

AGENDA REGULAR MEETING SAN BENITO COUNTY AIRPORT LAND USE COMMISSION

DATE: Thursday, December 17, 2020

6:00 P.M.

LOCATION: Via- Zoom

Attendance at the ALUC meeting is closed to the public per Executive Order N-29-30. The public may join meeting by Zoom: https://zoom.us/join per the instructions

provided at the end of the agenda:

Meeting ID: 829-6834-0901

COMMISSIONERS: Chair Ignacio Velazquez, Vice Chair Peter Hernandez,

Jaime De La Cruz, Mary Vazquez Edge, and Rolan Resendiz

Alternates: San Benito County: Mark Medina; City of San Juan Bautista: César E. Flores

Persons who wish to address the Board of Directors must complete a Speaker Card and give it to the Clerk prior to addressing the Board. Those who wish to address the Board on an agenda item will be heard when the Chairperson calls for comments from the audience. Following recognition, persons desiring to speak are requested to advance to the podium and state their name and address. After hearing audience comments, the Public Comment portion of the agenda item will be closed. The opportunity to address the Board of Director's on items of interest not appearing on the agenda will be provided during Section C. Public Comment.

6:00 P.M. CALL TO ORDER:

A. ACKNOWLEDGE Certificate of Posting

B. NOTICE OF TEMPORARY PROCEDURES FOR AIRPORT LAND USE COMMISSION MEETINGS (Please see Zoom instructions at the end of the agenda)

<u>Pursuant to California Governor Gavin Newsom's Executive Order N-29-20</u> issued on March 17, 2020, relating to the convening of public meetings in response to the COVID-19 pandemic. Additionally, members of the Airport Land Use Commission can attend the meeting via teleconference and to participate in the meeting to the same extent as if they were present.

C. PUBLIC COMMENT: (Opportunity to address the Board on items of interest not appearing on the agenda. No action may be taken unless provided by Govt. Code Sec. 54954.2. Speakers are limited to 3 minutes.)

CONSENT AGENDA:

(These matters shall be considered as a whole and without discussion unless a particular item is removed from the Consent Agenda. Members of the public who wish to speak on a Consent Agenda item must submit a Speaker Card to the Clerk and wait for recognition from the Chairperson. Approval of a consent item means approval as recommended on the Staff Report.)

- 1. **FIND** Project No. 2018-23, Associated with Assessor Parcel No. 053-350-005 on the corner of Wright Road and San Felipe Road in the City of Hollister, **CONSISTENT** with the 2012 Hollister Municipal Airport Land Use Compatibility Plan Lezama
- 2. **FIND** Project No. 2018-6, Associated with Assessor Parcel Nos. 019-090-026 and 053-350-0030 located on 1100 San Felipe Road in the City of Hollister, **CONSISTENT** with the 2012 Hollister Municipal Airport Land Use Compatibility Plan Lezama

Adjourn to ALUC Meeting on Thursday, January 21, 2021. Agenda Deadline is Tuesday, January 05, 2020 at 12:00 P.M.

In compliance with the Americans with Disabilities Act (ADA), if requested, the Agenda can be made available in appropriate alternative formats to persons with a disability. If an individual wishes to request an alternative agenda format, please contact the Clerk of the Council four (4) days prior to the meeting at (831) 637-7665. The Council of Governments Board of Directors meeting facility is accessible to persons with disabilities. If you need special assistance to participate in this meeting, please contact the Clerk of the Council's office at (831) 637-7665 at least 48 ours before the meeting to enable the Council of Governments to make reasonable arrangements to ensure accessibility.

ZOOM INSTRUCTIONS:

Members of the public are encouraged to participate in Board meetings in the following ways:

Remote Viewing

Members of the public who wish to watch the meeting can view the meeting online through Zoom. Instructions for participating via Zoom are included below.

2. Written Comments & Email Public Comment

Members of the public may submit comments via email by 5:00 PM. on the Wednesday prior to the Board meeting to the Clerk of the Board at monica@sanbenitocog.org. Regardless of whether the matter is on the agenda. Every effort will be made to provide Board Members with your comments before the agenda item is heard.

3. Airport Land Use Commission meeting - Zoom Instructions for remote Participants:

Each meeting will have a meeting ID, which is a unique number associated with an instant or scheduled meeting. Three ways to attend zoom meetings:

- 1. Over the phone (Audio only):
 - · (669) 900-6833 or (408) 638-0968.
- 2. Open the Web-browser:
 - https://zoom.us/join
- 3. Smart device Application:
 - · Apple App store: https://apps.apple.com/us/app/id546505307
 - · Android App store: https://play.google.com/store/apps/detailsZid=u.s.zoom.videomeetings

Zoom Audio Only (phone)

If you are calling in as audio-only, please dial (669) 900-6833 or (408) 638-0968.

- 1. It will ask you to enter the **Meeting ID**, 829-6834-0901, followed by the **"#" key**, which can be found at the top page of the agenda. The meeting agenda can be found at: http://www.sanbenitocog.org/wp-content/uploads/2020/12/ALUC_Packet_121720.pdf
- 2. It will then ask for a **Participant ID**, press the "#" key to continue.
- 3. Once you enter the zoom meeting, you will automatically be placed on mute.
- 4. <u>Public Comment:</u> If you are using a phone, please press the "*9" to raise your hand, zoom facilitator will unmute you when your turn arrives.

Zoom on Web-browser or Zoom app on Tablet or Smartphone

If joining through web-browser launch: https://zoom.us/join or launch the Zoom app on your Tablet or Smartphone

- 1. Select "JOIN A MEETING"
- 2. The participant will be prompted to enter **Meeting ID**, 829-6834-0901 and name to join the meeting. Which can be found at the top page of the agenda. The meeting agenda can be found at: http://www.sanbenitocog.org/wp-content/uploads/2020/12/ALUC_Packet_121720.pdf
- 3. You can launch audio through your computer or set it up through the phone. Follow instructions provided by Zoom.
- 4. Public Comment: Click "Raise hand" icon, the zoom facilitator will unmute you when your turn arrives.

Public Comment Guidelines

- If participating on zoom Once you are selected, you will hear that you have been unmuted: State your first name, last name, and county you reside in for the record.
- The Airport Land Use Commission welcomes your comments.
- Each individual speaker will be limited to a presentation total of three (3) minutes.
- Please keep your comments, brief, to the point, and do not repeat prior testimony, so that as many people as possible can be heard. Your cooperation is appreciated.

CERTIFICATE OF POSTING

Pursuant to Government Code Section #54954.2(a) the Meeting Agenda for the Airport Land Use Commission on **December 17, 2020** at **6:00 P.M.** was posted at the following locations freely accessible to the public:

The front entrance of the Old San Benito County Courthouse, Monterey Street, Hollister, CA 95023, and the Council of Governments Office, 330 Tres Pinos Rd., Ste. C7.

Hollister, CA 95023 at the following date and time:

On the 14th day of December 2020, on or before 5:00 P.M.

The meeting agenda was also posted on the Council of San Benito County Governments website, www.sanbenitocog.org, under Meetings, ALUC, Meeting Schedule

I, Monica Gomez, swear under penalty of perjury that the foregoing is true and correct.

BY: Monica Gomez, Secretary II

Council of San Benito County Governments



Agenda Item	1
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Staff Report

To: Airport Land Use Commission

From: Veronica Lezama, Transportation Planner Telephone: (831) 637-7665

Date: December 17, 2020

Subject: Land Use Consistency Determination

Recommendation:

FIND Project No. 2018-23, Associated with Assessor Parcel No. 053-350-005 on the corner of Wright Road and San Felipe Road in the City of Hollister, CONSISTENT with the 2012 Hollister Municipal Airport Land Use Compatibility Plan.

Summary:

The ALUC application associated with assessor parcel number 053-350-005 was reviewed in accordance with the adopted 2012 Hollister Municipal Airport Land Use Compatibility Plan.

Financial Considerations:

The Airport Land Use Commission (ALUC) has an adopted application fee structure. The fee consists of a minimum \$300 non-refundable payment that is submitted at the time the application is provided to ALUC.

Background:

Land use actions proposed within the Hollister Municipal Airport Influence Area (Attachment 1) are subject to ALUC review to determine consistency with the Hollister Municipal Airport Land Use Compatibility Plan. The purpose of the Compatibility Plan is to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards.

Staff Analysis:

ALUC staff received an application for a Consistency Determination with the adopted 2012 Hollister Municipal Airport Land Use Compatibility Plan.

