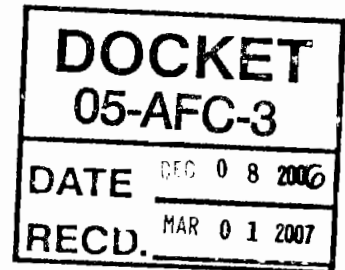


**From:** <Doug.Davy@CH2M.com>  
**To:** <rworl@energy.state.ca.us>, <jmathias@energy.state.ca.us>  
**Date:** Fri, Dec 8, 2006 10:46 AM  
**Subject:** Sun Valley Energy Project - Agency consultation letters - Non-Reclaimable Wastewater Line - 1 of 2

Bob,

Attached is an electronic copy of information regarding the Sun Valley Energy Project (SVEP) that we have sent to the California Department of Fish and Game, US Army Corps of Engineers, and Santa Ana Regional Water Quality Control Board. We are providing this information with a request for concurrence that the SVEP non-reclaimable wastewater pipeline will not require (1) a Clean Water Act Section 404 permit and Section 401 Water Quality Certification, (2) a Porter-Cologne Act Water Quality Control Act Waste Discharge Requirements, or (3) a California Fish and Game Code Section 1603 Streambed Alteration Agreement. Although there are drainage features that are adjacent to the wastewater pipeline route in McLaughlin Road, the water in these seasonal drainage features crosses the road only as sheet flow, during periods of high rainfall, and not through a culvert or under a bridge. We therefore do not believe that these features would have jurisdictional status under the Clean Water Act, Porter-Cologne Act, or California Fish and Game Code. The pipeline will be constructed entirely within McLaughlin Road adjacent to these features and Edison Mission Energy (EME) proposes using construction Best Management Practices to ensure that there are no accidental discharges to these features during construction.



The information sent to the agencies includes the following:

- 1) A transmittal letter to Mr. Adam Fisher of the Santa Ana Regional Water Quality Control Board and Mr. David Castanon of the Corps of Engineers. We have been unable to identify a contact person at the California Department of Fish and Game and have sent the letter to the regional Habitat Conservation Program office for assignment.
- 2) A technical memorandum discussing the drainage features and fieldwork conducted on behalf of EME to document the location and characteristics of these features.
- 3) A map showing the feature locations that was prepared using sub-meter accuracy global positioning system (GPS) data superimposed on an aerial photograph.
- 4) Photographs documenting the drainage features that were taken during a period of high winter rainfall.

We will follow up with telephone calls after the agencies have had some time to receive and review the materials. We expect that the agencies will provide EME with letters or e-mails indicating their agreement that no permits will be necessary for the non-reclaimable wastewater line, and we will provide you with any information we receive from the agencies.

I'll send the attachments in two installments, since they are large files.

Best regards,

Douglas M. Davy, Ph.D.  
Senior Project Manager  
CH2M HILL  
2485 Natomas Park Drive, Suite 600  
Sacramento, CA 95833  
(916) 286-0278  
ddavy@ch2m.com <BLOCKED::mailto:ddavy@ch2m.com>

**CC:** <vyamada@edisonmission.com>

## Sun Valley Energy Project – Drainage Features

**PREPARED FOR:** California Department of Fish and Game  
Santa Ana Regional Water Quality Control Board  
U.S. Army Corps of Engineers, Los Angeles District

**PREPARED BY:** Russell Huddleston/CH2M HILL

**COPIES:** John Mathias/California Energy Commission  
Doug Davy/CH2M HILL

**DATE:** December 1, 2006

### Introduction

The Edison Mission Energy Sun Valley Energy Project (SVEP) will be a nominal 500 megawatt (MW) peaking facility consisting of five natural gas-fired turbine-generators and associated equipment. The facility will be located near Romoland in unincorporated Riverside County on an approximately 20-acre parcel. Although the project site is currently in agricultural use, the land is zoned Manufacturing-Service Commercial. The project site is located at 29500 Rouse Road, Romoland, California. The Assessor's Parcel Numbers are 331-250-019 and -020. The site is located in Township 5S, Range 3W, Section 14 (San Bernardino Base and Meridian).

