

From: [alasdair mullarney](#)
To: [Harris, Susan](#)
Cc: [Cherry Diefenbach](#)
Subject: JVR DEIR
Date: Monday, November 23, 2020 12:01:59 PM

Dear Ms. Harris,

My name is Alasdair Mullarney and I am Director of Operations for AGCSC, the glider club which operates primarily at County Airport L78, Jacumba, California.

I110-1

I have studied the DEIR relating to a proposal to develop a significant solar power generation project in the Jacumba area. Some details of this proposal give me great cause for concern and I wish to suggest some modifications – relatively simple in the scale of the proposal.

I110-2

Firstly – and most critically, a field of solar panels and high fencing immediately off the West end of the runway would present a very real hazard to a glider encountering difficulty either on launch or on approach to the runway. I know of several occasions in the past where gliders have, in emergency situations, made safe landings on the soft terrain as it currently exists. Such an emergency would likely prove lethal should the proposed installation proceed without modification.

I110-3

Secondly, our club uses a winch to launch gliders: a cable attached the glider is rapidly wound in by a winch situated at the opposite end of the airport; as the glider picks up speed it can climb rapidly to altitude. It can happen, in various emergency situations, that the cable must be jettisoned - where it is at the mercy of the wind conditions. The upper end of the cable has a drogue parachute attached with several heavy carabiners which would undoubtedly cause damage should they land on a solar panel. This would almost certainly be a repeating occurrence over time when launching to the West with solar panels closely flanking the runway, both North and South.

I110-4

Lastly, there is concern about possible glare from reflections which may affect vision, and therefore judgment, of pilots in close proximity to the West end of the runway. The DEIR addresses the issue of glare from the perspective of a pilot making a normal approach at a shallow angle. This is not representative of the way gliders are flown at Jacumba, frequently circling for long periods at lower altitudes and making much steeper approaches than would a powered aircraft.

I110-5

I believe it would mitigate these issues if the proposal were modified to exclude any installation East of the dirt road at Longitude 116°10'44" and South of Old Highway 80.

I110-6

I would point out that glider activity at Jacumba is by far the greatest contributor to aircraft operations at Jacumba airport - and has been for decades. I began flying at Jacumba in 1988 and now serve in the club as an FAA Certificated Flight Instructor with consequent responsibility for safety oversight.

I110-7

In closing may I say that I am generally in favor of renewable energy strategies, but must confess that I am somewhat taken aback at the prospect of such a radical transformation of the Jacumba Valley. However, I will leave it to others to raise concerns about environment, aesthetics and other concerns as they see fit. I shall confine my plea to the potentially life-threatening issue of airport operations safety, and trust that it will be acted upon with prudence.

I110-8

Alasdair Mullarney, Operations Director AGCSC, CFI-G