Project Description:

The Wright 13 Project is proposed north end of the City of Hollister in San Benito County, approximately 1.25 miles south of the Hollister Municipal Airport (Attachment 2). The applicant is proposing to create four lots from the existing 13-acre parcel. Three parcels would contain a new cannabis cultivation, distribution, and manufacturing facility, with access provided by a

private easement shared by all parcels. The remaining parcel is a stormwater detention basin. The applicant is specifically proposing to include three greenhouses totaling 341,062 square feet (Attachment 3).

During a project review, the Airport Land Use Commission considers several Compatibility Plan policies including: *Noise, Safety, Airspace Protection*, and *Overflight*. An analysis of each of the four compatibility factors is discussed below.

Noise Policy 3.2.

The Noise Policy objective is to avoid establishment of noise-sensitive land uses in the portions of airport environs that are exposed to significant levels of aircraft noise. The magnitude noise impacts are depicted by four contours, which show the greatest annualized noise impacts anticipated to be generated by the airport over the next 20 years.

The project is proposed outside of the Noise Contours (Attachment 4). As such, the project does not require additional noise attenuation measures beyond what is required by the California Building Code. As a result, the proposed project is consistent with the Hollister Municipal Airport Land Use Compatibility Plan's Noise Policy.

Safety Policy 3.3.

The Safety Policy objective is to minimize the risks associated with an off-airport aircraft accident or emergency landing. The policy focuses on reducing the potential consequences of such events by limiting sensitive land uses (i.e. residential) and intensities of non-residential uses (i.e. commercial, industrial, etc.). This policy is defined in terms of the geographic distribution of where accidents are most likely to occur based on the six safety zones.

The project is proposed within the Safety Zone 6 (Attachment 5)- the least restrictive of the Safety Zones. According to Table 2: Safety Compatibility Criteria, the *Indoor Storage* use is *Normally Compatible* and allowed within Safety Zone 6 (Attachment 6). As an additional condition of compatibility, the project must also comply with the indicated usage intensity limits and other listed conditions identified in Table 2: Safety Compatibility Criteria (Attachment 6). The applicant identifies 56 parking sports and has noted that the project's usage intensities is proposed between 24-30 employees/guest. The applicant's proposed intensity limits will not exceed those allowed in Safety Zone 6. As such, the project is consistent with the Compatibility Plan's Safety Policy.

Airspace Protection Policy 3.4.

The Airspace Protection Policy seeks to prevent creation of land use features that can be hazards to the airspace required by aircraft in flight and have the potential for causing an aircraft accident to occur.

In evaluating the airspace protection compatibility of the proposed development, three categories of hazards to airspace shall be considered: physical, visual, and electronic. The categories of hazard applicable to the project are outlined in bold below.

- a. The height of structures and other objects situated near the airport are a primary determinant of physical hazards to the airport airspace.
 - **ALUC Staff Analysis:** The project is proposed outside of the Critical Airspace Protection Zone and any object in this zone is allowed to have a height of up to 35 feet above the ground. The project structures will not exceed 20 feet in height and therefore consistent with the Federal Regulation 49 CFR Part 77, which establishes standards and notification requirements for objects affecting navigable airspace.
- b. Land use features that have the potential to attract birds and certain other wildlife to the airport area are also to be evaluated as a form of physical hazards (FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants on or Near Airports*).
 - **ALUC Staff Analysis:** The applicant is proposing a detention basin designed not hold standing water after storm events so as to not attract birds, basin pumps shall be sized and programmed accordingly to drain within 24 hours. The detention basin design is consistent with the Compatibility Plan.
- c. Visual hazards of concern include certain types of lights, sources of glare, and sources of dust, steam, or smoke.
 - **ALUC Staff Analysis:** The applicant is proposing the construction of 341,062 square feet of indoor glass greenhouse buildings for a cannabis cultivation facility. San Benito Airport Land Use Commission staff requested that the applicant provide a glare study as greenhouses may have the potential to pose hazard to pilots in the form of glare. The applicant provided a Solar Glare Analysis Study to evaluate the potential for solar glare from the project for airplanes on the final approach to the airport (Attachment 7).

The impact of glare depends on the interaction between the position of the sun, the angle and orientation of the reflective surface, the reflectivity of the surface, the size of the project, and the relative location of the observer. "Green" rated glare indicates a low potential for after-image, "yellow" rated glare indicates the potential for after-image exists, and "red" rated glare indicates the potential for retinal damage.

The report concluded that the preparer of the study "Solas does not expect the Wright 13 greenhouses to produce red-grade glare or yellow-grade glare at the evaluated flight paths. The model predicts green-grade glare at all flight paths evaluated. Results assume there are clear skies year-round and there is no screening between the greenhouses and the flight paths. The results of the Glare Gauge analysis identified four locations will experience greengrade glare as described in detail in the report, page 16. Green rated glare indicates a low potential for after-image.

a. Electronic hazards are ones that may cause interference with aircraft communications or navigation.

Staff Analysis: None

The proposed project is consistent with the Compatibility Plan's Airspace Protection Policy.

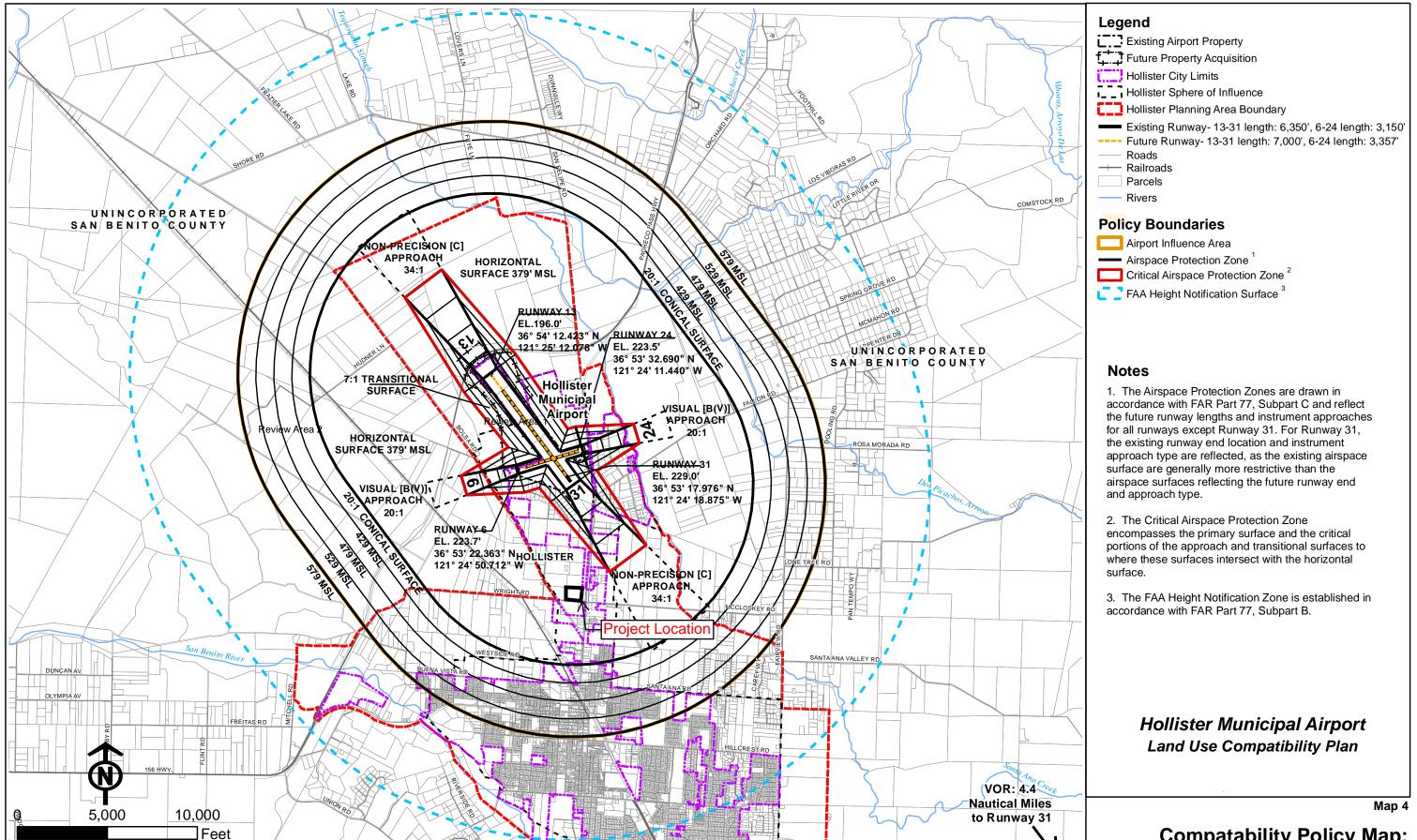
Overflight Policy 3.5.

