-	MEMORANDUM FOR RECORD 20 MAY 2011
	SUBTECT : YOB PACKAGE
	1. ENCLOSED LETTER AND MEMO AND DEAWINGS PROVIDED
	BY APPLICANT (LARRY EVANS) AT MEETING 20 MAY 2011
	AS ADVANCE OF LETTER TO BE SIGNED / MAILED SAME DOT.
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COL Alfred A. Pantano, Jr. District Commander U.S. Army Corps of Engineers Jacksonville District P.O. Box 4970 Jacksonville, FL 32232-0019

Sir:

The Puerto Rico Electric Power Authority (PREPA) is working with the U.S. Army Corps of Engineers' Jacksonville District (District) Regulatory Division to secure a permit to construct the Via Verde pipeline in Puerto Rico. This project will provide PREPA with the capability to diversify fuels and deliver natural gas (NG) as an alternative fuel source for three power plants along the north shore of Puerto Rico.

As part of the ongoing evaluation, and PREPA's continual commitment to reduce; even further the environmental impacts of the project, the proposed pipeline corridor alignment was shifted and adjusted as it approached the Cambalache power plant near Arecibo. This change was necessary in order, among other efforts, to: (1) accommodate a relocation of the Cambalache metering station to an upland parcel and reduce impacts to wetlands, (2) avoid a Waste to Energy project to be constructed near PR-2, and (3) to keep a prudent distance from neighboring communities.

The adjusted alignment required the pipeline to cross underneath the Rio Santiago diversion channel just north of PR-22 before crossing back beneath the Rio Grande de Arecibo to arrive at the Cambalache meter station. The Rio Santiago diversion channel is part of the District's Rio Grande de Arecibo Flood Control Project. As the non-federal sponsor for that project, the Puerto Rico Department of Natural and Environmental Resources is asking for approval under 33 USC 408 to modify the project and allow PREPA to run the pipeline under the diversion channel using horizontal directional drilling technology (HDD). The proposed modification does not involve a significant change to the project's scope or exceed the level of ordinary District Operation and Maintenance responsibilities.

Please consider this letter to be a written request for a modification of the Rio Grande de Arecibo Flood Control Project. Attached please find a copy of the report providing information requested as part of a 408 Submittal Package. An additional copy has been also provided to the District's Regulatory Division and Programs and Project Management Division, for immediate action. Due to the importance of this project in relation to the economy of Puerto Rico, it is urged that all attention and support to this request be provided by your office.

Sincerely,

Hon. Daniel Galan Kercado Secretary Department of Natural and Environmental Resources cc. Exemption (b)(6) North Permits Branch, CESAJ

Exemption (b)(6) Coastal/Navigation & Antilles Branch, CESAJ

Exemption (b)(6) Antilles Construction Office, CESAJ

Mailing addresses:

Exemption (b)(6)

U.S. Army Corps of Engineers Jacksonville District P.O. Box 4970 Jacksonville, FL 32232-0019

Exemption (b)(6).

U.S. Army Corps of Engineers Jacksonville District P.O. Box 4970 Jacksonville, FL 32232-0019

Exemption (b)(6)

U.S. Army Corps of Engineers 400 Ave Fernandez Juncos San Juan, PR 00901-3223

Request for Project Modification

1. Description of project and modification:

The Puerto Rico Energy and Power Authority (PREPA) proposes to construct a 24-inch diameter steel natural gas (NG) pipeline from the EcoEléctrica LNG Terminal in Peñuelas north to the Cambalache Termoeléctricas Authority Central electric power plant in Arecibo, then east to the Palo Seco and San Juan power plants. The approximately 92 mile pipeline will be embedded (buried) for its entire length and will pass through the municipalities of Peñuelas Adjuntas, Utuado, Arecibo, Barceloneta, Manati, Vega Alta, Vega Baja, Dorado, Toa Baja, Cataño, Bayamón, and Guaynabo. Installation of the pipeline will require an initial construction right-of-way (ROW) approximately 100 feet wide and a permanent maintained post-construction ROW of 50 feet.

In a Real Estate Division Memo dated 20 January 2011, four flood control projects that the pipeline will pass near, or through, were identified. These projects were: Rio Grande de Arecibo, Rio Grande de Manati in Barceloneta, Rio Cibuco in Vega Baja and Rio La Plata in Dorado/Toa Alta, PR. In addition, the Via Verde pipeline is proposed to pass underneath the Rio Hondo/Rio Bayamon flood control channel(s).

The Real Estate Memo documented that except for the La Plata Project (future Construction Contract #3), the Pipeline would have no direct impact over USACE-DNER cost-share projects.

The pipeline project and its proximity to these Flood Control projects will be discussed in the order of approach from West to East as the project traverses from Arecibo to San Juan.

a. Rio Grande de Arecibo at Arecibo, P.R.

The project includes a floodwall and 2 miles of levee along the west side of the Arecibo River; channel improvements, a plug, and channel diversion on the Santiago River; and a short levee on the Tanama River. Construction began in year 2002 and was recently completed.

The Via Verde pipeline will approach the Federal Project from the south as it traverses North down the Grande de Arecibo valley from the interior. The pipeline corridor is located east of PR-10 and will not affect, nor approach, the Tanama Levee. The pipeline remains east of the Federal Project as it approaches, and passes underneath PR-22. The project modification request involves crossing the Santiago River Diversion Channel at 17° 27' 17" N, 66° 42' 26" W using horizontal directional drilling (HDD) technology. Project Construction Alignment Sheets (48.0-Z-321.43 and 321.44) and Horizontal Directional Drill profiles (48.0-Z-325.06 and 325.22) are attached as Exhibit 1. Within the river floodplain the pipeline will proceed north approximately 1,800 feet to another HDD crossing where the pipe will turn east and pass underneath the Rio Grande de Arecibo on its approach to the Cambalache power plant. For this 1,800 foot section, the pipe will be buried using standard open trench techniques. A typical trench cross section drawing is provided as Exhibit 2.

b. Rio Grande de Manati at Barceloneta, P.R.

The project consists of 5,200 meters of levee around the town of Barceloneta, and includes channel diversion and interior drainage facilities.

