

**AIRPORT LAND USE COMMISSION  
RIVERSIDE COUNTY**



<b>DOCKET</b>	
<b>09-AFC-6</b>	
DATE	JAN 19 2010
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January 19, 2010

**CHAIR**  
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**VICE CHAIRMAN**  
Rod Ballance  
Riverside

California Energy Commission  
Attn.: Alan Solomon, Project Manager  
1516 Ninth Street  
Sacramento CA 92225

**COMMISSIONERS**

RE: Blythe Solar Power Project (09-AFC-6)

Arthur Butler  
Riverside

Dear Mr. Solomon:

Robin Lowe  
Hemet

Thank you for providing the Riverside County Airport Land Use Commission (ALUC) with an opportunity to participate in the review of the above-referenced project.

John Lyon  
Riverside

Glen Holmes  
Hemet

A portion of the proposed power plant site is located within the Airport Influence Area of Blythe Airport, and a large portion of the transmission line between the proposed power plant and the proposed substation traverses the Airport Influence Area. If this project were not located on Federal land and if jurisdiction over its components were not preempted, the applicant would be required to submit the proposal to the Riverside County Airport Land Use Commission for formal review prior to its consideration by the local governing body, the Riverside County Board of Supervisors.

Melanie Fesmire  
Indio

**STAFF**

Director  
Ed Cooper

John Guerin  
Barbara Santos

The Land Use section appropriately lists the applicable laws, ordinances, regulations, and standards administered and implemented by ALUC. The Riverside County Airport Land Use Commission is responsible for reviewing major land use projects subject to city, county, school district, or special purpose district permitting processes within Airport Influence Areas and determining whether these projects are consistent with the Compatibility Plan adopted by the Commission for the airport's environs. The purpose of the Airport Land Use Commission, pursuant to Section 21670(a)(2) of the State of California Public Utilities Code, is "to protect 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 that these areas are not already devoted to incompatible uses." As such, the AFC states that "a review of airport land use compatibility with the Riverside County ALUC will be required," and we would welcome the opportunity to evaluate this project as a major land use action and provide an advisory compatibility determination. (As noted below, with respect to development on federal land, ALUC has no official jurisdiction.)

County Administrative Center  
4080 Lemon St., 9th Floor  
Riverside, CA 92501  
(951) 955-5132

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

In the course of project review, the ALUC considers a number of factors, including housing density (for residential projects), population intensity (for nonresidential projects), noise sensitivity, airspace obstruction, overflight, and hazards to flight. This proposed project, in its operating stage, would clearly comply with population intensity standards, and is not noise-sensitive. We are concerned, however, that the proposed use could constitute a hazard to flight by reflecting sunlight towards aircraft approaching or departing from Blythe Airport. Uses that cause flashes of glare could distract aircraft operators, with devastating results.

Given the State's objective of increasing the proportion of electric power generated by renewable energy sources, along with the development intensity limitations imposed by

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ALUCs, it is not surprising that landowners and entrepreneurs are increasingly likely to propose renewable energy facilities in the vicinity of airports. However, we are not aware of any publicly accessible information base addressing the visual effects of large-scale solar arrays as viewed from above. In this regard, we would recommend that the Energy Commission analyze the reflectivity of the proposed solar-tracking parabolic mirror system in comparison to the reflectivity of panels utilized at power generating facilities using alternative solar technologies. If the reflectivity using this technology is found to be significantly greater than the reflectivity of panels in, for example, a photovoltaic solar project, your agency should include among the alternatives in the environmental document a project that utilizes photovoltaic solar and a project with mixed solar (the applicant's proposal outside the Airport Influence Area and photovoltaic technology inside the Airport Influence Area). Neither the California Energy Commission nor the Bureau of Land Management should be constrained by the identity of the applicant in determining the type of project that would best serve the public objectives of "energy independence, environmental protection, and economic prosperity."

