact me at (415) 934-5735.

Very Truly Yours,



Karen Kubick
Manager
Infrastructure Development

cc: Jeanne Sole, City Attorney
John Mundy, SF Port
Rona Sandler, City Attorney
Steven A. Deyoung, SFERP
Russell Stepp, SFERP



FUGRO WEST, INC.

1000 Broadway, Suite 200
Oakland, California 94607
Tel: (510) 268-0461
Fax: (510) 268-0137

November 8, 2005
Project No. 05.275

City and County of San Francisco
Department of Public Works
Site Assessment and Remediation Division
1680 Mission Street, First Floor
San Francisco, California 94103

Attention: Stanley DeSouza

Subject: SFERP Project, Statistical Analyses of Data

Dear Mr. DeSouza:

At your request, Fugro West, Inc., (Fugro) in cooperation with AEW Engineering, Inc. (AEW), has conducted a statistical evaluation of certain chemical data obtained for the San Francisco Electric Reliability Project (SFERP) near Pier 80 in San Francisco, California. The purpose of the evaluation is to determine whether data recently collected from the 4-acre Port parcel are similar and consistent with findings from prior investigations performed on this parcel and a 13-acre parcel located directly west, the San Francisco Municipal Railways (MUNI) Metro East Light Rail Vehicle Facility. Prior investigations were performed in conjunction with development of a Risk Management Plan and Site Management Plan (RMP/SMP) for construction of a light rail maintenance and operations yard for the MUNI.

LIMITATIONS

Fugro has prepared this report in a professional manner, using that degree of skill and care, exercised for similar projects under similar conditions by reputable and competent environmental consultants. Fugro shall not be responsible for conditions or consequences arising from relevant facts that were concealed, withheld, or not fully disclosed at the time the report was prepared. Fugro also notes that the facts and conditions referenced in this report may change over time and the conclusions and recommendations set forth herein are applicable only to the facts and conditions as described at the time of this report. Fugro believes that conclusions stated herein to be factual, but no guarantee is made or implied. This report has been prepared for the benefit of the City of San Francisco.

PROJECT DESCRIPTION

The MUNI is currently constructing a light rail maintenance yard (the Maintenance Yard), referred as Metro East Light Rail Vehicle Maintenance and Operations Yard, on the western 13 acres of the Former Western Pacific Railroad (WPRR) Yard (the Former Western Pacific





Property), an area reclaimed from the Bay located north of Islais Creek in southeast San Francisco.

The Former Western Pacific Property is located north of Pier 80 and is bounded by Illinois Street on the west, 24th and 25th streets on the north, San Francisco Bay on the east, and Cesar Chavez Street (Army Street) on the South. The Former Western Pacific Property consists of about 39 acres of property (30 acres are land reclaimed by filling operation and about 9 acres are water lots in San Francisco Bay). The property is owned by the Port of San Francisco (Port).

Previous reports indicate that the Former Western Pacific Property is underlain with fill material primarily composed of loose sand and rock excavated from surrounding hills and miscellaneous man-made debris including concrete rubble, asphalt, wood, tarry roofing shingles, brick, ceramic tile, slag and glass. According to soil borings drilled at the property, the fill material ranges in thickness between 6 to 38 feet. Details of the site geology and hydrogeology are described in the *Site Characterization/Corrective Measure Study Report, MUNI Metro East Light Rail Vehicle Maintenance & Operation Facility, San Francisco, California dated, 1999* (the SC/CMS Report).

We understand that MUNI currently plans to lease the additional 4-acre parcel from the Port. Initially, the additional 4 acres will be used as a staging area for construction activities conducted at the adjacent 13-acre parcel. It is anticipated that ultimately the 4-acre parcel will be covered with hardscape and/or buildings preventing access and exposure to the site soil, with the exception of few hundred square feet for planting and landscaping.

SITE CHARACTERIZATION AND RISK ASSESSMENT

The Site Characterization/Corrective Measure Study (SC/CMS) and a San Francisco Health Code Article 22A (Article 22A) Compliance evaluation were conducted by AGS, Inc., for the MUNI on the Metro East Light Rail Vehicle Maintenance and Operations Facility (the MUNI Site). The purposes for the SC/CMS and Article 22A Compliance field investigation at the MUNI Site were to:

- Characterize the chemical contamination at the site, with particular focus on areas where soil excavation will be required for construction of the MUNI Site.
- Perform a human health and ecological risk assessment to evaluate the impact of chemical contamination at the site to human health and the environment.
- Identify the need of site remediation and/or risk management based on results of human health and ecological risk assessment.

Details of the investigation are described in the SC/CMS Report. Based on the results of the site characterization, a human health risk assessment was conducted on soil as parts of the corrective measure study. The risk assessment identified Arsenic; Chromium (total) and Chromium VI; Lead; Benzo(a) anthracene; Benzo(a) pyrene; Benzo(b) fluoranthene;



Dibenzo(a,h) anthracene; and Indeno(1,2,3,cd) pyrene as Chemicals of Potential Concern (COPC) in soil for the human health risk assessment at the MUNI Site.

