CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD SAN DIEGO REGION

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Clean Water Act Section 401 Water Quality Certification and Waste Discharge Requirements for Discharge of Dredged and/or Fill Materials

PROJECT: Below Ground Demolition of In-Water Structures Project Certification Number R9-2014-0028 WDID: 9 000002700

Reg. Meas. ID: 395224 Place ID: 802907 Party ID: 13291 Person ID: 544937

APPLICANT: Dynegy South Bay, LLC 990 Bay Boulevard Chula Vista, CA 91911

ACTION:

Order for Low Impact Certification	Order for Denial of Certification
 Order for Technically-conditioned	 Waiver of Waste Discharge
Certification	Requirements
Enrollment in SWRCB GWDR	Enrollment in Isolated Waters Order
Order No. 2003-017-DWQ	No. 2004-004-DWQ

PROJECT DESCRIPTION

An application dated March 4, 2014 was submitted by Dynegy South Bay, LLC (hereinafter Applicant), for Water Quality Certification pursuant to section 401 of the Clean Water Act (33 U.S.C. § 1341) for the proposed South Bay Power Plant Below Ground Demolition of In-Water Structures Project (Project). The California Regional Water Quality Control Board, San Diego Region (San Diego Water Board) deemed the application to be complete on May 2, 2014. The Applicant proposes to discharge dredged or fill material to waters of the United States and/or State associated with construction and demolition activities at the Project site. The Applicant has also applied for a Clean Water Act section 404 permit and a Rivers and Harbors Act section 10 Letter of Permission from the United States Army Corps of Engineers for the Project (USACE File No. SPL-2014-00053-RRS).

The Project is located within the City of Chula Vista, San Diego County, California at 990 Bay Boulevard. The Project center reading is located at latitude 32.613611 and longitude -117.097222. The Applicant has paid all required fees for this Certification in the amount of \$2,547.00. On March 5, 2014, the San Diego Water Board provided public notice of the Project application pursuant to California Code of Regulations, title 23, section 3858 by posting information describing the Project on the San Diego Water Board's web site and providing a period of twenty-one days for public review and comment. No comments were received. The Applicant proposes to remove in-water structures associated with the South Bay Power Plant (SBPP) within the tidal waters of San Diego Bay. The Project includes the following elements:

- 1. Removal of four intake structures and associated concrete abutments located along the north shoreline of the intake channel. SBPP has four intake structures: the intakes for power generation Units 1 and 2 are combined in a single structure, the intake for power generation Unit 3, and the intake for power generation Unit 4. These concrete structures will be broken up and removed using a land-based excavator down to the level of the rock base that supports the structure, which is 4 feet below surface level. The excavator will be used to pull out the concrete pieces and place them onto a nearby staging area, where they will be reduced in size using a hydraulic hammer, loaded onto trucks using a shovel or other similar mechanized lift, and hauled for stockpiling and testing at the Concrete Stock Pile and Crushing Area (see Attachment 3, Figure B). The process of transferring the materials to the Concrete Stock Pile and Crushing Area is expected to be completed within 1 to 2 days. Once the structures are removed, the area of the intake structures will be backfilled with approximately 1,266 cubic yards of clean soil and rock rip rap to match the slope and substrate of the existing adjacent shoreline, extending to the bottom of the submerged slope of the intake channel.
- 2. Removal of two utility bridges and their supporting pier structures that extend across the intake and discharge channels. The bridge decks will be removed by lifting them off their support piers using a land-based crane and placing them on a nearby staging area for sizing and processing in the same manner as described above. The bridge support piers will be cut off at the pier footings, at the level of the surrounding substrate, using an underwater cable saw operated from a floating barge. The bridge support piers will be supported by a land-based crane during cutting and then lifted out of the water using the crane and placed on a nearby staging area for sizing and processing as described above. Piping and supports attached to the bridges will be removed prior to removal of the bridge itself. Expansion joint material found on the bridge foundations has been identified as containing polychlorinated biphenyls (PCBs)(see utility bridge locations in Attachment 3, Figure A). The expansion joint material will be positioned beneath each bridge to keep joint material from falling into the water.

The following structures will be fourlifted out of the water with a land-based crane and placed on a nearby staging area for processing and disposal:

- 1. Bridge abutments currently sitting on existing rip rap,
- 2. Concrete slab and concrete block below the ramp, both on rip rap,
- 3. Blowdown pipe structure on rip rap,
- 4. Four steel I-beam pier supports,
- 5. Concrete boat ramp on gravel base near the intake channel, and
- 6. Floating booms at the mouths of both the intake and discharge channels.

The housing of four cooling water discharge pipes, which are vertical structures, will be left in place and structurally sealed with rock. The rock will be placed even with the top of each discharge pipe and the adjacent substrate to prevent entry by divers or wildlife. This structural sealing will occur within each of the existing discharge pipes and will not result in a change in the existing substrate of the marine waters of the U.S. within the discharge channel.

A total of 713.9 cubic yards of concrete and debris will be removed during the in-water demolition activities. Concrete waste material will be analyzed according to the accepted and approved Demolition Soil Management Plan for Dynegy South Bay Power Plant (DSMP), dated September 9, 2013. The DSMP requires the concrete waste material to be either hauled off-site for disposal at the Otay Landfill in Chula Vista, CA or crushed and reused on-site as backfill in upland locations. All metal, such as rebar, will be removed from the concrete material and recycled off-site at the Ecology Recycling Facility in Wilmington, CA. All staging areas and stockpiles are required to comply with the requirements of the Construction Storm Water Pollution Prevention Plan (SWPPP) in order to prevent any waste materials from discharging to the Bay.

Silt curtains will be deployed across each of the channel mouths during demolition activities to contain disturbed sediment from multiple work locations within the channels, prevent the potential spread of silt/turbid water to marine waters in Greater San Diego Bay, and provide a barrier to exclude green sea turtles from the work areas (see Attachment 3, Figure A).

The Project application includes a description of the design objective, operation, and degree of treatment expected to be attained from equipment or activities (including construction Best Management Practices (BMPs)) to treat waste and reduce runoff or other effluents which may be discharged. Compliance with the Certification conditions will help ensure that construction and demolition discharges from the Project will not cause on-site or off-site erosion, damage to nearby properties, or otherwise damage marine habitats in violation of water quality standards in the *Water Quality Control Plan for the San Diego Basin (9)* (Basin Plan).

