



# AIRPORT LAND USE COMMISSION RIVERSIDE COUNTY

# DOCKET

## 11-AFC-4

DATE JAN 19 2012RECD. JAN 20 2012

CHAIR January 19, 2012

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Rancho MirageSENT VIA: U.S. Postal Service and  
Email [pmartine@energy.state.ca.gov](mailto:pmartine@energy.state.ca.gov)VICE CHAIRMAN  
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Energy Facilities Siting Office  
ATTN: Pierre Martinez, Project Manager  
1516 Ninth Street  
Sacramento CA 95814-5112COMMISSIONERS  
Arthur Butler  
RiversideJohn Lyon  
Riverside**RE: Request for Agency Participation in the Review of the Rio Mesa Solar Electric  
Generating Facility, Application for Certification (Docket No. 11-AFC-4)**Glen Holmes  
Hemet

Dear Mr. Martinez:

Greg Pettis  
Cathedral CityRichard Stewart  
Moreno Valley

Thank you for giving the Riverside County Airport Land Use Commission ("ALUC") the opportunity to participate in review of the Rio Mesa Solar Electric Generating Facility proposed by BrightSource Energy, Inc. ("Project"). The comments below are responsive to the California Energy Commission's notice dated October 28, 2011 requesting that the ALUC identify its significant concerns and the substantive permitting requirements that it would apply but for the CEC's certification authority.

## STAFF

Director  
Ed CooperJohn Guerin  
Russell Brady  
Barbara Santos

The Application for Certification ("AFC") identifies many of the laws, ordinances, regulations, and standards applicable to the Project. However, it does not reference the Riverside County Airport Land Use Compatibility Plan ("RCALUCP") adopted by the ALUC. The ALUC is a separate legal entity from the County of Riverside created under the Public Utilities Code. The ALUC is charged with protecting public health, safety and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent these areas are not already devoted to incompatible uses. In light of this charge, the ALUC often works with California Department of Transportation's Division of Aeronautics. As adopted in 2004 (following the adoption of the Riverside County General Plan and, therefore, not reflected therein), the Countywide Policies of the RCALUCP identify "any proposal for construction or alteration of a structure (including antennas) taller than 200 feet above ground level at the site" as a major land use action requiring review by the ALUC, "regardless of location within Riverside County." Accordingly, the portions of the Project not on federal land would be subject to ALUC review, as well as County review, absent the CEC's certification authority.

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The Project proposes not one, but three separate 750 foot high towers, that would focus sunlight from three concentric rings of heliostats. Given the proximity of the Project to the Blythe Airport, airport operations may be adversely impacted. The Project is not the first or only solar power plant project potentially impacting Blythe Airport. The ALUC has previously commented to the CEC on the Blythe Solar Power Project northwest of the airport. There are additional photovoltaic solar power plant projects on and around the Blythe Airport. The volume of solar power plant projects and mix of solar thermal and photovoltaic technologies raises pilot safety issues associated with glint and glare. The ALUC is concerned that the cumulative glint and glare effects of the multiple solar power plant projects may affect the usability of Blythe Airport. While only one solar power plant project with County approval has been constructed in the



vicinity to date, a 100 megawatt ("MW") facility has been approved on airport grounds and four additional solar power plant projects with a combined potential capacity of 1,039.75 MW are in process. We, therefore, urge the CEC to require the Project proponent to file an application with the ALUC for project review. The ALUC would require a comprehensive analysis of the glint/glare effects potentially affecting the safety of air navigation in the vicinity of Blythe Airport.

In addition to glint and glare, the Project proponent should be required to analyze whether the auxiliary boilers, air cooled condensers, or any other element of the Project would produce thermal plumes, and the characteristics of those plumes, if any, that could potentially affect aircraft handling.

The Land Use section of the AFC references Blythe Airport runways as being 5,800 feet and 6,543 feet in length and states that the proposed 220 kilovolt (kV) generator tie-line structures ("gen-tie") will, at their closest point, be located approximately 25,000 feet from the end of the nearest runway. However, the Blythe Airport Land Use Compatibility Plan, and the Airport Master Plan upon which it was based, call for a runway extension to the west, which may reduce the distance from the proposed gen-tie to the runway. The Project proponent should be required to provide information regarding the distance from the gen-tie to the nearest point on the runway as proposed for extension. The ALUC has concerns about the location and elevation of the gen-tie in relation to the Blythe Airport runways.

We also note that the Appendix to the AFC includes an Obstacle Evaluation Study prepared by Capitol Airspace Group of Alexandria, Virginia. The report notes that the proposed facility "is located within the lateral boundaries of VR-296, a visual military training route used for terrain following operations originating at March Air Reserve Base, California. This route may be used by military pilots to conduct operations as low as 300 feet above ground level." Accordingly, the CEC should require the Project proponent to provide documentation establishing military approval of the Project.

We look forward to continuing to work with the CEC on this Project. The comments contained in this letter are preliminary and summarize our review of the materials provided for evaluation. The ALUC reserves the right to issue additional comments as the Project moves forward. The ALUC also requests that it be allowed to meaningfully participate in the preparation of the CEC's certified regulatory program documentation to ensure that all potentially significant impacts, mitigation measures and Project alternatives are identified.

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