

## DOCKETED

<b>Docket Number:</b>	09-AFC-06C
<b>Project Title:</b>	Blythe Solar Power Project - Compliance
<b>TN #:</b>	201058
<b>Document Title:</b>	Comments on Part A of the California Energy Commission's Staff Assessment
<b>Description:</b>	Comments on BSPP SA Part A
<b>Filer:</b>	Mary Dyas
<b>Organization:</b>	Riverside County Airport Land Use Commission
<b>Submitter Role:</b>	Public Agency
<b>Submission Date:</b>	10/28/2013 7:05:34 AM
<b>Docketed Date:</b>	10/28/2013

# AIRPORT LAND USE COMMISSION RIVERSIDE COUNTY



October 22, 2013

**CHAIR**  
Simon Housman  
Rancho Mirage

**VICE CHAIRMAN**  
Rod Ballance  
Riverside

**COMMISSIONERS**

Arthur Butler  
Riverside

John Lyon  
Riverside

Glen Holmes  
Hemet

Greg Pettis  
Cathedral City

Richard Stewart  
Moreno Valley

**STAFF**

Director  
Ed Cooper

John Guerin  
Russell Brady  
Barbara Santos

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

[www.rcaluc.org](http://www.rcaluc.org)

Ms. Mary Dyas, Compliance Project Manager  
California Energy Commission: Dockets Unit, MS-14  
Docket No. 09-AFC-7C  
1516 Ninth Street  
Sacramento CA 95814-5512

**RE: Blythe Solar Power Project – Comments on Part A of the California Energy Commission’s Staff Assessment**

Dear Ms. Dyas:

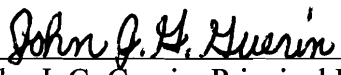
Thank you for providing the Riverside County Airport Land Use Commission (ALUC) with a copy of the California Energy Commission’s Request for Comments on Part A of the Staff Assessment of the proposed amendment that would modify the technology and reduce the size of the project. In 2010, ALUC reviewed the original proposal that was then under consideration by the California Energy Commission (CEC) and evaluated several areas of concern with regard to the Blythe Solar Power Project, culminating in a letter to the CEC dated July 14, 2010.

At this time, we have only seen a reduction of a generalized revised layout plan (with notes that are not easily legible at the reduced scale). We would like an opportunity to view a larger, more legible exhibit of the project layout.

The applicant is requesting to be able to select “the specific combination of technologies” (single-axis tracking, fixed-axis tilt, or a combination of the two) “prior to construction.” As Abdel-Karim Abulabon noted on page 4.9-8 of the Soil and Water Resources section, “the orientation and technique for collection of the sun’s energy, as well as the number of panels and supports may be different.” While we would anticipate that the switch from solar thermal to photovoltaic technology would result in lesser glint/glare impacts, significant design changes to the locations and/or orientation of solar arrays (including whether the panels are tracking or fixed-axis, since tracking panels may produce glare while in, or while transiting to, the “stow” position) could potentially affect the locations where (and the times when) hazardous glare would occur. In that regard, we look forward to the opportunity to review Part B of the Staff Assessment, which will cover Land Use, Traffic and Transportation, and Visual Resources. Please also see our comment letter to the Bureau of Land Management issued on October 2, 2013.

While ALUC has no official jurisdiction over the development of this project on federal land, we would appreciate an opportunity to formally review the amended project in an advisory capacity at a public hearing through the ALUC application process. Projects submitted by October 30 and determined to be complete would be eligible for consideration at ALUC’s meeting on December 12, 2013 in La Quinta. If you have any questions, please contact the undersigned at (951) 955-0982.

Sincerely,  
RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION

  
\_\_\_\_\_  
John J. G. Guerin, Principal Planner

JJGJG:bks

cc: Simon Housman, ALUC Chairman  
Chad Wilshire, Riverside County EDA – Aviation Division  
Robert Eppers, California Pilots Association  
ALUC Staff

Y:\ALUC\Blythe\Part A Staff Assessment BSPP ALUC Staff Comments.ltr to CEC.doc