Project construction and demolition will permanently impact 0.052 acre (112.75 linear feet) of enclosed bay waters of the United States and/or State. The Applicant reports that the Project purpose cannot be practically accomplished in a manner which would avoid or result in less adverse impacts to aquatic resources considering all potential practicable alternatives, such as the potential for alternate available locations, designs, reductions in size, configuration or density. Turbidity increases in the water column during demolition activities is expected to be minimal as most structures will be lifted out of the water, with exception of the removal of the intake structures and subsequent backfill activities. The Applicant proposes to implement BMPs, including the deployment of silt curtains to contain turbidity within the intake and discharge channels, to ensure that impacts attributable to the Project will not violate applicable water quality standards. To further reduce potential impacts from increased turbidity, the Certification requires the Applicant to conduct visual observations and water quality monitoring at the Project site during demolition activities. The Applicant must also avoid and monitor for green sea turtles to ensure that there are no adverse effects from the demolition activities.

Compensatory mitigation is not required for this Project because impacts attributable to the Project, while permanent, are associated with the removal of structures from the San Diego

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Bay shoreline and the placement of substrate that will provide rocky subtidal and/or intertidal habitat similar to the adjacent shoreline.

Additional Project details are provided in Attachments 1 through 3 of this Certification.

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Attachments:

1. Definitions	
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- Project Location Maps
 Project Site Plans

I. STANDARD CONDITIONS

Pursuant to section 3860 of title 23 of the California Code of Regulations, the following three standard conditions apply to <u>all</u> water quality certification actions:

- A. This Certification action is subject to modification or revocation upon administrative or judicial review, including review and amendment pursuant to section 13330 of the Water Code and chapter 28, article 6 (commencing with title 23, section 3867), of the California Code of Regulations.
- B. This Certification action is not intended and shall not be construed to apply to any discharge from any activity involving a hydroelectric facility and requiring a Federal Energy Regulatory Commission (FERC) license or an amendment to a FERC license unless the pertinent Certification application was filed pursuant to California Code of Regulations title 23, section 3855 subdivision (b), and that application specifically identified that a FERC license or amendment to a FERC license for a hydroelectric facility was being sought.
- C. This Certification action is conditioned upon total payment of any fee required under title 23, chapter 28 (commencing with section 3830) of California Code of Regulations and owed by the applicant.

II. GENERAL CONDITIONS

- A. Term of Certification. Water Quality Certification No. R9-2014-0028 (Certification) shall expire upon a) the expiration or retraction of the Clean Water Act section 404 (33 U.S.C. §1344) permit issued by the U.S. Army Corps of Engineers for this Project, or b) five (5) years from the date of issuance of this Certification, whichever occurs first.
- B. **Duty to Comply.** The Applicant must comply with all conditions and requirements of this Certification. Any Certification noncompliance constitutes a violation of the Water Code and is grounds for enforcement action or Certification termination, revocation and reissuance, or modification.
- C. General Waste Discharge Requirements. The requirements of this Certification are enforceable through Water Quality Order No. 2003-0017-DWQ, *Statewide General Waste Discharge Requirements for Discharges of Dredged or Fill Material that have Received State Water Quality Certification* (Water Quality Order No. 2003-0017-DWQ). This provision shall apply irrespective of whether a) the federal permit for which the Certification was obtained is subsequently retracted or is expired, or b) the Certification is expired. Water Quality Order No. 2003-0017-DWQ is accessible at:

http://www.waterboards.ca.gov/water_issues/programs/cwa401/docs/generalorders/go_wdr401regulated_projects.pdf.

- D. Project Conformance with Application. All water quality protection measures and BMPs described in the application and supplemental information for water quality certification are incorporated by reference into this Certification as if fully stated herein. Notwithstanding any more specific conditions in this Certification, the Applicant shall construct, implement and comply with all water quality protection measures and BMPs described in the application and supplemental information. The conditions within this Certification shall supersede conflicting provisions within the application and supplemental information submitted as part of this Certification action.
- E. **Project Conformance with Water Quality Control Plans or Policies**. Notwithstanding any more specific conditions in this Certification, the Project shall be constructed in a manner consistent with the Basin Plan and any other applicable water quality control plans or policies adopted or approved pursuant to the Porter Cologne Water Quality Act (Division 7, commencing with Water Code Section 13000) or section 303 of the Clean Water Act (33 U.S.C §1313). The Basin Plan can be accessed at:

http://www.waterboards.ca.gov/sandiego/water issues/programs/basin plan/index.shtml

The receiving water limitations set forth below for San Diego Bay waters are based on applicable water quality standards contained in the Basin Plan, other water quality control plans and policies and federal regulations and are a required part of this Certification. Project activities shall not cause or contribute to exceedances of these receiving water limitations in San Diego Bay. Compliance with these limitations shall be determined from samples collected at the points of compliance described in the Monitoring Requirements in section V of this Certification.

- 1. Visual. Floating particulates and grease and oil shall not be visible.
- 2. **Color**. Waters shall be free of coloration that causes nuisance or adversely affects beneficial uses.
- 3. **Hydrogen Ion Concentration**. The pH shall not be changed at any time more than 0.2 units from that which occurs naturally.
- 4. **Hydrogen Ion Concentration**. The pH shall not be depressed below 7.0 nor raised above 9.0.
- 5. Turbidity. If natural turbidity is between 0 to 50 nephelometric turbidity units (NTUs), the maximum increase from dredge activities must not exceed 20 percent of the measured natural turbidity. If natural turbidity is between 51 to 100 NTUs, the maximum increase from dredge activities must not exceed 10 NTUs. If natural turbidity is greater than 100 NTUs, the maximum increase from dredge activities must not exceed 10 NTUs.
- 6. **Dissolved Oxygen**. The dissolved oxygen concentration shall not at any time be depressed more than 10 percent from that which occurs naturally.
- 7. Water Quality Objectives. Water quality objectives applicable to San Diego Bay established in Chapter 3 of the San Diego Water Board's Water Quality Control Plan for the San Diego Basin (Basin Plan) shall not be exceeded.