The Overflight Compatibility Policy is intended to help notify people, through real estate disclosures, about the presence of aircraft overflight near airports so that they can make informed decisions regarding acquisition or lease of property in the affected areas. Overflight policies do not apply to non-residential development. The applicant is proposing a non-residential use and is therefore consistent with the Overflight Compatibility Policy.

Executive Director Review: <u>MG</u> Counsel Review: <u>N/A</u>

Supporting Attachment(s):

- 1. Compatibility Policy Map: Airport Influence Area
- 2. Project Location Map
- 3. Project Site Plan
- 4. Noise Contour Map
- 5. Safety Zones Map
- 6. Table 2: Safety Compatibility Criteria
- 7. Glare Analysis Report



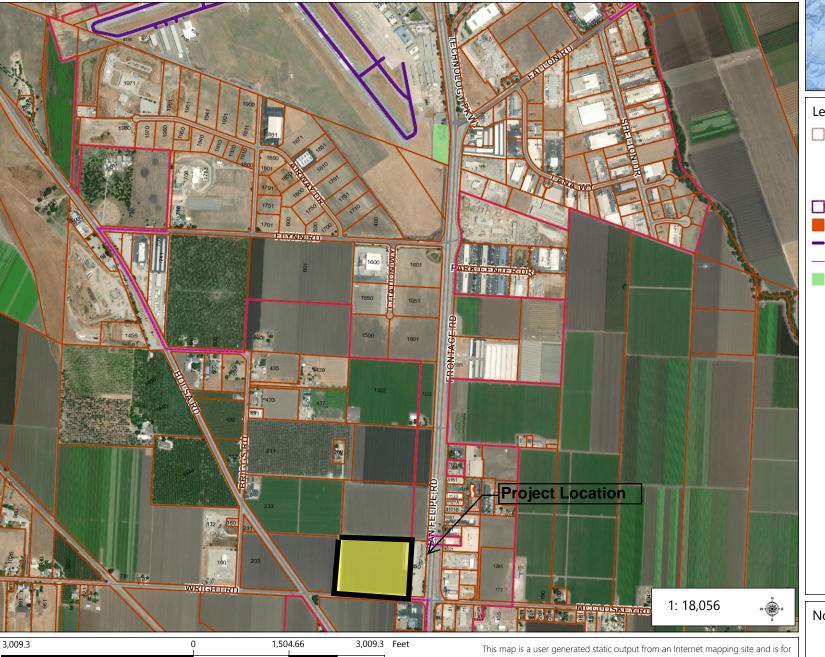
HOLLISTER

Source: Mead & Hunt, Inc.

