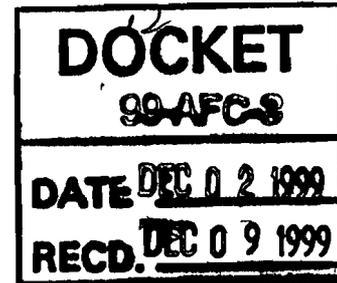


December 2, 1999

Mr. Paul Richins, Project Manager
AFC Metcalf Energy Center
California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814-5512



Dear Mr. Richins:

Subject: Application for Certification for Metcalf Energy Center by Calpine and Bechtel Enterprises, Incorporated and Draft Management Plan for Tulare Hill

The Santa Clara Valley Water District (District) has reviewed the Application for Certification (AFC) provided to the California Energy Commission by Calpine and Bechtel Enterprises, Incorporated, transmitted to the District on July 22, 1999, and the Draft Management Plan for Tulare Hill, received on October 19, 1999. The District has the following comments in addition to the comments already submitted on October 22, 1999:

GEOLOGIC HAZARDS AND RESOURCES SECTION—AFC

8.15.1.1.1 Major Faults

In addition to active faults, geologists often include a discussion of potentially active faults. Instead of addressing whether a fault is "active," the State of California presently focuses on those faults with the possibility of displacements during latest Pleistocene and Holocene times. State geologists have categorized faults as being type "A" or type "B," depending on their estimated slip rate and the magnitude earthquake a particular fault is capable of generating. Additional faults that fit this category and which fall within the 30-mile radius of the consultant's study include the Monterey Bay-Tularcitos fault, the Quien Sabe fault, and the Zayante-Vergeles fault, all type "B" faults. In addition to the main trace of the Hayward fault, which the consultant lists as being 22 miles from the site, the State has identified the "Southeastern Extension" (also a "B" fault) of the Hayward fault, which is about 4 miles from the site. A discussion of these additional faults may be appropriate.

8.15.1.4.2 Earthquake Ground Shaking

Reference is made to possible ground accelerations of 0.5 g and 0.4 g at the site due to an earthquake on the Santa Clara fault. The consultant may want to compare the above accelerations at the site with those due to ground shaking on other nearby faults, such as the Southeastern Extension of the Hayward fault (4 miles away) and the Monte Vista-Shannon fault (about 6 miles away). Earthquakes on these other faults may have a higher probability of occurring than on a relatively unknown one such as the Santa Clara fault.

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8.15.3.2 Ground Shaking

In addition to the 1997 UBC code, there is the 1998 California Building Code that needs to be followed with respect to design for ground shaking. The 1998 CBC is listed later in section 8.15.4.2 State LORS.

The District would like to review the forthcoming geotechnical report that will address expansive clay, liquefaction, seismic shaking, and other pertinent geologic hazards at the site.

HAZARDOUS MATERIALS HANDLING SECTION—AFC

The District is unable to provide comments on the Hazardous Materials Handling section at this time. For specific questions about this section, please call Mr. Beau Goldie at (408) 265-2607, extension 2634.

DRAFT MANAGEMENT PLAN FOR TULARE HILL REPORT

The last paragraph on page 10 of Attachment BR-26 states that walnut trees to be removed as part of the subject project are proposed to be replaced by walnut trees at a 1:1 ratio. The District recommends that the mitigation plan be modified to replace walnut trees by some of the other riparian species proposed, and not by walnut trees.

FLOOD CONTROL CONSIDERATIONS

As indicated on our October 22, 1999, letter, a hydraulic analysis needs to be completed for any alternative(s) to be presented. Hydraulically, the District recommends a comprehensive solution that will deal with the Metcalf Energy Center (MEC) site and surrounding sites as one hydraulic system rather than analyzing the MEC site as a separate unit. This system approach should take into account the changes proposed to the Coyote Valley Research Park (CVRP) site (upstream of your site) and the unimproved parcel between CVRP and MEC, and include a hydraulic solution that would not negatively impact that unimproved parcel as a result of the MEC improvements.