- Priority Pollutant Criteria. Priority pollutant criteria applicable to San Diego Bay promulgated by the U.S. Environmental Protection Agency (U.S. EPA) through the a) National Toxics Rule (NTR) (40 CFR 131.36 promulgated on December 22, 1992 and amended on May 4, 1995) and b) California Toxics Rule (CTR) (40 CFR 131.38, (65 Fed. Register 31682-31719), adding Section 131.38 to Title 40 of the Code of Federal Regulations, on May 18, 2000) shall not be exceeded.
- F. **Project Modification**. The Applicant must submit any changes to the Project, including Project operation, which would have a significant or material effect on the findings, conclusions, or conditions of this Certification, to the San Diego Water for prior review and written approval. If the San Diego Water Board is not notified of a significant change to the Project, it will be considered a violation of this Certification.
- G. Certification Distribution Posting. During Project construction and demolition, the Applicant must maintain a copy of this Certification at the Project site. This Certification must be available at all times to site personnel and agencies. A copy of this Certification shall also be provided to any contractor or subcontractor performing construction and/or demolition work, and the copy shall remain in their possession at the Project site.
- H. **Inspection and Entry**. The Applicant must allow the San Diego Water Board or the State Water Resources Control Board (State Water Board), and/or their authorized representative(s) (including an authorized contractor acting as their representative), upon the presentation of credentials and other documents as may be required under law, to:
 - 1. Enter upon the Project or Compensatory Mitigation site(s) premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Certification;
 - 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Certification;
 - 3. Inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Certification; and
 - 4. Sample or monitor, at reasonable times, for the purposes of assuring Certification compliance, or as otherwise authorized by the Clean Water Act or Water Code, any substances or parameters at any location.
- I. Enforcement Notification. In the event of any violation or threatened violation of the conditions of this Certification, the violation or threatened violation shall be subject to any remedies, penalties, process or sanctions as provided for under State law. For purposes of section 401(d) of the Clean Water Act, the applicability of any State law authorizing remedies, penalties, process or sanctions for the violation or threatened violation or threatened violation constitutes a limitation necessary to assure compliance with the water quality standards and other pertinent requirements incorporated into this Certification.

- J. **Certification Actions**. This Certification may be modified, revoked and reissued, or terminated for cause including but not limited to the following:
 - 1. Violation of any term or condition of this Certification;
 - 2. Monitoring results indicate that continued Project activities could violate water quality objectives or impair the beneficial uses of San Diego Bay;
 - 3. Obtaining this Certification by misrepresentation or failure to disclose fully all relevant facts;
 - 4. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge; and
 - 5. Incorporation of any new or revised water quality standards and implementation plans adopted or approved pursuant to the Porter-Cologne Water Quality Control Act or section 303 of the Clean Water Act.

The filing of a request by the Applicant for modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any Certification condition.

- K. **Duty to Provide Information**. The Applicant shall furnish to the San Diego Water Board, within a reasonable time, any information which the San Diego Water Board may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Certification or to determine compliance with this Certification.
- L. **Property Rights**. This Certification does not convey any property rights of any sort, or any exclusive privilege.
- M. Petitions. Any person aggrieved by this action of the San Diego Water Board may petition the State Water Board to review the action in accordance with the California Code of Regulations, title 23, sections 3867 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date of this Certification. Copies of the law and regulations applicable to filing petitions may be found on the Internet at: http://www.waterboards.ca.gov/public_notices/petitions/water_quality or will be provided upon request.
- N. Conditional Waiver of Waste Discharge Requirements for Low Threat Discharges. Prior to start of Project construction and demolition, the Applicant must, as applicable, obtain coverage under, and comply with, the requirements of San Diego Water Board Water Quality Order No. R9-2014-0041, *Conditional Waivers of Waste Discharge Requirements for Low Threat Discharges in the San Diego Region*, and the general and

specific waiver conditions contained in Waiver No. 10 – Discharges/Disposal to Land of Solid Wastes.¹

III. CONSTRUCTION BEST MANAGEMENT PRACTICES

- A. **Approvals to Commence Construction**. The Applicant shall not commence Project construction or demolition until all necessary federal, State, and local approvals are obtained.
- B. **Personnel Education.** Prior to the start of the Project, and annually thereafter, the Applicant must educate all personnel on the requirements in this Certification, pollution prevention measures, spill response measures, and BMP implementation and maintenance measures.
- C. **Spill Containment Materials.** The Applicant must, at all times, maintain appropriate types and sufficient quantities of materials on-site to contain any spill or inadvertent release of materials that may cause a condition of pollution or nuisance if the materials reach waters of the United States and/or State.
- D. Silt Curtain Deployment. The Applicant shall deploy and maintain a continuous length of silt curtain across the mouth of the intake and discharge channels to trap sediment that may become suspended as a result of demolition activity. The bottom of the silt curtains must be weighted with ballast weights or rods affixed to the base of the fabric to resist the natural buoyancy of the silt curtain fabric and lessen its tendency to move in response to currents. Where feasible and applicable, the floating silt curtains must be anchored and deployed from the surface of the water to just above the substrate. The silt curtain must be monitored for damage, dislocation or gaps and must be immediately repaired where it is no longer continuous or where it has loosened. The silt curtain must control and contain the migration of re-suspended sediments at the water surface and at depth.
- E. General Construction Storm Water Permit. Prior to start of Project construction and demolition, the Applicant must, as applicable, obtain coverage under, and comply with, the requirements of State Water Board Water Quality Order No. 2009-0009-DWQ, the *General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activity*, (General Construction Storm Water Permit) and any reissuance. If Project construction activities do not require coverage under the General Construction Storm Water Permit, the Applicant must develop and implement a runoff management plan (or equivalent construction BMP plan) to prevent the discharge of sediment and other pollutants during construction and demolition activities.

¹ A copy of Waiver No. 10 – Discharge/Disposal to Land of Solid Wastes may be obtained on the San Diego Water Boards' Conditional Waivers website at <u>http://www.waterboards.ca.gov/rwqcb9/water_issues/programs/waivers/waivers_w.shtml</u>.

