

DOCKETED

Docket Number:	15-AFC-01
Project Title:	Puente Power Project
TN #:	215442
Document Title:	Testimony of Todd McNamee
Description:	N/A
Filer:	PATRICIA LARKIN
Organization:	SHUTE, MIHALY & WEINBERGER LLP
Submitter Role:	Intervenor Representative
Submission Date:	1/18/2017 4:35:02 PM
Docketed Date:	1/18/2017

INTERVENOR CITY OF OXNARD

EXHIBIT ____

Testimony of Todd McNamee

Re: Acceptable Risk from the Exhaust Plume of the Proposed P3 Facility

Qualifications

I am Todd McNamee, Director of Airports for the County of Ventura, I joined the County of Ventura in 2001 as the Deputy Director of Airports and was appointed as the Director of Airports in 2005. I oversee the operations, maintenance, and development of the Camarillo Airport and Oxnard Airport. I am also a pilot based out of Camarillo Airport and have extensive personal knowledge of air traffic patterns at both airports. Finally, I am a Past President of the Southwest Chapter of American Association of Airport Executives (AAAE) and have received numerous awards including the Southwest AAAE Award of Distinction for my service to the aviation industry.

Statement

As the Department of Airports commented on the Preliminary Staff Assessment, the proposed location of P3 creates a hazard to aviation that does not currently exist due to the projected high velocity combined thermal plumes from three power plants—the Puente Plant, Mandalay 3, and the McGrath Peaker.¹ These plumes will interfere with the safe operation of the Oxnard Airport. The Final Staff Assessment includes additional modeling which shows there is a significant impact to aviation due to the exhaust plume, but does not model the impact of the plume from all three power generating facilities.

The FSA also takes the position that mitigation measure **TRANS-7** will mitigate the impact of the Puente project. In my professional opinion as Director of Airports, the proposed mitigation **TRANS-7** does not adequately mitigate the potential hazard and also restricts access to and from the Oxnard Airport. If P3 were developed as proposed, it could negatively impact the Department of Airport's efforts to restore commercial airline service to Oxnard Airport, an economic impact that was not addressed by the Energy Commission staff assessments.

Page 1-9 of the PSA Executive Summary states, "*Conditions of Certification **TRANS-6** and **TRANS-7** would mitigate potentially significant impacts to aviation from the thermal plumes that P3 would generate from the combustion turbine generator (CTG) stack. Condition of Certification **TRANS-6** would require obstruction marking and lighting of the CTG stack to alert pilots of the location of the plumes at night. Condition of Certification **TRANS-7** would require the project owner to work with the Federal*

¹ TN# 213674.

Aviation Administration (FAA) and the Oxnard Airport Manager to notify all pilots using the Oxnard Airport and airspace above the P3 site of potential thermal plume hazards.”

The Department of Airports does not agree that this measure is adequate. The measure would be like placing a sign on the side of a highway, **“Driving on this highway may result in your vehicle becoming unstable and is dangerous,”** and expect that all motorists will avoid driving on that highway. Additionally, if **TRANS-7** resulted in overflight being avoided, it then also results in restricting access to the Oxnard Airport in a manner that does not currently exist. This is of concern for the existing aircraft utilizing Oxnard Airport, and could negatively impact the DOA’s efforts to restore commercial airline service to Oxnard Airport.

The Final Staff Assessment (FSA) for the Puente Power Project (P3), published December 9, 2016, concludes that aviation impacts at the alternative location at 5th and Del Norte would be potentially significant even though that site is almost the same distance from Camarillo Airport that Puente is from Oxnard Airport (roughly 1.7 miles). I do not believe that this conclusion is supportable. The Del Norte/Fifth St Alternative is to the southwest of the Camarillo Airport and does not lie under any frequently used flight paths or aircraft traffic patterns for that airport. The Airport Land Use Plan arrival and departure paths cited in the FSA are not normal patterns for arrival or departure at Camarillo Airport. P3 on the other hand, lies under a frequent departure path where aircraft are flying at a low altitude and would cross the thermal plume from the power plant. Moreover, if the difference in impact is based on the volume of aircraft potentially overflying the alternative site compared to the P3 site, then proposed mitigation **TRANS-7** should be equally-available to address impacts from the Del Norte/Fifth Street Alternative. In sum, if staff’s conclusion is that potential aircraft hazards cannot be mitigated for the Del Norte/Fifth Street Alternative site, they cannot be mitigated for the P3 site either.

While I cannot say with certainty that an aviation accident will occur because of the NRG P3 plume, neither can the Energy Commission or NRG state that such a scenario would not occur during P3’s 30 year lifespan. It is also my expert opinion as a career aviation executive and as a pilot that the proposed NRG P3 facility should not be developed in the proposed area of comparatively higher risk when there is perhaps a better location which poses no aviation hazards.

Date: Jan. 17, 2017

Sincerely,



TODD L. McNAMEE, AAE
Director of Airports