The Via Verde pipeline will approach the Federal Project from the West. The pipeline's 100-foot construction right-of-way (ROW) begins at the toe of slope of the Federal Levee. The pipe itself is located at the northern edge of this ROW and a minimum distance of 75-feet will separate the embedded pipe from the outer toe of the levee. As shown on the typical trench cross section in **Exhibit 2**, the embedded pipe will have no affect on the levee and will not change flow within the unnamed canal that passes through the levee at this location. The pipeline alignment, as the project passes north of the Federal Project and then South to PR-22, is depicted on the Project Construction Alignment Sheets (48.0-Z-321.56, 321.57 and 321.58) and, where the pipe will cross underneath the Manati River, Horizontal Directional Drill profile (48.0-Z-325.07) as **Exhibit 3**.

c. Rio Cibuco at Vega Baja, P.R. (Sec. 205)

The proposed project improvements include levees with culverts and a detention area for interior drainage. Project implementation included construction of the following flood control items: a 2,595 foot long levee in the eastern section of town; a 4,337 foot long levee in the northern section of town; and a 34.9 acre recreation area. In addition, PR Highway 688 was raised three meters to cross over the eastern levee and two meters to cross over the northern levee. The non-Federal sponsor is the Department of Natural and Environmental Resources. Project construction was initiated in 1994 and was completed in 1996.

Recent changes to the pipeline corridor alignment have eliminated any concerns with this Federal Project. The proposed pipeline will no longer proceed north of PR-22 along the Rio Indio and then back south down the valley west of PR-676. Instead, the pipeline will turn East when it meets PR-22 (east of PR-674) and run along the southern edge of the PR-22 ROW until it crosses underneath the highway to continue eastward until it meets with the PR-2 interchange. The project will have no affect on the eastern or northern levees, or the recreation area.

d. Rio de La Plata at Dorado/Toa Baja, P.R.

The Project plan calls for the construction of 7.0 miles of channel improvements in the Rio De La Plata and 7.6 miles of levees. The plan also includes the replacement of 3 bridges, recreation facilities, and mitigation for environmental impacts. Land acquisition process for the project was initiated in June 1995 and contract award was originally scheduled for 1997.

The Via Verde corridor will approach this Federal Project from the West as the pipe passes underneath PR-693 between PR-694 and PR-695. The pipeline alignment, from where the project passes north of PR-22 until it passes underneath the Rio de La Plata and PR-854 (the eastern edge of the proposed Federal Project) is depicted on the Project Construction Alignment Sheets (48.0-Z-321.81, 321.82, 321.83 and 321.84) and, where

the pipe will cross underneath the Rio de La Plata, Horizontal Directional Drill profile (48.0-Z-325.11) as **Exhibit 4.** The pipe will pass at a depth of -45 feet beneath the river bed and will have no affect on future channel improvement operations. Likewise, where the route of the proposed pipeline passes through a possible disposal area on the eastern edge of the future project, no interference is expected since the pipe will be buried with a minimum of 3-foot cover.

e. Rio Bayamon at Levittown, P.R.

The project to provide improvements to the flood control channel is pending Congressional funding. The Via Verde corridor will approach the Rio Hondo and Rio Bayamon channels from the west near the mouth of both channels at Boca Vieja Cove. The pipeline will cross both channels with a single HDD operation. The pipeline alignment and drill profile are depicted on Construction Alignment Sheet 48.0-Z-321.91 and Horizontal Directional Drill Sheet 48.0-Z-325.13, respectively, as **Exhibit 5**.

Purpose/need for modification:

The project corridor must cross into the Grande de Arecibo Federal Flood Control Project for three basic purposes:

- 1. Avoid a Waste to Energy project to be constructed nearby PR-2,
- 2. To accommodate relocation of the Cambalache metering station to an upland parcel and reduce impacts to wetlands and,
- 3. To maintain a prudent distance from neighboring communities

The project modification request does not involve the other identified Federal projects since the proposed pipeline will not impact them.

2. Technical Analysis:

- Geotechnical Evaluation:

The proposed modification will not affect the structural integrity of the Federal project. Initially, it was mistakenly thought the pipeline would cross underneath the levee. Closer review of the aerial photos, the project boundary maps and the final pipeline corridor alignment drawings confirmed the Via Verde project would only cross underneath the Rio Santiago diversion channel. As shown on the HDD drawings (Exhibit 1) the pipe's entry and exit points will be located 500 feet from the edge of the channel. In addition, the pipe will be placed at -50 feet below the bed of the channel. Geotechnical borings were conducted and are provided in Exhibit 6. At the design depth of -50 feet, the pipe will be located in a layer of gray fine to medium silty sand with some organic silt. Immediately above this layer is a 15-foot thick stratum of gray, organic, silty clay. There is no indication the technique to be used for the HDD crossing (standard HDD procedures using Bentonite, etc) will affect operation of the channel.

After the pipe is embedded, all overburden will be removed and disposed of in an approved upland site outside of the Federal Project boundary. The construction ROW will be restored to pre-construction grade and condition and allowed to revegetate. Only deep rooted, woody vegetation would be precluded from re-establishing within a 50-foot zone immediately above the buried pipe (for structural integrity considerations). Access to the construction site(s) will use available surface roads.

- Structural:

The HDD crossing will not affect the structural integrity, or operation, of the channel. No permanent ancillary structures are proposed within the Federal Project boundary.

- Hydraulic/Hydrology:

The pipeline will not change groundwater hydrology or the flow characteristics within the channel. No changes to water surface profiles or flow distribution is anticipated. Since the pipe will be embedded to a depth of at least 5-feet, the project will not change or affect the flood storage capacity of the flood basin. There will be no upstream or downstream impacts from the proposed project. Placement of the pipeline will result in no impact to floodplain management.

- Operation and Maintenance:

The pipeline will not affect or impede in any way future operation or maintenance of the channel or the Flood Control Project in general. Routine maintenance and inspections of the pipe will be done remotely using a pipeline inspection gauge (PIG). No permanent ancillary facilities such as mainline valve stations, metering stations or maintenance/access roads will be constructed in the section of the pipe that would fall within the boundaries of the Federal Project.

3. Real Estate Analysis:

Embedment of the pipeline will initially require a 100-foot wide construction right-of-way (ROW) while the pipe sections are welded together and placed in the trench. After construction and placement is completed, a 50-foot wide maintenance ROW will be used to ensure deep rooted vegetation does not grow back over the buried pipeline. A 150-foot wide restrictive easement will also be used to ensure inappropriate development does not occur over the pipeline in the future. The Puerto Rico Planning Board is considering a restriction for the entire pipeline corridor that would address this easement.

4. Discussion of Residual Risk:

The modification proposal does not seek to degrade, raise, or realign the Federal Project. There is no anticipated system impact from the pipe alignment. The proposed work will not approach or affect the levee constructed further to the east (several thousand meters distance) nor will it approach or affect the Rio Tanama levee in the south. Placement of the pipe within the Flood Control Project will result in no increased threat or risk to life or property. The pipeline will be embedded for its entire length and there is no expected risk of damage as a result of flooding that may occur within the river basin. No assistance under PL 84-99 is expected.