Figure 1 shows the project site and appurtenant facilities, including the electric transmission line, natural gas supply line, and non-reclaimable waste water pipeline. SVEP will connect to Southern California Edison's electrical transmission system at the Valley Substation, which is approximately 600 feet north of the project site. The project will connect with Southern California Gas Company's natural gas pipeline via a 750-foot-long 12-inch diameter pipeline connection to the existing gas line that runs along Menifee Road east of the project site. Non-reclaimable wastewater will be discharged through an 8-inch-diameter pipeline that will run northwest from the project along the railroad right-of-way to McLaughlin Road and along McLaughlin Road to connect with the Inland Empire Energy Center's non-reclaimable waste water line located at McLaughlin and Antelope roads. This line is 0.75 mile in length.

### Site Characterization

The proposed project site includes approximately 20 acres of agricultural land typically cultivated in wheat. The Burlington Northern Santa Fe (BNSF) railroad tracks are located immediately north of the site and agricultural fields are present immediately to the west, south, and east of the site. A fenced equipment storage yard is located immediately to the northeast and a residential home is located to the southeast. No natural habitats, trees or wetland areas were evident at the proposed project site.

cultivated field. As previously noted, there is no culvert connection between this feature and the drainage on the north side of McLaughlin Road. Sparse vegetation within this drainage included ruderal species such as ryegrass (*Lolium sp.*), mustard, Harding grass (*Phalaris minor*) and remnant sunflower.

### **Drainage B**

Drainage B is a well-defined, presumably excavated channel ranging from three to four feet wide, located on the north side of McLaughlin Road (Figure 2). The channel terminates at the road where there are no culverts or other ditches resulting in significant sheet flow onto the roadways in this area. The channel was unvegetated at the time of the survey with ruderal vegetation along the upper edges such as remnant sunflowers, mustard, ryegrass and Harding grass.

### **Drainage C**

Drainage C is a discontinuous drainage channel located on the north side of McLaughlin Road. The east end of the feature originates at a crushed, 16-inch diameter corrugated metal pipe that is nearly completely filled with soil. No defined channel was observed east of the culvert and vegetation was characterized predominantly by upland grasses such as rip-gut brome (*Bromus diandrus*) and barley (*Hordeum murinum ssp. leporinum*). To the west, the drainage is slightly better defined in some areas, with other areas exhibiting only weakly expressed swale-like topography. Vegetation includes ruderal species such as mustard, remnant sunflowers and ryegrass. Two 18-inch diameter culverts are present under Antelope Road.

### **Roadside Drainages**

Two shallow roadside drainages were observed on the south side of Mathews Road. No culverts were associated with these features; however, at the west end, water appears to sheet-flow over the roadway and during high flows drain into Drainage C on the north side of McLaughlin Road. Vegetation in these ditches includes predominantly upland grasses such as rip-gut brome and barley with ruderal forbs such as filaree (*Erodium sp.*).

### **Detention Basin**

A shallow constructed detention basin is present in the southwest corner of the Valley Substation. The topography in this area has been graded to slope slightly to the southwest and two low berms (approximately 24 inches high) have been constructed along the south and west edges of the property. At the time of the survey a shallow ponding was noted in the corner of the basin.