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- F. Waste Management. The Applicant must properly manage, store, treat, and dispose of wastes in accordance with applicable federal, State, and local laws and regulations. Waste management shall be implemented to avoid or minimize exposure of wastes to precipitation or storm water runoff. The storage, handling, treatment, or disposal of waste shall not create conditions of pollution, contamination or nuisance as defined in Water Code section 13050. Upon Project completion, all Project generated debris, building materials, excess material, waste, and trash shall be removed from the Project site(s) for disposal at an authorized landfill or other disposal site in compliance with federal, State and local laws and regulations.
- G. Waste Management. Except for a discharge permitted under this Certification, the dumping, deposition, or discharge of trash, rubbish, unset cement or asphalt, concrete, grout, damaged concrete or asphalt, concrete or asphalt spoils, wash water, organic or earthen material, steel, sawdust or other construction or demolition debris waste from Project activities directly into waters of the United States and or State, or adjacent to such waters in any manner which may permit its being transported into the waters, is prohibited.
- H. Construction Equipment. All equipment must be washed prior to transport to the Project site and must be free of sediment, debris, and foreign matter. All equipment used in direct contact with surface water shall be steam cleaned prior to use. All equipment using gas, oil, hydraulic fluid, or other petroleum products shall be inspected for leaks prior to use and shall be monitored for leakage. Stationary equipment (e.g., motors, pumps, generator, etc.) shall be positioned over drip pans or other types of containment.
- Process Water. Water containing mud, silt, or other pollutants from equipment washing or other activities, must not be discharged to waters of the United States and/or State or placed in locations that may be subjected to storm water runoff flows. Pollutants discharged to areas within a stream diversion must be removed at the end of each work day or sooner if rain is predicted.
- J. **Hazardous Materials.** Except as authorized by this Certification, substances hazardous to aquatic life including, but not limited to, petroleum products, unused cement/concrete, asphalt, and coating materials, must be prevented from contaminating the soil and/or entering waters of the United States and/or State. BMPs must be implemented to prevent such discharges during each Project activity involving hazardous materials.
- K. Limits of Disturbance. The Applicant shall clearly define the limits of Project disturbance to waters of the United States and/or State using highly visible markers such as flag markers, construction fencing, or silt barriers prior to commencement of Project construction and demolition activities within those areas.
- L. Qualified Biologist and On-site Environmental Professional. The Applicant shall designate an on-site environmental professional to monitor Project construction and demolition activities within or adjacent to waters of the United States and/or State to ensure compliance with the Certification requirements. The environmental professional

shall notify the Project qualified biologist immediately if a violation of this Certification occurs or has the potential to occur. The qualified biologist shall be given the authority to stop all work on-site if a violation of this Certification occurs or has the potential to occur. Records and field notes of the environmental professional and qualified biologist activities shall be kept on-site and made available for review upon request by the San Diego Water Board.

- M. California Least Tern. In-water construction and demolition activities should be scheduled to occur between September 16 and March 31outside the California least tern nesting season. Should in-water Project activities be conducted during the least tern breeding season, a qualified Biological Monitor familiar with the California least tern and other special status seabirds and waterfowl shall be retained by the Applicant to conduct monitoring within 500 feet of construction and demolition activities. The monitor shall be empowered to delay commencing work, and shall do so if terns are actively foraging (e.g., searching and diving) within the work area. Should adverse impacts to terns occur (e.g., agitation or startling during foraging activities), the Biological Monitor shall be empowered to delay or halt construction and demolition, and shall do so until California least terns have left the project site.
- N. **Green Sea Turtle.** The Applicant shall implement the *Green Sea Turtle Avoidance and Monitoring Plan for the Dynegy South Bay Power Plant Below Ground Demolition Project*, dated August 25, 2014. All observations shall be reported in the monthly Receiving Water and Visual Observation Monitoring Reports required under section V.H of this Certification.
- O. Beneficial Use Protection. The Applicant must take all necessary measures to protect the beneficial uses of waters of San Diego Bay described in the Basin Plan. This Certification requires compliance with all applicable requirements of the Basin Plan. If at any time, an unauthorized discharge to surface waters (including rivers or streams) occurs or monitoring indicates that the Project is violating, or threatens to violate, water quality objectives, the associated Project activities shall cease immediately and the San Diego Water Board shall be notified in accordance with Notification Requirement VI.A of this Certification. Associated Project activities may not resume without approval from the San Diego Water Board.

IV. PROJECT IMPACTS AND COMPENSATORY MITIGATION

- A. **Project Impact Avoidance and Minimization**. The Project must avoid and minimize adverse impacts to waters of the United States and/or State to the maximum extent practicable.
- B. **Project Impacts.** Unavoidable Project impacts to San Diego Bay must not exceed 0.052 acres (112.75 linear feet).
- C. **Eelgrass and Mitigation.** The Applicant shall conduct pre-construction and demolition survey(s) for Caulerpa taxifolia and eelgrass not more than one year prior to the start of in-water activities. The pre-construction and demolition survey(s) shall be completed by

a qualified biologist in accordance with the Southern California Eelgrass Mitigation Policy² (SCEMP) and provided to the San Diego Water Board prior to the start of inwater activities. The eelgrass survey must be conducted during an appropriate index period, as determined by a qualified biologist (i.e., a period representing maximum eelgrass coverage), and must include both aerial and density characterization of the beds. If eelgrass is found on the Project site during the pre-construction and demolition survey, a post-construction and demolition survey must be performed by a qualified biologist within 30 days following project completion to quantify any unanticipated losses to eelgrass habitat. Impacts must then be determined from a comparison of pre- and post-construction and demolition survey results. Any Impacts to eelgrass must be mitigated through conformance with the SCEMP, which defines the mitigation ratio and other requirements to achieve mitigation for significant eelgrass impacts. If required following the post-construction and demolition survey, the SCEMP defined mitigation must be developed; approved by the San Diego Water Board, U.S. Army Corps of Engineers and National Marine Fisheries Service; and implemented to offset losses to eelgrass. Surveys conducted during eelgrass dormancy will not be accepted.

