



County of San Diego, Planning & Development Services
Project Planning Division

TO: ED GOWENS, SENIOR AIRPORT PLANNER, AIRPORT AUTHORITY
FROM: NICHOLAS KOUTOUFIDIS, STAFF AIRPORT SPECIALIST
SUBJECT: **PDS2018-GPA-18-010 (JVR SOLAR) COMMENTS – AIRPORT REVIEW**
DATE: APRIL 10, 2019

The County received your email dated February 20, 2019 regarding the JVR Solar Project (Project) consistency with the Jacumba Airport Land Use Compatibility Plan (ALUCP). This memorandum provides the County's analysis and explains why the County believes the Project is consistent with the ALUCP.

CONSISTENCY DETERMINATION:

The ALUCP requires development with the Jacumba Airport Influence Area to comply with certain requirements, including maximum lot coverage and open land.

Maximum Lot Coverage

All development in Safety Zones 2 and 4 must adhere to maximum lot coverage requirements in Table JAC-2, with all structures counted toward coverage. JAC.2.8. Table JAC-2 compares the land use to the Safety Zone to determine if the use is incompatible, conditional, or compatible with the airport use. If a use is conditional or compatible, it is allowed with a maximum 50% lot coverage in Zone 2 and 70% lot coverage in Zone 4. Solar panel energy production is not specifically addressed on Table JAC-2, but it is most similar to the utility use "cell phone tower, wind turbines," which is marked compatible in Table JAC-2 and allowed with 50% and 70% lot coverage in Zones 2 and 4, respectively.

Lot coverage is not defined in the ALUCP or in the California Airport Land Use Planning Handbook. Your email from February 20th provides that coverage means the percentage of property ground not openly exposed to the sky. That is similar to the County's Zoning Ordinance, which defines lot coverage as "the percentage of net site area covered by the vertical projection of any structure excluding any structure not extending above grade." Under these definitions, the area between each solar panel is not included as lot coverage because the ground is openly exposed to the sky and there is no vertical projection above grade.

The Project site is 1240 acres, with 33.81 acres in Zone 2 and 87.95 acres in Zone 4.

Of the 33.81 acres in Zone 2, the County believes 8.45 to 15.21 acres are covered, which is 25% to 45%. If the County measured the general area in which solar panels are grouped together, including the uncovered area between the individual panels, the lot



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coverage would be approximately 30 acres, or 88%. But as described above, the County determined lot coverage by measuring the actual coverage from each individual solar panel at its widest part and excluding the uncovered area between them from the coverage total. Using that methodology, the lot coverage is between 8.45 to 15.21 acres, or 25% to 45%.

Of the 87.95 acres in Zone 4, approximately 22 acres to 39.58 are covered, which is 25% to 45%. If the County measured the general area in which solar panels are grouped together, including the uncovered area between the individual panels, the lot coverage would be approximately 73 acres, or 83%. But as described above, the County determined lot coverage by measuring the actual coverage from each individual solar panel and excluding the uncovered area between them from the coverage total. Using that methodology, the lot coverage is approximately 22 to 39.58 acres, or 25% to 45%.

Because the lot coverage in Zone 2 is between 25% to 50% (which is less than 50%), and because the lot coverage in Zone 4 is 25% to 45% (which is less than 70%), the Project's lot coverage is consistent with the ALUCP.

Open Land Criteria

Project sites 10 acres or greater must provide at least one area of open land (0.5 acres) per 10 acres. JAC.2.8. Open land is intended to allow light aircraft to have controlled emergency landings, and an area qualifies as "open land" if it meets the following requirements: free of most structures and obstacles such as walls, large trees or poles, and overhead wires; minimum dimensions of 75 x 300 feet; oriented in the typical direction of flights. JAC.2.9(b)-(c). Roads are acceptable as open land if they meet the above criteria. JAC.2.9(d).

As noted above, the Project site impacts 121.95 acres within Safety Zone 2 and 4, and it requires 6.1 acres to satisfy the open land criteria. That total provided is 8.8 acres, which satisfies the requirement for 0.5 acre of open land per 10 acres of project site.

Summary

The project is consistent with the Jacumba Airport Land Use Compatibility Plan and should be approved by the Airport Land Use Commission.