

ROMOLAND SCHOOL DISTRICT 25900 Leon Road, Homeland, CA 92548
Roland Skumawitz, Superintendent (951) 926-9244



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DOCKET	
05-AFC-3	
DATE	Jun 8 2006
RECD.	Jun 8 2006

TO: DOCKETS
COMPANY:
FAX #: (916) 654-4365
DATE: Thursday, June 8, 2006

FROM: Peggy Wales for Roland Skumawitz
COMPANY: Romoland School District
of PAGES: 5, Including Cover

**RE: ROMOLAND SCHOOL DISTRICT ISSUES and CONCERNS ABOUT the
PROPOSED SUN VALLEY ENERGY PROJECT APPLICATION for
CERTIFICATION (AFC)**

COMMENTS:

To Whom It May Concern:

Please find attached the Romoland School District Issues and Concerns About the Proposed Sun Valley Energy Project Application for Certification (AFC). We are also faxing a copy to the PAO, and the original letter will be mailed by U.S. mail today.

If you should have any questions, please feel free to contact me at (951) 926-9244.

Thank you! ☺



ROMOLAND SCHOOL DISTRICT

25900 Leon Road • Homeland, CA 92548
(951) 926-9244 • FAX (951) 926-2170

Roland Skumawitz, Superintendent

June 6, 2006

Dockets Unit
California Energy Commission
1516 9th Street, MS-4
Sacramento, CA 95814

**SUBJECT: ROMOLAND SCHOOL DISTRICT ISSUES AND CONCERNS ABOUT
THE PROPOSED SUN VALLEY ENERGY PROJECT APPLICATION FOR
CERTIFICATION (AFC)**

Dear Mr. Worl:

Thank you for the notification of the Sun Valley Energy Project (SVEP) response to the CEC request for information. We appreciated the opportunity to comment on the AFC (environmental document) for this project. The Romoland School District has several concerns regarding traffic and air quality impacts resulting from this project. The following outlines impacts on the school district and suggested mitigation measures to reduce these impacts to less than significant levels.

TRAFFIC IMPACTS

Children and parents use the streets surrounding the SVEP site when walking to and from school. The AFC states that there would be no impacts to bicycle or pedestrian safety; however children and construction trucks will be traveling along Ethanac Road at the same time during AM peak hour as well as during PM off peak hour. The project will generate 490 peak hour construction trips along Ethanac Road. Because there are no sidewalks, elementary students currently walk along the Ethanac Road shoulder over the freeway overpass to Antelope Road. Construction trucks along this route would create an increased hazard for these students. Additionally, although there is a crossing guard at the Ethanac Road (Route 74) at Sherman Road intersection, this crossing would become more dangerous with a significant increase in construction trucks, especially during AM peak hour.

The list below shows the Romoland School District Instructional Schedules for each elementary school. All times listed below indicate a period of time when students and parents are entering and leaving from school. What the schedule shows is that all schools experience parent and student traffic throughout the day and there is no real "down" times. Children are traveling on the surrounding roadways at all times of the day.

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Romoland School

Kids Connection Open** 6:00 a.m. - 7:55 a.m.
 A.M. Kindergarten Start 7:45 a.m.
 Grades 1 - 8 Start 8:00 a.m.
 P.M. Kindergarten Start 10:30 a.m.
 A.M. Kindergarten End 11:50 a.m.
 Grades 1-3 End 2:05 p.m.
 Grades 4-5 End 2:25 p.m.
 Grades 6 - 8 End 2:35 p.m.
 P.M. Kindergarten End 2:35 p.m.
 Kids Connection Open** 2:05 - 6:00 p.m.

Harvest Valley School

A.M. Kindergarten Start 7:45 a.m.
 Grades 1-8 Start 8:00 a.m.
 P.M. Kindergarten Start 10:00 a.m.
 A.M. Kindergarten End 11:50 a.m.
 Grades K -3 End 2:05 p.m.
 Grades 4-5 End 2:20 p.m.
 Grades 6 -8 End 2:35 p.m.
 Kids Connection Open** 2:05 - 6:00 p.m.

Boulder Ridge School

Kids Connection Open** 6:00 a.m. - 8:10 a.m.
 A.M. Kindergarten Start 7:55 a.m.
 Grades 1-6 Start 8:15 a.m.
 P.M. Kindergarten Start 10:40 a.m.
 A.M. Kindergarten End 12:00 noon
 Grades 1-3 End 2:15 p.m.
 Grades 4-6 End 2:35 p.m.
 P.M. Kindergarten End 2:45 p.m.
 Kids Connection Open** 12:00 noon - 6 p.m.

**** Kids Connection is the before/after school child care program at each site (Harvest Valley does not have a morning program). Students and parents arrive and leave during this period of time.**

The project applicant should include additional personnel to assist with student crossing and safety along Ethanac Road (Route 74) and at the Ethanac Road (Route 74) and Sherman Road intersection. This requirement should be included in the Traffic Control Plan that will be prepared for the Riverside County Transportation Department.

