DOCKET
05-AFC-3
DATE MAR 10 2006
RECD. MAR 20 2006

March 10, 2006

Mr. Robert Worl
Energy Commission Project Manager
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Mr. Robert E. Johnson, Manager
Siting and compliance Office
Systems Assessment and Facilities Siting Division
1516 Ninth Street
Sacramento, CA 95814-5512

SUBJECT: PROPOSED SUN VALLEY ENERGY PROJECT APPLICATION for CERTIFICATION (AFC)

Dear Mr. Worl and Mr. Johnson:

Thank you for the notification of the Sun Valley Energy Project (SVEP) Informational Presentation and Site Visit that was conducted for the Romoland Community on February 27, 2006. We appreciated the opportunity to attend this event. The Romoland School District (District) has several concerns regarding this project and we look forward to participating in the ongoing review process.

We are extremely concerned about the potential environmental and safety effects that this project may pose to our students and faculty. The District encompasses four elementary schools, three of which are within 5,000 feet of the proposed SVEP (see attached Figures 1 and 2). Boulder Ridge Elementary is located less than 2,600 feet from the proposed project site.

The purpose of this letter is to formally initiate our communication on this project and to express our preliminary concerns. The District has not yet had the opportunity to review technical reports or detailed plans for the project. We look forward to the availability of these reports has the review process progresses, and will submit comments.

Following are our preliminary comments based on a very initial review of the project proposal:

NEED FOR PROJECT

Given the number of existing power plants and recently proposed facilities in Riverside County, the need for this facility needs to be demonstrated. Two power plants have been constructed in Riverside County since 2000 and are now operational:

PROOF OF SERVICE (REVISED 3-3-06) FILED WITH
ORIGINAL MAILED FROM SACRAMENTO ON 3-20-06
E Johnson

- Wildflower Indigo 1,2,&3 – Intergen – 135 MW
- Blythe I – Blythe Energy – 520 MW

Three additional power plants are currently under construction in Riverside County:

- Riverside Energy Resource Center Unit 1 – 75 MW – anticipated completion date 3/06
- Riverside Energy Resource Center Unit 2 – 75 MW – anticipated completion date 3/06
- Inland Empire Combined Cycle (IECC)– Calpine – 800 MW – anticipated completion date 6/08

The Inland Empire Combined Cycle (IECC) Calpine is very close to the existing Romoland Elementary School (approximately 1000 feet). There also are plans for a 520 MW power plant (Blythe II Combined Cycle) in Riverside County that has been approved by the CEC but the project is currently on hold.

NATURAL GAS PIPELINE

The project description states that natural gas would be supplied to the power plant by a 750-foot long natural gas pipeline via a connection with one of Southern California Gas Company's high-pressure natural gas pipelines in the area. The California Department of Education (CDE) guidelines for school siting (CCR Title 5, 14010(h)) state that a "school site shall not be located within 1,500 feet of the easement of an aboveground or underground pipeline that can pose a safety hazard". The alignment of the pipeline and its diameter and operating pressure that will serve the facility and its diameter and operating pressure is not known, but there is a potential impact to existing schools and planned future schools from this proposed pipeline.

WATER PIPELINE

The routes of the supply water pipeline and the 0.75-mile long non-reclaimable wastewater line should be specified with respect to their location and proximity to the District's existing schools and potential future schools in order to comply with the CDE requirement that schools located within 1,500 feet of a pipeline easement must be evaluated. Issues include volumes of water that could be released from potential rupture of the lines and the possibility of flooding at the schools.

HAZARDOUS MATERIALS

It is probable that significant amounts of aqueous and/or anhydrous ammonia will be stored and used at the facility at quantities that would require development of risk management plans and modeling of potential release scenarios under the CCR, Title 19, Chapter 45 – California Accidental Release Prevention (CalARP) Program. There may be serious consequences to students or staff at the existing or proposed future schools from an accidental release of ammonia from the on-site storage tanks or an accident involving one of the trucks delivering ammonia to the site. Also, the power plant may contain lesser quantities of other chemicals, such as sulfuric acid, sodium hydroxide, sodium hypochlorite, and cyclohexamine that could pose a threat to students' health. The truck routes that will be used to deliver chemicals to the site should be specified and evaluated with respect to hours and routes that children will use while traveling to and from school. Accidental releases of natural gas during plant operation also should be assessed with respect to its impact on the community and adjacent schools.

