CALIFORNIA ENERGY COMMISSION
1516 NINTH STREET
SACRAMENTO, CA 95814-5512
www.energy.ca.gov

January 17, 2013

California Energy Commission
DOCKETED
11-AFC-3
TN # 69176
JAN 17 2013

Mr. Andy Wilson
California Pilots Association
31438 Greenbriar Lane
Hayward, CA 94544

Subject: **Quail Brush Generation Project, Energy Commission Staff's Response to California Pilots Association Status Report #1**

Dear Mr. Wilson:

The California Energy Commission staff has reviewed the Status Report #1 that you recently filed with the Committee in charge of this proceeding. We thank you for taking the time to articulate the concerns of the California Pilots Association ("Association") regarding our review of the Quail Brush Generation Project (QBGP) Application for Certification (11-AFC-3). Staff is providing this letter in response to several requests you made in the Association's status report.

Staff review of the QBGP and preparation of the Preliminary Staff Assessment (PSA) is occurring at the same time the Federal Aviation Administration (FAA) is concluding a two-year study of thermal plumes, and conducting a meeting to outline the study results and describe a Plume Hazard model. The Energy Commission has interest in the FAA meeting occurring in Washington, D.C. and would like to receive any information that comes out of the meeting.

Staff has been working with FAA representatives on thermal plume issues since the Blythe I project came on line in 2002 and a pilot complained about turbulence from the project's thermal plumes. Staff initiated a compliance process in that case which included participants from the FAA and Caltrans Aeronautics. It became clear during this process that the FAA review of proposed construction or alteration projects via the Form 7460-1 process did not address industry generated plumes that could be a hazard to navigable airspace near airports. The FAA was also involved with the Russell City and Eastshore power plant siting proceedings in 2007 and 2008. During that period, staff encouraged the FAA to perform the necessary research and modeling to analyze potential impacts of industrial plumes on aviation safety. The FAA has previously taken the position that the standard Notice To Airmen (NOTAM) issued by the FAA advising pilots to avoid direct over-flight of all power plants is sufficient to ensure air traffic safety in this regard.

Energy Commission staff is using a plume average vertical velocity of 4.3 m/s as its current criteria to determine the critical velocity of concern to light aircraft. This is based on the Australian Civil Aviation Safety Authority (CASA) advisory circular (CASA 2004).

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ORIGINAL IN SACRAMENTO ON 1/17/2013
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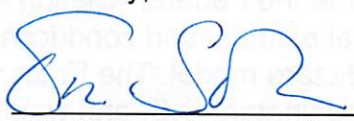
Vertical velocities below this level are not of concern to light aircraft. Staff hopes the new research and recommendations will be presented at the FAA's meeting.

The QBGP PSA will specifically address and analyze any potential hazards associated with plumes created during operation of the QBGP. As part of the Energy Commission's review process, the PSA will be made available to all interested agencies and the public for review and comment. The Energy Commission will also conduct public workshop(s) for the PSA which will allow for detailed discussion with staff members who authored the PSA. Regarding your request for staff to hold one or preferably two additional workshops *before* staff publishes the PSA, we do not plan to hold any additional workshops prior to publishing the PSA. However, plume issues can be addressed during the staff workshop(s) held after publication of the PSA and prior to publication of the Final Staff Assessment (FSA) for the project.

We would like to assure you that any pertinent information provided from the Association or the FAA that results in needed revisions or updates to the analysis presented in the PSA will be incorporated into the FSA. The Energy Commission looks forward to receiving the information forthcoming from the FAA and working with the California Pilots Association.

Please don't hesitate to contact me at (916) 651-0966 if you have any questions. Thank you.

Sincerely,



Eric Solorio, Project Manager
Siting, Transmission and Environmental
Protection Division

CC: Proof of Service List (11-AFC-3)

BEFORE THE ENERGY RESOURCES CONSERVATION AND DEVELOPMENT COMMISSION OF THE STATE OF CALIFORNIA
1516 NINTH STREET, SACRAMENTO, CA 95814
1-800-822-6228 – WWW.ENERGY.CA.GOV

APPLICATION FOR CERTIFICATION FOR THE QUAIL BRUSH GENERATION PROJECT

DOCKET NO. 11-AFC-03
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(Revised 12/28/2012)

SERVICE LIST:

APPLICANT
Cogentrix Energy, LLC
C. Richard "Rick" Neff, Vice President
Environmental, Health & Safety
John Collins, VP Development
Lori Ziebart, Project Manager
Quail Brush Generation Project
9405 Arrowpoint Boulevard
Charlotte, NC 28273
rickneff@cogentrix.com
johncollins@cogentrix.com
loriziebart@cogentrix.com

CONSULTANTS FOR APPLICANT
Tetra Tech EC, Inc.
Connie Farmer
Sr. Environmental Project Manager
Sarah McCall
Sr. Environmental Planner
143 Union Boulevard, Suite 1010
Lakewood, CO 80228
connie.farmer@tetratech.com
sarah.mccall@tetratech.com

Tetra Tech EC, Inc.
Barry McDonald
VP Solar Energy Development
17885 Von Karman Avenue, Ste. 500
Irvine, CA 92614-6213
barry.mcdonald@tetratech.com

