

DOCKETED

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AIRPORT LAND USE COMMISSION RIVERSIDE COUNTY



July 30, 2013

SENT VIA: U.S. Postal Service and
Email Christine.Stora@energy.ca.gov

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County Administrative Center
4080 Lemon St., 14th Floor.
Riverside, CA 92501
(951) 955-5132

www.rcaluc.org

California Energy Commission
Siting, Transmission and Environmental Protection Division
ATTN: Christine Stora, Project Manager
1516 Ninth Street, MS-2000
Sacramento CA 95814-5112

RE: Comments regarding Preliminary Staff Assessment ["PSA"] of the Palen Solar Electric Generating System Petition to Amend (Docket No. 09-AFC-7C)

Dear Ms. Stora:

Thank you for giving the Riverside County Airport Land Use Commission ("ALUC") the opportunity to participate in review of the Palen Solar Electric Generating System Petition to Amend proposed by BrightSource Energy, Inc. ("Project"). ALUC did not comment on Solar Millennium's project at this site, involving the use of parabolic trough technology, because the site is not located within a designated Airport Influence Area. However, the change to a solar tower technology places this project within the realm of ALUC concern.

Pursuant to Policy 1.5.3.(c) of the Countywide Policies of the 2004 Riverside County Airport Land Use Compatibility Plan, proposals "for construction or alteration of a structure (including antennas) taller than 200 feet above the ground level at the site" constitute major land use actions subject to ALUC review "[r]egardless of location within Riverside County." Therefore, if this project were not on federal land, it would be subject to ALUC review, as well as County review, absent the California Energy Commission's certification authority.

Furthermore, it is noteworthy that the California Energy Commission (CEC) has often recommended that project applicants file with ALUC, most recently in relationship to the Blythe Solar Power Plant facility. ALUC would request the opportunity to consider the Project locally at a public hearing in Riverside County and forward its conditions to the CEC for its consideration.

On page 4.10-10 of the Palen PSA, it is stated that thermal plume vertical velocity could exceed 4.3 meters per second at altitudes of approximately 200 feet above ground level or below. The authors then proceed to state that the impact would be less than significant because aircraft "would generally be flying at altitudes much higher than 200 feet above ground level." This statement is true for itinerant aircraft overflying the area, but would not hold for emergency medical evacuation helicopters. (There is record of a helicopter crash in Bakersfield resulting from a direct flyover through a power plant's thermal plume.) Provision should be made for the wet surface air cooler, auxiliary boiler, and nighttime boiler to be shut down in the event of an emergency requiring an airborne evacuation.

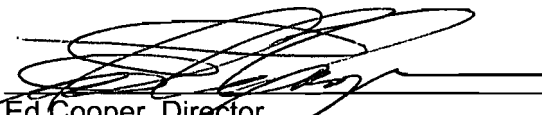
Our concerns regarding the effect of solar flux on medical evacuation helicopter pilots and occupants remains as stated in our letter of November 27, 2012 regarding the Rio Mesa SEGS. There is considerable discussion of the effect of solar flux on birds, but no discussion of the effects of solar flux on the occupants of emergency aircraft. However, on page 4.2-374, it is

stated that solar flux densities could range as high as 600 kilowatts per square meter. At levels as low as 5 kilowatts per square meter, bare human skin would experience first-degree burns within 20 seconds of continuous exposure, second-degree burns within 30 seconds, and third-degree burns within 50 seconds. Thus, in the event that an emergency medical evacuation is needed from a location at or near the tower and/or the heliostats, it may be necessary to shut down the entire facility to reduce the temperatures sufficiently to allow the helicopter to safely exit the facility, or to transfer the patient(s) to a ground location that would allow the helicopter to safely land and take off without entering the superheated airspace.

This is one of many solar energy generation facilities (both thermal facilities subject to CEC certification and photovoltaic facilities subject to County permitting) proposed along the Interstate 10 corridor between the privately-operated Desert Center Airport and public-use Blythe Airport. Airport Land Use Commissioners have expressed increasing concerns regarding the adverse cumulative impacts created by these facilities on an airport.

Given the foregoing, ALUC would request the opportunity to consider the Project locally at a public hearing in Riverside County and forward its conditions to the CEC for its consideration. If you have any questions regarding this response, please contact John Guerin, Principal Planner, Riverside County Airport Land Use Commission staff, at (951) 955-0982.

Sincerely,
RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION



Ed Cooper, Director

Cc: Juan Perez, Director, Riverside County Transportation & Land Management Agency
Carolyn Syms-Luna, Riverside County Planning Director
Daryl Shippy, Riverside County Economic Development Agency
Chad Wilshire, Riverside County Economic Development Agency
Tiffany North, Office of Riverside County Counsel