WATER SUPPLY

The District strongly supports the use of recycled water from South Bay Water Recycling as the best source of supply for MEC's cooling requirements. The District has also reviewed the concept of providing raw water from the Cross Valley Pipeline on an interim basis (3 to 5 years) to satisfy MEC's cooling requirements before recycled water becomes available, and will consider allowing a connection to that pipeline under a set of conditions to be agreed upon by the District and MEC.

The District is also willing to consider the proposal of using groundwater for cooling requirements on an interim basis (3 to 5 years) in lieu of, or in combination with, the raw water alternative discussed above. This will be contingent upon MEC's assurance that recycled water will be the long-term water supply for their cooling needs, and upon the completion of a hydrogeological study to identify and quantify any

potential impacts on the groundwater basin as a result of long-term sustained pumping. This proposal also requires agreement from the water retailer for that area.

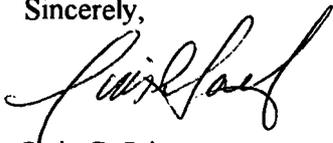
The District is agreeable to the use of groundwater as a water supply source for MEC's cooling requirements during a short-term emergency condition, which according to the project's consultant, is expected to last a maximum of two to three weeks, and is not expected to happen on a frequent basis. If the raw-water connection discussed previously were to be implemented, the District will also be agreeable to the concept of MEC's use of raw water as a short-term emergency supply under certain conditions.

The District has also considered the use of recycled water as a water supply for uses other than cooling at the MEC. Currently, the District would not support the use of recycled water on an open system because of concerns related to the potential degradation of the groundwater basin.

Please reference District File No. 25791 on further correspondence regarding this project.

If you have any comments or need further information, please call me at (408) 265-2607, extension 2576.

Sincerely,



Luis C. Jaimes
Associate Engineer
Community Projects Review Unit

cc: Mr. Bob Anderson
California Energy Commission
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Ms. Valerie J. Young
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Pleasanton, CA 94566

STATE OF CALIFORNIA

Energy Resources Conservation
and Development Commission

In the Matter of:)	Docket No. 99-AFC-3
)	
Application for Certification for the)	PROOF OF SERVICE
Metcalf Energy Center [Calpine)	(*Revised: 10/15/99)
<u>Corporation and Bechtel Enterprises, Inc.]</u>)	

I, **Chester Hong**, declare that on **December 9, 1999** I deposited in the United States mail, copies of the attached **APPLICATION FOR CERTIFICATION FOR METCALF ENERGY CENTER BY CALPINE AND BECHTEL ENTERPRISES, INCORPORATED AND DRAFT MANAGEMENT PLAN FOR TULARE HILL** in Sacramento, CA with first class postage thereon fully prepaid and addressed to the following:

DOCKET UNIT

Send the original signed document plus 12 copies to the following address:

CALIFORNIA ENERGY COMMISSION
Attn: **Docket No. 99-AFC-3**
DOCKET UNIT, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

In addition to the documents sent to the Commission Docket Unit, also send individual copies of all documents to:

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*Revisions to POS List, i.e. updates, additions and/or deletions.
Metcalf Energy Center (Docket No. 99-AFC-3)*

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*Revisions to POS List, i.e. updates, additions and/or deletions.
Metcalf Energy Center (Docket No. 99-AFC-3)*

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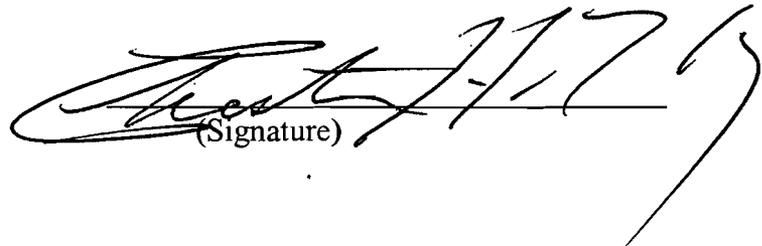
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***California Air Resources (CARB)**
Project Assessment Branch
PO Box 2815
Sacramento, CA 95812

I declare that under penalty of perjury that the foregoing is true and correct.


(Signature)

CEC INTERNAL DISTRIBUTION LIST ONLY!

Parties DO NOT mail to the following individuals. The Energy Commission Docket Unit will internally distribute documents filed in this case to the following:

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