

Barstow Airport Aviation Safety Committee (BAASC)
P.O. Box 117 Daggett, CA. 92327

April 29, 2019

County of San Bernardino, Land Use Services Department
Tom Nieves, Contract Planner
385 N. Arrowhead Avenue, First Floor
San Bernardino, CA 92415 Tom.Nieves@lus.sbcounty.gov
RE: Daggett Solar Power Facility, Draft EIR (SCH No. 2018041007)

Dear Mr. Nieves,

We are pleased to submit our comments and concerns regarding the proposed Daggett Solar Power Project DEIR.

We are very concerned that Addendum H-3 (Airport Safety and Compatibility Technical Memorandum) of the DEIR has vastly understated impacts to aircraft safety and to safe airport operation. We believe that construction of the project, as proposed, would result in the following very serious and unaddressed safety issues for both the general aviation community and for the military community which uses the airport heavily for helicopter flight training.

1. **Reflections/Glare/Glint** - The DEIR glare/glint analysis is defective in that it only addresses glare from the sun affecting aircraft making straight-in approaches to land. In actuality, many landings are not "straight-in" approaches but are "pattern" landings. A pattern landing requires an aircraft to "fly the pattern" which is a three-legged approach to the actual landing. The three aircraft legs include the "downwind" leg parallel to the runway, the "cross-wind" leg at a right-angle to the runway and "final" leg in line with the runway. The glare/glint analysis completely ignores the negative impact of reflections affecting aircraft on the downwind and cross-wind legs. Further, the DEIR discusses potential impacts only to aircraft making straight-in approaches however, the impact to aircraft making departures is not addressed. Finally, the DEIR claims no glare/glint impact at night however if a panel is reflective (even partially reflective) during the daytime, it is also going to be reflective at night, especially of moonlight, which in the desert can and is very bright during a substantial number of nights.

2. **Dust Effects** - The DEIR ignores impacts to aircraft from the very substantial amount of airborne dust which will be created by the proposed project. This dust, unless completely and constantly mitigated (unlikely at best) will obscure pilot's views during takeoff, while flying in the pattern and while landing. Obscuring of a pilot's view will at best, cause the aircraft to have to abort the takeoff or the landing and, at worst, cause the pilot to lose "situational awareness", in other words, to be unable to judge the position of the aircraft with relation to the ground and to the aircraft height above the ground. Losing view of the ground is likely to cause an aircraft to collide violently with the ground, with catastrophic results. In addition, dust ingestion into aircraft engines is also a very serious concern. Aircraft engines must breath air. Dust ingestion can also be severe enough to cause actual engine failure. Again, this can lead to catastrophic results (i.e. aircraft crashes). Finally, heavy dust ingestion into aircraft engines causes accelerated aircraft engine wear and substantially higher maintenance and repair costs.

We urge you to consider and to address the above very serious safety and cost issues during your review of the Draft EIR. Siting the proposed solar project so as to surround an active airport on three sides is, in our view, a very dangerous and ill-advised proposition. The Barstow area aviation community, both civilian and military deserve no less than a continued safe flying environment at the Barstow/Daggett airport. Thank-you for considering our significant safety concerns.

Signed,

Jack Unger
Chair - Barstow Airport Aviation Safety Committee