

## DOCKETED

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*Comment Received From: Steven DeGeorge*

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**Comments on California Energy Commission (CEC) Preliminary Staff Assessment (PSA) for Puente Power Plant (P3) dated June 20, 2016.**

*Additional submitted attachment is included below.*



# Ventura County Transportation Commission

September 15, 2016

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

Re: Comments on California Energy Commission (CEC) Preliminary Staff Assessment (PSA) for Puente Power Plant (P3) dated June 20, 2016.

Dear Commissioners:

The Ventura County Transportation Commission (VCTC) appreciates the opportunity to comment on the California Energy Commission (CEC) Preliminary Staff Assessment (PSA) for Puente Power Plant (P3) dated June 20, 2016. VCTC serves as the Airport Land Use Commission (ALUC) for Ventura County and provides comments based upon the adopted Comprehensive Airport Land Use Plan (CLUP) for Ventura County, the stated purpose of which is, [*“intended to protect the and promote the safety and welfare of residents near the military and public use airports in the County, as well as airport users, while promoting the continued operation of those airports. Specifically, the plan seeks to protect the public from the adverse effects of aircraft noise, to ensure that people and facilities are not concentrated in areas susceptible to aircraft accidents, and to ensure that no structures or activities encroach upon or adversely effect the use of navigable airspace.”*] It is in that context that the ALUC provides the comments below.

The Land Use chapter of the PSA for the proposed Puente Power Plant does not consider consistency with the adopted CLUP for Ventura County. The CLUP for Ventura County establishes study areas for each of the airports in Ventura County and provides policy direction for compatible land uses surrounding Ventura County’s Airports. The proposed P3 is approximately 1.9 miles northwest of the Oxnard airport and falls within the study area for Oxnard Airport. The PSA should include a specific discussion of the proposed P3 in relationship to its land use and impacts on the Oxnard Airport. While the Traffic and Transportation chapter of the PSA acknowledges the CLUP it does not contain a discussion of compatibility or consistency.

While the physical structure of the proposed P3 is outside of any airport safety zone and the height of the P3 exhaust stack is below the conical surface established by Federal Aviation Administration (FAA) Regulation Part 77, the exhaust plume extends well above that surface creating uncertain conditions for flight operations. The discussion of the P3 exhaust plume within the Traffic and Transportation chapter of the PSA does not capture the operational concerns voiced by the County of Ventura, Department of Airports at a June 8, 2016 meeting including CEC staff, Department of Airports staff, ALUC staff, and others or in subsequent discussions. The County of Ventura, Department of Airports’ local knowledge of existing conditions and aircraft movements in this area is critical in any assessment of potential hazards.

Although FAA Part 77 does not currently include guidance on thermal plumes the FAA's movement towards more careful analysis of thermal plumes, supported by the memorandum cited below suggests that a robust discussion of the P3 thermal plume would be appropriate.

FAA Memorandum, Technical Guidance and Assessment Tool for the evaluation of Thermal Exhaust Plume Impact on Airport Operations, dated September 14, 2015 states that the overall risk associated with a thermal exhaust plume causing a disruption to flight is low, but that such plumes may pose a "unique hazard" to aircraft in critical phases of flight such as takeoff and landing and are therefore incompatible with airport operations. The September 14, 2015 Memorandum goes on to identify the MITRE "Exhaust-Plume-Analyzer" as a free tool to better assess the impact of such plumes on flight operations.

The Memorandum further discusses that FAA Advisory Circular (AC) 5190-4, A Model Zoning Ordinance to Limit the Height of Objects Around Airports, is currently being updated to include evaluation of exhaust plumes. Although that update has not been published yet, it demonstrates the FAA's ongoing effort to ensure exhaust plumes are thoroughly considered.

The ALUC suggests that a much more thorough analysis of the P3 exhaust plume needs to be conducted, including the MITRE analysis and consideration of local aircraft traffic patterns, so that the public can be confident in the conclusions that the PSA puts forward. The results of that additional study should also be put in the context of land use consistency within the CLUP Study Area for Oxnard Airport. Should the P3 exhaust plume be found to be disruptive to flight operations, it could inhibit further commercial development of Oxnard Airport and could be counter to the policies contained in the Ventura County CLUP. It is important to carefully consider this issue prior to the Commission selecting this location for the proposed Puente Power Plant.

Again, thank you for the opportunity to provide comments. Should you have question concerning the Ventura County ALUC's comment please feel free to contact Steve DeGeorge Director of Planning at (805) 642-1591 (ext. 103).

Respectfully,



Darren Kettle,  
Executive Director