Compatability Policy Map: Airspace Protection Zones



County of San Benito Project Location



San Jose

France

Syco

Legend

SBC Parcels
California County Boundaries

<all other values>

San Benito

City Limit

City Liiii

Tentative Subdivision

Hollister Airport Runways

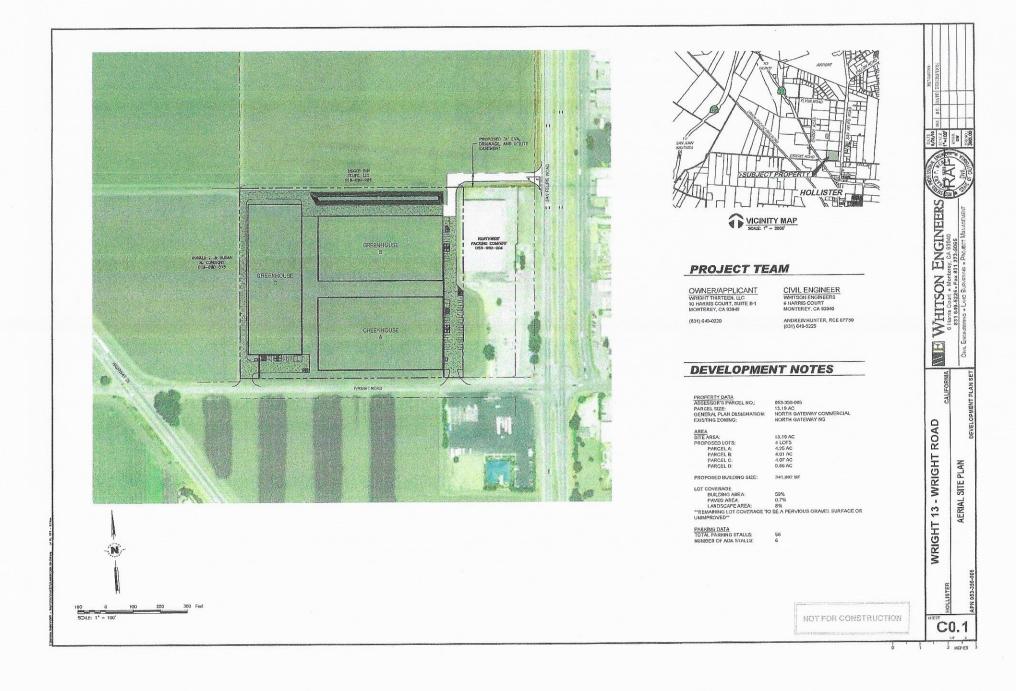
Tentative Streets

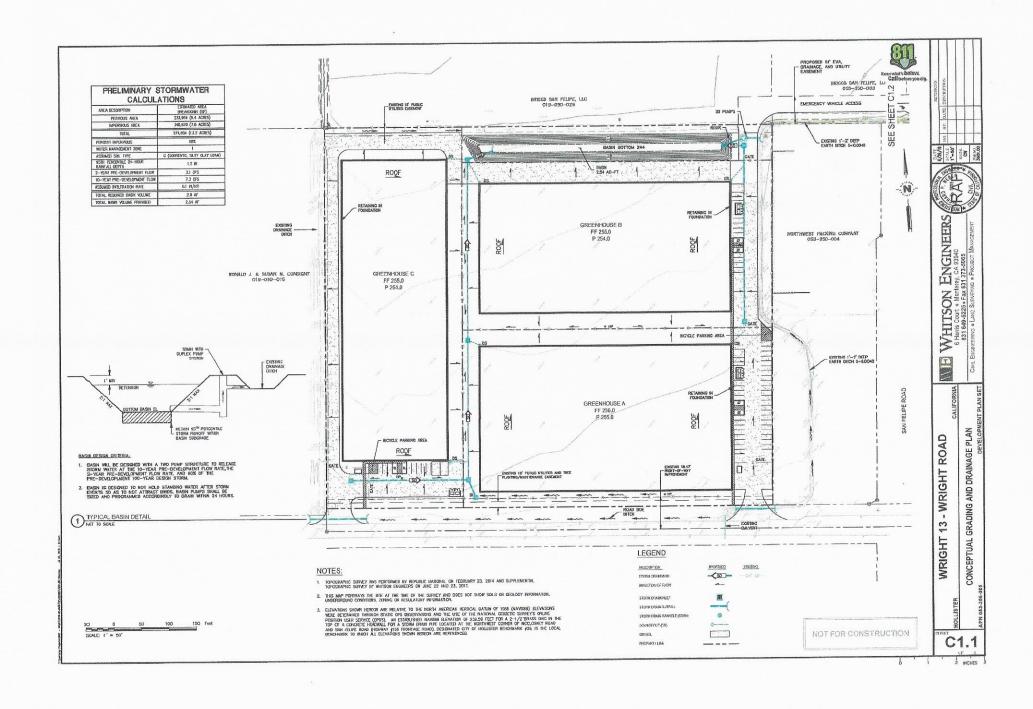
Park

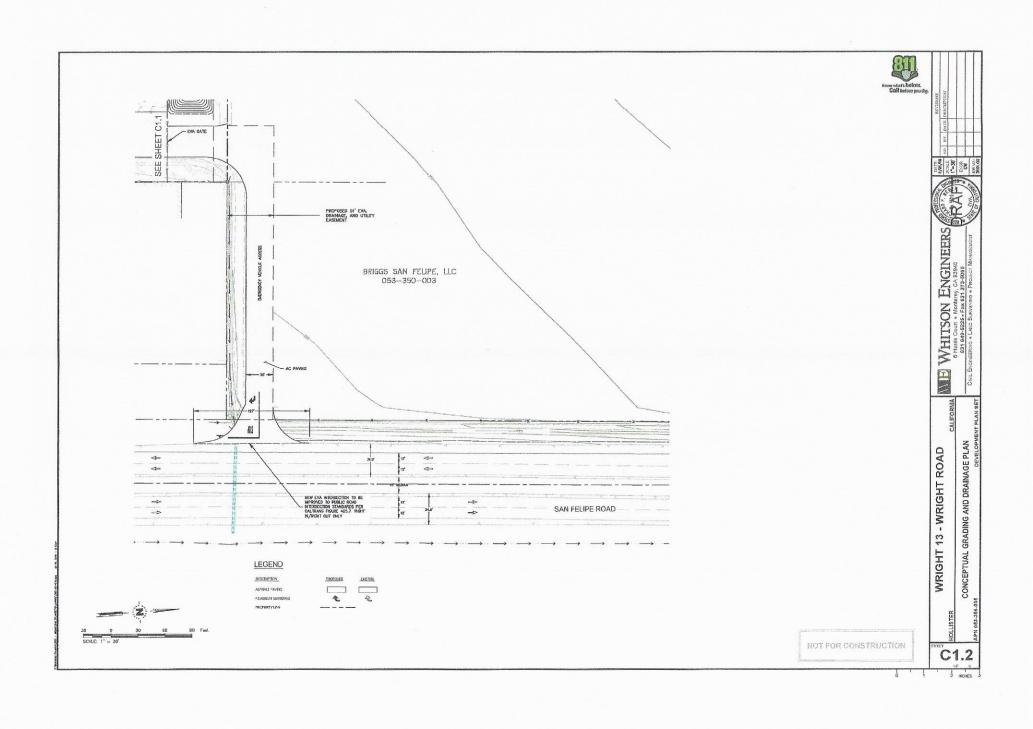
Notes

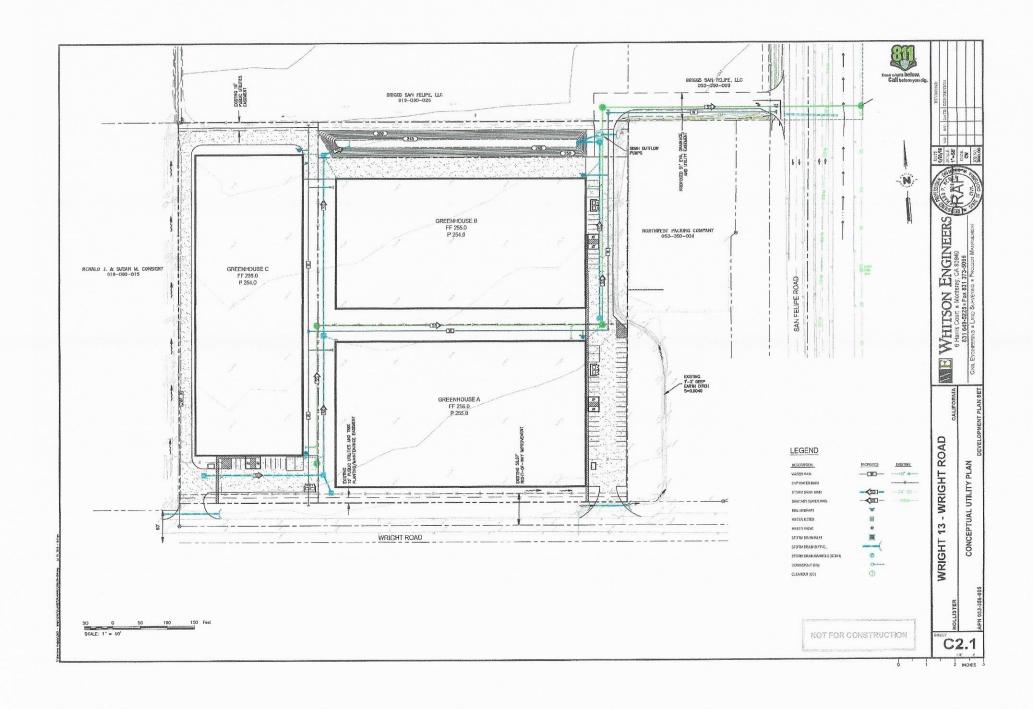
WGS_1984_Web_Mercator_Auxiliary_Sphere ©County of San Benito, GIS Services

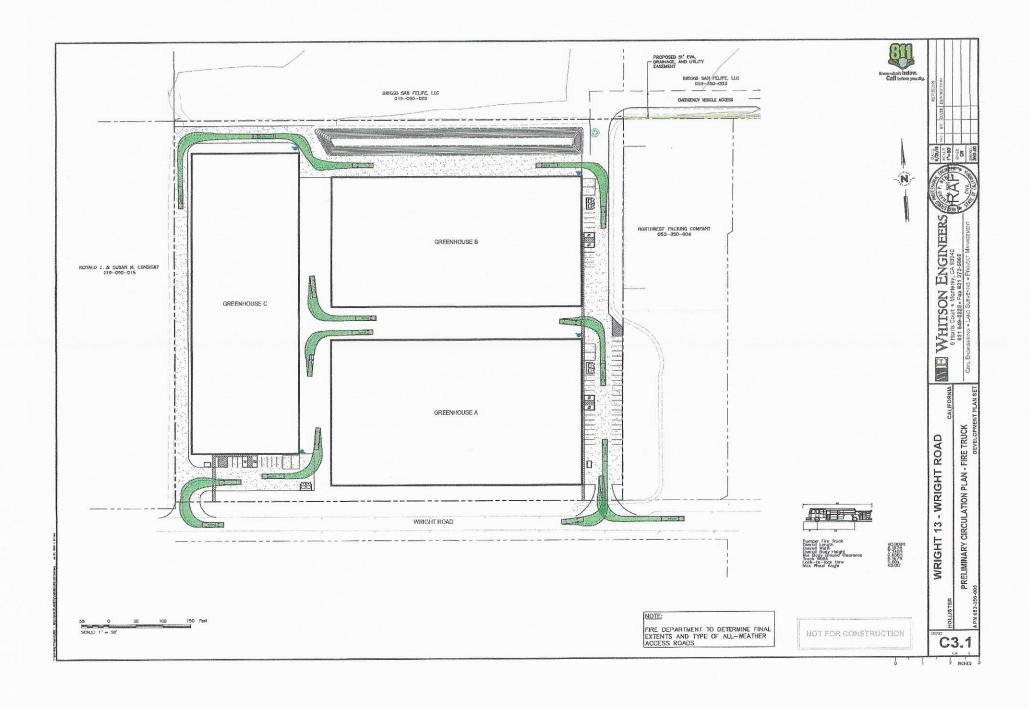
This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable.