5. Discussion of Executive Order 11988 Considerations:

Executive Order 11988 requires federal agencies to avoid to the extent possible the long and short-term adverse impacts associated with the occupancy and modification of flood plains and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. In accomplishing this objective, "each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health, and welfare, and to restore and preserve the natural and beneficial values served by flood plains in carrying out its responsibilities" for the following actions:

- · acquiring, managing, and disposing of federal lands and facilities:
- providing federally-undertaken, financed, or assisted construction and improvements;
- conducting federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities.

With regard to the Via Verde project, there are no practicable alternative routes available that would avoid construction within the floodplain at this location. The pipeline corridor route was altered, and incursion into the Grande de Arecibo flood control project required, to avoid a Waste to Energy project the Government of Puerto Rico is constructing at PR-2.

The proposed modification to the Federal Project and the incursion into the floodplain will not carry associative permanent facilities that would be at risk from future flood events. The pipeline will run underneath the Rio Santiago channel at a depth of -50 feet (safe from flood impacts) and the section of pipe that will extend northward from the HDD exit point within the floodplain will also be embedded for its entire length before the pipe exits the floodplain via another HDD crossing under the Grande de Arecibo River.

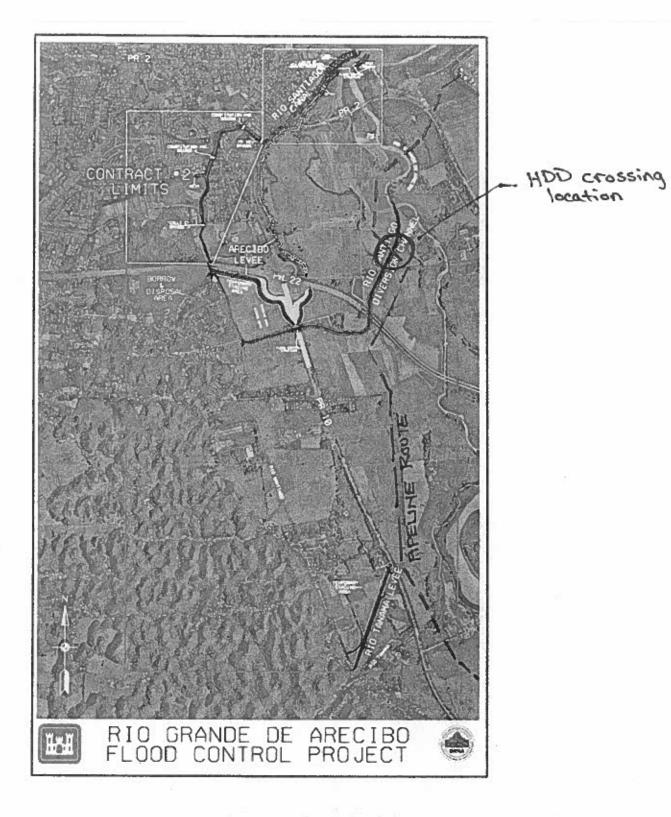
6. Administrative Record:

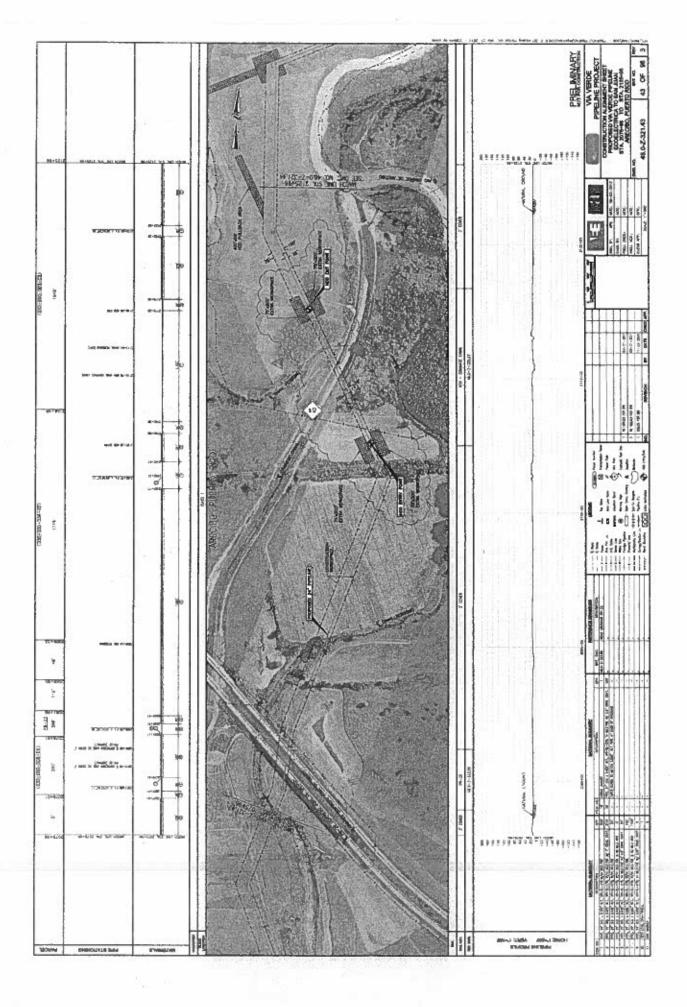
The Via Verde total plan of development for the project is being evaluated by the Jacksonville District's regulatory Division. The appropriate NEPA process will be determined and undertaken by the Regulatory Division. POC: Robert B. Barron

7. Environmental Protection Compliance:

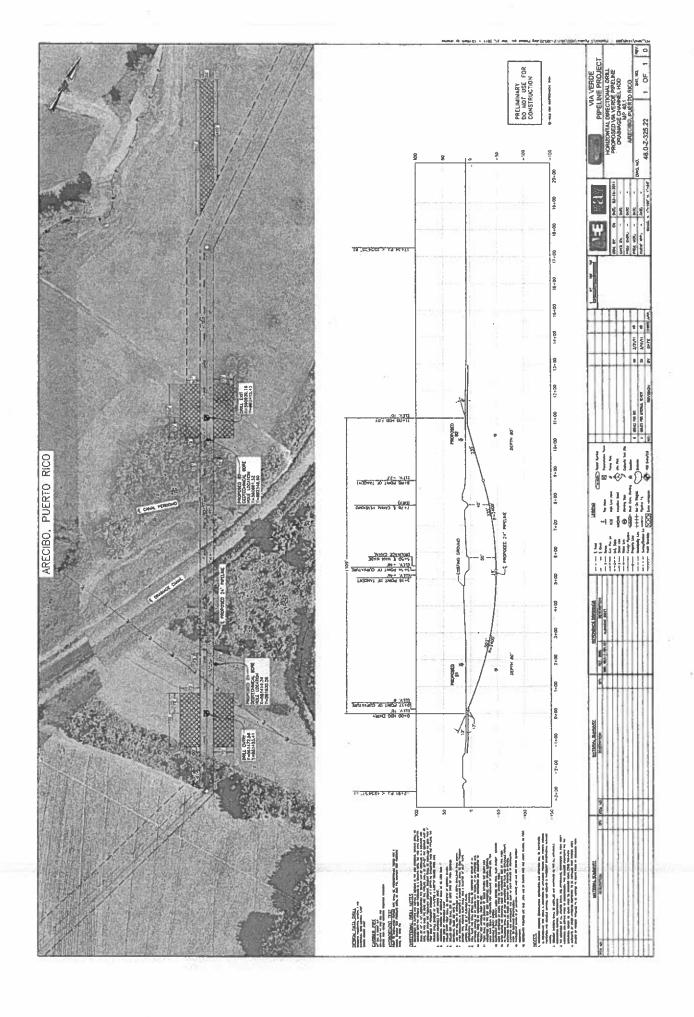
See 6. (above)

