

CALIFORNIA BARREL COMPANY
Development, Investment, Cooperation

VIA EMAIL

March 6, 2023

1 Dr. Carlton B. Goodlett Place,
City Hall, Room 244
San Francisco, Ca. 94102-4689
Email: chanstaff@sfgov.org

Dear Supervisor Chan,

Thank you for your recent inquiry about the interaction between sea level rise (SLR) and potentially contaminated groundwater at the Potrero Power Station project (PPS) currently under development at the site of the former PG&E Potrero Power Plant. We understand that your concerns were prompted in part by a recent article published in the San Francisco Examiner entitled, *"Rising Groundwater is Coming to San Francisco"* (published date February 2, 2023). This memorandum has been prepared with input from our environmental consultant Geosyntec, our civil engineer (CBG) and our construction team, and provides what we hope is useful context for the issues discussed in the article, details on the various remediation approaches that have been implemented by PG&E to address groundwater contamination, and a summary of the design and construction approaches undertaken by California Barrel Company (CBC) to monitor and control the any potential consequences of the interaction between groundwater and sea level rise at the site.

- 1) **Multiple local regulators have confirmed existing remedies and planned developments are adequate to address anticipated SLR at the site:** The remedies implemented by PG&E under Regional Water Quality Control Board (Water Board) oversight, and the development design elements being implemented by CBC, under Water Board, the Bay Conservation and Development Commission (BCDC) and SF Department of Building Inspection (SFDPI) oversight, provide an appropriate level of protection for human health considering conditions predicted by the best available science regarding SLR and corresponding groundwater rise at the PPS. The remedies and the future development plans include a process to regularly review the effectiveness of the remedies and the safety of the development on a regular frequency so that adaptive management plans can be implemented in response to changing SLR conditions and predictions in the future.
- 2) **Groundwater contamination at the site has been shown to be minimal:** The latest PG&E investigations of the site's groundwater quality show that the concentration of constituents of concern meets commercial/industrial land use standards, and is below levels that would harm the Bay ecosystem, if it migrated into bay. CBC is planning further testing this year and is happy to provide the results of those studies when they are complete.
- 3) **CBC's site improvements over the past year have improved groundwater conditions:** Over the past year CBC has excavated and disposed offsite approximately 127,000 cubic

yards of residually contaminated soil and pumped and treated approximately 10.5 million gallons of water off the site, likely further improving the conditions of the groundwater.

- 4) **CBC's development has planned for a worst-case scenario of 9 feet of SLR:** Guidance provided by Bay Area public agencies expect we will experience between 5.7 and 6.9 feet and some guidance documents recommend planning for as much as 9 feet of sea level rise by the year 2100. Groundwater has been measured to be at an elevation of approximately 2 feet above mean sea level near the shoreline and approximately 20 feet above mean sea level in the middle of the Site (near the existing Station A Building). The future ground elevations corresponding to these locations are approximately 17 feet near the shoreline and approximately 25 feet in the middle of the site. A study conducted by PG&E concluded that the current tidal influence on groundwater only extends inland within approximately 100 to 300 feet of the shoreline. Based on the recorded groundwater elevation within this zone, the Site could accommodate as much as 15 feet of sea level rise before groundwater would reach the ground surface (17 feet of ground elevation minus 2 feet of groundwater elevation allows for 15 feet of buffer between ground surface and groundwater). This assumes a 1 to 1 correlation between sea level rise and groundwater rise, which is an overly conservative correlation. It is important to note that most of downtown San Francisco would be submerged if we experienced 9 feet of sea level rise.
- 5) **Study reported in Examiner admits its scope is inadequate to assess harm from SLR:** Though the report in San Francisco Examiner news article appropriately identified several possible conditions that could occur as a consequence of future SLR pushing up groundwater, the report also clearly states that, *"The approach used [in the report] is not sufficient for assessing contaminant plume migration or potential contaminant mobilization, as this would require further examination of groundwater flow paths."* The Risk Management Plan for the PG&E remedies and the SLR Adaptive Management Plan for the development have incorporated site-specific evaluations of SLR and corresponding groundwater rise in the form of periodic monitoring and assessment activities. If these evaluations identify potential impacts that may be imminent from SLR and rising groundwater, the adaptive management plan measures will be implemented as appropriate.

Sincerely,



Enrique Landa,
Managing Partner
California Barrel Company LLC
Project Sponsor, Power Station