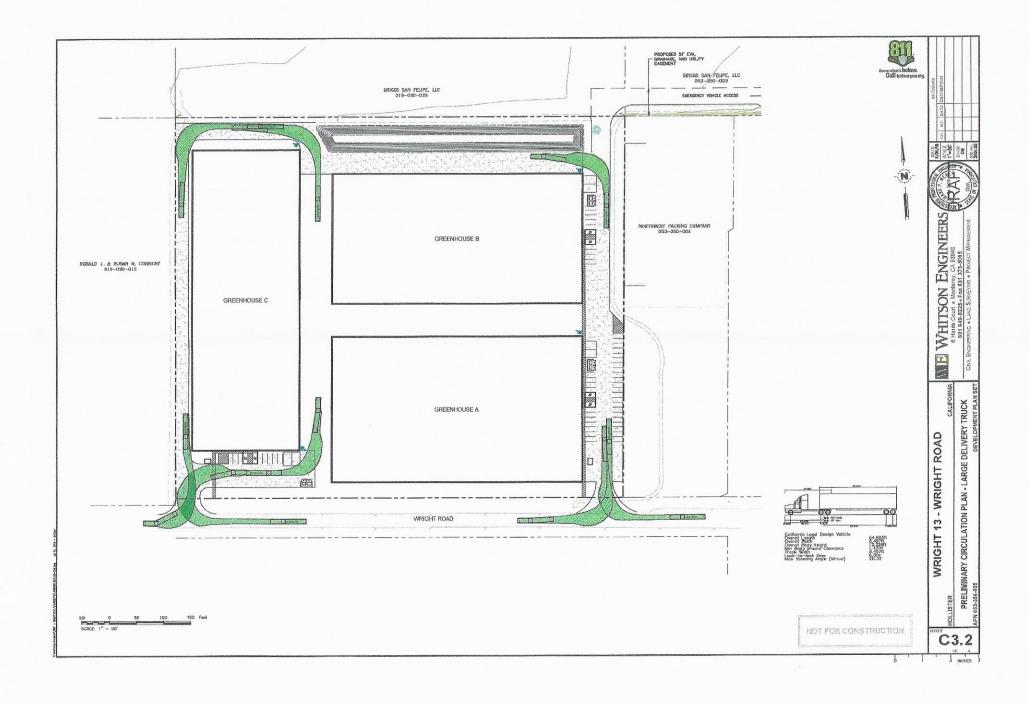


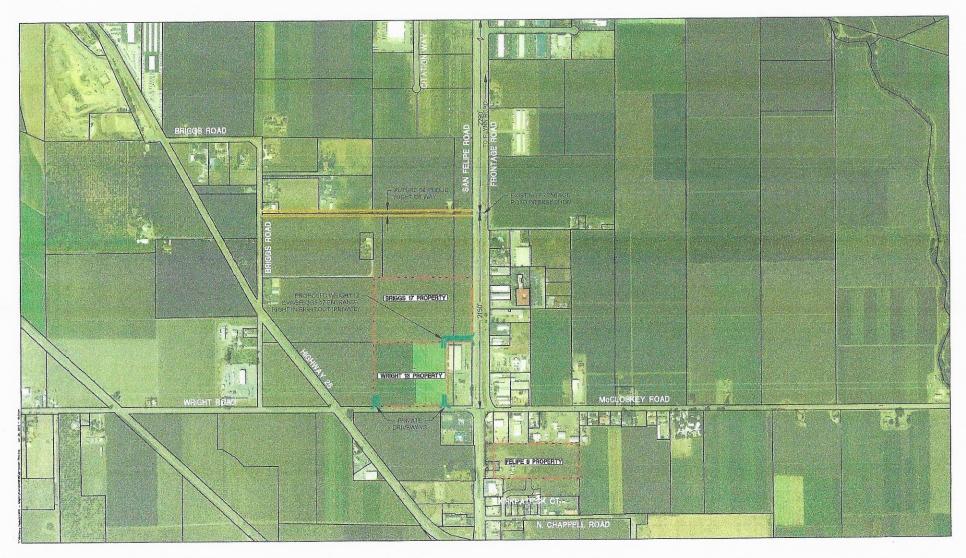












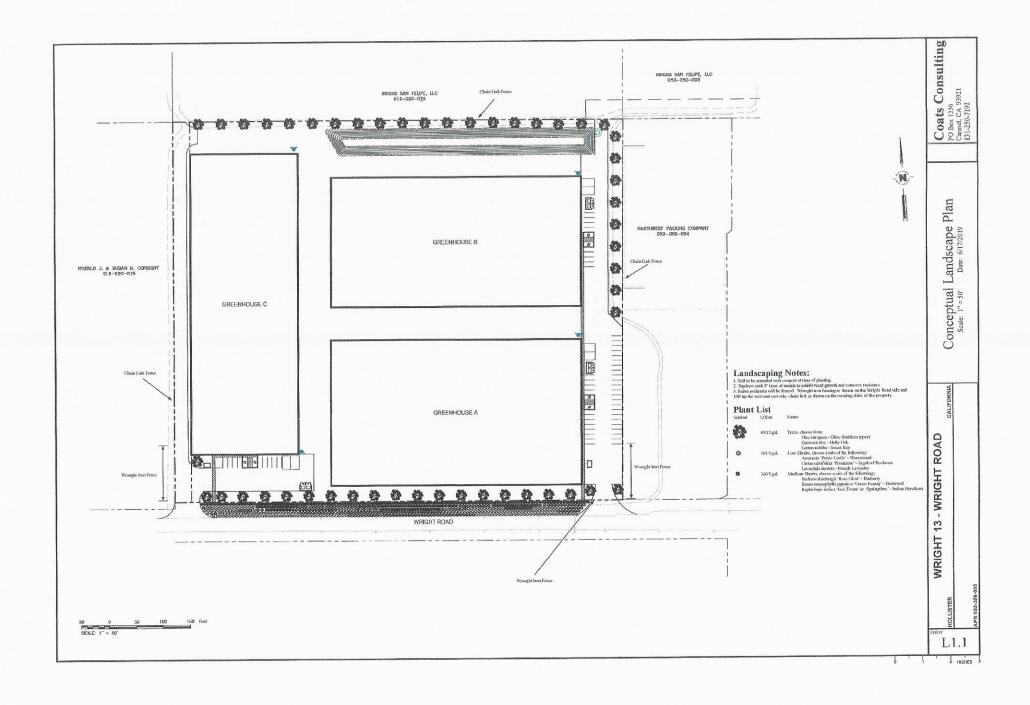
REGIONAL MAP-PROPOSED ACCESS AND CIRCULATION HOLLISTER CULTIVATION PARK HOLLISTER, CALIFORNIA

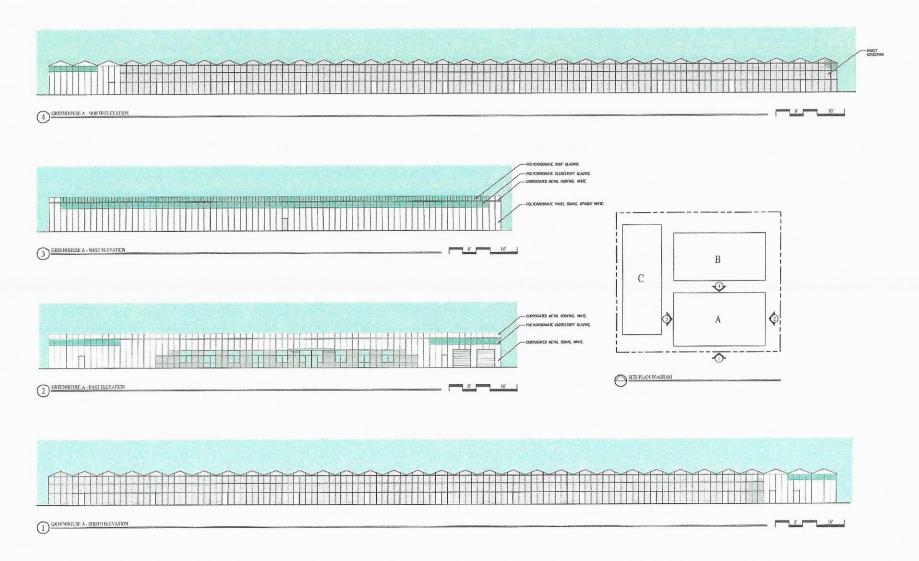


Whitson Engineers
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CIVIL ENCRETIONS - LAND SERVENIUS & PROJECT MARKEMENT | WWW.WHitsonongineers.com
Pagestile, 2001 5927, 391.