V. MONITORING AND REPORTING REQUIREMENTS

- A. **Representative Monitoring**. Samples and measurements taken for the purpose of monitoring under this Certification shall be representative of the monitored activity.
- B. **Monitoring Reports**. Monitoring results shall be reported to the San Diego Water Board at the intervals specified in section V of this Certification.
- C. **Monitoring and Reporting Revisions**. The San Diego Water Board may make revisions to the monitoring program at any time during the term of this Certification and may reduce or increase the number of parameters to be monitored, locations monitored, the frequency of monitoring, or the number and size of samples collected.
- D. Records of Monitoring Information. Records of monitoring information shall include:
 - 1. The date, exact place, and time of sampling or measurements;
 - 2. The individual(s) who performed the sampling or measurements;
 - 3. The date(s) analyses were performed;
 - 4. The individual(s) who performed the analyses;
 - 5. The analytical techniques or methods used; and
 - 6. The results of such analyses.

² An electronic copy of the Southern California Eelgrass Mitigation Policy may be obtained at the following website: http://www.westcoast.fisheries.noaa.gov/publications/habitat/california_eelgrass_mitigation/eelpolrev11_final.pdf

- E. Green Sea Turtle Monitoring. The Applicant shall monitor green sea turtle activity in accordance with the *Green Sea Turtle Avoidance and Monitoring Plan for the Dynegy South Bay Power Plant Below Ground Demolition Project*, dated August 25, 2014. Green sea turtle observation monitoring documentation must be included in the monthly Receiving Water and Visual Observation Monitoring Reports described in section V.H of this Certification.
- F. **Receiving Water Visual Observation Monitoring.** The Applicant must conduct visual observation monitoring of the Project demolition activities within San Diego Bay prior to, during, and after each period of Project demolition activities. The visual observation monitoring documentation must be included in the monthly Receiving Water and Visual Observation Monitoring Reports described in section V.H of this Certification. At a minimum, the visual observation monitoring documentation monitoring documentation monitoring documentation for the section of V.H of the Certification. At a
 - 1. **Parameters.** The following parameters shall be visually monitored immediately outside of the construction and demolition area:
 - a. No floating particulates, suspended materials, grease, or oil; and
 - b. No significant discoloration of the water surface.
 - Field Documentation. Visual observations shall be recorded throughout Project demolition activities. In addition to the requirements listed in section V.D., monitoring field logs shall include observations of water quality conditions including sheen, color, odor, floating particulates, and surface visible turbidity plume. Logs shall also include weather conditions, such as wind speed/direction and cloud cover.
 - 3. Response Actions. If the condition of the silt curtain is observed to be damaged, dislocated, or has gaps where a visible turbidity plume is forming outside of the silt curtain, a response action shall be taken immediately to correct the situation. Response actions may include, but are not limited to, work stoppage until silt curtain repair is completed, implementation of operational modifications, and/or implementation of additional BMPs (e.g., a second silt curtain). Response actions, if needed, shall be documented in the monitoring field log.
- G. **Receiving Water Quality Monitoring.** The Applicant shall conduct twice weekly receiving water monitoring during demolition activities to verify that applicable water quality standards for pH, dissolved oxygen (DO) and turbidity are not violated outside of the construction and demolition area. The monitoring plan shall contain the following elements:
 - Monitoring Stations. During each monitoring event, water quality parameters including pH, DO, and turbidity shall be measured at six stations. Four of the stations, MI1, MI2, MD1 and MD2, shall be compliance stations and two of the stations, MI3 and MD3, shall be reference stations as shown in Attachment 3, Figure A of this Certification. Monitored water quality measurements shall be compared to the reference stations. Monitoring station positions shall be located using a Global Position System (GPS) accurate to within ±3 meters. Station descriptions are as follows:

- a. **Compliance Stations.** The four compliance monitoring stations, MI1, MI2, MD1 and MD2, shall be located approximately 100 feet and 250 feet west of each channel outside of the silt curtains placed at the end of each channel as described in Attachment 3, Figure A of this Certification. The compliance stations shall be located approximately the same distance from shore as the construction or demolition activity. The locations shall be adjusted in the field to better target a visible turbidity plume, if a visible plume is observed; and
- b. Reference Station. The two reference stations, MI3 and MD3, shall be located 500 feet west of the silt curtains, beyond the influence of construction and demolition activities, as described in Attachment 3, Figure A of this Certification. Natural pH, DO, and turbidity shall be determined through measurements at the reference stations. The reference stations shall be monitored during every event, because the turbidity water quality objective is based on an acceptably small increase in the vicinity of the construction and demolition activity relative to ambient reference levels. The location of the reference stations shall remain the same for all monitoring events.
- Water Quality Measurements. Monitored water quality measurements for pH, DO, and turbidity at the Compliance Stations shall be compared to Reference Station measurements. Water quality measurements shall be collected from a depth of 10 feet below the water surface at each of the stations. Monitoring depths shall be determined using a depth finder with an accuracy of ±0.5 feet. Water quality shall be monitored using instrumentation capable of measuring pH, DO, and turbidity (in nephelometric turbidity units (NTU's));
- 3. **Monitoring Frequency.** Water quality monitoring shall be conducted on a twice weekly basis after in-water demolition activities have been underway for at least 30 minutes. During the twice weekly water column monitoring all water quality parameters will be measured;
- 4. **Sample Integrity.** The integrity of each water sample collected shall be maintained from the time of collection to the point of data reporting. Proper record keeping and chain of custody (COC) procedures shall be implemented to allow samples to be traced from collection to final disposition. After collection of water samples, documentation on various logs and forms shall be required to adequately identify and catalog sample information; and
- 5. **Compliance Criteria.** Receiving Water Limitations are provided in section II.E of this Certification. The point of compliance with these receiving water limitations shall be at stations MI1 and MD1, located 100 feet from the silt curtains placed at the end of each channel. The construction and demolition areas are defined as the area(s) occupied by the demolition equipment, demolition debris stockpiles, silt curtains, and associated work activities.