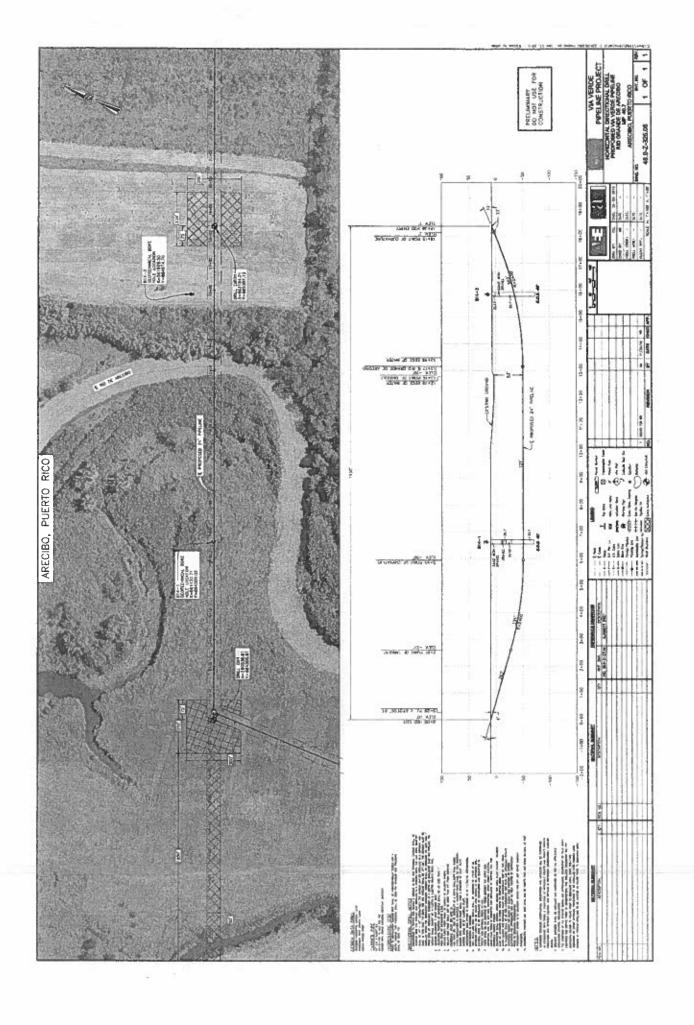
- Rio Grande de Arecibo Flood Control Project Map
- Construction Alignment Sheet 48.0-Z-321.43_Rev 3
- Construction Alignment Sheet 48.0-Z-321.44_Rev 2
- Horizontal Directional Drill Sheet 48.0-Z-325.22_Rev 2
- Horizontal Directional Drill Sheet 48.0-Z-325.06_Rev 1



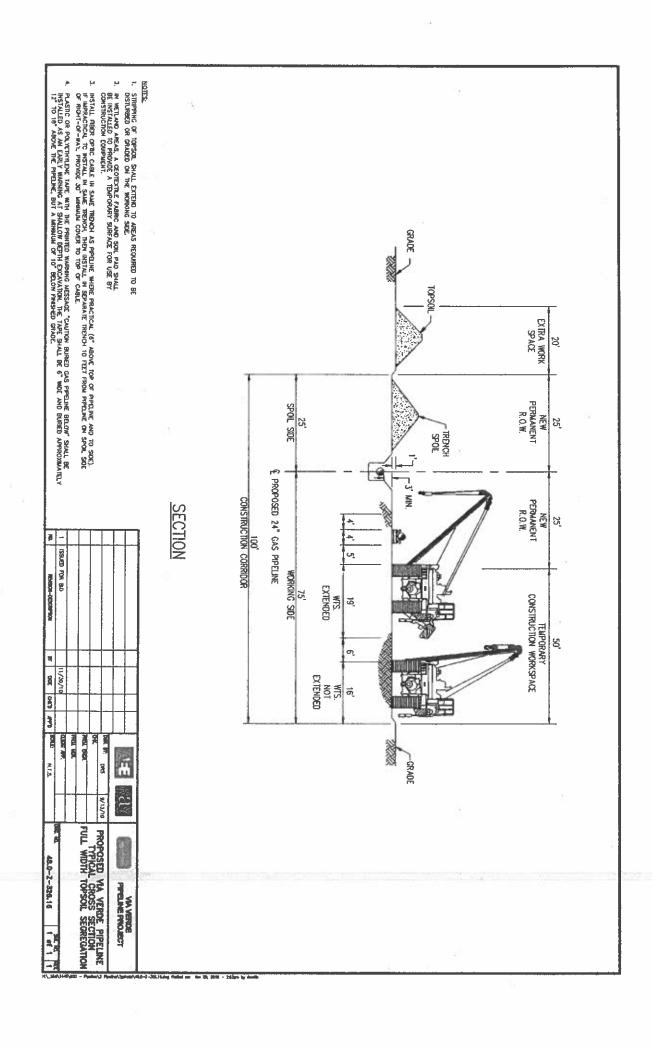


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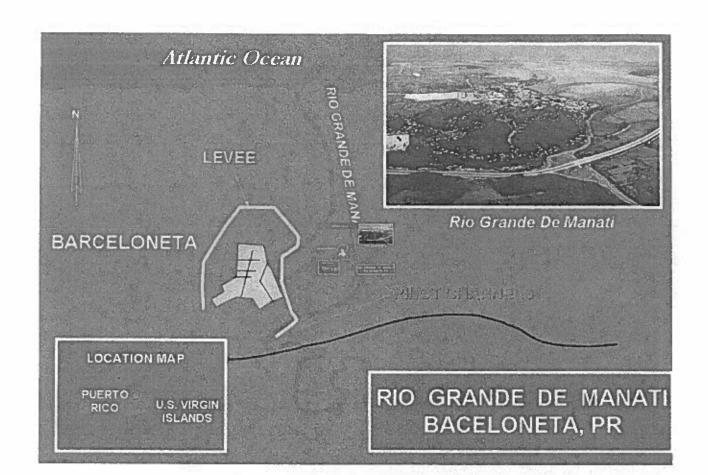


