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November 20, 2007

Ms. Melanie Stalder U.S. Army Corps of Engineers Regulatory Branch 915 Wilshire Blvd. Los Angeles, CA 90017



Subject: Edison Mission Energy Sun Valley Energy Project

Dear Ms. Stalder:

Thank you for making time for the site visit to the Edison Mission Energy Sun Valley Energy Project on October 19. Per our discussion in the field, we have clarified the project description, updated the map and provided detailed maps at a scale of 1 inch equals 100 feet showing the location of the project features in relation to the drainage features identified in the immediate vicinity. We have also included a description of the process that the CEC uses to ensure compliance with avoidance requirements for sensitive features.

Changes to the figures include the following:

- The drainage ditch on the north side of Mathews Road is shown on the maps.
- The detention basin on the south side of the substation and the areas previously mapped as Roadside Drainage A and Roadside Drainage B are no longer present and have been removed from the maps.
- The remaining drainages have been relabeled for easier identification Drainage Swale
 A is now Drainage A and what was previously labeled as Drainage A is now Drainage
 D. The ditch on the north side of Matthews Road is Drainage E.

As we discussed in the field on Friday, the project features will all be located within existing roadways and upland areas and direct impacts to the drainages will be avoided.

The only project feature that crosses the drainage ditch on the north side of Mathews Road is the transmission line which is an overhead feature similar to the transmission lines we saw in the field visit. The transmission poles are the only part of the feature that includes ground disturbing activities, and those poles will be located and constructed to avoid any impacts to the drainage feature. A typical monopole transmission tower is shown in Figure 5.1-3 of the CEC application attached for your reference.

The other linear features shown on Figure 2 are underground pipelines that will include digging a trench and filling over the pipeline. All soil disturbances will be located within the existing disturbed areas of the roads. Per your request, a more detailed description of typical pipeline construction process in included below.

- 1. Trenching width depends on the type of soils encountered and requirements of the governing agencies. The optimal trench will be approximately 18 inches wide and 48 inches deep. If loose soil is encountered, a trench up to 8 feet wide at the top and 2 feet wide at the bottom may be required. The pipeline will be buried to provide a minimum cover based on regulatory requirements and other facilities within the easement. The excavated soil will be piled on one side of the trench and only in the roadway and used for backfilling after the pipe is installed. The pipeline will be installed through trenching at all locations except where boring or directional drilling is required to pass beneath other buried utilities.
- 2. **Stringing** consists of trucking lengths of pipe to the right-of-way (ROW) and laying them on wooden skids beside the open trench.
- 3. **Installation** consists of bending, welding, and coating the weld-joint areas of the pipe after it has been strung, padding the ditch with sand or fine spoil, and lowering the pipe string into the trench.
- 4. Backfilling consists of returning spoil back into the trench around and on top of the pipe, ensuring that the surface is returned to its original grade or level. The backfill will be compacted to protect the stability of the pipe and to minimize subsequent subsidence.
- 5. Plating consists of covering any open trench in areas of foot or vehicle traffic at the end of a workday. Plywood plates will be used in areas of foot traffic and steel plates will be used in areas of vehicle traffic. Plates will be removed at the start of each workday.

Per CEC conditions of certification during construction, a biological resources monitor will identify and clearly mark all sensitive resources areas, including the drainage features to be avoided. Best management practices, such as silt fencing, straw wattles, or other measures, would be installed to prevent incidental fill into any of the drainage features. As such, we have not submitted a formal wetland delineation nor are we requesting a jurisdictional determination. We do request concurrence from the U.S. Army Corps of Engineers that the project would not affect any of these drainages and confirmation no permit would be required as long as impacts are avoided based on your observations of the site during the October 19th field visit and the attached drawings.

Thank you once again for meeting with us. If you have any questions about the drawings or the project, please do not hesitate to contact me at 916-286-0278 or Russell Huddleston at 916-286-0329.

Sincerely,

CH2M HILL

MnMn/hm/ Douglas M. Davy, Ph.D.

Project Manager

Enclosures

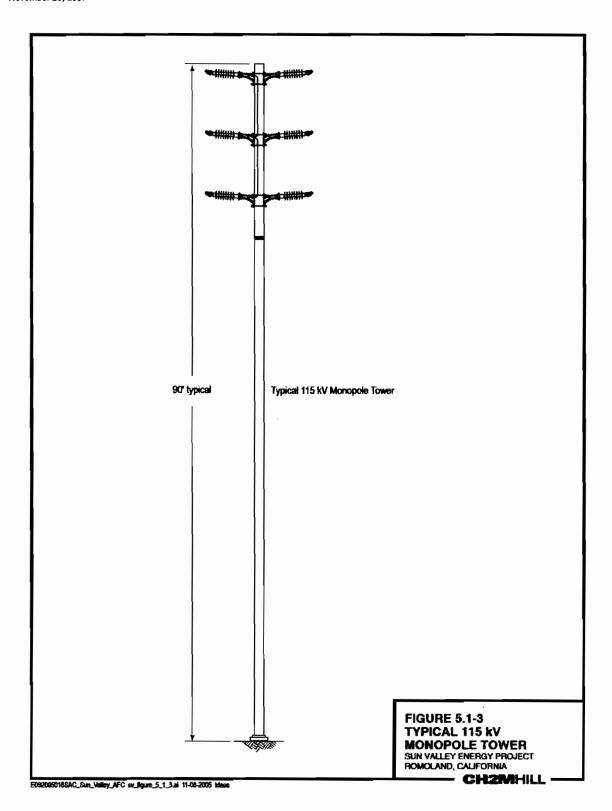
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Daniel Swenson, USACE

Victor Yamada, EME Jenifer Morris, EME

Robert Worl, California Energy Commission

Russell Huddleston, CH2M HILL





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