



February 27, 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 Messrs. Worl and Johnson:

Thank you for the notification of the Sun Valley Energy Project Informational Presentation and Site Visit being conducted for the Romoland Community on February 27, 2006. We appreciate the opportunity to participate in the review process for the proposed project and will attend this meeting. The Romoland School District (District) has several concerns regarding this project and we look forward to becoming educated on the specifics of the proposal.

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, including Romoland Elementary School located less than 3,000 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:

- 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 – Calpine – 800 MW – anticipated completion date 6/08

The Inland Empire Combined Cycle (IECC) Calpine is very close to the existing Romoland Elementary School (970 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 500 MW Inland Empire Energy Center 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 us on your distribution list of available documentation, including technical reports which will assist us in evaluating the issues we have identified in this letter.

Sincerely,

THE PLANNING CENTER



Roland Skumhartz, Superintendent  
Romoland School District