



BLACK & VEATCH

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Sacramento Cogeneration Authority
Procter & Gamble Cogeneration Project

B&V Project 23933
B&V File 32.0406
May 13, 1994

Mr. B. B. Blevins
California Energy Commission
1516 Ninth Street
Sacramento, California 95814
Attn: Docket Unit

Subject: Comments on the Preliminary Staff
Assessment - Traffic and Water
Resources

Attention: Mr. B. B. Blevins

Gentlemen:

Enclosed are twelve copies of our comments on the Traffic and Water Resources sections of the Preliminary Staff Assessment (PSA) for the Procter & Gamble Cogeneration Project. We anticipate that the California Energy Commission will incorporate these comments into the Final Staff Assessment. If necessary, however, we can discuss these items at the upcoming PSA workshops.

Please contact me at (913) 339-2164 or Douglas Timpe at (913) 339-7214 if you have any questions on this material.

Very truly yours,

BLACK & VEATCH

David M Lefebvre

David M. Lefebvre

Enclosures

cc: Darrell Woo, CEC
D. Parker, SCA
R. Simms, Walsh Construction Company

**SACRAMENTO COGENERATION AUTHORITY
PROCTER & GAMBLE COGENERATION PROJECT
COMMENTS ON APRIL 15, 1994 PRELIMINARY STAFF ASSESSMENT**

Water Resources

On page 176 of the PSA, the CEC states that a balanced on-site cut and fill should be maintained to ensure that adjacent properties not be subject to deeper flooding than would exist prior to project development.

The U.S. Army Corps of Engineers informed Black & Veatch that the flood elevations for the area were determined using only conveyance areas near the river. The flood elevations in backwater areas, outside the conveyance area, are projected from the calculated elevations. This method of modeling the flood elevations is very conservative, since it does not consider any floodwater storage in the backwater areas. Thus, the flood elevations presented by the U.S. Army Corps of Engineers are not entirely representative of the actual flood elevations in the project vicinity.

The project site lies outside the conveyance area, in a backwater area. Since the flood elevations calculated for the site are not dependant on conveyance across or storage on the site, any increase of material volume on the site will not affect the calculated elevation. Therefore, the additional fill on the site, from material excavated for foundations and aggregate surfacing imported to the site, will not cause an increase in the calculated flood elevation.

Based on the information received from the U.S. Army Corps of Engineers, it is suggested that Water-4 on page 176 of the PSA be deleted.

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STATE OF CALIFORNIA

State Resources Conservation
and Development Commission

In the Matter of:)

Application for Certification of)
the Sacramento Cogeneration)
Authority's Procter &)
Gamble Cogeneration Project)

) Docket No. 93-AFC-2
)
) PROOF OF SERVICE
) (REV. 12/03/93)
)
)
)

PROOF OF SERVICE

I, Douglas C. Timpe, declare that on May 13, 1994, I deposited copies of the attached Comments on the Preliminary Staff Assessment - Traffic and Water Resources in the United States mail at Overland Park, KS, with first class postage thereon fully prepaid and addressed to the following:

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Projects Permitting & Licensing
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Sacramento, CA 95852-1830

Steve Cohn
General Counsel's Office
SMUD
P. O. Box 15830
Sacramento, CA 95852-1830

INTERESTED PARTY

(NONE LISTED)

INTERESTED AGENCIES

Richard Johnson
Division Chief
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Sacramento, CA 95826

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I am and was at the time of the service of the attached paper over the age of 18 years and not a party to the proceeding involved.

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

 _____

Attachment