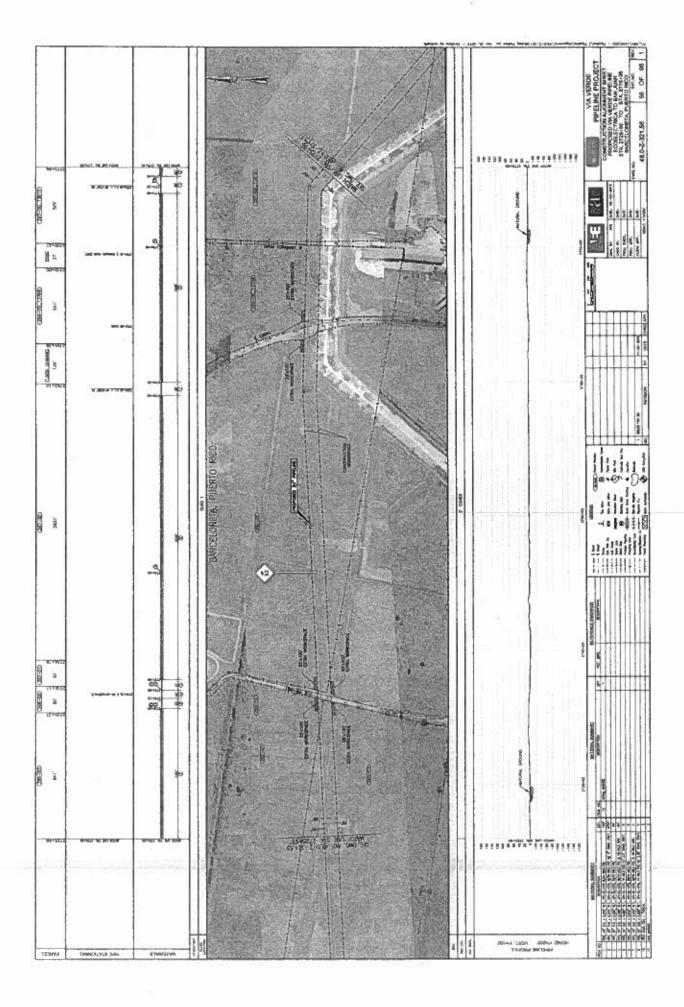


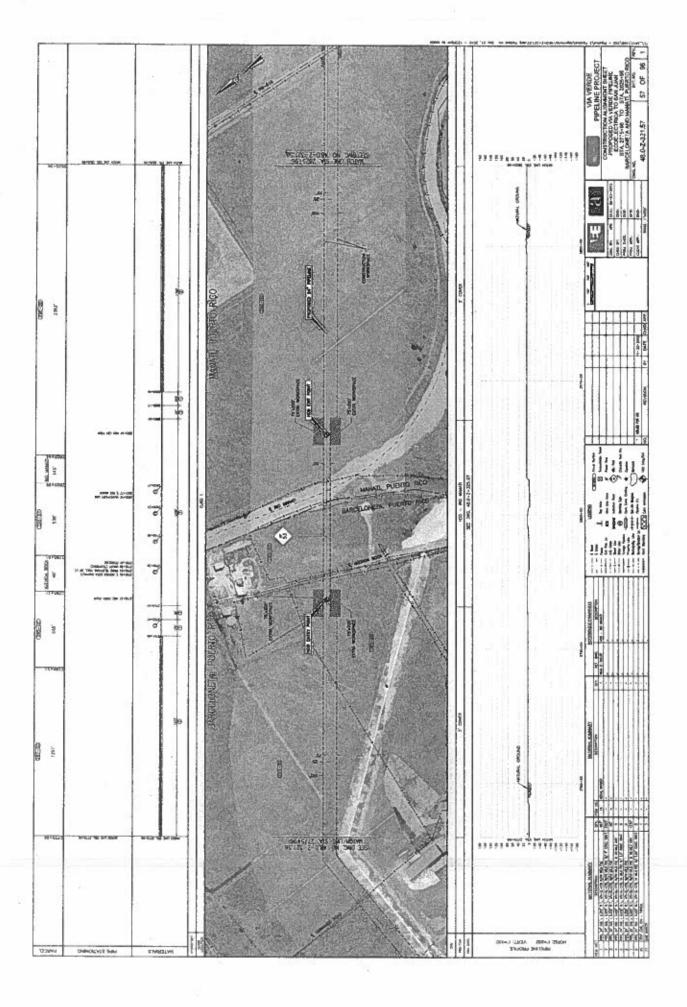
• Typical trench cross section sheet 48.0-Z-326.16_Rev 1

