

DEPARTMENT OF TRANSPORTATION

DIVISION OF AERONAUTICS – M.S.#40

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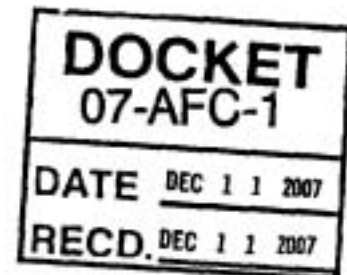
TTY 711



*Flex your power!
Be energy efficient!*

December 11, 2007

Mr. Jim Adams, MA, Planner II
Environmental Office, MS 40
California Energy Commission
1516 9th Street
Sacramento, California 95814-5504



Dear Mr. Adams:

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), reviewed the proposed Victorville 2 Hybrid Power Project (Victorville 2) Site Plan and proposed site on October 4, 2007 with Peter Soderquist, manager of the Southern California Logistics Airport (VCV). We also conducted overflights of two similar existing sites, known as Kramer Junction and Harper Lake, respectively, located between Edwards Air Force Base and Barstow, California.

The Division has technical expertise in the areas of airport operations safety, noise, and airport land use compatibility. We are a funding agency for airport projects, and we have permit authority for public-use and special-use airports and heliports. We offer the following comments:

The proposal is for the construction a 250-acre solar array and support infrastructure near the approach end of Runway 17 at VCV. As part of our review, the Division relies on Federal Aviation Administration (FAA) aeronautical studies to evaluate whether proposed structures near airports are flight hazards. The studies are required by Federal Aviation Regulation (FAR) Part 77, "Objects Affecting Navigable Airspace." FAR Part 77 is a FAA regulation and is available on-line at <https://oecaaa.faa.gov/oecaaa/external/portal.jsp>. FAR Part 77, does address hazards to flight; however, it does not address other types of hazardous material, features, or affects created by similar projects. Therefore, we conducted overflights, both at low altitude and traffic pattern altitude, to simulate conditions proximate to those that might be found at Victorville 2. At approach altitudes of 200 to 300 feet, we found no unusual turbulence or thermal plume rising from the surface of the solar array. The consistency of the surface at the two existing facilities and the turbulence directly above and downwind of the surfaces was roughly similar to overflight of a smooth water surface. We found the reflections to be somewhat sharper and cleaner than those compared at the same time over water; however, the flash and distraction level appeared to be the same by four observers, in two separate light aircraft. (See enclosed photographs.)

The Division has no objection to the proposed project, based on aircraft operational safety, provided:

- The project sponsor submits a Notice of Proposed Construction or Alteration (Form 7460-1) to the FAA and then obtains a no-hazard determination from the FAA prior to beginning construction.

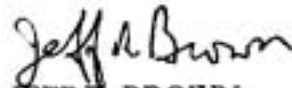
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- The VCV Airport has no objection to the facility.
- The project is compliant with the provisions of the California Environmental Quality Act.

These comments reflect the areas of concern to the Division with respect to airport safety impacts and regional airport land use planning issues. We advise you to contact our Caltrans District 8 San Bernardino office concerning surface transportation issues.

Thank you for the opportunity to review and comment on this proposal. If you have any questions, please call me at (916) 654-4565.