The human health risk assessment concluded that based on conservative estimates of risk to human health, chemicals underlying the MUNI Site do not pose a significant risk to daily on- and off-site occupants. Conservative estimates of risk to future construction workers at the MUNI Site slightly exceed target criteria. Because conservative estimates of risk to future construction workers at the MUNI Site slightly exceed target risk levels (a carcinogenic risk of 1×10^{-5} and a non-carcinogenic hazard index of 1.0), risk management practices were recommended to address health and safety issues associated with the proposed construction work. Risk management practices will be implemented through the Risk Management Plan and Site Management Plan (RMP/SMP). The RMP/SMP consists of the following major elements:

- Deed restriction. The MUNI and the Port entered a deed restriction agreement on the MUNI Site. The deed restriction explicitly included the restricted industrial land use, restricted groundwater use, and compliance with the Risk Management Plan. The final deed restriction was duly recorded with the Records Office in the City and County of San Francisco.
- Risk management practices before site redevelopment, including risk management controls to be implemented before site redevelopment.
- Risk management practices during redevelopment including 1) site specific health and safety worker planning requirement and safety programs; and 2) construction impact mitigating measures.
- Risk management practices after redevelopment including 1) paving site; 2) restriction of groundwater uses; 3) protocols for future subsurface development; and 4) long-term maintenance and compliance.

DATA EVALUATION

We understand that MUNI intends to use a portion of the 4-acre parcel in the near term as a construction laydown area for the MUNI Metro East Facility, after which it would sublease the parcel to the San Francisco Public Utilities Commission for construction of a gas turbine power generation facility, the SFERP. Accordingly, MUNI, would like to apply the existing SC/CMS, RMP/SMP, and deed restriction for the MUNI Site to the additional 4-acre parcel. Additional soil sampling and analyses were conducted by CH2MHill at this 4-acre area in July 2005. Soil samples were tested for Total Petroleum Hydrocarbons as Diesel (TPHd), Motor Oil (TPHmo), Bunker "C" Oil, arsenic, lead, and asbestos analyses. To conduct this evaluation, Fugro relied on data provided by AEW and San Francisco Department of Public Works (SFDPW), including the following sources of chemical data:

- Table 1 – Environmental Soil Sampling Results obtained by CH2MHill for the 4-acre parcel, and



- Tables 3 and 15 of the "Final Site Characterization/Corrective Measure Study Report, MUNI Metro East Light Rail Vehicle Maintenance and Operation Facility, San Francisco, California, 1999.

Copies of these data tables are presented in Appendix A. For the purposes of this evaluation, we included the results for all the duplicate samples and removed no data that might be considered an outlier. We also assumed that all data was representative and comparable without consideration for variation due to sample depth. For the purpose of the statistical evaluation, ND results were considered to be equal to respective detection limit values. We also excluded results for any composite samples.

Fugro utilized the USEPA's ProUCL software to create a histogram of three populations of chemical data for both total lead and arsenic concentrations since these metals were previously identified as COPCs. We did not review the data for TPHd, TPHmo, or Bunker C because we understand that no Human Health Risk Values were established for those analytes. Fugro compared the histograms of "previous" and "cumulative" data sets. Copies of these Histograms and Summaries of the General Statistics calculated by the ProUCL program are presented in Appendix B.

Based on our review of the histograms, it appears that the new lead and arsenic data populations are similar to the previous results. We base this conclusion on the overall geometry of the histograms, both separate and combined, comparison of the calculated 95% UCLs, and with consideration that there are only 20 samples in the new data population. We note that the maximum values of the new data (2,100 mg/kg for lead and 460 mg/kg for arsenic) are less than the maximum values from the previous findings (2,530 and 591 mg/kg, respectively). Additionally, the mean values of the combined lead and arsenic data (288 and 34.5 mg/kg, respectively) are very similar to the mean values calculated for the previous lead and arsenic data (301 and 32 mg/kg).

Based on the results of the ProUCL calculations, it appears that the lead data has a lognormal distribution. The 95% H-UCL of the lognormal distribution for the previous lead data is 1,096 mg/kg compared to 982 mg/kg for the combined lead data. Assuming a Gamma Distribution, the Adjusted Gamma 95% UCL is 404.4 mg/kg for the previous lead data compared to 374 mg/kg for the combined data.

For the arsenic, the ProUCL calculations indicate that the data populations are non-parametric. Using the Chebyshev method, the calculated 95% UCL for the previous arsenic data is 73.1 mg/kg compared to the 95% UCL for the combined arsenic data, which is 72.9 mg/kg.

Therefore, it is Fugro opinion that the total lead and arsenic values detected in the soil samples from the 4-acre parcel are similar to the data generated from the adjacent 13-acre parcel.

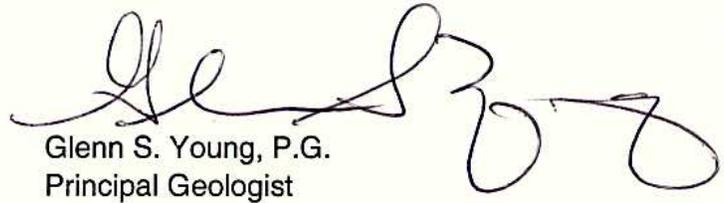


CLOSING STATEMENT

We believe this provides the information required at this time. Please contact the undersigned if you have any questions.



Sincerely,
FUGRO WEST, INC.



Glenn S. Young, P.G.
Principal Geologist

GSY:tm

Attachments: Appendix A – Data Tables
Appendix B - Histograms and General Statistics Summary Tables

Copies Submitted: Rona Sandler, Deputy City Attorney
Jeanne Sole, Deputy City Attorney
John Mundy, Port of San Francisco
Karen Kubick, San Francisco Public Utilities Commission
John Fong, SF MUNI

extra copy. Property
Pier 80
9/30/00
0090



Human Health and Ecological Risk Assessment

Former Western Pacific Property – Port Site
San Francisco, California

Prepared for:

Port of San Francisco
Ferry Building
San Francisco, California 94111

September 2000

Project No. 5553.008

**Port of San Francisco
Environmental Health & Safety**

Geomatrix Consultants