In reference to impacts on aircraft navigation, the cumulative effects of both solar projects and more traditional power plants should be considered, and the analysis should extend beyond projects on public land to include projects on privately owned properties in the City of Blythe and those portions of unincorporated Riverside County within a ten-mile radius. It should be noted that there are two existing "fossil fuel" power generation facilities located directly to the east of Blythe Airport. These facilities are located just beyond the easterly terminus of the east-west runway and generate visible plumes. Additionally, a photovoltaic solar energy project is proposed for location on airport property.

**At some point, a question arises as to whether the cumulative effects of all these facilities would constitute too many distractions for pilots attempting to take off from, or land on, a Blythe Airport runway.**

Pursuant to Policy 4.3.7 of the Countywide Policies of the 2004 Riverside County Airport Land Use Compatibility Plan:

"New land uses that may cause visual, electronic, or increased bird strike hazards to aircraft in flight shall not be permitted within any airport's influence area. Specific characteristics to be avoided include:

- (a) Glare or distracting lights which could be mistaken for airport lights;
- (b) Sources of dust, steam, or smoke which may impair pilot visibility;
- (c) Sources of electrical interference with aircraft communications or navigation;
- (d) Any proposed use, especially landfills and certain agricultural uses, that creates an increased attraction for large flocks of birds. (Refer to FAA Order 5200.5A, *Waste Disposal Sites on or Near Airports* and Advisory Circular 150/5200-33A, *Hazardous Wildlife Attractants On or Near Airports*.)"

This policy is implemented through the application of the following "standard" condition:

The following uses shall be **prohibited**:

- (a) Any use which would direct a steady light or flashing light of red, white, green, or amber colors associated with airport operations toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing at an airport, other than an FAA-approved

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navigational signal light or visual approach slope indicator.

- (b) **Any use which would cause sunlight to be reflected towards an aircraft engaged in an initial straight climb following takeoff or towards an aircraft engaged in a straight final approach towards a landing at an airport.**
- (c) Any use which would generate smoke or water vapor or which would attract large concentrations of birds, or which may otherwise affect safe air navigation within the area.
- (d) Any use which would generate electrical interference that may be detrimental to the operation of aircraft and/or aircraft instrumentation.

Given these provisions, the Energy Commission should determine whether the project, as proposed, would cause the reflection of sunlight toward aircraft engaged in the highlighted maneuvers following takeoff or prior to landing. If such an effect is likely, the project would not be in compliance with our agency's substantive requirements.

Airport Land Use Commissions have no jurisdiction over federal lands; nevertheless, ALUC review of individual projects in an advisory capacity can serve to enhance their compatibility with airport activity.

In the event that the Energy Commission decides to refer the applicant to ALUC for advisory project review, or in the event of a voluntary review, the applicant shall submit a complete ALUC application packet for review. The ALUC application form is available at [www.rcaluc.org](http://www.rcaluc.org) (click Forms).

In the event that the Energy Commission and/or the Bureau of Land Management decide to conduct airport compatibility review for this project without utilizing the ALUC review process, ALUC staff would recommend that the project be subject to the above "standard" condition, supplemented by the following special conditions:

If the mirrors are mounted on a framework, such framework shall have a flat or matte finish so as to minimize reflection of sunlight.

In the event that any incidence of glare or electrical interference affecting the safety of air navigation occurs as a result of project operation, the permittee shall be required to take all measures necessary to eliminate such glare or interference.

Thank you for the opportunity to provide comments. If you have any questions, please contact me at (951) 955-0982.

**RIVERSIDE COUNTY AIRPORT LAND USE COMMISSION**

  
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John J. G. Guerin, Principal Planner

Cc: Blythe Airport – Attn.: Jim Rodkey, City of Blythe Director of Public Works  
CALTRANS Division of Aeronautics – Attn.: Sandy Hesnard  
Riverside County Economic Development Agency – Attn.: Chad Davies  
Marie McLean, CEC  
James Adams, CEC