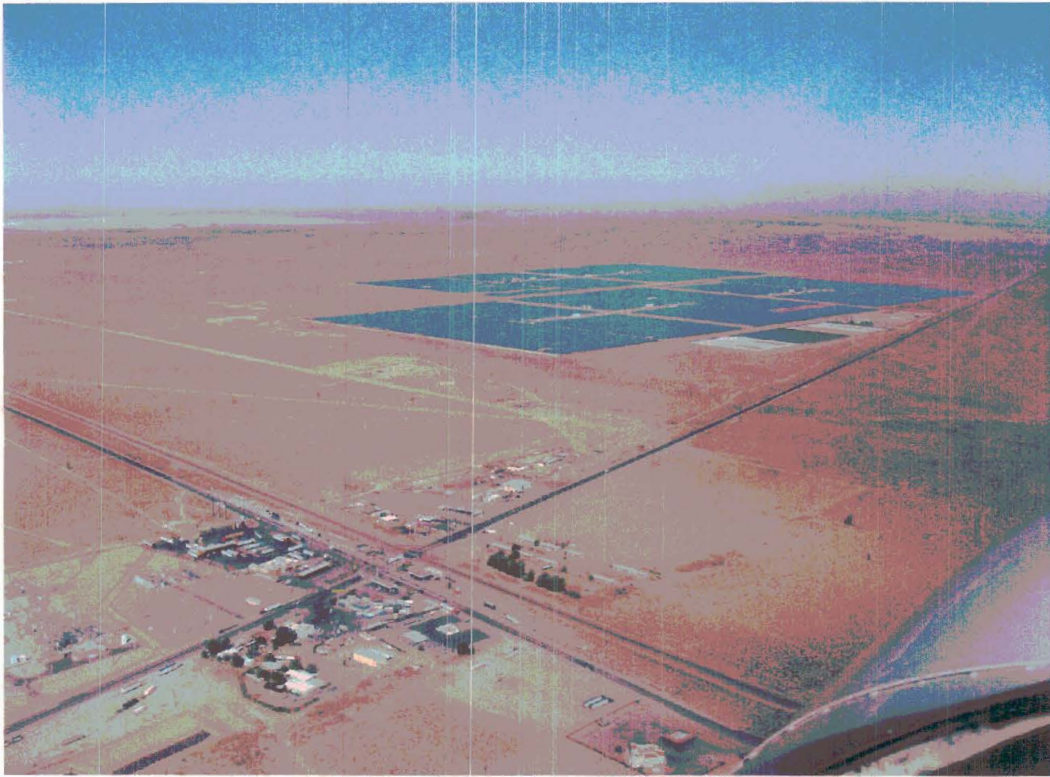
Sincerely,



JEFF R. BROWN
Aviation Safety Consultant

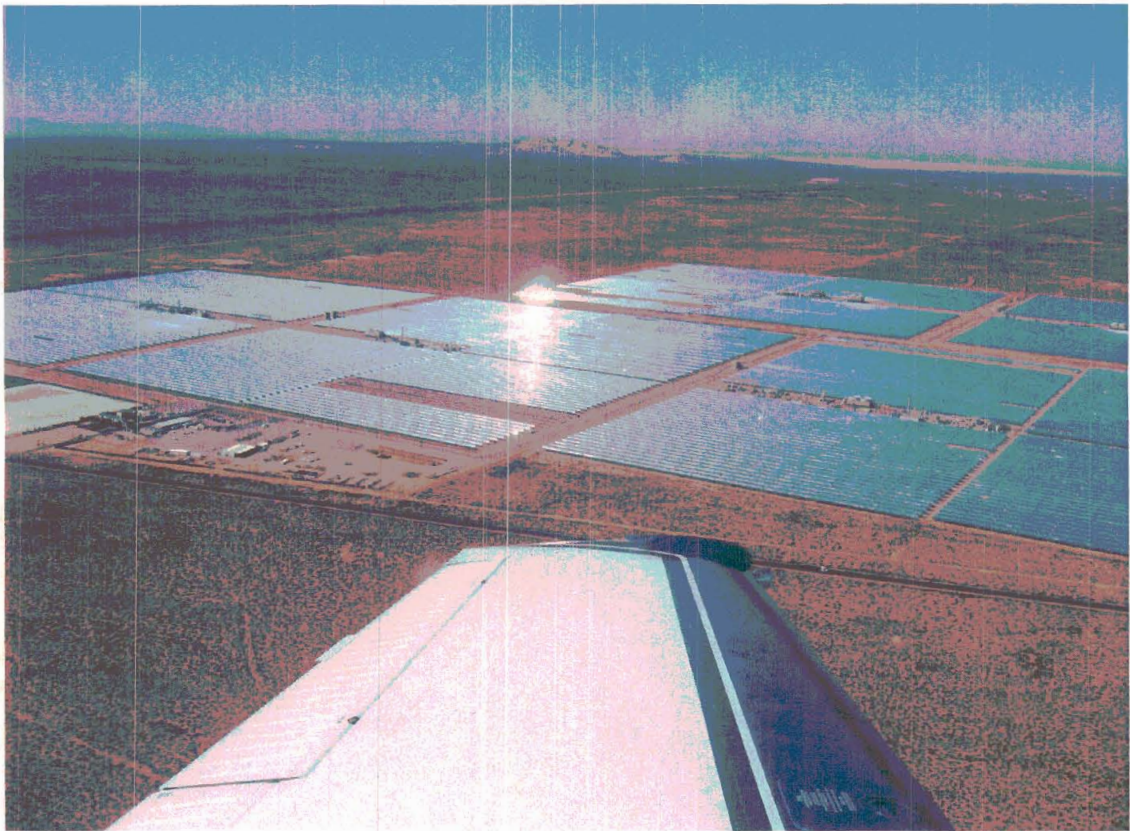
Enclosures

c: Peter Soderquist, Airport Manager
John S. Kessler, CEC Project Manager
FAA, AWP-622



"Caltrans improves mobility across California"

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