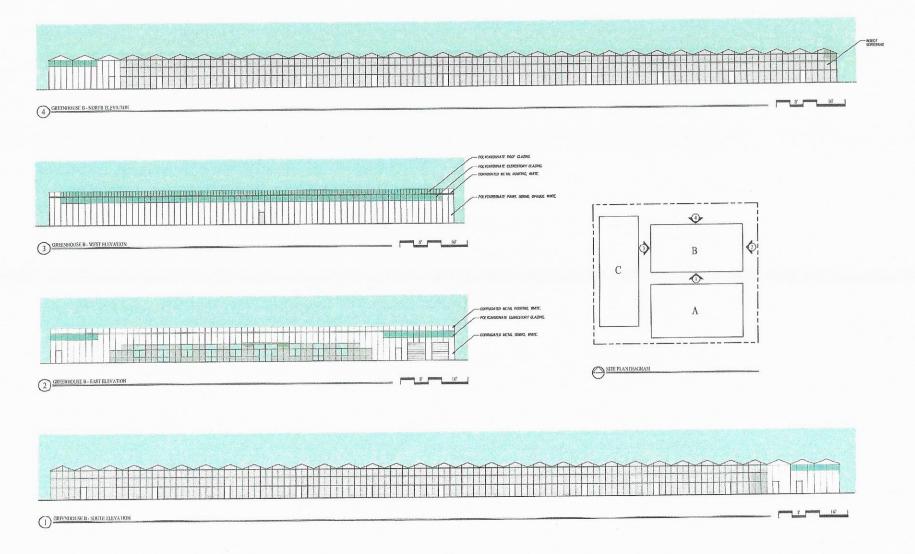






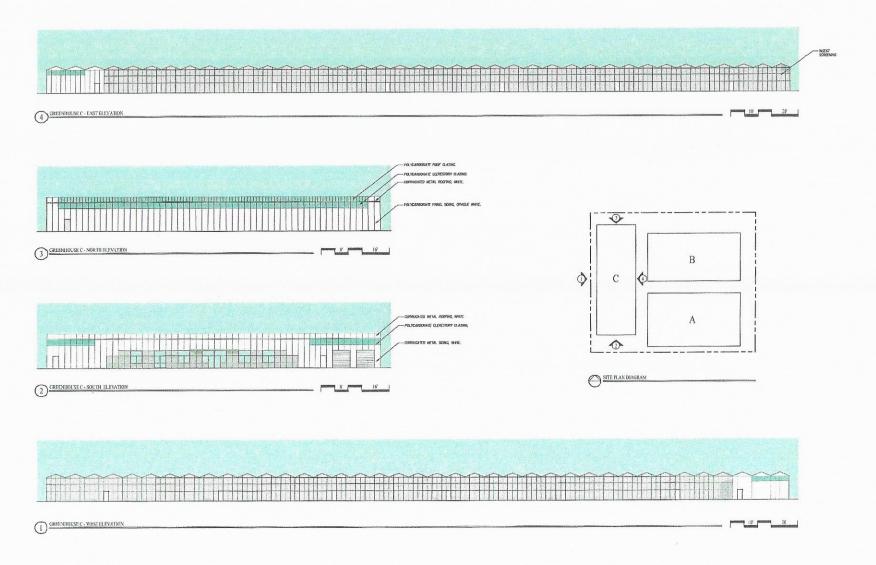
WRIGHT 13 - WRIGHT ROAD

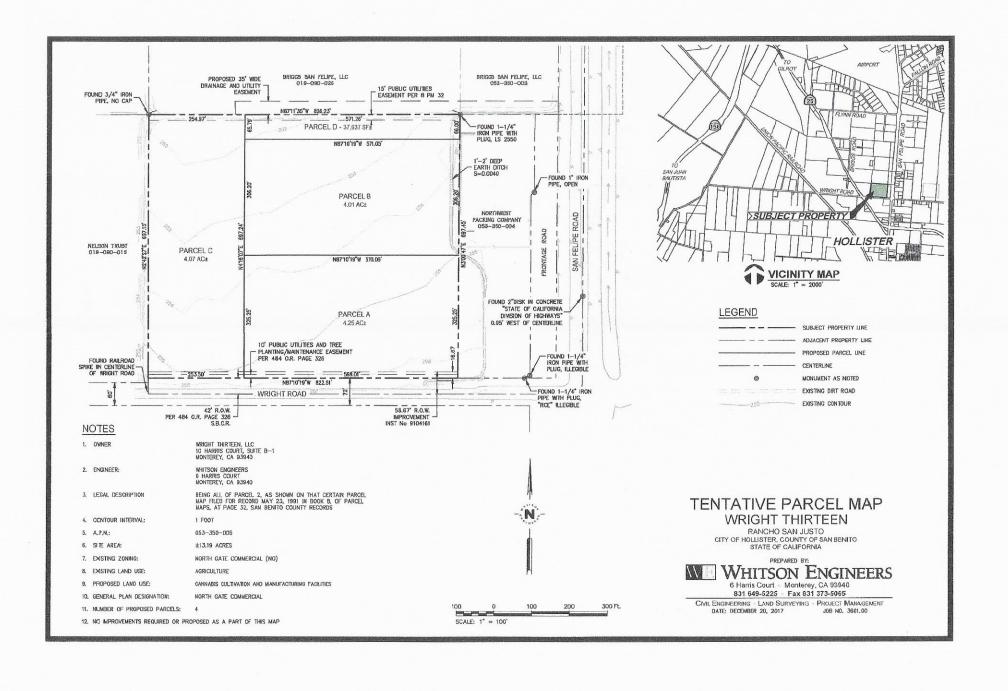
GREENHOUSE A BUILDING ELEVATIONS MARCH 14, 2019



WRIGHT 13 - WRIGHT ROAD

GREENHOUSE B BUILDING ELEVATIONS MARCHITE, 2019



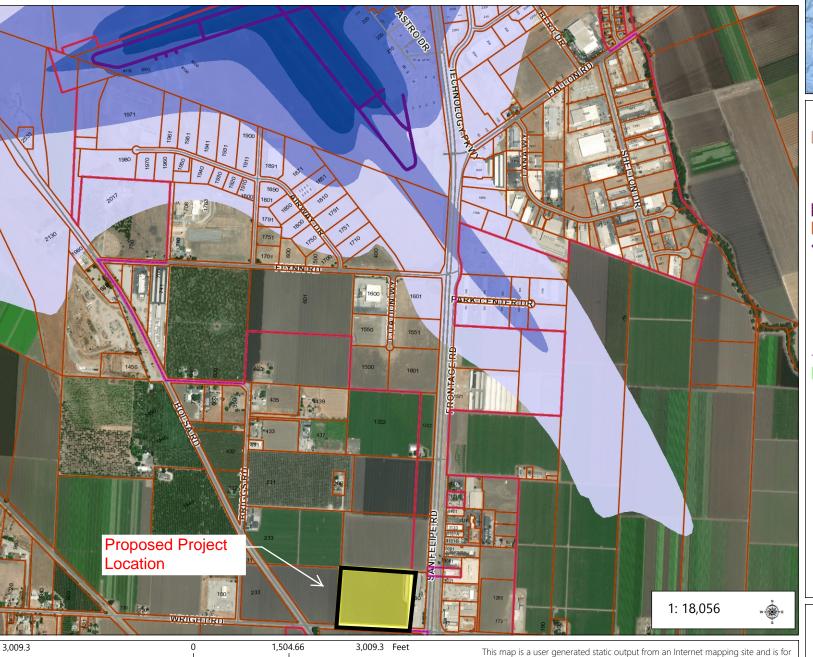


ATTACHMENT 4



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County of San Benito Noise Contours



Legend

SBC Parcels

California County Boundaries

<all other values>

San Benito

City Limit

Tentative Subdivision

Hollister Airport Runways Hollister Airport Noise Impact 2

55 - 60 dB CNEL

60 - 65 dB CNEL

65 - 70 dB CNEL

70+ dB CNEL

Tentative Streets

Park

Notes

reference only. Data layers that appear on this map may or may not be accurate,

current, or otherwise reliable.

County of San Benito safety Zones Legend **SBC Parcels** California County Boundaries <all other values> San Benito City Limit Tentative Subdivision Hollister Airport Runways Hollister Airport Safety Zones Runway Protection Zone FARK GENTER DR Inner Approach/Departure Zone Inner Turning Zone 1550 Outer Approach/Departure Zone Sideline Zone 1500 Traffic Pattern Zone **Tentative Streets** Park 1322 437 289 231 **Proposed Project** Location 1: 18,056 Notes 1,504.66 3,009.3 Feet 3,009.3 This map is a user generated static output from an Internet mapping site and is for reference only. Data layers that appear on this map may or may not be accurate, WGS_1984_Web_Mercator_Auxiliary_Sphere current, or otherwise reliable. ©County of San Benito, GIS Services

