

DOCKETED

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Caltrans - Aeronautics

Caltrans-Aeronautics has reviewed the Preliminary Staff Assessment (PSA) for the Petition to Amend the Sonoran Energy Project (SEP) (formally Blythe II).

Although we object to the project for aviation safety reasons because of the potential addition of more turbulence causing plume generators within 1 mile of the airport, the project was approved by the Energy Commission in 2005. This petition attempts to reduce the applicants requirement to meet all mitigation conditions prior to construction.

In Trans-9, to mitigate the effects of the thermal plumes, the applicant was originally required to accomplish the following prior to construction:

1. Adding a remark on the Automated Surface Observation System advising pilots to avoid low-altitude direct overflight of the BEP II;
2. Changing the Visual Flight Rule traffic pattern for Runway 26 from left-hand turns to right-hand turns; and
3. Designating a runway other than Runway 26 as the primary calm wind runway.

In Trans-9 of the applicant's petition they want a request to the FAA to satisfy conditions #2 & #3. The conditions were placed on the approval to construct to mitigate the risks of the new power plant and potential thermal plumes. There is an issue with this plan that needs to be corrected. First, the Sonoran Energy Project cannot submit a request to change airport operations. The Airport owner/operator (County of Riverside) determines the best and safest operations at the airport within FAA standards and Caltrans permit conditions. Only Riverside County can request the FAAs concurrence to change traffic patterns and the calm wind runway. As such, it would be inappropriate to allow just a request to satisfy compliance. It appears the Condition of Certification must be met by SEP before construction can begin. We suggest that SEP work with Riverside County to jointly develop a feasible plan to meet the required conditions that the County may take to the FAA.

If airports are negatively impacted by nearby projects yet are approved without meeting their required mitigation conditions, this sets a dismal precedent for all airports in California.

Thank you for the opportunity to comment on the PSA for SEP.