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- H. Receiving Water and Visual Observation Monitoring Reports. The Applicant shall prepare and submit monitoring reports that contain the results of visual observation monitoring and receiving water quality monitoring activities for each week of in-water Project construction activities. The reports must be submitted monthly, no later than 30 days following each calendar month of in-water construction and demolition activities and must include:
 - 1. The following identification numbers in the header or subject line: Certification No. R9-2014-0028, PIN 802907;
 - 2. The names, qualifications, and affiliations of the persons contributing to the report;
 - 3. The status, progress, and anticipated schedule for completion of Project demolition activities including, as applicable, the installation and operational status of best management practice project features for turbidity control, erosion, and storm water quality treatment;
 - 4. Green sea turtle observation monitoring documentation;
 - 5. A summary table of the receiving water monitoring results with a comparison to receiving water limitation compliance criteria;
 - 6. An evaluation, interpretation, and tabulation of the visual observations required under section V.F and water quality data required under section V.G including interpretations and conclusions as to whether applicable receiving water limitations were attained at each compliance monitoring station; and
 - 7. A description of all incidents of non-compliance and its cause, the period of the noncompliance including exact dates and times, if the noncompliance was not corrected, and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.
- Final Project Completion Report. The Applicant must submit a Final Project Completion Report to the San Diego Water Board within 30 days of completion of the Project. The final report must include the following information:
 - 1. Date of construction and demolition initiation;
 - 2. Date of construction and demolition completion;
 - 3. As applicable, BMP installation and operational status for the Project;
 - 4. As-built drawings of the Project, no bigger than 11"X17";
 - A summary of visual observations required under section V.F of this Certification and water quality data required under section V.G of this Certification, collected during all demolition activities completed during the course of the Project and a summary of any response actions taken; and
 - 6. The pre- and post- construction and demolition eelgrass surveys, as applicable, required under section IV.C of this Certification, including a description of actions that will be taken by the Applicant to mitigate for any impact to eelgrass habitat.

- J. **Reporting Authority.** The submittal of information required under this Certification, or in response to a suspected violation of any condition of this Certification, is required pursuant to Water Code section 13267 and 13383. Civil liability may be administratively imposed by the San Diego Water Board for failure to submit information pursuant to Water Code sections 13268 or 13385.
- K. Electronic and Paper Media Documents. The Applicant must submit all reports and information required under this Certification in both hardcopy (paper) and electronic format. The preferred electronic format for each report submission is one file in PDF format that is also Optical Character Recognition (OCR) capable. All paper and electronic documents submitted to the San Diego Water Board must include the following identification numbers in the header or subject line: Certification No. R9-2014-0028:PIN 802907.
- L. **Document Signatory Requirements**. All applications, reports, or information submitted to the San Diego Water Board must be signed as follows:
 - 1. For a corporation, by a responsible corporate officer of at least the level of vice president.
 - 2. For a partnership or sole proprietorship, by a general partner or proprietor, respectively.
 - 3. For a municipality, or a State, federal, or other public agency, by either a principal executive officer or ranking elected official.
 - 4. A duly authorized representative may sign applications, reports, or information if:
 - a. The authorization is made in writing by a person described above.
 - b. The authorization specifies either an individual or position having responsibility for the overall operation of the regulated activity.
 - c. The written authorization is submitted to the San Diego Water Board Executive Officer.

If such authorization is no longer accurate because a different individual or position has responsibility for the overall operation of the Project, a new authorization satisfying the above requirements must be submitted to the San Diego Water Board prior to or together with any reports, information, or applications, to be signed by an authorized representative.

M. **Document Certification Requirements**. All applications, reports, or information submitted to the San Diego Water Board must be certified as follows:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my

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inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

N. **Document Submittal Address.** The Applicant must submit reports required under this Certification, or other information required by the San Diego Water Board, to:

Executive Officer California Regional Water Quality Control Board San Diego Region Attn: 401 Certification No. R9-2014-0028:PIN 802907 2375 Northside Drive, Suite 100 San Diego, California 92108

VI. NOTIFICATION REQUIREMENTS

- A. **Twenty Four Hour Non-Compliance Reporting.** The Applicant shall report any noncompliance which may endanger health or the environment. Any such information shall be provided orally to the San Diego Water Board within **24 hours** from the time the Applicant becomes aware of the circumstances. A written submission shall also be provided within five days of the time the Applicant becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected; the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The San Diego Water Board, or an authorized representative, may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.
- B. Hazardous Substance Discharge. Except for a discharge which is in compliance with this Certification, any person who, without regard to intent or negligence, causes or permits any hazardous substance or sewage to be discharged in or on any waters of the State, shall as soon as (a) that person has knowledge of the discharge, (b) notification is possible, and (c) notification can be provided without substantially impeding cleanup or other emergency measures, immediately notify the County of San Diego, in accordance with California Health and Safety Code section 5411.5 and the California Office of Emergency Services of the discharge in accordance with the spill reporting provision of the State toxic disaster contingency plan adopted pursuant to Government Code Title 2, Division 1, Chapter 7, Article 3.7 (commencing with section 8574.17), and immediately notify the State Water Board or the San Diego Water Board of the discharge. This provision does not require reporting of any discharge of less than a reportable quantity as provided for under subdivisions (f) and (g) of section 13271 of the Water Code unless the Applicant is in violation of a Basin Plan prohibition.
- C. **Oil or Petroleum Product Discharge.** Except for a discharge which is in compliance with this Certification, any person who without regard to intent or negligence, causes or permits any oil or petroleum product to be discharged in or on any waters of the State, or discharged or deposited where it is, or probably will be, discharged in or on any waters of the State, shall, as soon as (a) such person has knowledge of the discharge,

(b) notification is possible, and (c) notification can be provided without substantially impeding cleanup or other emergency measures, immediately notify the California Office of Emergency Services of the discharge in accordance with the spill reporting provision of the State oil spill contingency plan adopted pursuant to Government Code Title 2, Division 1, Chapter 7, Article 3.7 (commencing with section 8574.1). This requirement does not require reporting of any discharge of less than 42 gallons unless the discharge is also required to be reported pursuant to Clean Water Act section 311, or the discharge is in violation of a Basin Plan prohibition.

