

DOCKETED

| | |
|-------------------------|---|
| Docket Number: | 15-AFC-01 |
| Project Title: | Puente Power Project |
| TN #: | 211755 |
| Document Title: | Report of Conversation with CEC Staff and Todd McNamee, Director of the Ventura County Department of Airports |
| Description: | Report of Conversation with CEC Staff regarding Comments on the Puente Power Project |
| Filer: | Cathy Hickman |
| Organization: | California Energy Commission |
| Submitter Role: | Commission Staff |
| Submission Date: | 6/8/2016 2:19:03 PM |
| Docketed Date: | 6/8/2016 |

CALIFORNIA ENERGY COMMISSION
REPORT OF CONVERSATION



***Siting, Transmission, and
 Environmental Protection Division***

FILE: 15-AFC-01

PROJECT TITLE: Puente Power Project

| | | | |
|--|--|---|--|
| <input type="checkbox"/> Telephone | <input checked="" type="checkbox"/> E-Mail | <input type="checkbox"/> Meeting Location: NA | |
| NAME: Andrea Koch (916-654-3850) | DATE: 2/1/2016 – 5/11/2016 | TIME: Various | |
| WITH: Todd McNamee, Director of the Ventura County Department of Airports | | | |
| SUBJECT: Comments on the Puente Power Project | | | |

See the attached e-mail for a conversation between Andrea Koch, Traffic and Transportation analyst for the Puente Power Project, and Todd McNamee, Director of the Ventura County Department of Airports.

| | |
|------------|--------------------------|
| CC: | Signed: |
| | Name: Andrea Koch |

From: [McNamee, Todd](#)
To: [Koch, Andrea@Energy](mailto:Koch_Andrea@Energy)
Cc: [Rubio, Jorge](#); [Powers, Erin](#)
Subject: RE: Puente Power Plant- Potential Impacts to Aviation
Date: Wednesday, May 11, 2016 4:38:41 PM
Attachments: [Avigation Easement w Height #s.doc](#)

Hi Andrea,

I was reminded of this today after being contacted by Jim Adams of your office to meet and discuss this power plant and the Mission Rock plant. We are scheduled to meet in person June 8 at my office in Camarillo.

Sorry that I have not responded sooner. The language you propose for lighting looks good to me. As for the easement, I've attached a template we use for easement language with which this project would be consistent. Not sure if it is still the same proponent that I worked with many moons ago, but yes, they agreed to grant an easement to the County. Perhaps your office could make this a condition of approval.

Thanks,

Todd

From: Koch, Andrea@Energy [mailto:Andrea.Koch@energy.ca.gov]
Sent: Wednesday, May 11, 2016 4:20 PM
To: McNamee, Todd <Todd.McNamee@ventura.org>
Subject: FW: Puente Power Plant- Potential Impacts to Aviation

Hi Todd.

I haven't heard back since my last e-mail. What do you think?

Thanks!

Andrea

From: Koch, Andrea@Energy
Sent: Monday, March 14, 2016 10:55 AM
To: 'McNamee, Todd'
Cc: Rubio, Jorge; Gutierrez, Ashley@Energy; Flores, David@Energy
Subject: RE: Puente Power Plant- Potential Impacts to Aviation

Hi Todd.

Yes, you are correct about the lighting. The Puente project's Application for Certification (AFC) states that the stack would be in the runway approach obstruction clearance zone for the Oxnard Airport and must be lighted. (Is this true?) The applicant notified the FAA of the stack, and the FAA issued a Determination of No Hazard, stating that lighting of the stack is not necessary. However, we are requiring lighting of the stack due to the plume hazards. Here is our proposed condition of certification requiring lighting of the stack. Please let me know what you think.

TRANS-7 Obstruction Marking and Lighting

The project owner shall install obstruction marking and lighting on the combustion turbine generator (CTG) stack and transmission lines and structures. Lighting on the CTG stack shall consist of one, non-blinking red aviation obstruction light in accordance with FAA Advisory Circular 70/7460-1L, Obstruction Marking and Lighting.

Lighting shall be operational for the life of project operation. Upgrades to the required lighting configurations, types, location, or duration shall be implemented consistent with any changes to FAA obstruction marking and lighting requirements.

Verification: At least 60 days prior to the start of construction, the project owner shall submit to the CPM for approval final design plans for the CTG stack and transmission lines and structures that depict the required obstruction marking and lighting.

Prior to the start of plant operation, the project owner shall install and activate permanent obstruction marking and lighting consistent with FAA requirements and shall inform the CPM in writing within 10 days of installation and activation.

Could you tell me a little bit more about the aviation easement? Do you mean that the Puente applicant previously agreed to providing an easement? Is there an example of the language that would be required in the easement?

Thanks for the information, Todd!

Also, our Preliminary Staff Assessment will be published at some point (hopefully soon). I think it will be distributed to you by the project manager, but I'll also forward you a link when it is available.

Andrea

From: McNamee, Todd [<mailto:Todd.McNamee@ventura.org>]
Sent: Thursday, March 10, 2016 1:00 PM
To: Koch, Andrea@Energy
Cc: Rubio, Jorge; Gutierrez, Ashley@Energy
Subject: RE: Puente Power Plant- Potential Impacts to Aviation

Andrea,

Circling back. I believe it was previously agreed that obstruction lighting would be installed voluntarily by the power plant developer/operator. Also, I respectfully request that an aviation easement be granted to the County for the parcel. This is typically a condition of development enforced through the City, but this was also previously agreed to already. If needed, I can dig through old files and hopefully find the documentation showing this.