## **Discussion**

No wetland or other aquatic features were identified on the 20-acre SVEP facility site. Both the natural gas and non-reclaimable water pipeline will be constructed within existing dirt field access roads which appear to be routinely graded and maintained. A few drainages are present in the vicinity of the proposed non-reclaimed water pipeline. No construction, fill or discharge is expected to occur, however, in any of these features because the non-reclaimable waste water line will be constructed entirely within the existing roadway. In

## Sun Valley Energy Project – Drainage Features

**PREPARED FOR:** California Department of Fish and Game  
Santa Ana Regional Water Quality Control Board  
U.S. Army Corps of Engineers, Los Angeles District

**PREPARED BY:** Russell Huddleston/CH2M HILL

**COPIES:** John Mathias/California Energy Commission  
Doug Davy/CH2M HILL

**DATE:** December 1, 2006

### Introduction

The Edison Mission Energy Sun Valley Energy Project (SVEP) will be a nominal 500 megawatt (MW) peaking facility consisting of five natural gas-fired turbine-generators and associated equipment. The facility will be located near Romoland in unincorporated Riverside County on an approximately 20-acre parcel. Although the project site is currently in agricultural use, the land is zoned Manufacturing-Service Commercial. The project site is located at 29500 Rouse Road, Romoland, California. The Assessor's Parcel Numbers are 331-250-019 and -020. The site is located in Township 5S, Range 3W, Section 14 (San Bernardino Base and Meridian).

Figure 1 shows the project site and appurtenant facilities, including the electric transmission line, natural gas supply line, and non-reclaimable waste water pipeline. SVEP will connect to Southern California Edison's electrical transmission system at the Valley Substation, which is approximately 600 feet north of the project site. The project will connect with Southern California Gas Company's natural gas pipeline via a 750-foot-long 12-inch diameter pipeline connection to the existing gas line that runs along Menifee Road east of the project site. Non-reclaimable wastewater will be discharged through an 8-inch-diameter pipeline that will run northwest from the project along the railroad right-of-way to McLaughlin Road and along McLaughlin Road to connect with the Inland Empire Energy Center's non-reclaimable waste water line located at McLaughlin and Antelope roads. This line is 0.75 mile in length.

### Site Characterization

The proposed project site includes approximately 20 acres of agricultural land typically cultivated in wheat. The Burlington Northern Santa Fe (BNSF) railroad tracks are located immediately north of the site and agricultural fields are present immediately to the west, south, and east of the site. A fenced equipment storage yard is located immediately to the northeast and a residential home is located to the southeast. No natural habitats, trees or wetland areas were evident at the proposed project site.

Land use surrounding the project site includes a mixture of agricultural fields, fallow-ruderal areas, residential developments, and industrial areas. The Southern California Edison Valley Substation and a wood recycling facility are located north of the project, and the Inland Empire Energy Center currently under construction is located approximately 0.7 mile to the northwest. Agricultural and fallow-ruderal habitats are common to the west and southwest of the project area along with some areas supporting natural coastal scrub habitat present on the low, rocky hills. The area to the southeast of the project site, on the east side of Menifee Road and south of the railroad tracks is currently being developed for housing. Areas to the northeast are predominantly agricultural fields.

## Methods

A field investigation was conducted by CH2M HILL biologists Russell Huddleston and Victor Leighton on March 24, 2006 to identify potential wetlands, drainages and other aquatic resources on the site. The survey was conducted soon after a rainy period after sufficient rainfall had occurred to result in surface inundation and flows such that seasonal wetland features would most likely be evident. Surveys included the 20-acre project site and the associated linear features. Surveys along linear features generally examined a survey corridor 100 feet wide (50 feet to either side of the centerline), but were extended further in areas where drainages extended beyond the study limits in order to identify flow patterns and connectivity. All drainages, features with defined bed and bank, and culverts were mapped in the field using a Trimble® Geo-XT global positioning system unit. Representative photos of the site and mapped features are included in Attachment A.

## Results

A total of six drainage features were identified in the general vicinity of the proposed reclaimed water pipeline along McLaughlin Road (Figure 2). The proposed pipeline would be located entirely within the existing roadway and no culverts or defined channels would be affected. A shallow constructed storm water detention basin was also observed in the southwest corner of the Valley Substation (Figure 2). Brief descriptions of the drainages are provided below.