- D. **Anticipated Noncompliance**. The Applicant shall give advance notice to the San Diego Water Board of any planned changes in the Project or the Compensatory Mitigation project which may result in noncompliance with Certification conditions or requirements.
- E. **Transfers.** This Certification is not transferable in its entirety or in part to any person or organization except after notice to the San Diego Water Board in accordance with the following terms:
 - 1. **Transfer of Property Ownership:** The Applicant must notify the San Diego Water Board of any change in ownership of the Project area. Notification of change in ownership must include, but not be limited to, a statement that the Applicant has provided the purchaser with a copy of the Section 401 Water Quality Certification and that the purchaser understands and accepts the certification requirements and the obligation to implement them or be subject to liability for failure to do so; the seller and purchaser must sign and date the notification and provide such notification to the San Diego Water Board within 10 days of the transfer of ownership.
 - 2. Transfer of Mitigation Responsibility: Any notification of transfer of responsibilities to satisfy the mitigation requirements set forth in this Certification must include a signed statement from an authorized representative of the new party (transferee) demonstrating acceptance and understanding of the responsibility to comply with and fully satisfy the mitigation conditions and agreement that failure to comply with the mitigation conditions and associated requirements may subject the transferee to enforcement by the San Diego Water Board under Water Code section 13385, subdivision (a). Notification of transfer of responsibilities meeting the above conditions must be provided to the San Diego Water Board within 10 days of the transfer date.

Upon properly noticed transfers of responsibility, the transferee assumes responsibility for compliance with this Certification and references in this Certification to the Applicant will be interpreted to refer to the transferee as appropriate. Transfer of responsibility does not necessarily relieve the Applicant of this Certification in the event that a transferee fails to comply.

F. **Discharge Commencement**. The Applicant must notify the San Diego Water Board in writing **at least 5 days prior to** the start of Project construction and demolition.

VII. CALIFORNIA ENVIRONMENTAL QUALITY ACT COMPLIANCE

- A. The San Diego Unified Port District is the Lead Agency under the California Environmental Quality Act (CEQA) (Public Resources Code section 21000, et seq.) section 21067, and CEQA Guidelines (California Code of Regulations, title 14, section 15000 et seq.) section 15367, and has filed a Notice of Determination dated May 20, 2010 for the Final Environmental Impact Report (FEIR) titled *Chula Vista Bayfront Master Plan* (State Clearing House Number 2005081077). The San Diego Water Board also considered the California Coastal Commission's Certified Regulatory Program Substitute Environmental Document (SED) that evaluated the impacts from the project and incorporated feasible mitigation measures to substantially lessen any significant adverse effects on the environment in accordance with CEQA. The Lead Agency has determined the Project will have a potentially significant effect on the environment and mitigation measures were made a condition of the Project.
- B. The San Diego Water Board is a Responsible Agency under CEQA (Public Resources Code section 21069; CEQA Guidelines section 15381). The San Diego Water Board has considered the Lead Agency's FEIR and the California Coastal Commission's SED and finds that the Project as proposed will have a significant effect on resources within the San Diego Water Board's purview.
- C. The San Diego Water Board has required mitigation measures as a condition of this Certification to avoid or reduce the environmental effects of the Project to resources within the Board's purview to a less than significant level.
- D. As a Responsible Agency under CEQA, the San Diego Water Board will file a Notice of Determination in accordance with CEQA Guidelines section 15096 subdivision (i).

VIII. SAN DIEGO WATER BOARD CONTACT PERSON

Lisa Honma, Environmental Scientist California Regional Water Quality Control Board, San Diego Region 2375 Northside Drive, Suite 100 San Diego, California 92108 Telephone: 619-521-3367 Email: <u>Lisa.Honma@waterboards.ca.gov</u>

IX. WATER QUALITY CERTIFICATION

I hereby certify that the proposed discharge from the **South Bay Power Plant Below Ground Demolition of In-water Structures Project** (Certification No. R9-2014-0028) will comply with the applicable provisions of sections 301 ("Effluent Limitations"), 302 ("Water Quality Related Effluent Limitations"), 303 ("Water Quality Standards and Implementation Plans"), 306 ("National Standards of Performance"), and 307 ("Toxic and Pretreatment Effluent Standards") of the Clean Water Act. This discharge is also regulated under State Water Board Order No. 2003-0017-DWQ, "*Statewide General Waste Discharge Requirements for Dredged or Fill Discharges that have Received State Water Quality Certification (General WDRs)*," which requires compliance with all conditions of this Water Quality Certification. Please note that enrollment under Order No. 2003-017-DWQ is conditional and, should new information come to our attention that indicates a water quality Dynegy South Bay, LLC - 21 -South Bay Power Plant Below Ground Demolition of In-water Structures Certification No. R9-2014-0028

problem, the San Diego Water Board may issue individual waste discharge requirements at that time.

Except insofar as may be modified by any preceding conditions, all Certification actions are contingent on (a) the discharge being limited to, and all proposed mitigation being completed in strict compliance with, the applicants' Project description and/or the description in this Certification, and (b) compliance with all applicable requirements of the Basin Plan.

I, David W. Gibson, Executive Officer, do hereby certify the forgoing is a full, true, and correct copy of Certification No. R9-2014-0028 issued on August 29, 2014.

DAVID W. GIBSON Executive Officer San Diego Water Board

Date

ATTACHMENT 1

DEFINITIONS

Activity - when used in reference to a permit means any action, undertaking, or project including, but not limited to, construction, demolition, operation, maintenance, repair, modification, and restoration which may result in any discharge to waters of the State.

Buffer - means an upland, wetland, and/or riparian area that protects and/or enhances aquatic resource functions associated with wetlands, rivers, streams, lakes, marine, and estuarine systems from disturbances associated with adjacent land uses.

California Rapid Assessment Method (CRAM) - is a wetland assessment method intended to provide a rapid, scientifically-defensible and repeatable assessment methodology to monitor status and trends in the conditions of wetlands for applications throughout the State. It can also be used to assess the performance of compensatory mitigation projects and restoration projects. CRAM provides an assessment of overall ecological condition in terms of four attributes: landscape context and buffer, hydrology, physical structure and biotic structure. CRAM also includes an assessment of key stressors that may be affecting wetland condition and a "field to PC" data management tool (eCRAM) to ensure consistency and quality of data produced with the method.

Compensatory Mitigation Project - means compensatory mitigation implemented by the Applicant as a requirement of this Certification (i.e., applicant -responsible mitigation), or by a mitigation bank or an in-lieu fee program.

Discharge of dredged material – means any addition of dredged material into, including redeposit of dredged material other than incidental fallback within, the waters of the United States and/or State.

Discharge of fill material – means the addition of fill material into waters of the United States and/or State.