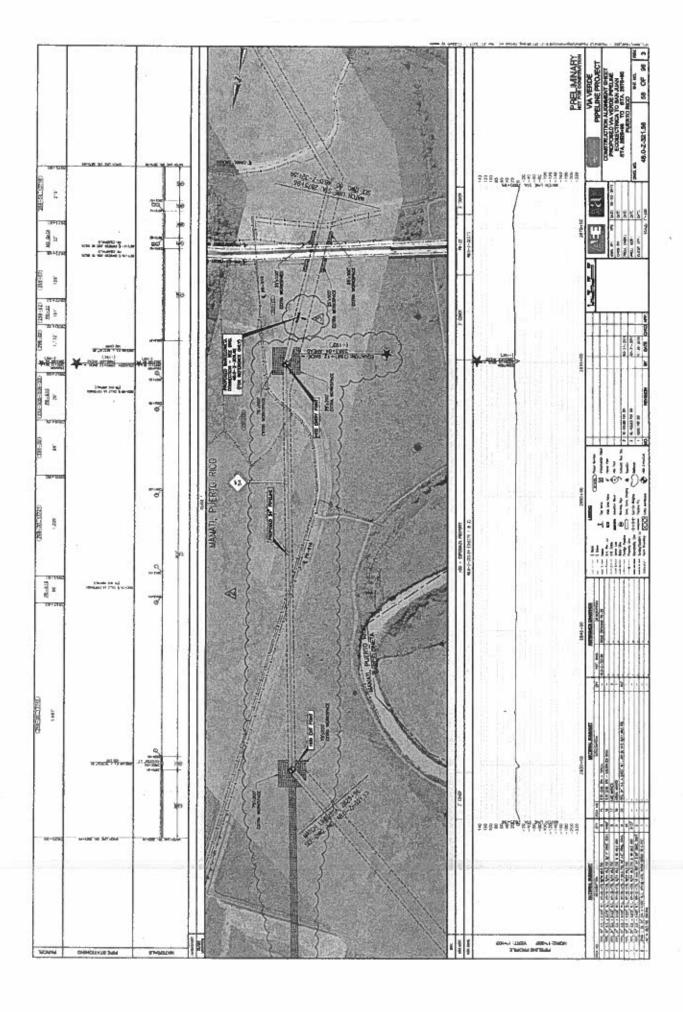


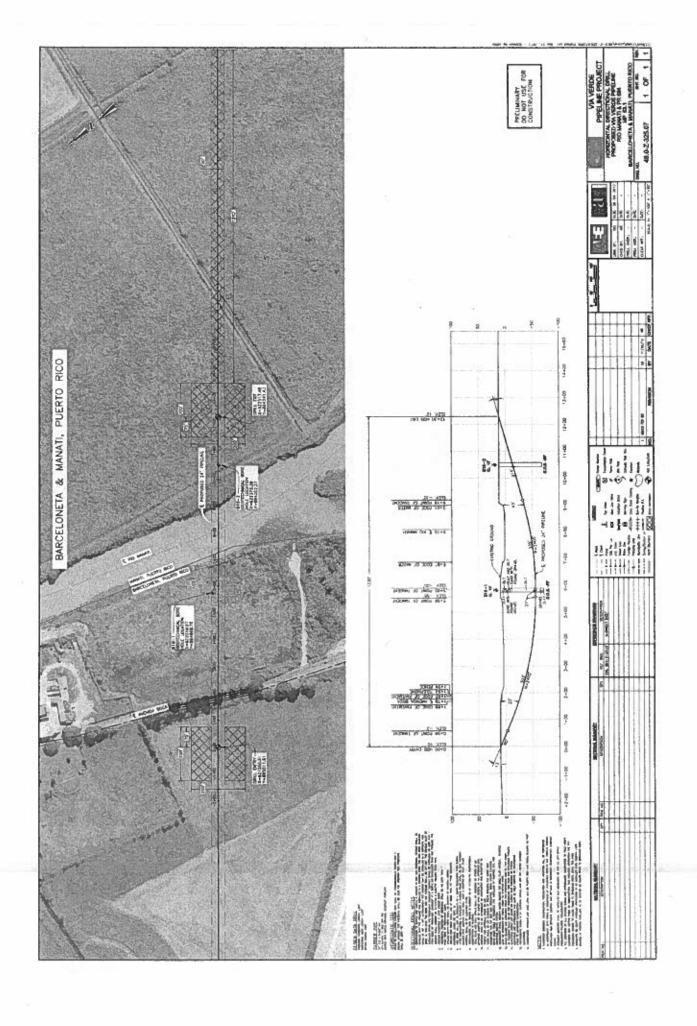
- Rio Grande de Manati Flood Control Project Map
- Construction Alignment Sheet 48.0-Z-321.56 Rev 1
- Construction Alignment Sheet 48.0-Z-321.57_Rev 1
- Construction Alignment Sheet 48.0-Z-321.58_Rev 3
- Horizontal Directional Drill Sheet 48.0-Z-325.07_Rev 1