### Drainage Swale A

Drainage swale A extends approximately 85 feet along the north side of McLaughlin Road and is characterized by a narrow (approximately 2-foot-wide) erosional channel. Water from the surrounding area appears to collect in this area and flow to the south. There is no culvert at McLaughlin Road and water appears to sheet flow over the road and into the roadside drainage, which is part of Drainage A (Figure 2). The erosional channel was largely devoid of vegetation with scattered mustard (*Brassica* sp.) and remnant sunflower (*Helianthus*) along the edges.

### Drainage A

Drainage A appears to be a constructed ditch for the conveyance and storage of storm water. The channel parallels the south side of McLaughlin Road and then curves to the south where the feature broadens and gradually rises slightly in elevation before ending in a

cultivated field. As previously noted, there is no culvert connection between this feature and the drainage on the north side of McLaughlin Road. Sparse vegetation within this drainage included ruderal species such as ryegrass (*Lolium sp.*), mustard, Harding grass (*Phalaris minor*) and remnant sunflower.

### **Drainage B**

Drainage B is a well-defined, presumably excavated channel ranging from three to four feet wide, located on the north side of McLaughlin Road (Figure 2). The channel terminates at the road where there are no culverts or other ditches resulting in significant sheet flow onto the roadways in this area. The channel was unvegetated at the time of the survey with ruderal vegetation along the upper edges such as remnant sunflowers, mustard, ryegrass and Harding grass.

### **Drainage C**

Drainage C is a discontinuous drainage channel located on the north side of McLaughlin Road. The east end of the feature originates at a crushed, 16-inch diameter corrugated metal pipe that is nearly completely filled with soil. No defined channel was observed east of the culvert and vegetation was characterized predominantly by upland grasses such as rip-gut brome (*Bromus diandrus*) and barley (*Hordeum murinum ssp. leporinum*). To the west, the drainage is slightly better defined in some areas, with other areas exhibiting only weakly expressed swale-like topography. Vegetation includes ruderal species such as mustard, remnant sunflowers and ryegrass. Two 18-inch diameter culverts are present under Antelope Road.

### **Roadside Drainages**

Two shallow roadside drainages were observed on the south side of Mathews Road. No culverts were associated with these features; however, at the west end, water appears to sheet-flow over the roadway and during high flows drain into Drainage C on the north side of McLaughlin Road. Vegetation in these ditches includes predominantly upland grasses such as rip-gut brome and barley with ruderal forbs such as filaree (*Erodium sp.*).

### **Detention Basin**

A shallow constructed detention basin is present in the southwest corner of the Valley Substation. The topography in this area has been graded to slope slightly to the southwest and two low berms (approximately 24 inches high) have been constructed along the south and west edges of the property. At the time of the survey a shallow ponding was noted in the corner of the basin.

## **Discussion**

No wetland or other aquatic features were identified on the 20-acre SVEP facility site. Both the natural gas and non-reclaimable water pipeline will be constructed within existing dirt field access roads which appear to be routinely graded and maintained. A few drainages are present in the vicinity of the proposed non-reclaimed water pipeline. No construction, fill or discharge is expected to occur, however, in any of these features because the non-reclaimable waste water line will be constructed entirely within the existing roadway. In

addition, biological resources construction monitors will be present to ensure that there is no fill or discharge to these features.

One or two transmission towers may be located near the southwest corner of the Valley Substation, but would be located outside of the detention basin area.





**CH2MHILL**

CH2M HILL  
2485 Natomas Park Drive  
Suite 600  
Sacramento, CA 95833  
Tel 916.920.0300  
Fax 916.920.8463

December 8, 2006

Mr. Adam Fisher  
Santa Ana Regional Water Quality Control Board  
3737 Main Street, Suite 500  
Riverside, California  
92501

**Subject: Sun Valley Energy Project**

Dear Adam:

Enclosed is a brief technical memorandum describing drainage features in the vicinity of Edison Mission Energy's proposed Sun Valley Energy Project, to be located in western Riverside County, California. No wetlands were identified in the project area and all associated linear features would be constructed within existing roadways and utility corridors, thereby avoiding impacts to any aquatic features. In addition, construction monitors would ensure that there are no impacts to aquatic features.

