

DOCKETED

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June 27, 2016

California Energy Commission
Scott Polaske, Energy Analyst
1516 9th St., MS 40
Sacramento, CA 95814

Re: Proposed Mission Rock Energy Center

The proposed site is 3.4 miles SW of Santa Paula Airport (SZP) in what the FAA considers class "G" airspace. Santa Paula Airport is a non-towered privately owned, public use facility that is home to over 300 based aircraft and close to 100,000 flight operations per year. Because the airport is non-towered and in class "G" airspace, several Federal Aviation Regulations dictate altitude and Visual Flight Rule (VFR) minimums for the airspace. FAR 91.119 Minimum safe altitudes (see attached) dictates height restrictions for flights in class "G" airspace. In uncongested areas such as the river bed location west of SZP, altitudes must be kept to allow for an emergency landing without undue hazards to persons or property on the surface. In the river bed area, that could be as low as 50ft or less. FAR 91.126 (2) (see attached) "Each pilot of a helicopter or a powered parachute must avoid the flow of fixed-wing aircraft" dictates that helicopters avoid our traffic pattern. The location of Santa Paula Airport, in a valley with close proximity to South Mountain, limits the size of our traffic pattern. Our traffic pattern altitude is 850MSL (Mean Sea Level) or approximately 600 AGL (Above Ground Level). We ask that helicopters approach and depart our helipad from the South below our traffic pattern altitude (see attached diagrams). FAR 91.155 VFR Weather Minimums dictate visibility and cloud clearance (see attached). In class G airspace west of Santa Paula Airport, below 1200 AGL, a legal operation can take place as long as the pilot has 1 mile of flight visibility and remains clear of clouds. With that in mind, it is reasonable that with the coastal fog we experience, a pilot would be operating at low altitudes below the fog in airspace around the proposed site for the Mission Rock Energy Center. It is also reasonable that a pilot based at SZP may use an instrument approach to one of Ventura County Airports, CMA or OXR, cancel the instrument approach once below the fog layer and continue to SZP via low altitude with one mile of visibility and remaining clear of clouds. With this scenario it is possible that an aircraft would be flying as low as 200 ft AGL under a cloud layer with power structures at the same altitude.

We have had three fatalities within the last five years on standard height power lines approximately one and one half miles west of the airport that span the river bed. Because of the nature of the airspace and topography, flying at those altitudes as indicated above is not a violation of any Federal Aviation Administration regulations and does occur.

The Mission Rock project will add 36 transmission structures from approximately 80 feet tall to 200 feet tall in this same area of class "G" airspace along with the connecting power lines. These lines in this location will pose additional risks to pilots operating within the guidelines of operations in class "G" airspace as laid out by the FAA. The attached traffic pattern diagram shows the proposed power plant approximate location and new transmission lines in yellow. A large amount of all traffic arriving at Santa Paula Airport, approach from the Saticoy Bridge (as shown on the diagram) and report over the junkyard to enter directly into the downwind leg. This means that most of the landing traffic at SZP will be flying directly over the proposed location of the power plant. Additionally, most departures from SZP proceed straight out which will put departing traffic over the proposed site as well.

We have strong objections to the construction of additional flight hazards in this area. If these structures are allowed to be built, we would urge the Energy Commission to require all the wires be marked with "ball markers" and all towers be fitted with obstruction lights.

Although SZP is not lighted, the FAA does not prohibit the operation of aircraft at non-lighted airports and night operations do occur. This area is also a converging point for aircraft coming into both Ventura County Airports which do have lighted runways and instrument approach capabilities.

In reading your decision regarding the power plant at Carlsbad, the difference to the Mission Rock site is the airspace designation. The Carlsbad plant is located in the Palomar Airport Class D airspace. Your decision regarding Carlsbad was based on recommended pattern altitude at a controlled airport. No flight activities can occur in class D airspace unless they are in contact with the control tower who can dictate altitude requirements. Santa Paula Airport is a non-towered, uncontrolled airport located in class G airspace with no such airspace and altitude restrictions.

We appreciate your attention to this important issue. Please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Rowena Mason". The signature is fluid and cursive, with a long horizontal line extending to the right.

Rowena Mason
President, SPAA
Airport Manager