COUNSEL FOR APPLICANT
Bingham McCutchen LLP
Ella Foley Gannon
Camarin Madigan
Three Embarcadero Center
San Francisco, CA 94111-4067
ella.gannon@bingham.com
camarin.madigan@bingham.com

INTERVENORS
Roslind Varghese
9360 Leticia Drive
Santee, CA 92071
roslindv@gmail.com

Rudy Reyes
8655 Graves Avenue, #117
Santee, CA 92071
rreyes2777@hotmail.com

Dorian S. Houser
7951 Shantung Drive
Santee, CA 92071
dhouser@cox.net

Kevin Brewster
8502 Mesa Heights Road
Santee, CA 92071
lzpup@yahoo.com

Mr. Rob Simpson, CEO
Helping Hand Tools
1901 First Avenue, Suite 219
San Diego, CA 92101
rob@redwoodrob.com

Sierra Club, San Diego Chapter
c/o Law Office of Robert W. Wright
Robert W. Wright
716 Castro Street
Solana Beach, CA 92075
bob.wright@mac.com

Sunset Greens
Homeowners Association
c/o Briggs Law Corporation
Cory J. Briggs
Isabel E. O'Donnell
99 East "C" Street, Suite 111
Upland, CA 91786
cory@briggslawcorp.com
isabel@briggslawcorp.com

INTERVENORS (cont'd.)
HomeFed Fanita Rancho, LLC
c/o Allen Matkins Leck Gamble
Mallory & Natsis LLP
Jeffrey A. Chine
Heather S. Riley
501 West Broadway, 15th Floor
San Diego, CA 92101
jchine@allenmatkins.com
hriley@allenmatkins.com
jkaup@allenmatkins.com
vhoy@allenmatkins.com

Preserve Wild Santee
Van Collinsworth
9222 Lake Canyon Road
Santee, CA 92071
savefanita@cox.net

Center for Biological Diversity
John Buse
Aruna Prabhala
351 California Street, Suite 600
San Francisco, CA 94104
jbuse@biologicaldiversity.org
aprabhala@biologicaldiversity.org

***California Pilots Association**
Andy Wilson
31438 Greenbrier Lane
Hayward, CA 94544
andy.wilson@calpilots.org

*Indicates Change

INTERESTED AGENCIES

California ISO
e-recipient@caiso.com

City of Santee
Department of Development Services
Melanie Kush
Director of Planning
10601 Magnolia Avenue, Bldg. 4
Santee, CA 92071
mkush@ci.santee.ca.us

City of San Diego
Morris E. Dye
Development Services Dept.
1222 First Avenue, MS 501
San Diego, CA 92101
mdye@sandiego.gov

County of San Diego
Mindy Fogg
Land Use Environmental Planner
Advance Planning
Department of Planning & Land Use
5510 Overland Avenue, Suite 310
San Diego, CA 92123
mindy.fogg@sdcounty.ca.gov

ENERGY COMMISSION – PUBLIC ADVISER

Jennifer Jennings
Public Adviser's Office
publicadviser@energy.ca.gov

COMMISSION DOCKET UNIT

California Energy Commission –
Docket Unit
Attn: Docket No. 11-AFC-03
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512
docket@energy.ca.gov

OTHER ENERGY COMMISSION PARTICIPANTS (LISTED FOR CONVENIENCE ONLY):

After docketing, the Docket Unit will provide a copy to the persons listed below. Do not send copies of documents to these persons unless specifically directed to do so.

KAREN DOUGLAS
Commissioner and Presiding Member

ANDREW McALLISTER
Commissioner and Associate Member

Raoul Renaud
Hearing Adviser

Eileen Allen
Commissioners' Technical Adviser for Facility Siting

Galen Lemei
Adviser to Commissioner Douglas

Jennifer Nelson
Adviser to Commissioner Douglas

David Hungerford
Adviser to Commissioner McAllister

Patrick Saxton
Adviser to Commissioner McAllister

Eric Solorio
Project Manager

Stephen Adams
Staff Counsel

DECLARATION OF SERVICE

I, Diane L. Scott declare that on January 17, 2013, I served and filed copies of the attached **Quail Brush Generation Project (11-AFC-03) Energy Commission Staff's Response to California Pilots Association Status Report #1,** dated January 17, 2013. This document is accompanied by the most recent Proof of Service, which I copied from the web page for this project at: http://www.energy.ca.gov/sitingcases/quailbrush/index.html.

The document has been sent to the other parties in this proceeding (as shown on the Proof of Service) and to the Commission's Docket Unit, as appropriate, in the following manner:

(*Check one*)

For service to all other parties and filing with the Docket Unit at the Energy Commission:

_X_ I e-mailed the document to all e-mail addresses on the Service List above and personally delivered it or deposited it in the US mail with first class postage to those parties noted above as "hard copy required"; **OR**

___ Instead of e-mailing the document, I personally delivered it or deposited it in the US mail with first class postage to all of the persons on the Service List for whom a mailing address is given.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that I am over the age of 18 years.

Dated: January 17, 2013

Diane L. Scott

Diane L. Scott, *Project Assistant*
Siting, Transmission and Environmental Protection Division