AIR QUALITY

Air emissions from the proposed power plant must be evaluated with respect to sensitive receptors, which include all existing schools and the sites for future proposed schools. Of particular concern is the emission of particulates, which according to the Center for Community Action and Environmental Justice, will be at levels three times higher than older facilities. This is critical in an area that is already in non-attainment with high particulate concentrations and with many other large emission sources that are currently operating or planned for the area (the 800 MW IECC Calpine under construction, nearby asphalt batch plant, asphalt recycling, concrete block plant, sewer plant, and other nearby manufacturing and industrial sources). The cumulative impacts of all of these emission sources in conjunction with emissions from the proposed facility must be considered in determining the air quality impact. The CDE requires an evaluation of emissions from all facilities within a 0.25-mile radius of a proposed school site to determine the potential endangerment to public health of the students and staff (Education Code 17213(c).

NOISE

The noise levels from the power plant must be considered with respect to the Riverside County's not-to-exceed levels of 45 dBA during nighttime hours and 65 dBA during daytime hours, as well as the CDE school siting criterion that classrooms should not have a background noise level in excess of 30 dB.

TRANSMISSION LINES

The CDE has established the following limits for locating any part of a school site property line near the edge of easements for high-voltage power transmission lines:

- 100 feet for 50 to 133 kV transmission lines
- 150 feet for 220 to 230 kV transmission lines
- 350 feet for 500 to 550 kV transmission lines

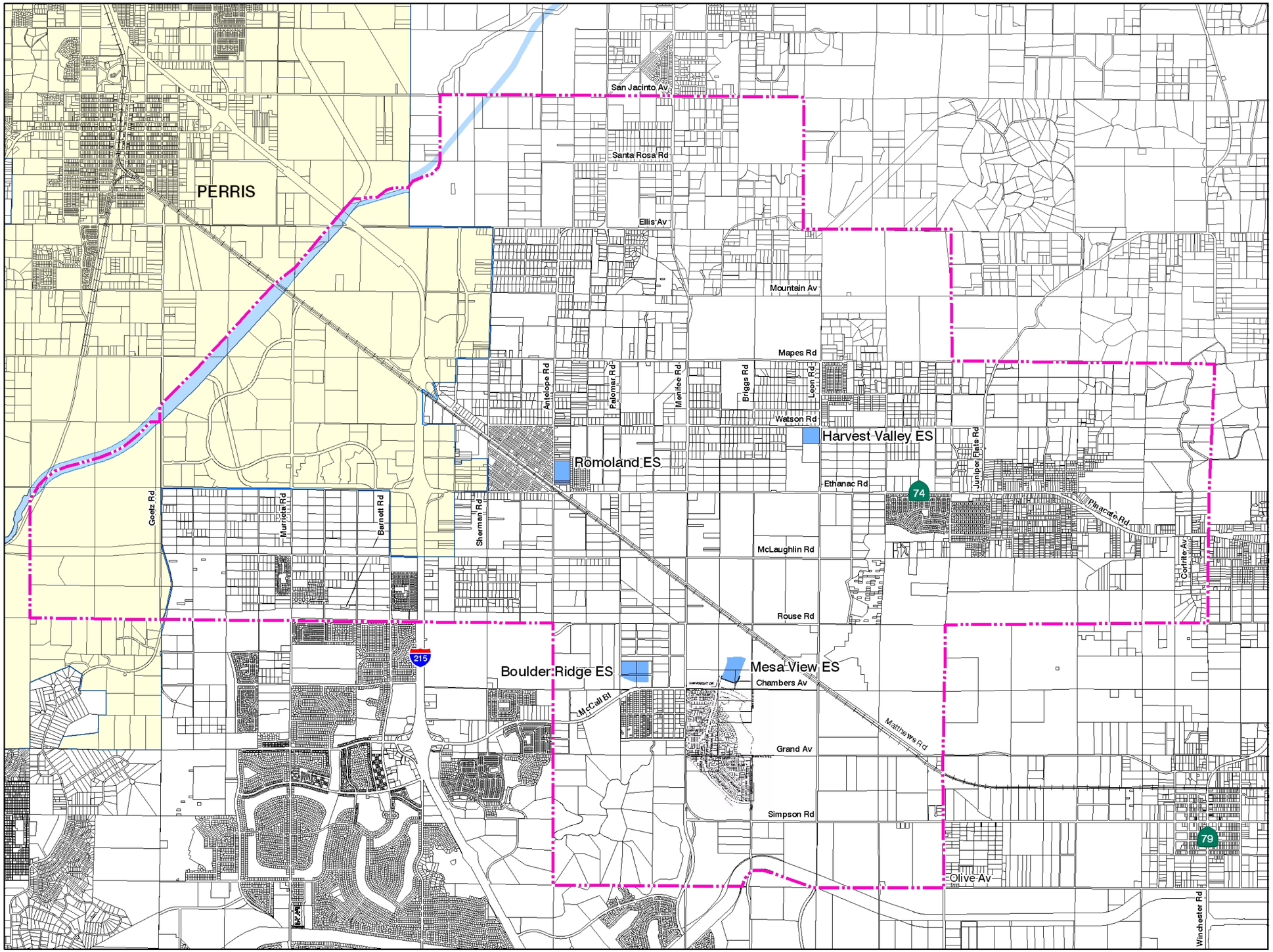
Therefore, the exact location route and easement for the new 115 kV transmission line associated with this project should be specified with respect to EMF exposure and audible noise to the existing and proposed school locations.