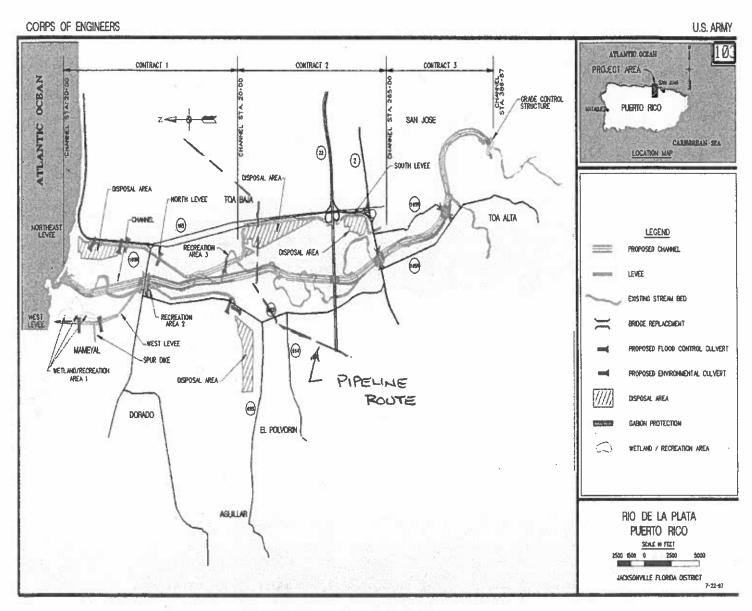






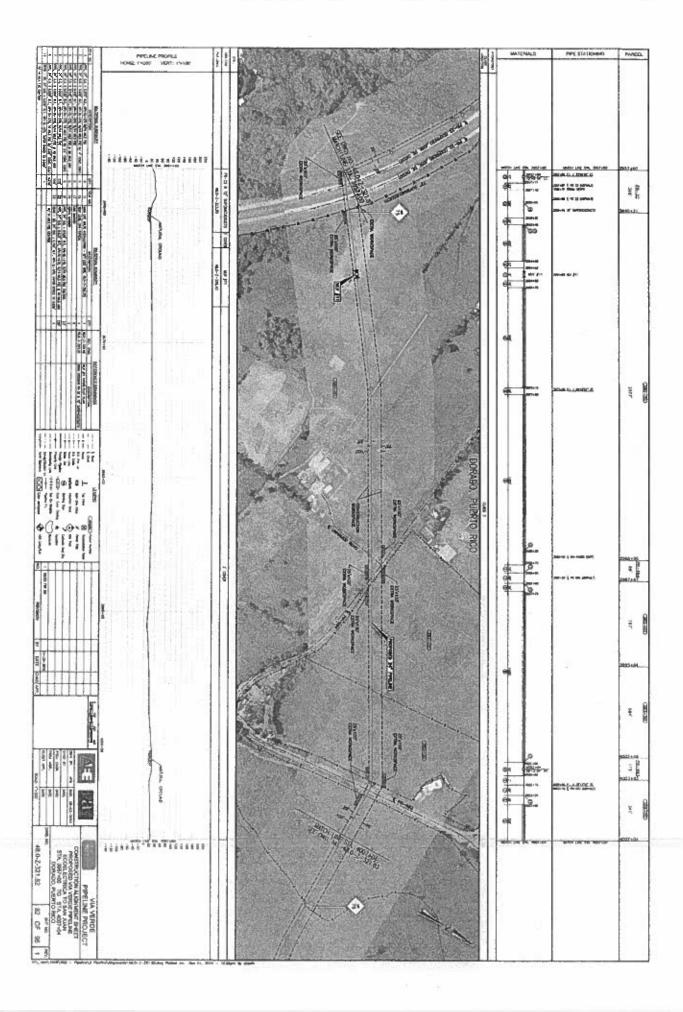


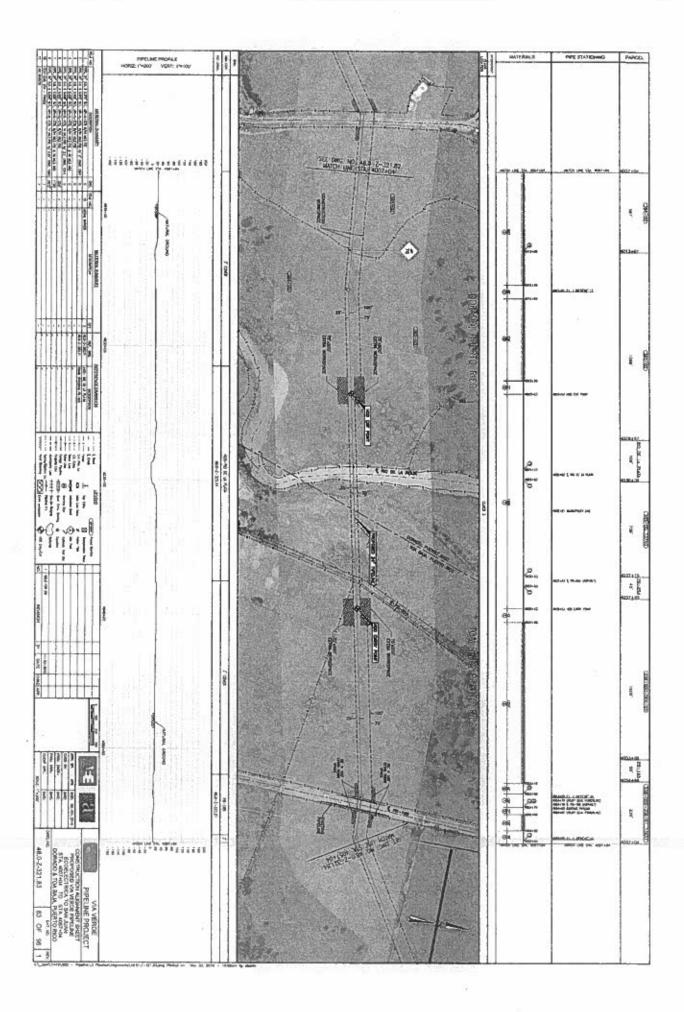
- Rio de La Plata Flood Control Project Map
- Construction Alignment Sheet 48.0-Z-321.81_Rev 1
- Construction Alignment Sheet 48.0-Z-321.82_Rev 1
- Construction Alignment Sheet 48.0-Z-321.83_Rev 1
- Construction Alignment Sheet 48.0-Z-321.84_Rev 1
- Horizontal Directional Drill Sheet 48.0-Z-325.11_Rev 1



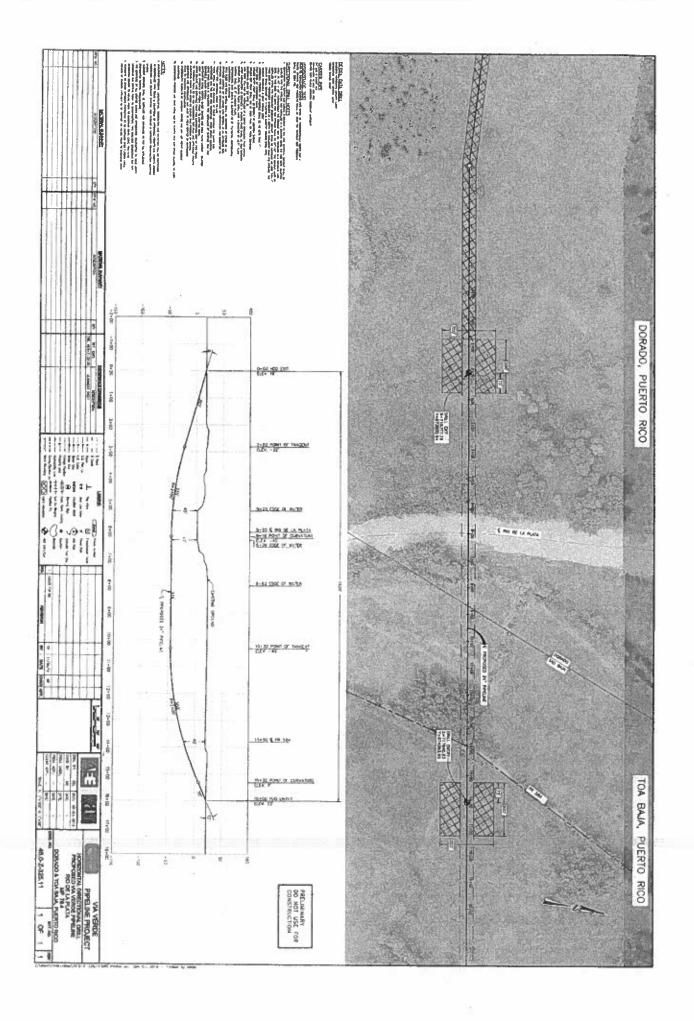
Rio De La Plata Project

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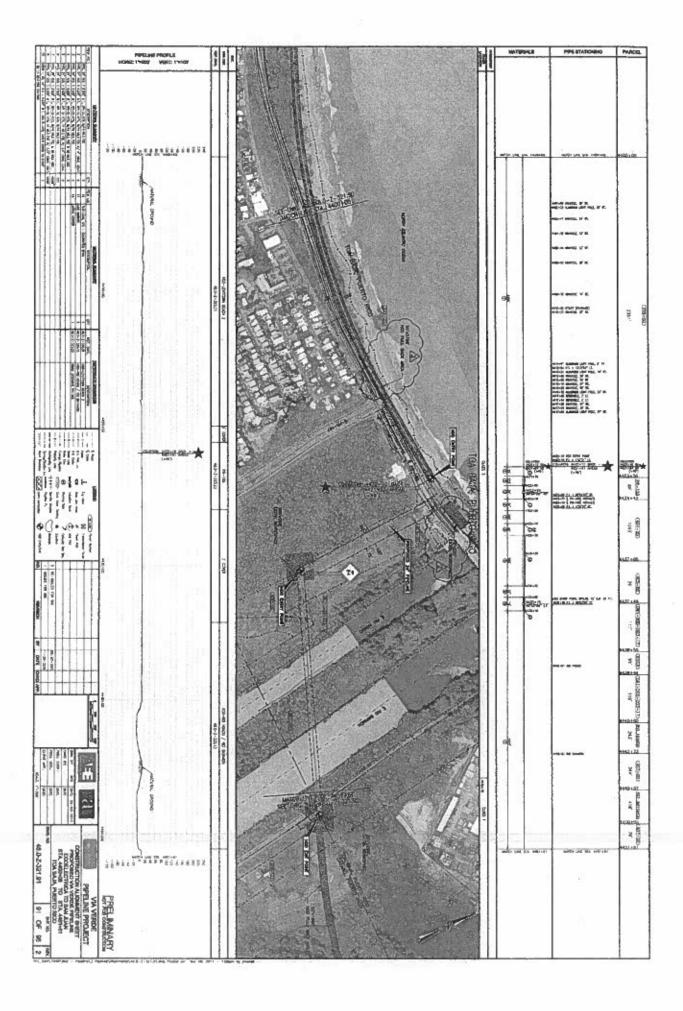


