

Formerly:

Simons, if & Associates, Inc. IMA Engineers, Inc. FLO Engineering, Inc. CDC Engineering, Inc.

January 20, 2000

Mr. Brad Wetstone, Project Manager California Public Utilities Commission c/o Aspen Environmental Group 30423 Canwood Stret, Suite 215 Agoura Hills, CA 91301

SUBJ:

Bolsa Chica Water Transmission Line and Wastewater Service Project Draft Supplemental Environmental Impact Report, December 1999.

Dear Mr. Wetstone:

I have reviewed the subject report and offer the following comments:

Section ES.1 Page ES-1, Paragraph 4 References to CSDOC should be changed to OCSD throughout the document.	16-1
Section ES.4 Page ES-5, Paragraph 3 The City of Huntington Beach has expressed disinterest in providing water since they believe they are unable based on insufficient existing capacity in the City's water system.	16-2
Section ES.5 General Comment: For Alternative 1, are there environmental issues related to increasing the City's water supply in order to provide water (such as new city wells, upgrading existing city waterlines, etc.)	16-3
Section B.6.1 Page B-13, Paragraph 4 First sentence should end with "Old Bolsa Chica Road" instead of "Bolsa Chica Road".	16-4
Section B.6.1 Page B-14, Paragraph 5 It is not intended the pipeline will be connected to the guardrail. Instead, it is intended the pipeline will be connected to the parapet of the upstream end of the concrete box culvert.	16-5

. . . .

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Section B.6.2 Page B-20, Paragraph 1 The groundwater would not be pumped directly into the reservoir. The groundwater would be pumped through a treatment process and then into the reservoir.		16-6
Section B.6.2 Page B-20, Paragraph 5 No reclaimed water facilities are proposed since OCWD is not moving forward with plans to bring reclaimed water to the area.		16-7
Section B.6.3 Page B-21, Paragraph 2 The proposed force main is 6 inches in diameter.		16-8
Section B.6.3 Page B-21, Paragraph 4 The proposed lift station would not replace the existing COHB lift station.		16-9
Section B.6.3 Page B-22 and 23 Figures B-8 and B-9 are not correct. Please call for additional information.	I	16-10
Section B.6.3 Page B-24, Paragraph 2 Paragraph needs to be changed to reflect new OSCD structure.	İ	16-11
Section B.7.1 Page B-27, Table B.7.2 Construction of Pipeline Section 3 would not require the use of an excavator. Excavators are typically used only for trenching operations deeper than 10 to 12 feet. Additionally, for Sections 1 and 2, excavator use (number of days) would be highly limited. This should be corrected.		16-12
Section B.7.1 Page B-30, Paragraph 4 Signs of high groundwater were not encountered during previously performed geotechnical investigations.		16-13
Section B.8.3 Page B-37, Paragraph 1 Includes statements that are not applicable to the project. There is no intake pump, and "both booster stations may also include trash racks" does not apply.		16-14
Section C.1.2.3 Page C.1-11, Table C.1-9 These quantities should be re-calculated based on reduced use of excavators. The use of excavators has been significantly over estimated on Table B.7-2.	I	16-15

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Section C.1.2.3

Page C.1-12, Mitigation Measures

These mitigation measures should be re-evaluated once emission calculations are revised per previous comments.

16-16

Section C.5.2.4

Page C.5-10, Mitigation Measure G-1

We have conducted geotechnical investigations to consider soil stability, etc. Rupture zones however, were not specifically investigated. In any case, several usual and customary design features have been incorporated into the design such as regularly spaced butterfly valves, restrained joints, seismic design of span structures. All of these features will mitigate fault rupture regardless of the actual fault locations. Additional geologic/geotechnical studies would not result in a more seismically enhanced design.

16-17

Section G

Page G-1, List of Preparers

I am employed by "Tetra-tech Infrastructure Southwest Group", not Metcalf & Eddy, and I have a B.S. in Mechanical Engineering.

16-18

Appendix 4 - Air Quality Calculations

Table 1

The use factor on an excavator is significantly over estimated in these calculations. The use of an excavator rather than a backhoe would be limited to trenching operations deeper than 10 to 12 feet. A more realistic factor would be 10%. Additionally, the maximum number of "excavators" would be one for Segment 1, one for Segment 2, and none for Segment 3.

16-19

As usual, please feel free to call me if you have questions regarding these comments, or if you need additional information.

Sincerely,

TETRA TECH, INC.
INFRASTRUCTURE SOUTHWEST GROUP

Jon Austin, P.E.

Cc: Ed Mountford

RESPONSES TO TETRA TECH, INC., INFRASTRUCTURE SOUTHWEST GROUP Engineers for the proposed water transmission line Letter Dated January 20, 2000

- The concerns of the applicant are noted. The CPUC understands that there may be obstacles to this alternative. Please also note that the Scoping Memorandum prepared by the CPUC Administrative Law Judge (dated March 16, 1999) specifically identified the prospect of the City providing water service as an issue to be addressed in the CPCN proceeding. It is therefore deserving of examination in the SEIR.
- The City of Huntington Beach has expressed willingness to be the water purveyor to the Bolsa Chica Planned Community. In the City's comments submitted in relation to the Draft SEIR, the City again expresses its willingness to be the water provider.
- 16-3 The environmental impacts of Alternative 1 are evaluated in Section D.
- 16-4 Correction made, thank you.
- 16-5 Correction made, thank you.
- 16-6 The text has been corrected, thank you for pointing out this discrepancy.
- 16-7 The text has been changed to reflect this information, thank you.
- 16-8 Correction made, thank you.
- 16-9 Correction made, thank you.
- 16-10 These figures have been updated in the Final SEIR based on information provided by Tetra Tech.
- 16-11 The text of the Supplemental DEIR has been changed to reflect the OCSD restructuring.
- 16-12 See response for comment 16-19 below.
- 16-13 Noted. The CPUC anticipates that dewatering will be limited to nuisance water in particular areas. The text of the document has been modified to include the results of early geotechnical investigations in relation to possible dewatering.
- 16-14 Noted. The text has been changed to rectify this error.
- 16-15 See response to Comment 16-19, following.
- 16-16 This opinion is noted. However, the SEIR preparers believe that the mitigation measures recommended are appropriate for the emissions generated.
- 16-17 Previously prepared geotechnical reports by Toro International for this project (and reviewed by GTC) did not address the entire pipeline route. Additional geotechnical investigation for the full length of the pipeline and ancillary facilities would refine placement of the valves and other features planned for mitigation of seismic effects.

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- 16-18 The "John Austin" referred to is an employee of Metcalf & Eddy, a subcontractor to the CPUC's prime contractor, Aspen Environmental Group.
- 16-19 The construction assumptions listed in Appendix 4 are appropriate for quantifying the emissions that would be generated from the construction of the water line. In fact, the equipment inventory was reviewed by Jon Austin of Tetra Tech on November 2, 1999.

The preparers of the SEIR do not agree that the 50 percent factor should be reduced. The 50 percent factor for excavators represents the combination of the engine load factor plus the length of time each excavator would be used per eight-hour construction period. These assumptions are typical for the construction of a pipeline in an urban setting. However, it should be noted that the length of time that each excavator would be operational would be much less than the 50 percent factor.

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