Attachment 5

Hanne Internation Criticals Section 7				100			
Usage Intensity Criteria ¹	Safety Zone					Additional Criteria	
Max. Sitewide Average Intensity (people/acre) Max. Single-Acre Intensity (people/acre)	1 10 20	60 120	3 100 300	150 450	5 100 300	300 1,200	Numbers below indicate zone in which condition applies
Land Use Category ²		Land Use Acceptability (see page 2-49 for legend)					
Eating/Drinking Establishments: restaurants, fast-food dining, bars [approx. 60 s.f./person] 6							2-5: Intensity limits as indicated
Limited Retail/Wholesale: furniture, automobiles, heavy equipment, lumber yards, nurseries [approx. 250 s.f./person] ⁶							2, 5: Intensity limits as indicated; design site to place parking inside and bldgs outside of zone if possible
Offices: professional services, doctors, finance, civic; radio, television & recording studios, office space associated with other listed uses [approx. 215 s.f./person] 6						_	2-5: Intensity limits as indicated
Personal & Miscellaneous Services: barbers, car washes, print shops [approx. 200 s.f./person] ⁶							2-5: Intensity limits as indicated
Vehicle Fueling: gas stations and fueling facilities at trucking & transportation terminals							5: Allowed only if airport serving
Industrial, Manufacturing, and Storage Uses							
Hazardous Materials Production: oil refineries, chemical plants			Γ				3-6: Allowed only if alternative site outside zone would not serve intended function; Fire Marshal to determine if special design features should be incorporated into structure to withstand damage from aircraft collision; exercise caution with uses creating plumes and other airspace hazards 3
Heavy Industrial						_	2-5: Avoid bulk production/storage of hazardous (flammable, explosive, corrosive, or toxic) materials; permitting agencies to evaluate possible need for special measures to minimize hazards if struck by aircraft
Light Industrial, High Intensity: food products preparation, electronic equipment [approx. 200 s.f./person] ⁶							2-5: Intensity limits as indicated; avoid bulk production/storage of hazardous (flammable, explosive, corrosive, or toxic) materials; permitting agencies to evaluate possible need for special measures to minimize hazards if struck by aircraft
Light Industrial, Low Intensity: machine shops, wood products, auto repair [approx. 350 s.f./person] ⁶						_	2 - 4: Intensity limits as indicated 5: Single story only; max. 10% in mezzanine 2-5: Avoid bulk production/storage of hazardous (flammable, explosive, corrosive, or toxic) materials; permitting agencies to evaluate possible need for special measures to minimize hazards if struck by aircraft
Indoor Storage: wholesale sales, warehouses, mini/other indoor storage, barns, greenhouses [approx. 1,000 s.f./person] ⁶						X	2: Single story only; max. 10% in mezzanine

Table 2, continued

]	Land Us	se Acceptability	Interpretation/Comments
		Normally Compatible	Normal examples of the use are compatible under the presumption that usage criteria will be met. Atypical examples may require review to ensure compliance with usage intensity criteria. Noise, airspace protection, and/or overflight limitations may apply.
		Conditional	Use is compatible if indicated usage intensity limit and/or other listed conditions are met.
		Incompatible	Use should not be permitted under any circumstances.

Notes

- ¹ Usage intensity criteria applicable to all nonresidential development (i.e., Normally Compatible as well as Conditional land uses). Nonresidential development must satisfy both forms of intensity limits (see Policy 3.3.6). See Note 6 below and Policy 3.3.7 for information on how to calculate nonresidential intensity. Up to 10% of total floor area may be devoted to ancillary use (see Policy 3.3.6(c)).
- Multiple land use categories and compatibility criteria may apply to a project. Land uses not specifically listed shall be evaluated using the criteria for similar uses.
- These uses may pose hazards to flight as they may attract birds or other wildlife; generate dust or other visual hazards; or create physical hazards (e.g., power lines or other tall objects). See *Section 3.4* for applicable airspace protection policies.
- Capacity of people for Large and Major Assembly Facilities obtained from International Building Code.
- Residential density limits provided in terms of dwelling units per acre (du/ac). Construction of a single-family home, including a second dwelling unit as defined by state law, allowed on a legal lot of record if such use is permitted by local land use regulations. A family day care home (serving \le 14 children) may be established in any dwelling. See *Policies 1.4.5* and 3.3.5(h).
- Common occupancy load factors (approximate number of square feet per person) source: Mead & Hunt, Inc. based upon information from various sources including building and fire codes, facility management industry sources, and ALUC surveys. The common occupancy load factors represent the maximum occupancy during a normal peak period occupancy, not on the highest attainable occupancy used in building and fire codes. Common occupancy load factors provided in the table for specific land uses may be used as a means of calculating the usage intensity of a proposed development. See Policy 3.3.7 for other methods of calculating usage intensities.



Solar Glare Analysis Report – Wright 13 and Briggs 17 Greenhouses

Wright 13, LLC and Briggs 17, LLC, Hollister, California

Version 2.0

Issued For Use

09 October 2020

Delivered to: Geary Coats, Coats Consulting





Acknowledgement

Prepared by: Keith Knudsen

Jason Mah Paula McGarrigle Gabriel Risbud-Vincent

Document Purpose

This report provides an assessment of glare hazard from the proposed Wright 13 and Briggs 17 Greenhouse Projects in Hollister, California, USA.

Document History

Wright 13 and Briggs 17 Solar Glare Analysis

Version	Date	Comments
1.0	07 October 2020	Issued for Review
2.0	09 October 2020	Issued for Use

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Appendix A ForgeSolar Modelling Assumptions



Glossary

Term	Description
After-image	Visual image that persists after the stimulus that caused it has stopped.
ALUC	Airport Land Use Commission
Azimuth	Horizontal angle of the Sun around an object. North is 0°, east is 90°, south is 180°, and west is 270°.
Coats	Coats Consulting
FAA	Federal Aviation Administration
FP	Flight path
mrad	Measure of angle, 1/1000 th of a radian
SGHAT	Solar Glare Hazard Analysis Tool
Subtended Angle	Size of an object divided by the distance from the observer.
W/m ²	Watts per square metre

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Section 1, Introduction

1 INTRODUCTION

The Wright 13, LLC and Briggs 17, LLC are proposing to build multiple greenhouses in the city of Hollister, California. The Wright 13 and Briggs 17 projects (Projects) will be located at the north end of the city in San Benito County, approximately 1.25 miles south of the Hollister Municipal Airport.

The San Benito County Airport Land Use Commission (ALUC) reviews development proposals that may affect operations at the Hollister Municipal Airport, Frazier Lake Airpark, and surrounding areas. The ALUC has requested that the project applicants provide an analysis of potential impacts to aviation due to solar glare from the Projects. Reflective surfaces, like the glass roof sections of the greenhouses, may reflect sunlight and produce glare along flight paths at the Hollister Municipal Airport. In addition, ALUC is charged with ensuring new proposed projects within the ALUC area of responsibility are consistent with the ALUC land use plan.

Solas Energy Consulting Inc. (Solas) was retained by Coats Consulting (Coats) to conduct a solar glare analysis for flight paths at the Hollister Municipal Airport. This report documents the potential for solar glare from the Projects for airplanes on final approach to the airport.

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Section 2, Project Description

2 PROJECT DESCRIPTION

Wright 13 will include three greenhouses situated on a 13-acre parcel of land, and Briggs 17 will include a single greenhouse on a 17-acre parcel. Both sites are at the north end of the City of Hollister, California. The Projects are on the west side of San Felipe Road, with California State Route 25 to the west and Wright Road to the south. The end of the nearest runway at the Hollister Municipal Airport is about 0.8 miles north of the Briggs site, and one mile north of the Wright site. The immediate surrounding area includes residential buildings, industrial/commercial establishments, and agricultural land. The approximate location of the Projects is shown in Figure 1. The parcels are currently being used for agriculture. The greenhouses will be approximately two storeys tall, and they will incorporate tempered glass for the roofs.

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Section 2, Project Description

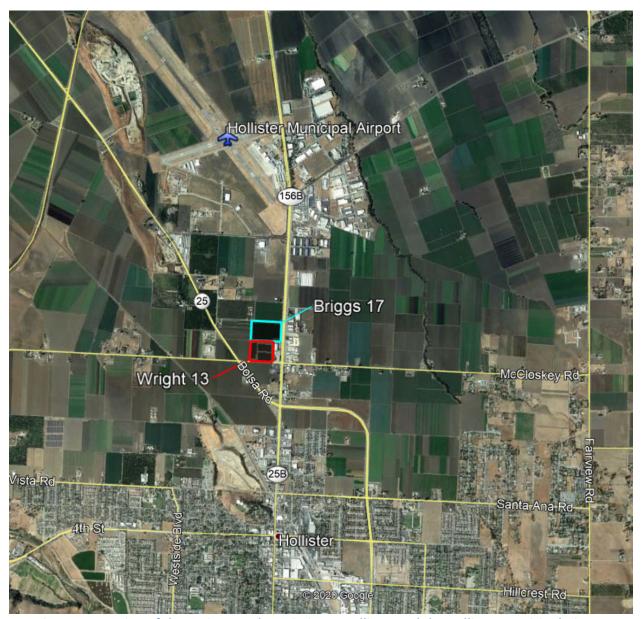


Figure 1: Location of the Projects and proximity to Hollister and the Hollister Municipal Airport

Figure 2 outlines the Wright site in red, and the Briggs site in blue. The greenhouse footprints are shown as the dark interior areas.

