

Patrick Brown

From: Brown, Bronwyn <Bronwyn.Brown@sdcounty.ca.gov>
Sent: Wednesday, May 9, 2018 12:49 PM
To: Patrick Brown
Cc: Mills, Benjamin; Koutoufidis, Nicholas
Subject: RE: County Airport's Comments on Proposed Solar Farm Adjacent to Jacumba Valley Airport

Hi Pat,

As mentioned below if the FAA reviews the glare study and accepts it, the comments below are considered final and you should save this email. I have asked Eric Nelson to inform me if the FAA requests to review the study.

From: Patrick Brown [mailto:Patrick.Brown@baywa-re.com]
Sent: Wednesday, May 09, 2018 7:05 AM
To: Brown, Bronwyn <Bronwyn.Brown@sdcounty.ca.gov>
Cc: Mills, Benjamin <Benjamin.Mills@sdcounty.ca.gov>; Koutoufidis, Nicholas <Nicholas.Koutoufidis@sdcounty.ca.gov>
Subject: RE: County Airport's Comments on Proposed Solar Farm Adjacent to Jacumba Valley Airport

Ok thanks for sending. I will get the revised version back to you today. Will these comments be finalized in a letter after I send the revised plan?

Patrick Brown | +1 619 733 2649 | patrick.brown@baywa-re.com

From: Brown, Bronwyn [<mailto:Bronwyn.Brown@sdcounty.ca.gov>]
Sent: Tuesday, May 8, 2018 2:14 PM
To: Patrick Brown <Patrick.Brown@baywa-re.com>
Cc: Mills, Benjamin <Benjamin.Mills@sdcounty.ca.gov>; Koutoufidis, Nicholas <Nicholas.Koutoufidis@sdcounty.ca.gov>
Subject: County Airport's Comments on Proposed Solar Farm Adjacent to Jacumba Valley Airport

Hi Pat,

When you have a chance, can you please send an updated plot plan showing the project is not being built with RPZ's that would be appreciated.

Below are the County Airport Staff's comments. Please review and let me know if you would like to discuss or meet with them.

With respect to the proposed Solar Farm Project adjacent to Jacumba Valley Airport, Airport Staff has the following comments:

The FAA has evaluated the proposed Solar Farm project, and has found that portions of the development would not have adverse effects on navigable aviation. Although the FAA has evaluated the project with respect to Part 77 (airspace obstructions), it's our understanding at County Airports, FAA did not evaluate the project with respect to potential reflectivity impacts. It was our expectation this would take place within the FAA's 7460 review process, as mentioned in FAA's Solar Guide; Chapter 3, Section 3.1. However, we understand the project is on a short timeline and as requested by the County, the applicant has provided a Solar Panel Reflectivity Analysis utilizing Sandia's online program. Per their analysis and submitted report, the proposed project's reflectivity would not have an adverse effect on Jacumba Valley Airport. However, it's important to note, the Sandia Solar Panel Reflectivity Program "only" provides analysis for aircraft on final approach to each runway end. The program currently is not capable of evaluating reflectivity issues related to overflights, flights in the airport patterns, or circling approaches to the airport.

Due to the size of this proposed project (over 1,000 acres), and it's close proximity to the airport (immediately adjacent to the north), we believe there will likely be reflectivity impacts on pilots with respect to sun angles not analyzed by the Sandia Program. We understand however, the Sandia Reflectivity Web Based Program is likely the best solar panel reflectivity analysis tool currently available.

Therefore, we at County Airports do not object to the project with the following conditions:

1. The project is consistent with the Jacumba Airport Land Use Compatibility Plan (ALUCP).
2. The project eliminates any obstructions, solar panels or other objects, within the Runway Protect Zones (Zone 1). This relates to the first comment.
3. The project continues to be consistent with FAA's 7460 airspace analysis. If the FAA later decides to object to the project, due to a subsequent evaluation of the solar panel reflectivity, then the Airport's comments will support the FAA's final position.
4. If possible, during the public review process, the airport users have an opportunity to review and comment on the project.

Please let me know if you have any additional questions.

Eric

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