Thanks,

Todd

From: Koch, Andrea@Energy [<mailto:Andrea.Koch@energy.ca.gov>]
Sent: Monday, February 08, 2016 4:35 PM
To: McNamee, Todd <Todd.McNamee@ventura.org>
Cc: Rubio, Jorge <Jorge.Rubio@ventura.org>; Gutierrez, Ashley@Energy <Ashley.Gutierrez@energy.ca.gov>
Subject: RE: Puente Power Plant- Potential Impacts to Aviation

Thank you, Todd.

The FAA has issued a Determination of No Hazard for the project. Please see the following link:
http://docketpublic.energy.ca.gov/PublicDocuments/15-AFC-01/TN206297_20151007T143524_Federal_Aviation_Administration_Determination_of_No_Hazard_to_A.pdf

Also, I wanted to note that we normally mitigate plumes with a condition like this one for the Carlsbad Energy Center Power Project:

TRANS-3—Prior to start-up and testing activities of the plant and all related facilities, the project owner shall work with the FAA to notify all pilots using the McClellan-Palomar Airport and airspace above the CECP of potential air hazards. These activities would include, but not be limited to, the project owner working with the FAA in issuing a notice to airmen (NOTAM) of the identified air hazard and updating the Terminal Area Chart and all other FAA-approved airspace charts used by pilots that include the CECP site to indicate that pilots should avoid direct overflight.

-

Verification: At least 60 days prior to start of project operation, the project owner shall submit to the CPM for review and approval a letter from the FAA showing compliance with these measures.

This condition does not allow for an aviation easement due to concerns about plume effects to aircraft.

Please let me know your thoughts. It would be great to discuss this further as your schedule allows. Wednesday or Friday would be good for me. Please let me know a good time to call.

Thanks!

Andrea

From: McNamee, Todd [<mailto:Todd.McNamee@ventura.org>]
Sent: Monday, February 08, 2016 2:46 PM
To: Koch, Andrea@Energy
Cc: Rubio, Jorge
Subject: RE: Puente Power Plant- Potential Impacts to Aviation

Hi Andrea,

This site could have aircraft departing the Oxnard airport overflying it considerably lower than 4,260 feet and it is of concern. Overall height of the stack may be an issue as well. A "Notice of Proposed Construction" needs to be filed with the FAA using the FAA Form 7460-1 to see what objections the FAA may have. That should be the first step and then we may ask for things such as an aviation easement over

the parcel that protects airport operations by allowing aircraft to overfly the site as they are now.

I'm playing catch up after being out all of last week, but am available to discuss this further either later this week or early next week.

Thanks,

Todd

From: Koch, Andrea@Energy [<mailto:Andrea.Koch@energy.ca.gov>]

Sent: Monday, February 01, 2016 2:53 PM

To: McNamee, Todd <Todd.McNamee@ventura.org>

Subject: Puente Power Plant- Potential Impacts to Aviation

Hi Todd.

Steve DeGeorge of the Ventura County Transportation Commission referred me to you.

I am reviewing an application for the Puente Power Plant, located at 393 North Harbor Blvd. in the city of Oxnard, within the boundaries of the existing Mandalay Generating Station (MGS). The MGS would be decommissioned after construction of Puente, with the exception of Unit 3.

The Puente plant's 188-foot-tall exhaust stack would emit a thermal plume that could potentially impact aircraft. The Energy Commission uses a plume vertical velocity of 4.3 meters/second as the critical velocity of concern to light aircraft. Staff calculated that in a worst-case, calm wind scenario, the Puente's thermal plume would reach velocities of 4.3 m/s or above up to an altitude of 4,260 feet above ground level. Would you have any concerns about this? Do you know the likelihood of aircraft flying over the Puente plant at altitudes below 4,260 feet? The Oxnard Airport is located approximately 1.9 miles southeast of the project site.

I should note that the Puente plant is proposed to operate no more than 2,453 hours per year. Average operation, depending on electrical system needs, is estimated to be no more than 500 to 1,000 hours per year. Also, the existing MGS Unit 3, which would remain in operation, generates a plume that would reach velocities of 4.3 m/s or above up to an altitude of 3,700 feet above ground level, so aircraft should already avoid low overflight of this unit. The nearby McGrath plant generates a plume reaching velocities of 4.3 m/s or above up to an altitude of 838 feet above ground level.

Please let me know your thoughts, and feel free to give me a call. Also, if you'd like a more thorough report about the plume, I can probably send you the draft plume analysis prepared by my coworkers.

Here is a link to the project application information if you wish to review it:

<http://www.energy.ca.gov/sitingcases/puente/>

More specifically, please see the following link for the project description, with the site plan figures starting on page 70.

http://docketpublic.energy.ca.gov/PublicDocuments/15-AFC-01/TN204219-5_20150416T104348_20_Project_Description.pdf

Thank you for your time!

Andrea

Andrea Koch
Environmental Planner II
(916) 654-3850
Andrea.Koch@energy.ca.gov

California Energy Commission
Siting, Transmission, and Environmental Protection Division