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March 27, 2009

Mr. John Kessler
California Energy Commision
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: 07-AFC-08
Hydrology and Hydrogeology Report dated 2/27/09

From: Robin Bell
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Upon review of the Hydrology and Hydrogeology Report for the Vicinty of the Proposed CESF submitted by URS on Febuary 27, 2009, I have a few questions and comments. They are as follows:

1. Where is the water delivered in the water trucks coming from? Given the short travel time, I am concerned that it may be coming from the same aquifer and that this impact has not been considered. Please confirm that this water is coming from a source outside of Carrisa Plains. If it is proposed to be from other than the Carrisa aquifer, please include that as a condition of certification. If it is from the Carrisa aquifer, please ask that the hydrology report be revised to include this impact.

2. Given the enormity of the laydown area, it seems obvious that it could be designed in a more compact layout to avoid the need for creek crossings. It is apparent the real need for the creek crossings is to facilitate USACE as the lead Federal Agency. Given the potential impact alteration of surface hydrology may have to habitat designated as critical for Vernal Pool Fairy Shrimp and Longhorn Fairy Shrimp, this manipulation should not be tolerated. Please include the avoidance of creek crossings as a condition of certification.

3. it is concerning that hydrology and hydrogeology report it is based on very old data. The Kemnitzer report is 40 years old and the Betchel information is 25 years old. Both contain hearsay reports that large volume lower aquifer well pumping did not effect neighboring upper aquifer pumping. However, the majority of the homes and wells with two miles of the project site did not exist 25 years ago and I am concerned this old data does not represent the Carrisa Plains community as it exists today.

Previuosly, I asked the CEC to require the applicant perform a ten day well test at full pumping volume while monitoring the effect on the upper aquifer. After reading the report, I understand that the existing well is not capable of performing this test as it is not cased to excluded pumping of the upper aquifer. This is concerning as I wonder how many other lower aquifer wells are not cased through the upper aquifer. And I wonder if these connections exist, what is the real relation of the upper and lower aquifers. There do not appear to be any actual tests or facts in the report that prove that drawing down the lower aquifer will not affect the upper aquifer.

Since much of the hydrology report is based on very old data, hearsay information rather than evidence supported facts and information that does not represent the Carrisa Plains community as it exists today, please include a Condition of Certification that requires the applicant perform a ten day well test at full pumping volume while the effect on upper aquifer is monitored to ensure there is no effect on nearby wells. This test should be performed in the intial phases of construction as soon as their site well is established. Additionally, upper aquifer levels need to be monitored throughout the life of the project to ensure local residential wells are not affected by the project's prolonged pumping. The condition should also include a pre-determined mitigation plan should CESF affect local wells.

The above Conditions of Certification are essential as URS themselves acknowledge in the report that hydrogeology is an inexact science which contains a degree of uncertainty and they take care to exclude themselves of any warranty of this report. Given that local residents depend on the upper aquifer as their only source of water, this report is not enough to guarantee our water source will be dependable if CESF is built. We need Conditions of Certification to ensure it. If CESF is confident in their hydrology analysis, there should be no reason they disput these conditions.

Thank you for your consideration of these comments.