



March 22, 2010

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DOCKET

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Subject: ZAP1006BL10 - Blythe Solar Millennium Project

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We appreciate the submission of your application for the Riverside County Airport Land Use Commission's (ALUC) review of the proposed Solar Millennium Project (BSPP) as requested by the California Energy Commission (CEC). Based on our review of the application materials submitted and our list of concerns provided to the CEC in letters dated January 19, 2010 and March 1, 2010, following are our remaining concerns regarding the potential hazards to flight for the Blythe Airport that may be created by the proposed project:

Height of Structures

- Confirm by map/figure that ACC-4 is located outside of the AIA boundaries. If it is within the AIA, then it is inconsistent with maximum height requirements.
- Identify the height and number of proposed transmission poles relative to AIA Zones
- Update on FAA review of remaining transmission poles.

Radio Frequency Interference

- Detail how BSPP is comparable to the Palmdale Hybrid Power Project (PHPP) (i.e. total project acres, total MW, location related to distance from airport and to flight paths)
- What are the communication and navigation signals utilized by Blythe Airport?
- What would be the most likely maximum impact scenario involving line voltage, distance from the line to the receiving device, orientation of the antenna, signal level, line configuration and weather conditions and the level of interference created?
- What are the "acceptable levels" for electric field generation and what are the typical impacts at certain distances at that level?

Reflectivity/Glare

- Detail how BSPP is comparable to the Victorville (VV2) project (i.e. total project acres, total MW, location related to distance from airport and to flight paths, orientation of panels)
- How are the over-flights conducted for the VV2 analysis comparable to the BSPP proposal related to flight path?

Thermal Plumes

- Based on what data is the CEC "not concerned with [the small auxiliary two-cell wet cooling towers] being a potential hazard to aviation? Is any data available for these similar to the dry cooling towers on temperature rise and upward velocity? How often, how long, and what time of day are these to be used?

Provision of open space within Zone D

- Clarify the project footprint area and area left as open space (free of most structures and other major obstacles such as walls, large trees or poles greater than 4 inches in diameter measured 4 feet above the ground, and overhead wires) for the project area located within Zone D.

Cumulative impacts of additional hazards to flight.

- Due to the amount of existing and proposed solar facilities located within the vicinity of the Blythe Municipal airport, does this project propose additional hazards to flight which considered individually may be insignificant, but cumulatively may be considered significant?

AIRPORT LAND USE COMMISSION

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Without this information to determine the level of impacts on each of these issues, ALUC staff would be unable to prepare a report to the Commission determining this project to be consistent with the Blythe Airport Compatibility Plan or present significant hazards to flight or interfere with airport operations.

Sincerely,

Ed Cooper
Riverside County Airport Land Use Commission Director