

DOCKETED

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Project Title:	Blythe Solar Power Project - Compliance
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Document Title:	Airport Land Use Commission Comments on PMPD
Description:	Letter from Riverside County Airport Land Use Commission commenting on Presiding Member's Proposed Decision, Blythe Solar Power Project (revised)
Filer:	John Guerin
Organization:	Riverside County Airport Land Use Commission
Submitter Role:	Public Agency
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AIRPORT LAND USE COMMISSION RIVERSIDE COUNTY

January 13, 2014

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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 (Revised) – Comments on Presiding Member’s Proposed Decision

Dear Ms. Dyas:

This office has reviewed the Presiding Member’s Proposed Decision and offers the following comments for consideration by the California Energy Commission.

The California Energy Commission Staff Assessment Part B and the Presiding Member’s Proposed Decision each include a recommendation that Condition TRANS-9, as applied to the original project proposal, be removed from the list of conditions, on the basis that its references to parabolic trough collectors are no longer applicable or relevant to the amended project.

While we would support modification of Condition TRANS-9, we would like to point out that this condition was originally included in order to mitigate specific glint and glare outcomes identified for the original project that may still exist for the amended project, given the results of the SGHAT analysis indicating the likelihood of glare impacts during spring and fall months. Some of the measures originally identified in Condition TRANS-9 may still be appropriate, substituting “panels” for “mirrors,” especially if the applicant chooses to use tracking panels. These measures included:

- A requirement that the panels be brought out of stowage before sunrise and be aligned to catch the first rays of the morning sun, and not be returned to stowage until after sunset;
- When necessary to rotate modules or panels off-axis, rotate in a direction away from the flight pattern; and
- Check for aircraft in the vicinity before moving the panels into a wind-stow position.

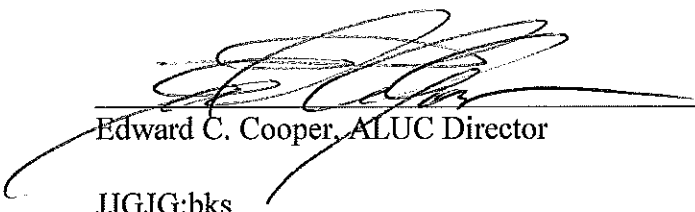
In the response to our comments on Part B of the staff assessment, CEC staff noted that (although not addressed in the staff assessment) the Solar Glare Hazard Analysis Tool (recommended by a Federal Aviation Administration interim policy) was used to determine the potential for glare impacts, and that the results show a potential for “temporary after-image” that would affect aircraft pilots using Runway 8/26 for up to one hour in the morning and in the afternoon during the spring and fall seasons. It is such impacts that Condition TRANS-9 was originally intended to address. We acknowledge that Condition TRANS-9 needs to be modified to correspond to the photovoltaic technologies potentially available to the applicant (rather than parabolic trough technology), but would recommend that a substitute condition be provided. We would encourage

consultation with Clifford Ho, who participated in the initial analysis, in formulation of a revised condition that would provide for elimination of glare impacts. If elimination of glare impacts is not possible through use of conditions, consideration should be given to modification of the array layout as a means of reducing glare impacts.

The response to our comments further states that the potential for “temporary after-image” would occur “with and without light textured glass and/or anti-reflective coating,” and that “the potential for temporary after-image can be eliminated with the use of deeply textured glass.” However, this finding has not affected the wording of Condition TRANS-12, which continues to require the project owner to use “textured glass or anti-reflective coating” on all photovoltaic solar panels, but does not specify “deeply textured glass” as mandatory. At minimum, then, we would request that Condition TRANS-12 be amended to require the use of “deeply textured glass” sufficient to eliminate the “potential for temporary after-image.”

If you have any questions, please contact me at (951) 955-5132.

Sincerely,
RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION



Edward C. Cooper, ALUC Director

JJGJG:bks

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

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Comments.ltr to CEC.doc

signed by the County of Riverside and Caltrans District 8 stating their satisfaction with the repairs to the CPM.

TRANS-6 Securing Permits/Licenses to Transport Hazardous Materials. The project owner shall ensure that permits and/or licenses are secured from the California Highway Patrol and Caltrans for the transport of hazardous materials.

Verification: The project owner shall include in its Monthly Compliance Reports, copies of all permits/licenses acquired by the project owner and/or subcontractors concerning the transport of hazardous substances.

~~**TRANS-7** Prior to the start of operation, the project owner shall seek and obtain FAA approval to insert comments or notations in the appropriate Aeronautical Charts, Airport/Facilities Directories, and Notice to Airmen (NOTAM) publication, to ensure that pilots are properly notified of the location of BSPP and the possible existence of thermal plumes and glint or glare from the solar arrays.~~

~~**Verification:** At least 30 days prior to the start of operation of any phase of the project, the project owner shall provide documentation that the AFD, NOTAM publication has been modified accordingly.~~

TRANS-8 Prior to the start of operation of any phase of the project, the project owner shall prepare an Avigation Easement in accordance with Appendix D of the California Airport Land Use Planning Handbook and have it signed by the Bureau of Land Management.