The Romoland School District looks forward to obtaining and reviewing more information regarding this proposed project. Please keep as on your distribution list of available documentation, including technical reports which will assist us in evaluating the issues we have identified in this letter.

Respectfully,

Roland Skumawitz, Superintendent
Romoland School District

Attachments



District Boundary

District Boundary

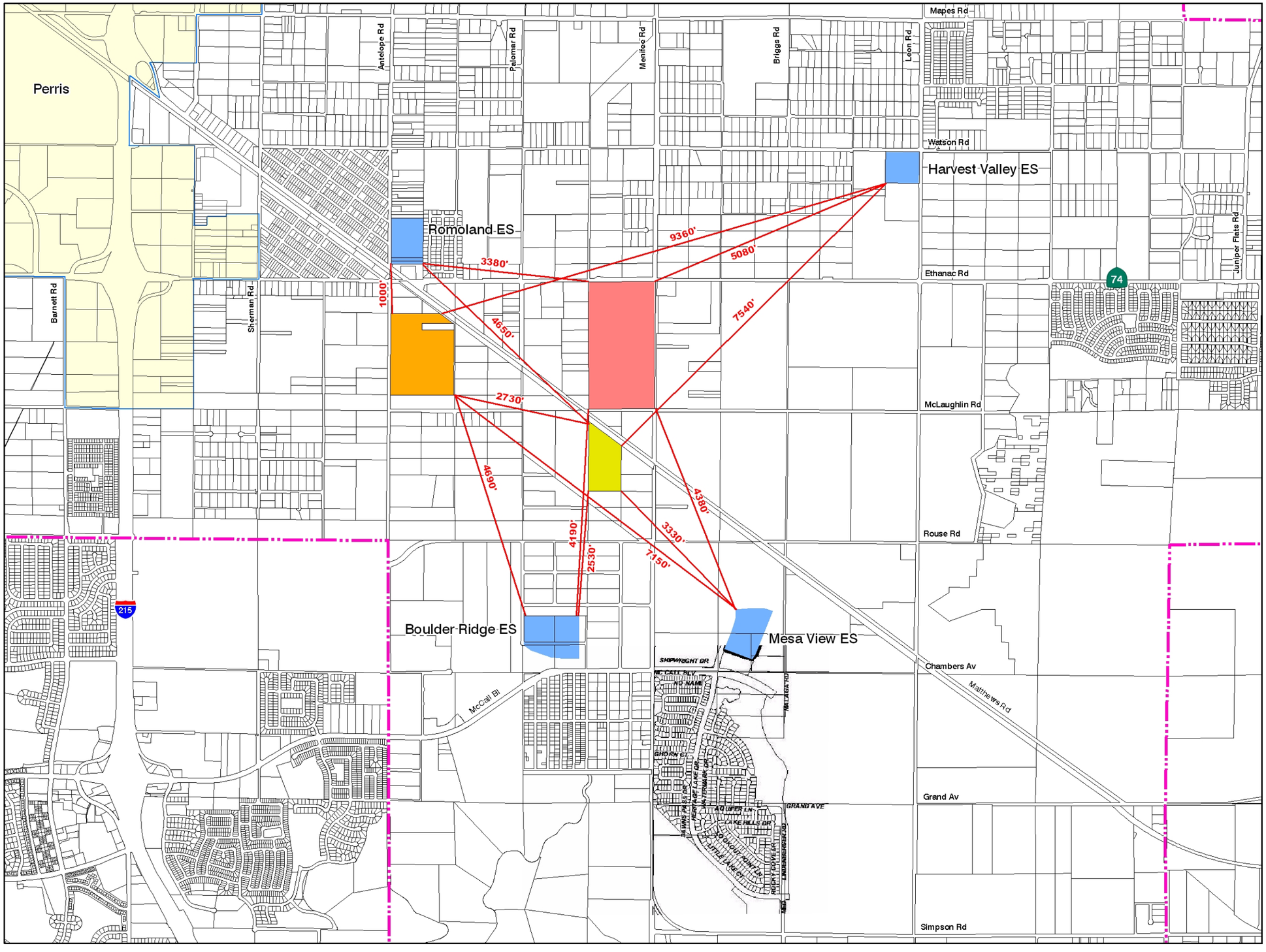
Cities

Elementary Schools

0 4,000 Feet

Romoland School District

Figure 1



School Locations & Distances

- District Boundary
- Cities
- Elementary Schools
- Existing Edison High Wattage Substation
- IECC (Under Construction)
- Proposed Sun Valley Energy Project (SVEP)

Feet
0 2,000

Romoland School District

Figure 2

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA

APPLICATION FOR CERTIFICATION FOR THE SUN VALLEY ENERGY PROJECT (SVEP)	**DOCKET NO. 05-AFC-3** **(Revised 3/3/2006)**

PROOF OF SERVICE LIST

DOCKET UNIT

Send the original signed document plus the required 12 copies to the address below:

CALIFORNIA ENERGY COMMISSION
DOCKET UNIT, MS-4
*Attn: Docket No. **05-AFC-3**
1516 Ninth Street
Sacramento, CA 95814-5512
E-mail: docket@energy.state.ca.us

* * * *

In addition to the documents sent to the Commission Docket Unit, also send individual copies of any documents to:

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INTERESTED AGENCIES

None listed as of 3/3/2006

INTERVENORS

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(CURE)
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Gloria D. Smith
Adams Broadwell Joseph & Cardozo
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DECLARATION OF SERVICE

I, **Evelyn M Johnson** declare that on **March 20, 2006** I deposited copies of the attached **RE: REVISED Comments from Romoland School District** in the United States mail at Sacramento, CA with first class postage thereon fully prepaid and addressed to those identified on the Proof of Service list above. Transmission via electronic mail was consistent with the requirements of California Code of Regulations, title 20, sections 1209, 1209.5, and 1210.

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

Evelyn M Johnson
[signature]

Revisions to POS List, i.e. updates, additions and/or deletions
SUN VALLEY ENERGY PROJECT Docket No. 05-AFC-3

* * * *

INTERNAL DISTRIBUTION LIST

FOR YOUR INFORMATION ONLY! Parties **DO NOT** mail to the following individuals. The Energy Commission Docket Unit will internally distribute documents filed in this case to the following:

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MS-33

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Revisions to POS List, i.e. updates, additions and/or deletions
SUN VALLEY ENERGY PROJECT Docket No. 05-AFC-3