The information included in the attached memorandum, including maps and site photographs provides a brief description of the project and of the drainage features observed in the area. This memorandum is not intended to be a formal wetland delineation or permit application; rather, we request your concurrence that no further action is needed in terms of permitting for these resources. Please contact me at (916) 286-0286 or [ddavy@ch2m.com](mailto:ddavy@ch2m.com) or Russell Huddleston at (916) 286-0239 or [rhuddle1@ch2m.com](mailto:rhuddle1@ch2m.com) with your questions or comments.

Sincerely,

Douglas M. Davy, Ph.D.  
Project Manager

Attachment

cc: V. Yamada, Edison Mission Energy  
R. Huddleston, CH2M HILL



**CH2MHILL**

December 8, 2006

CH2M HILL  
2485 Natomas Park Drive  
Suite 600  
Sacramento, CA 95833  
Tel 916.920.0300  
Fax 916.920.8463

Mr. David Castanon  
Branch Chief  
Regulatory Program – Los Angeles District  
United State Army Coprs of Engineers  
P.O. Box 532711  
Los Angeles, California  
90053-2325

**Subject: Sun Valley Energy Project**

Dear Mr. Castanon:

Enclosed is a brief technical memorandum describing drainage features in the vicinity of Edison Mission Energy's proposed Sun Valley Energy Project, to be located in western Riverside County, California. No wetlands were identified in the project area and all associated linear features would be constructed within existing roadways and utility corridors, thereby avoiding impacts to any aquatic features. In addition, construction monitors would ensure that there are no impacts to aquatic features.

The information included in the attached memorandum, including maps and site photographs provides a brief description of the project and of the drainage features observed in the area. This memorandum is not intended to be a formal wetland delineation or permit application; rather, we request your concurrence that no further action is needed in terms of permitting for these resources. Please contact me at (916) 286-0286 or [ddavy@ch2m.com](mailto:ddavy@ch2m.com) or Russell Huddleston at (916) 286-0239 or [rhuddle1@ch2m.com](mailto:rhuddle1@ch2m.com) with your questions or comments.

Sincerely,

Douglas M. Davy, Ph.D.  
Project Manager

Attachment

cc: V. Yamada, Edison Mission Energy  
R. Huddleston, CH2M HILL



**CH2MHILL**

CH2M HILL  
2485 Natomas Park Drive  
Suite 600  
Sacramento, CA 95833  
Tel 916.920.0300  
Fax 916.920.8463

December 8, 2006

California Department of Fish and Wildlife  
Habitat Conservation Program  
3602 Inland Empire Boulevard, C-220  
Ontario, California 91764

**Subject: Sun Valley Energy Project**

To whom it may concern,

Enclosed is a brief technical memorandum describing drainage features in the vicinity of Edison Mission Energy's proposed Sun Valley Energy Project, to be located in western Riverside County, California. No wetlands were identified in the project area and all associated linear features would be constructed within existing roadways and utility corridors, thereby avoiding impacts to any aquatic features. In addition, construction monitors would ensure that there are no impacts to aquatic features.

The information included in the attached memorandum, including maps and site photographs provides a brief description of the project and of the drainage features observed in the area. This memorandum is not intended to be a formal wetland delineation or permit application; rather, we request your concurrence that no further action is needed in terms of permitting for these resources. Please contact me at (916) 286-0286 or [ddavy@ch2m.com](mailto:ddavy@ch2m.com) or Russell Huddleston at (916) 286-0239 or [rhuddle1@ch2m.com](mailto:rhuddle1@ch2m.com) with your questions or comments.

Sincerely,

Douglas M. Davy, Ph.D.  
Project Manager

Attachment

cc: V. Yamada, Edison Mission Energy  
R. Huddleston, CH2M HILL