Dredged material – means material that is excavated or dredged from waters of the United States and/or State.

Ecological Success Performance Standards – means observable or measurable physical (including hydrological), chemical, and/or biological attributes that are used to determine if a compensatory mitigation project meets its objectives.

Enhancement – means the manipulation of the physical, chemical, or biological characteristics of an aquatic resource to improve a specific aquatic resource function(s). Enhancement results in the gain of selected aquatic resource function(s), but may also lead to a decline in other aquatic resource function(s). Enhancement does not result in a gain in aquatic resource area.

Establishment – means the manipulation of the physical, chemical, or biological characteristics present to develop an aquatic resource that did not previously exist. Creation results in a gain in aquatic resource area.

Fill material – means any material used for the primary purpose of replacing an aquatic area with dry land or of changing the bottom elevation of a water body.

Isolated wetland – means a wetland with no surface water connection to other aquatic resources.

Mitigation Bank – means a site, or suite of sites, where resources (e.g., wetlands, streams, riparian areas) are restored, established, enhanced, and/or preserved for the purpose of providing mitigation for impacts authorized by this Certification.

Preservation - means the removal of a threat to, or preventing the decline of, aquatic resources by an action in or near those aquatic resources. This term includes activities commonly associated with the protection and maintenance of aquatic resources through the implementation of appropriate legal and physical mechanisms. Preservation does not result in a gain of aquatic resource area or functions.

Re-establishment - means the manipulation of the physical, chemical, or biological characteristics of a site with the goal of returning natural/ historic functions to a former aquatic resource. Re-establishment results in rebuilding a former aquatic resource and results in a gain in aquatic resource area and functions.

Rehabilitation - means the manipulation of the physical, chemical, or biological characteristics of a site with the goal of repairing natural/ historic functions to a degraded aquatic resource. Rehabilitation results in a gain in aquatic resource function, but does not result in a gain in aquatic resource area.

Restoration - means the manipulation of the physical, chemical, or biological characteristics of a site with the goal of returning natural/historic functions to a former or degraded aquatic resource. For the purpose of tracking net gains in aquatic resource area, restoration is divided into two categories: re-establishment and rehabilitation.

Start of Project Construction - For the purpose of this Certification, "start of Project construction" means to engage in a program of on-site construction, including demolition, site clearing, grading, dredging, landfilling, changing equipment, substituting equipment, or even moving the location of equipment specifically designed for a stationary source in preparation for the fabrication, erection or installation of the building components of the stationary source within waters of the United States and/or State.

Uplands - means non-wetland areas that lack any field-based indicators of wetlands or other aquatic conditions. Uplands are generally well-drained and occur above (i.e., up-slope) from nearby aquatic areas. Wetlands can, however, be entirely surrounded by uplands. For example, some natural seeps and constructed stock ponds lack aboveground hydrological connection to other aquatic areas. In the watershed context, uplands comprise the landscape matrix in which aquatic areas form. They are the primary sources of sediment, surface runoff, and associated chemicals that are deposited in aquatic areas or transported through them.

Water quality objectives and other appropriate requirements of State law – means the water quality objectives and beneficial uses as specified in the appropriate water quality control plan(s); the applicable provisions of sections 301, 302, 303, 306, and 307 of the Clean Water Act; and any other appropriate requirement of State law.

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ATTACHMENT 2 PROJECT LOCATION MAPS



Figure 1a. Regional location map for the South Bay Power Plant



Figure 1b. Aerial photograph of the local region near the South Bay Power Plant





Figure 2. Locations of in-water work structures



Figure 3. Bridge and support piers over the intake channel (32.613782, -117.097355) (note that the bridges and support piers over the intake and discharge channels are identical)



Figure 4. Representative bridge abutment (32.613982, -117.097190)



Figure 5. Concrete slab and concrete block on the center jetty towards the discharge channel (32.613648, -117.097880)



Figure 6. Blowdown pipe structure in the intake channel (32.613939, -117.097148)



Figure 7. Steel Pier Supports (32.613275, -117.097720)



Figure 8. Concrete Boat Ramp in San Diego Bay near the Intake Channel (32.614671, -117.098157)



Figure 9. Floating boom at the mouth of the intake channel (32.614111, -117.097950)



Figure 10. Floating boom at the mouth of the discharge channel (32.613408, -117.098018)



Figure 11. Representative discharge structure in the discharge channel (32.613307, -117.096961)

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ATTACHMENT 3 PROJECT SITE PLANS



Figure A. Site Map showing Marine Areas and Monitoring Station locations in the Intake and Discharge Channels



Figure B. Locations of staging and stock pile areas

Dynegy South Bay Power Plant FIGURE 1 4/1/14



Dynegy South Bay Power Plant Plan View of Intake Structures prior to removal with jurisdictional lines Source NV5 (12/31/2013); Current display by Bill Magdych Associates (3/11/2014); Reviewed by Dynegy (3/11/2014)



Dynegy South Bay Power Plant Plan View of Intake Structures after their removal with jurisdictional lines Source NV5 (12/31/2013); Current display by Bill Magdych Associates (3/11/2014); Reviewed by Dynegy (3/11/2014)



Figure 1. Units 1 & 2 Intake Structure (32.614110, -117.097412)



Figure 2. Unit 3 Intake Structure (32.613917, -117.097018)



Figure 3. Unit 4 Intake Structure (32.613792, -117.096773)





Intake Channel

Units 1 and 2 (together) Intake Structure Plan View (Top Section) View from Above After Project

.

Existing Rip Rap



Intake Channel

Units 1 and 2 (together) Intake Structure Front View (Front Section) View from South to North Before Project



Units 1 and 2 (together) Intake Structure Front View (Front Section) View from South to North After Project





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Units 1 and 2 (together) Intake Structure Cross Section View (Side Section) View from East to West After Project







Units 3 and 4 (each) Intake Structures

Intake Channel

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Units 3 and 4 (each) Intake Structures Front View (Front Section) View from South to North Before Project



Units 3 and 4 (each) Intake Structures Front View (Front Section) View from South to North After Project



Units 3 and 4 (each) Intake Structures Cross Section View (Side Section) View from East to West Before Project



Units 3 and 4 (each) Intake Structures Cross Section View (Side Section) View from East to West After Project

