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July 24, 2000

Ms. Judith Iklé, CPUC  
Aspen Environmental Group  
235 Montgomery Street, Suite 800  
San Francisco, CA 94104

Dear Ms. Iklé:

Subject: Comments on the Draft Environmental Impact Report for Pacific Gas & Electric Company's Northeast San Jose Transmission Reinforcement Project (Site # 419)

Thank you for the opportunity to provide comments on the Draft EIR, dated June 2000, for PG&E's Northeast San Jose Transmission Reinforcement Project. Since groundwater is utilized for a major portion of Alameda County Water District's (ACWD) drinking water supply, ACWD has taken an aggressive role in managing and protecting its groundwater basin. This groundwater basin is comprised of a system of aquifers which exist under most of Fremont, Union City, Newark, and southern Hayward. Of these cities, we understand a portion of your project will involve construction in Fremont. Our review and comment is therefore limited to the proposed activities in Fremont.

In addition to having a general interest in providing review and commenting on projects to ensure groundwater protection, ACWD has certain specific authorities which may apply to your project as follows:

- Under the provisions of city ordinances, ACWD is the permitting agency for drilling or augering into the subsurface within the City of Fremont (as well as the cities of Newark and Union City). Permits are required for any installation of borings or wells, sealing/destruction of wells, or other drilling or augering, and the work must be performed according to ACWD requirements and must be inspected in the field by an ACWD staff person. Both geotechnical and environmental (chemical) investigations are subject to these requirements.
- Construction work or demolition work must not preclude access to an existing well whether active or abandoned. Prior to the work, ACWD will need to determine whether or not existing wells may be located in or near the proposed work area. Abandoned wells should be properly destroyed under ACWD permits before the construction or demolition work proceeds.

- Under Chapter 1942 of the Statutes of 1961, as amended April 2, 1961 and April 26, 1973, entitled the Replenishment Assessment Act of the Alameda County Water District, ACWD has authority to take actions to protect the groundwater basin and to levy a per acre-foot charge on the extraction of groundwater. Such groundwater extraction may include groundwater produced in the course of excavation dewatering or remediation of contaminated groundwater.
- Under Cooperative Agreements between ACWD and the Regional Water Quality Control Board (RWQCB) and the cities of Fremont, Newark, and Union City, ACWD may provide the oversight of investigation and clean-up of soil and groundwater at sites where a threat to groundwater quality has been determined. Please be advised that ACWD is providing this oversight in the investigation and cleanup of existing hydrocarbon contamination at PG&E's Newark Substation on 6453 Automall Parkway in Fremont. For other contaminated sites where ACWD is not lead, ACWD staff will track the progress of investigation and cleanup and will provide input to the lead agency. ACWD retains its authority as the permitting agency for construction/destruction of wells and borings at all sites regardless of which agency is lead for overseeing the investigation and cleanup of contamination.

In consideration of the above and with reference to the Draft EIR, specifically Sections 4.5 and 4.6 on pages ES-13 and ES-14 and Table ES-10 under the headings "Geology, Soils, and Paleontology" and "Water Resources and Hydrology" on pages ES-39 through ES-42, we respectfully request that the Final EIR include the additional measures PG&E will need to undertake in order to address the following comments:

- In the beginning of the design phase of the project, after the final selection among the various project alternatives has been made, PG&E should notify ACWD and provide detailed location figures so that we may scan our database for any existing wells that could be impacted by the project. PG&E should also notify ACWD of any newly acquired easements or proposed easement acquisitions so that we include these areas in our well search. Abandoned wells will need to be destroyed per ACWD requirements. Wells that are within or near the work area but not planned for destruction (or for which destruction will not be required) will need to be protected from potential damage during the project's construction phase.
- Prior to installation of wells or borings into the subsurface, permit application forms and required related must be submitted to ACWD for approval. The work must not proceed unless the permits have been approved and ACWD has scheduled an inspector. Detailed information on the permit process is available at ACWD upon request or can be found at ACWD's web site: <http://www.acwd.org/doingbusiness-wellpermits.html>.
- The possibility of groundwater extraction was not discussed in the Draft EIR; however, we anticipate that PG&E may opt to extract groundwater to enable subsurface

construction or to mitigate groundwater contamination. Prior to any groundwater extraction, PG&E must notify ACWD so that we may determine if the proposed extraction is subject to requirements and charges under our Replenishment Assessment Program.

- We request that PG&E provide ACWD the opportunity in the early phases of the design process to review and comment on drawings of tower foundations, piers, piles, wells, trenches/ conduits, or any other significant subsurface structures. Our interest in such a review is to ensure that deep structures will not allow groundwater from two different water bearing zones to intermingle, and to ensure that there will not be a direct conduit from the ground surface to groundwater. Generally, deep structures will not compromise the natural separation of water-bearing layers provided that sufficient concrete abuts directly against native soil along the sidewalls of the excavation or boring. However, if a gap is left between the structure and native soil or if such a gap is backfilled with gravel, the structure may pose a significant threat to deeper groundwater aquifers.
- With reference to Mitigation Measure H-4 in Table ES-10, RWQCB, the City of Fremont Fire Department, and/or Office of Emergency Services should be the first agencies to be contacted in the event of a spill of fuel or other hazardous materials during construction activities. However, PG&E should also notify ACWD in a timely manner of any such spills.
- With reference to Mitigation Measures H-4 and H-6 in Table ES-10, PG&E should provide ACWD copies of any work plans or reports sent to RWQCB or other agencies with respect to investigation or cleanup of soil or groundwater within the City of Fremont. The documents should be provided to ACWD in a timely manner so that we may have opportunity to provide input to RWQCB or other agencies. The City of Fremont Fire Department may also be interested in receiving copies of such reports.
- With reference to Mitigation Measure H-5 in Table ES-10, PG&E should submit the appropriate work plans for approval prior to performing additional investigation or remedial actions at the Newark Substation. Reports on the results of the work should also be sent to ACWD. Copies of any work plans and reports should also be sent to the RWQCB and the City of Fremont Fire Department.
- With reference to Mitigation Measure H-6 in Table ES-10, we appreciate PG&E's willingness to use conductor casings for the construction of piles where contaminated shallow groundwater is encountered. This practice is consistent with ACWD well construction requirements.

If you have any questions or require additional information, please contact the following ACWD staff:

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- Jim Ingle regarding ACWD requirements with respect to drilling, augering, or excavating into the subsurface. Tel.: (510) 659-1970, Ext. 450.
- Mike Halliwell regarding ACWD oversight of investigation and clean up of soil and groundwater at the Newark Substation. Tel.: (510) 659-1970, Ext. 412.
- Ted Trenholme regarding the Replenishment Assessment Program. Tel.: (510) 659-1970, Extension 411.

We greatly appreciate having this opportunity to review and comment. We look forward to receiving a copy of the Final EIR.

Sincerely,



Steven D. Inn  
Groundwater Resources Manager

mh:bk

Enclosures

cc: Bill Reykalin, City of Fremont Fire Department  
John Wolfenden, Region Water Quality Control Board  
Jim Ingle  
Mike Halliwell  
Ted Trenholme