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The construction truck route and the operational hazardous material transport route is along Matthews Road which runs along the BNSF rail right-of-way. An off-road bike trail also runs along this ROW. Hauling hazardous materials along this route to Ethanac Road, past the elementary school would significantly increase the potential conflicts with pedestrians and bicycles along this route.

Project applicant should construct a sidewalk along the south side of Ethanac Road between the northbound I-215 Ethanac Road offramp and Antelope Road.

Additionally, the proximity of Highway 74 to the Romoland School may result in significant truck noise at times when classroom instruction is taking place. Currently the district schedules maintenance activities such as landscape and other noise intensive work, during Wednesday afternoons or the weekend, when children are not in school. Wednesday afternoons is modified schedule where schools let out at approximately 1:00 p.m.

AIR QUALITY IMPACTS

It is clear that the facility exceeds the South Coast Air Quality Management District (SCAQMD) California Environmental Quality Act (CEQA) significance thresholds for both construction and operation emissions, therefore all feasible mitigation measures are required. The proposed SVEP is located near four elementary schools in the Romoland School District and construction and operation would adversely impact the health of students and teachers. This impact is currently being mitigated by obtaining emission offsets; however this mitigation does not reduce significant air quality impacts to less than significant levels, especially concerning localized air quality impacts.

1. More assurances on the availability of emission offsets are required. The applicant assumes that compliance with the yet to be adopted proposed amendments to SCAQMD Rule 1309.1 that would allow electric generating facilities to use the Priority Reserve to obtain emission offsets or credits. As currently proposed, SCAQMD Rule 1309.1 would limit the amount of PM10 allocated into the Priority Reserve to 125 pounds per quarter. The facility estimates that it will need about 16,118.5 pounds per month or about 537 pounds per day of PM10 emission credits. Therefore, the SVEP project would use an entire years' worth of PM10 credits from the Priority Reserve. It is doubtful that the SCAQMD would allow all PM10 credits for a year to apply to only one project. More assurance regarding the availability of offsets is required.
2. The use of offsets from the Priority Reserve does not provide direct mitigation to the area surrounding the project site. Emissions from the Priority Reserve have been generated throughout southern California, and not specifically the area near the facility. The emissions from the power plant will impact the area immediately surrounding the power plant; however the offsets were not generated from this area and the air quality in the local area will degrade. In order to provide true mitigation, emission offsets should be developed from the local area.

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3. The applicants' response to the CEC's request to look for local sources of emission reductions and mitigation is inadequate. We disagree that using local emission reductions for mitigation is a "novel" idea or that the reason it should not be considered is because it will take too much time. Since the area surrounding the SVEP facility includes a number of other industrial facilities, opportunities for emission reductions in the local community must also be investigated. In fact, it is required in order to use the SCAQMD's Priority Reserve. The proposed amended SCAQMD Rule 1309.1 (c)(3) requires the applicant to conduct a diligent effort to secure available ERCs or to create ERCs.

The AQMD controls the issuance of formal emission reduction credits (ERCs) and there are very few ERCs for certain pollutants available to purchase. There is few heavy industry emission sources near by, so traditional sources are scarce. Only electrification will generate "true" ERCs but even emission reductions that do not qualify as ERCs can provide reductions in emissions in the local area and would be beneficial to the community and can be used as mitigation measures. Listed below are a few sources that could be used.

1. Electrification of pumps powered by diesel, such as farm irrigation pumps or oil transfer pumps.
2. Conversion of transit or other routine delivery trucks in the area from diesel to LNG or CNG.
3. If rail yards are located near the area, reductions in locomotive engine emissions could be obtained by electrifying some engines.
4. Improvements to traffic delay by improving the level of service at nearby impacted intersections to reduce delay.
5. Apply selective catalytic reduction (SCR) to school boilers and other buildings with central hot water supply or other similar equipment, if not already equipped.
6. Apply Best Available Control Technology (BACT) to stationary sources (generally industrial sources) in the area. This would not generate true ERCs, but would reduce local emissions.

The Romoland School District looks forward to obtaining and reviewing more information regarding the air quality issue associated with this proposed project.

Respectfully,



Roland Skumawitz, Superintendent
Romoland School District

cc: Public Adviser's Office, California Energy Commission

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)

DOCKET
05-AFC-3

DATE JUN 8 2006

RECD. JUN 8 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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Gloria D. Smith
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DECLARATION OF SERVICE

I, **Raquel Rodriguez** declare that on **June 9, 2006** I deposited copies of the attached **Letter to CEC / Robert Worl from Romoland School District / Roland Skumawitz & Peggy Wales dated June 8, 2006 RE: Information Regarding Romoland School District Facilities and Potential Impacts,** 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.

[signature]

* * * *

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