

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



May 13, 2024

SCH #: 2024040604
GTS #: 04-NAP-2024-00354
GTS ID: 32539
Co/Rt/Pm: Napa/29/R7.094

Matt Ringel, Planner II
Napa County Planning Division
1195 Third Street, Suite 210
Napa, CA 94559

Governor's Office of Planning & Research

May 13 2024

STATE CLEARINGHOUSE

Re: Dynamo Solar Commercial Floating Solar Use Permit (P22-00340-UP), Zone Change (P23-00181-ZC), and Variance (P23- 00268-VAR) – Mitigated Negative Declaration (MND)

Dear Matt Ringel:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Dynamo Solar Floating Solar Use Permit, Zone Change, and Variance Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the April 2024 Draft MND.

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

Project Understanding

The proposed project would construct approximately 56-acres of floating solar panels on Napa Sanitation District's existing wastewater ponds, including approximately 2-miles of electrical transmission lines, with portions constructed above and below ground. The electrical transmission route will consist of 51 transmission line towers ranging in height from 38.5 feet to 74.5 feet tall.

Aeronautics

The proposed Project site is in Compatibility Zone D, of the Napa County Airport and therefore must adhere to the safety criteria and restrictions defined in the Airport Land Use Compatibility Plan (ALUCP) adopted by the Airport Land Use Commission (ALUC) pursuant to the PUC, Section 21674.

Per the California Public Utilities Code Section 21001 et seq. relating to the State Aeronautics Act, Section 21676(b) "prior to the amendment of a general plan...within the planning boundary established by the airport land use commission pursuant to Section 21675, the local agency shall first refer the proposed action to the commission. If the commission determines that the proposed action is inconsistent with the commission's plan, the referring agency shall be notified." Any proposed development in the defined safety zones, therefore, must adhere to the safety criteria and restrictions defined in the Airport Land Use Compatibility Plan(s) adopted by the ALUC pursuant to the PUC, Section 21674.

Compatibility concerns regarding airport obstructions and hazards to flight (such as wildlife attractants, lighting, or glare i.e., solar, etc.) should also be considered for further review upon site specific updates or projects. The project should take considerable review of the safety risk of high solar use near the airport due to any flight hazards it may cause to pilots. The presence of solar panels near airport facilities poses a significant hazard to aviation safety. Glare and reflection from solar panels can interfere with pilots' visibility during critical phases of flight, such as takeoff, landing, and taxiing. Moreover, the reflective surfaces of solar panels may disrupt air traffic control operations by creating visual distractions or impairing the readability of important instruments and displays. To mitigate these safety concerns, it is essential to conduct a comprehensive assessment in collaboration with aviation experts, regulatory authorities, and stakeholders. This assessment should evaluate any potential impacts of solar on flight operations, identify mitigation measures where possible, and establish clear guidelines for the safe integration of renewable energy infrastructure near airports.

The proposed Project must also address requirements from the Federal Aviation Administration (FAA), specified in Title 14 of the Code of Federal Regulations, Part 77. (14 CFR Part 77). Title 14 CFR Part 77.9 provides vertical and horizontal criteria for construction near an airport. To ensure compliance notices should be submitted to the FAA's Obstacle Evaluation Group (OEG) online ([link](#)). Conditions for approval shall be met if determined by the FAA.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Melissa Hernandez, Associate Transportation Planner via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please contact LDR-D4@dot.ca.gov.

Matt Ringel, Planner II
May 13, 2024
Page 3

Sincerely,

A handwritten signature in black ink, appearing to read "Luo Yunsheng". The signature is fluid and cursive, with the first name "Luo" and the last name "Yunsheng" written in a single continuous stroke.

YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse