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STATE OF CALIFORNIA

Energy Resources
Conservation and Development Commission

In the Matter of:

DOCKET NO. 16-AFC-01

Application For Certification STANTON ENERGY RELIABILITY CENTER

STANTON ENERGY RELIABILITY CENTER, LLC'S SUPPLEMENTAL COMMENT ON THE PRELIMINARY STAFF ASSESSMENT, NOISE-7

Stanton Energy Reliability Center, LLC (SERC, LLC), LLC hereby submits this Supplemental Comment on the Preliminary Staff Assessment (PSA), NOISE-7, for the Stanton Energy Reliability Center (SERC) published on March 29, 2018. SERC, LLC filed initial and final comments on the PSA on April 11, 2018, and April 30, 218, respectively. Both of those comments requested modification or deletion of Condition of Certification NOISE-7, which is related to noticing prior to conducting pile driving activities. SERC, LLC representatives and Staff discussed that there would not be any impact driven piles proposed for the SERC, although torque-driven piles were under consideration. Staff requested information pertaining to the potential noise generated from torque-driven pile installation activities. As part of the ongoing design resolution, SERC, LLC will not use torque-driven piles, in addition to the elimination of impact-driven piles for foundations. However, depending on final locations and depths of underground facilities (ductbanks and storm drains), it is possible that sheet piles may be required along the southern boundary of the property to protect the railroad embankment during construction activities. These sheet piles may require the use of an impact pile driver. Therefore, SERC, LLC requests the following modification of Condition of Certification NOISE-7 be incorporated into the Final Staff Assessment.

For proposed changes, we are using the convention of **bold italic** for proposed insertions and strikethrough for proposed deletions.

NOISE

Page 4.7-20, Condition of Certification NOISE-7

NOISE-7 The project owner shall perform *impact sheet*-pile driving in a manner to reduce the potential for any project-related noise and vibration complaints. The project owner shall notify the residents in the vicinity of *impact sheet*-pile driving prior to start of *impact sheet*-pile driving activities.

<u>Verification:</u> At least 15 days prior to first *impact sheet*-pile driving, the project owner shall submit to the CPM a description of the *impact sheet*-pile driving technique to be employed, including calculations showing its projected noise impacts at monitoring location LT1.

Dated: May 9, 2018

Respectfully Submitted,

Scott A. Galati

Counsel to SERC, LLC

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