

## DOCKETED

<b>Docket Number:</b>	02-AFC-01C
<b>Project Title:</b>	Sonoran Energy Project (formerly Blythe Energy Project Phase II) - Compliance
<b>TN #:</b>	210490
<b>Document Title:</b>	20160210 Letter - Response to Record of Conversation dated 20151028
<b>Description:</b>	N/A
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<b>Organization:</b>	Airport Land Use Commission Riverside County
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<b>Docketed Date:</b>	2/22/2016

# AIRPORT LAND USE COMMISSION RIVERSIDE COUNTY



February 10, 2016

**CHAIR**  
**Simon Housman**  
Rancho Mirage

Mr. Jim Adams  
California Energy Commission  
1516 Ninth Street  
Sacramento CA 95814

**VICE CHAIRMAN**  
**Rod Ballance**  
Riverside

**COMMISSIONERS**

RE: Sonoran Energy Project (02-AFC-01C)

**Arthur Butler**  
Riverside

Dear Mr. Adams:

**John Lyon**  
Riverside

Thank you for meeting with Mr. Daryl Shippy of the Riverside County Economic Development Agency and with me and my staff on October 28, 2015 regarding the Sonoran Energy Project and other proposed projects subject to the jurisdiction of your Commission within the vicinity of Blythe Airport.

**Glen Holmes**  
Hemet

**Greg Pettis**  
Cathedral City

**Steve Manos**  
Lake Elsinore

As discussed in our meeting on that day, this is the letter that we promised to provide to you with regard to our concerns relating to the project-specific and cumulative impacts of development of this power plant and additionally includes a request for corrections to erroneous attributions in the Report of Conversation made available for public viewing via the Docket Log for this Compliance Proceeding. This does not constitute our response to the recently released Preliminary Staff Assessment. We plan to respond to the Preliminary Staff Assessment within the specified period for public comments.

**STAFF**

**Director**  
**Ed Cooper**

**John Guerin**  
Russell Brady  
Barbara Santos

Given that Blythe Airport will be surrounded by both renewable and non-renewable energy generation projects in the future, the Riverside County Airport Land Use Commission (RCALUC) is concerned that a tipping point will soon be reached regarding cumulative hazards to flight. All lead agencies responsible for determining whether to approve additional energy generation projects within the Blythe Airport Influence Area must carefully consider the cumulative impacts of project approvals.

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(951) 955-5132

[www.rcaluc.org](http://www.rcaluc.org)

In considering hazards to flight from traditional power plants, the first concern would be exhaust plumes from power plant smoke stacks and cooling towers. Almost all general aviation traffic in Riverside County utilizes Visual Flight Rules, so visible plumes that hamper visibility are an obvious hazard, but unseen thermal plumes resulting in a significantly increased air temperature aloft can result in turbulence affecting a pilot's ability to maintain control of an aircraft. In a memorandum from the Offices of Airport Safety and Standards and Airport Planning and Programming (within the Federal Aviation Administration) issued on September 24, 2015, it is stated that the "FAA has determined that thermal exhaust plumes in the vicinity of airports may pose a unique hazard to aircraft in critical phases of flight (particularly takeoff, landing and within the pattern) and therefore are incompatible with aircraft operations. Flight within the airport traffic pattern, approach and departure corridors, and existing or planned flight procedures may be adversely affected by thermal exhaust plumes... Airport sponsors and land use planning and permitting agencies around airports are encouraged to evaluate and take into account potential flight impacts from existing and planned development that produce plumes (such as power plants or other land uses that employ smoke stacks, cooling towers or facilities that create thermal exhaust plumes.)"



Transmission lines pose another potential hazard to pilots preparing to land or having difficulty in ascending from takeoff, and such lines (existing or approved) are perpendicular to, and cross the extended runway centerline of, three of the four runway ends. Undergrounding of electrical lines is preferable in Airport Influence Areas. However, undergrounding the larger lines is usually considered cost-prohibitive. As a compromise, RCALUC has (in the past) required that new transmission lines in Compatibility Zone B1 be undergrounded and that spherical visibility balls be installed on the segments of new transmission lines traversing Compatibility Zones C and D.

Some energy facilities have proposed evaporative ponds for cooling purposes or even for wastewater management. Basins that would permit areas of standing water to remain open for extended periods of time would constitute a wildlife attractant. Federal Aviation Administration Advisory Circulars recommend a distance of five statute miles between the farthest edge of an airport's operations area and a hazardous wildlife attractant, if the attractant could cause hazardous wildlife movement into or across the approach or departure airspace.

Future proposals for non-renewable energy generation projects in this area will further negatively impact the airspace around Blythe Airport. As staff, we do not support allowing for additional power plants in this vicinity.

Additionally, I am concerned regarding the Report of Conversation filed in the Docket Log for this Compliance Proceeding. There are some erroneous attributions in the report of conversation that must be corrected.

In the second paragraph, it is stated that "RCALUC staff" provided answers to questions that you posed relating to the status of the Instrument Landing System Approach to Runway 26 and the Airport Weather Observing System and advised of the availability of an FAA UNICOM Advisory frequency. RCALUC staff does not maintain such familiarity with airport and aircraft operations and, therefore, did not make these statements.

In the sixth paragraph (the second paragraph on page 2), it is stated that "a letter from the County of Riverside Board of Supervisors will be sent...explaining in more detail the concerns raised at our meeting." This statement should have referenced a letter from the Riverside County Airport Land Use Commission, rather than a letter from the County of Riverside Board of Supervisors. My role in this meeting was as RCALUC Director, not as a representative of the Board of Supervisors.

Thank you for the opportunity to provide comments and offer corrections to the "Report of Conversation" document. If you have any questions, please contact me at (951) 955-5132.

Sincerely,  
RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION



Edward C. Cooper, Director

cc: Daryl Shippy, Airports Manager, Riverside County Economic Development Agency  
Simon Housman, ALUC Chairman  
Ron Bolyard, CALTRANS Division of Aeronautics  
Philip Crimmins, CALTRANS Division of Aeronautics