Verification: At least 60 days prior to the start of construction, the project owner shall submit a BLM-signed avigation easement to the CPM for review and approval. Once approved by the CPM, applicant shall send the Avigation Easement to the Riverside County Land Use Commission staff for review and recording purposes. Once recorded, applicant shall send a copy of the recorded document to the CPM.

~~**TRANS-9** Prior to the start of construction, the project owner shall provide a plan to the CPM which includes the measures to be taken to reduce glint and glare to the maximum extent possible. The plan shall include the following measures designed to:~~

- ~~• Block end loss reflections from reaching the sky where aircraft are operating by installing walls or screens at the north end of the parabolic trough collectors or by extending the heat collection elements beyond the north end of the collectors far enough to capture reflections when the sun is in the southern horizon, thus reducing the risk of end loss reflections.~~
- ~~• Ensure the mirrors are (1) brought out of stowage before sunrise and are aligned to catch the first rays of the morning sun; and (2) returned to stow position after sunset.~~

- ~~Ensure mirrors are continuously monitored for malfunctions and to ensure that they remain properly aligned with the sun. Acquire appropriate equipment and establish procedures to cover inoperative or malfunctioning mirrors immediately after malfunctions are discovered to prevent the escape of errant reflections.~~
- ~~Establish procedures to avoid glare while intentionally moving individual collectors off-axis to “dump” power incident on the heat collection elements during periods of high insolation. For example, if the plant operator needs to dump power and rotate several modules off-axis, the operator should start with the modules at the north-most and west-most parts of the collector field, which is furthest from the Blythe Airport to the southeast. For each module that is rotated off-axis, the operator should consider the nearest flight pattern; if it is to the east, then the module should be rotated to the west, and vice-versa. This rotating shall be done in a manner that minimizes the impact of glare on aircraft (for example, rotating modules furthest from the airport in a direction that is away from flight patterns).~~
- ~~Establish procedures to avoid glare when rotating mirrors into a wind-stow position. Plant operators shall check for aircraft in the vicinity before moving the collectors into a wind-stow position.~~

~~**Verification:** Within 30 days prior to the start of construction, the project owner shall submit the required plan for CPM review and approval. The project owner shall also notify the CPM when the required modifications have been made and are available for inspection.~~

~~In addition, the project owner shall compile data concerning the date and time of any malfunctions, the remedies taken to correct the malfunctions, and the success of the remedies. That information shall be included in the monthly compliance reports during construction and semi-annual compliance report during operation.~~

TRANS-10 Throughout the construction and operation of the project, the project owner shall document, investigate, evaluate, and attempt to resolve all project-related glare complaints. The project owner or authorized agent shall:

- Use the Complaint Resolution Form (below), or functionally equivalent procedure acceptable to the CPM, to document and respond to each complaint.
- Attempt to contact the person or persons making the complaint within 24 hours. If not contacted within 24 hours, attempt to contact the person or persons for a reasonable time period, to be determined by the CPM.
- Conduct an investigation to determine the source of glare related to the complaint.
- If the glare is project related, take all feasible measures to reduce the glare at its source.

- As soon as the complaint has been resolved to the complainant's satisfaction, submit to the CPM a report in which the complaint as well as the actions taken to resolve the complaint are documented. The report shall include (1) a complaint summary, including the name and address of the complainant; (2) final results of glare reduction efforts; and (3) a signed statement by the complainant, if obtainable, in which complainant states that the glare problem is resolved to his or her satisfaction.

Verification: Within five business days of receiving a glare complaint, the project owner shall file with the City of Blythe Development Services Department, the Riverside County Planning Department, and the CPM a copy of the Glare Complaint Resolution Form, documenting the resolution of the complaint. If mitigation is required to resolve a complaint and the complaint is not resolved within three business days, the project owner shall submit an updated Glare Complaint Resolution Form when the mitigation is implemented.

TRANS-11 Prior to the start of construction of the transmission line, the project owner shall submit a plan identifying measures to be taken to mark and light the lines and poles beneath runway approaches, typical pattern entry corridors, and typical departure routes pursuant to criteria included in FAAC 70/7460-1K. The plan shall identify the number and location of poles that are subject to the criteria and the exact measures to be taken to properly mark and light the poles in conformance with FAAC 70/7460.

Verification: At least 30 days prior to the start of transmission line mobilization, the project owner shall provide a construction plan for review and approval. Once the plan has been approved and implemented, the project owner shall provide documentation showing completion of the transmission line, including the required marking and lighting measures.

TRANS-12 The project owner shall use textured glass or anti-reflective coating on all photovoltaic (PV) solar panels.

Verification: At least 30 days prior to construction of PV panels, the project owner shall provide documentation that textured glass or anti-reflective coating will be used on all PV solar panels.

TRANS-13 The project owner shall construct all exposed PV panel support structures with matt or burnished surfaces.

Verification: At least 30 days prior to construction of PV panels, the project owner shall provide documentation showing that matt or burnished surfaces will be used on all PV panel support structures. matt or burnished surfaces on all PV solar panels.