

**DEPARTMENT OF TRANSPORTATION**

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December 19, 2008

Mr. James S. Adams  
 Environmental Office, MS 40  
 California Energy Commission  
 1516 9<sup>th</sup> Street  
 Sacramento, CA 95814-5504

Dear Mr. Adams:

California Energy Commission's Preliminary Staff Assessment for the Carlsbad Energy Center Project

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the above-referenced document with respect to airport-related noise and safety impacts and regional aviation land use planning issues. The Division has technical expertise in the areas of airport operations safety, noise and airport land use compatibility. We are a funding agency for airport projects and we have permit authority for public-use and special-use airports and heliports. We offer the following comments for your consideration.

The Preliminary Staff Assessment (PSA) is for the Carlsbad Energy Center Project (CECP). The CECP project site is located on the northeast section of the 95-acre Encina Power Station (EPS). The site is located approximately 2.5 miles northwest of the McClellan-Palomar Airport.

We understand that the CECP is the selected site. We support the CECP site over the alternative sites with respect to the potential for aviation impacts. The alternative sites posed a much greater risk for potential flight hazards.

Additionally, we suggest permanently adding a caution to the Automatic Terminal Information Service (ATIS) and the Automated Surface Observation System (ASOS) recommending that pilots not overfly the power plant because of possible flight hazard from thermal plumes.

The FAA's Visual Flight Reference (VFR) Terminal Area Chart for San Diego has a "waypoint" for the EPS power plant. This "waypoint" is a visual reference point for pilots to fix their location. While the waypoint is charted for use within a VFR corridor, where aircraft should be at an altitude where plumes would not be a concern, the potential for pilots to program the waypoints for use at a lower altitude exists. Given the concerns over the thermal plumes and the addition of cautions about direct overflight of the power plant, the advisability of continued use of the power plant as visual waypoint should be examined.

Aircraft altitudes, including those for airport traffic patterns, are referred to as mean sea level (MSL). References to above ground level (AGL) on pages 4.10-7 and 4.10-13 in the PSA, for example, should be changed to MSL.

Mr. James S. Adams  
December 19, 2008  
Page 2

These comments reflect the areas of concern to the Division with respect to airport-related noise and safety impacts and regional airport land use planning issues. We advise you to contact our Caltrans District 11 office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-5314.

JEFF BROWN 4-4565

Sincerely,



SANDY HESNARD  
Aviation Environmental Specialist

c: McClellan-Palomar Airport, San Diego County Regional Airport Authority