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February 29, 2016

California Energy Commission
1516 Ninth Street, MS-4 (Dockets Unit)
Sacramento CA 95814-5512

RE: Sonoran Energy Project (02-AF-01C) – County of Riverside Economic Development Agency
Comments on the Preliminary Staff Assessment

Dear Commissioners:

The County of Riverside Economic Development Agency (EDA) has reviewed the Preliminary Staff Assessment (PSA) regarding the proposed amendment for the Sonoran Energy Project (“SEP”), formerly the Blythe Energy Project Phase II (BEP). As stated in the PSA, the SEP is located approximately one mile east of Blythe Airport, which is a general aviation facility owned by the County of Riverside. As manager of Blythe Airport, the EDA makes the following observations of the PSA.

The EDA commends and supports Energy Commission staff’s conclusion and recommendation in the PSA that SEP would potentially result in more severe land use impacts from thermal plumes, which would greatly affect aircraft-pilot safety and make SEP incompatible with the Blythe Airport.

The Blythe Airport continues to be impacted by the existing Blythe Energy Project (BEP) generating facility which omits thermal exhaust plumes from the power plant smoke stacks and cooling towers. The exhaust plumes are in direct line with the main active Runway 26. Those exhaust plumes continue to impose hazardous conditions to aircraft safety that have yet to be mitigated. In a memorandum from the Offices of Airport Safety and Standards and Airport Planning and Programming within the Federal Aviation Administration (FAA) 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 airport operations. Flight within the airport traffic pattern, approach and the 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 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)”.

The PSA determined that operation of the SEP could create cumulative aviation impacts with the existing BEP because the locations of both facilities would be located within the arrival and departure pattern of air traffic using Runway 8-26 from the Blythe Airport. EDA is very concerned about these cumulative aviation impacts on air traffic at the airport. This cumulative effect is in addition to the increasing number of renewable energy generation projects that have been proposed and completed since the 2005 decision near the airport. (See Executive Summary Attachment A Table 1 SEP-Cumulative Project List). Further analysis needs to be conducted to establish the true effect of these energy projects on the flying public, the Blythe Airport, and residents in the surrounding areas.



The 2005 BEP II Final Decision includes Conditions of Certification **TRANS 9**, which specifies that the project construction cannot begin until the measures specified in the condition to mitigate aviation safety impacts from thermal plumes are achieved. The Petition to Amend proposes to modify **TRANS 9** to state that the project owner will have satisfied the condition by merely “requesting” that the FAA implement the measures. This proposed modification to **TRANS 9** is troubling to the County. It would essentially require the EDA to satisfy the projects owners’ mitigation requirement because the County would necessarily have to be the applicant, as the airport sponsor, to engage FAA to request approval of changing Airport procedures. The EDA is not willing to take on such a role unless the EDA is in full agreement with the changed procedures.

Neither the Energy Commission nor the SEP owner can condition the airport or airspace without the EDA, Airport Land Use Commission, California State Board of Aeronautics, and FAA approval. A comprehensive airport and airspace study needs to be conducted to examine the feasibility, safety, benefit, and impact of any change of airport procedures. At the conclusion of the study, the EDA would be amenable to discuss the results and consider IF the impact can be mitigated, and to what extent the best mitigation would be to protect the Blythe Airport.

The existing BEP has severely impacted the safety of the flying public at the Blythe Airport. Safety at Blythe Airport is of the utmost important to EDA as the airport manager. Without thorough evaluation of the Airport impacts being done by the Energy Commission in the FSA, with input from the owner of Blythe Airport, the EDA must oppose construction of the SEP as proposed in the Petition to Amend.

The PSA indicates that a “final determination of the project’s land use compatibility with the Blythe Airport and the Riverside County ALUCP will be included in the Final Staff Assessment (FSA) for Land Use.” (PSA 4.5-2). The County reserves the right to issue additional comments on the PSA and Final Staff Assessment as the land use compatibility continues to be evaluated, especially the thermal exhaust plume impacts.

Thank you for the opportunity to provide comments on the PSA and SEP amendment. Should you need additional information from the County, please contact County Airport Manager Daryl Shippy at (951) 955-9418, or Deputy County Counsel Tiffany North at (951) 955-6300.

Sincerely,

Daryl Shippy
Airport Manager