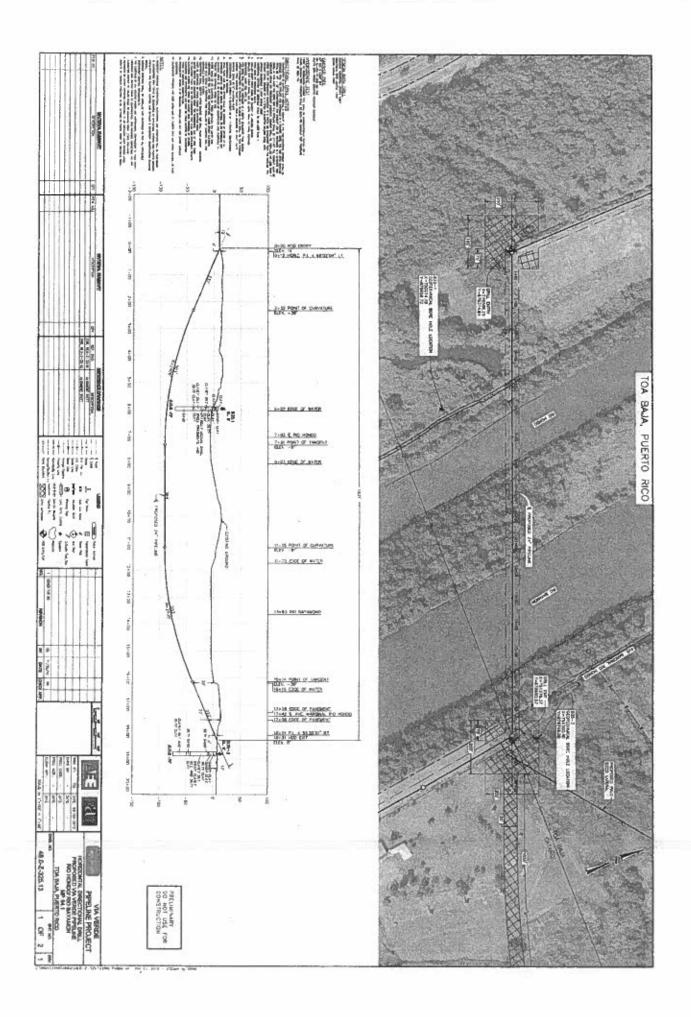


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- Construction Alignment Sheet 48.0-Z-321.91_Rev 2
- Horizontal Directional Drill Sheet 48.0-Z-325.13 Rev 1 (1 of 2)





- Aerial photograph image of Rio Santiago crossing with Core Boring location
- Geo Engineering Inc. Core Boring B-2 data sheet (3 pages)

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BORING NO. B-2 Canal GEO ENGINEERING INC. SHEET __ 1 __ OF ___ 3 START DATE 4/8/2011 COMPLTN. DATE PROJECT Via Verde Pipeline LOCATION Peñuelas-Guaynabo, PR **COMPLETION DEPTH 80.00ff.** CLIENT RAY Architects and Engineers PROJECT NO. GEO-750-2010 **BORING LOCATION** MP 40 (Canal Crossing) WATER DEPTH: **DRILL RIG** SAMPLER: HAMMER WT. 140 DURING DRILLING (ft.) FOREMAN L.Olivo CHECKED CRP AFTER COMPLETION (ft) 12 FIELD VALUES I N VALUE LOWS/FT) U.S.C.S. DESIGNATION E DEPTH **MOISTURE CONTENT** (tst) DEPTH **MATERIAL DESCRIPTION** £. 3 SPT (BL SPT W% 102030405060 PL H 0 0. Dark brown sandy clay (Topsoil and 30 1.5 Alluvial) 12 16 Light brown silty sand and clayey sand (Alluvial) 15 1.0 Light brown, dark brown mottled, clay 5 50 Dark gray, organic silty clay 10 23 10 12 15 Brown medium gravelly sand with traces of silt (Alluvial) 10 16 13 22 29 (coarse) 20 20 17 26 Dark greenish gray, organic silty clay and clayey silt 25 25 21 'qu - UNCONFINED COMPRESSION STRENGTH; REPORTED VALUES OBTAINED FROM: U.S.C.S. - UNIFIED SOIL CLASSIFICATION SYSTEM DESIGNATION. - NATURAL WATER CONTENT, PLASTIC LIMIT, W%,PL,LL AND PI A. POCKET PENETROMETER LIQUID LIMIT AND PLASTICITY INDEX B. SPRING TEST (RESPECTIVELY) C. UNCONFINED COMPRESSION TEST D. TRIAXIAL TEST

GEO ENGINEERING INC.

 BORING NO.
 B-2 Canal

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 LOCATION
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COMPLETION DEPTH 80H. SPT N VALUE (BLOWS/FT) FIELD VALUES U.S.C.S. DESIGNATION DEPTH (FT) MOISTURE CONTENT (tst) **MATERIAL DESCRIPTION** , _D E SPT W% W% PΙ 102030405060 PL | LL Gray fine to medium, silty sand (Alluvial) 26 20 30L 30 Gray and dark gray, organic silty clay with peat inclusions 63 35 35 2 40 40 52 1.0 45 23 17 Gray fine to medium silty sand with few dark gray organic silt 60 50^L 53 Greenish gray, organic clayey silt and silty clay 55 Push/18" 53 Light brown clay (Alluvial) 60 60 0.9 50 Dark brownish gray, organic clayey 66 65 silt

BORING NO. B-2 Canal SHEET ___3 OF _ GEO ENGINEERING INC. LOCATION MP 40 (Canal COMPLETION DEPTH 80ff. SPT N VALUE (BLOWS/FT) FIELD VALUES U.S.C.S. DESIGNATION **DEPTH** (FT) DEPTH (FT) MOISTURE CONTENT qu" (tst) **MATERIAL DESCRIPTION** SPT W% PL LL PI 102030405060 23 Dark gray, silghtly organic fine to medium silty sand 70 44 (and sandy silt) 76 1.5 16 Dark gray, organic clayey silt 80 80 End of Boring 25 85 90 90 95 95 00 - 100 05 105