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Section 2, Project Description



Figure 2: Project Boundaries and Proposed Wright 13 and Briggs 17 Greenhouses

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Section 3, Project Assumptions

3 PROJECT ASSUMPTIONS

The Wright site consists of approximately 13 acres of land, with the greenhouses occupying about eight acres. The Briggs site encompasses 17 acres with a greenhouse footprint of about 12 acres. Solas used multiple sources to determine the site elevations, including publicly available topographic contours from the Google Maps interface, and preliminary drawings provided by Coats. Solas assumed a constant ground elevation of about 252 feet above sea level for the entire Wright site, and 248 feet for the Briggs site. These values represent the current minimum elevations at the sites, which result in a conservative glare analysis. A change of grade will affect the results of the glare analysis.

The Project greenhouses will have sections of their roofs built with tempered glass. The roofs are designed with peaks at regular intervals and a slope of approximately 23 degrees. The glass panes will face east and west (azimuth angles of 93 and 273 degrees, respectively) for Wright A and B, while the glass will face north and south (three and 183 degrees, respectively) for Wright C. The glass panes of the Briggs greenhouse will face east and west. The roof line starts 17.0 feet above ground level, extending to a height of 20.1 feet at the top. Solas modelled the roofing as smooth glass without anti-reflective coating. The side walls of the greenhouses were not modelled in this analysis.

The model assumes the reflective surface lies in a plane defined by the outlined area, so the analysis was completed at the top and bottom extents of the roof to determine glare from different parts of the glass panes. The analysis was also run at an intermediate height above ground of 18.5 feet to help identify trends in the frequency and size of glare.

Solas based the location of the greenhouses on the satellite imagery maps provided by Coats. A single footprint was evaluated instead of two buildings for Wright A and B, resulting in a more conservative analysis. Overlapping footprints with identical dimensions were plotted for each greenhouse to model the different roof azimuths. Only the more conservative values were kept for simultaneous instances of glare from each set of footprints.

Detailed input parameters and assumptions can be found in Appendix A.

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¹ Data provided by Coats.

Section 4, Glare Regulations and Receptors

4 GLARE REGULATIONS AND RECEPTORS

The Federal Aviation Administration (FAA) reviews solar PV facilities that are proposed in proximity to airstrips for the potential of glare. A similar review may be completed for other glare-producing objects like mirrored or highly reflective building features. The FAA may accept an evaluation using one of the following levels of assessment:²

- 1. a qualitative analysis of potential impact in consultation with the Air Traffic Control Tower, pilots, and airport officials;
- 2. a demonstration field test with solar panels at the proposed site in coordination with Air Traffic Control Tower personnel; or,
- 3. a geometric analysis to determine days and times when there may be an ocular impact.

This analysis falls into the third category referenced above. This report summarizes the results using geometric analysis (ForgeSolar's Solar Glare Hazard Analysis Tool (SGHAT), or GlareGauge³) for the Projects.

The Hollister Municipal Airport Land Use Compatibility Plan states that developments that may produce visual hazards, such as glare, are subject to additional review by the ALUC. Along with the review conducted by the ALUC, sources of glare must be consistent with FAA rules and regulations.⁴

Solas evaluated multiple flight paths (FPs) for airplane landing approaches at the Hollister Municipal Airport. Standard flight landing paths (FP1-4) were modelled using standard FAA evaluation parameters. Solas did not model an air traffic control tower since the Hollister Municipal Airport does not have a control tower. Specific parameters used to analyze flight operations can be found in Appendix A.

Solas analyzed the potential for glare at the receptors shown in Figure 3. Four flight paths (landing approaches represented by green lines) were evaluated.

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² https://www.faa.gov/airports/environmental/policy_guidance/media/FAA-Airport-Solar-Guide-2018.pdf, accessed: September 16, 2020.

³ Copyright, Sims Industries, 2015

⁴ http://sanbenitocog.org/wp-content/uploads/2018/10/ADOPTED-ALUCP-June-2012.pdf, accessed: September 16, 2020.

Section 4, Glare Regulations and Receptors

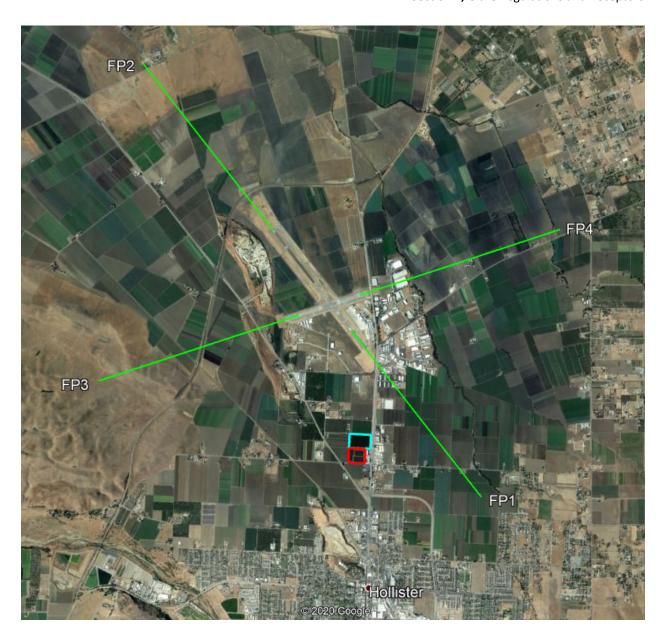


Figure 3: Wright 13 and Briggs 17 Projects with Flight Paths Identified

Table 1 describes the receptors used in the analysis. The horizontal viewing angle for flight routes is limited to 50 degrees in either direction from the direction of travel. Solas does not consider glare outside of this field of view to be a risk to the pilot.⁵

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⁵ Rogers, J. A., et al., Federal Aviation Administration, Evaluation of Glare as a Hazard for General Aviation Pilots on Final Approach, 2015.



Section 4, Glare Regulations and Receptors

Table 1: Description of Receptors

Receptor Number	Location	Description
FP1	Hollister Municipal Airport	Northwest-bound descent at runway 31, 2-mile approach from 603 feet above landing threshold
FP2	Hollister Municipal Airport	Southeast-bound descent at runway 13, 2-mile approach from 603 feet above landing threshold
FP3	Hollister Municipal Airport	Northeast-bound descent runway 6, 2-mile approach from 603 feet above landing threshold
FP4	Hollister Municipal Airport	Southwest-bound descent at runway 24, 2-mile approach from 603 feet above landing threshold

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Section 5, Glare Prediction Method

5 GLARE PREDICTION METHOD

The impact of glare depends on the interaction between the position of the sun, the angle and orientation of the reflective surface, the reflectivity of the surface, the size of the project, and the relative location of the observer. The modelling software assumes there is no cloud cover and does not include screening effects from existing or proposed foliage, terrain, buildings or other obstacles. The model is therefore considered to be conservative.

The sun's position is described using the angle of elevation and solar azimuth. The angle of elevation is the angle between the horizon and the centre of the sun. The azimuth is measured as the angle from true north in a clockwise direction.

Solas performed the glare analysis using the ForgeSolar GlareGauge⁶ software tool. This tool uses project inputs and solar positioning calculations to determine if glare will occur at identified observation points. If glare is found, the tool calculates the retinal irradiance (brightness) and subtended angle (size divided by distance) of the glare source. These two factors predict ocular hazards ranging from temporary after-image to retinal burn. Minor topographic features are not always identified in GlareGauge due to the resolution of topographic contours from Google Earth.

"Green" rated glare indicates a low potential for after-image, "yellow" rated glare indicates the potential for after-image exists, and "red" rated glare indicates the potential for retinal damage. Glare that is beyond 50 degrees from a driver's or pilot's line-of-sight does not constitute a safety hazard.⁷

The amount of light reflected by a surface depends on the sunlight's angle of incidence at the surface as illustrated in Figure 4.

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⁶ Copyright, Sims Industries, 2015

⁷ Ho, C. K. and Sims, C. A., Sandia National Laboratories, 2016, Solar Glare Hazard Analysis Tool (SGHAT) User's Manual v. 3.0.

Section 5, Glare Prediction Method

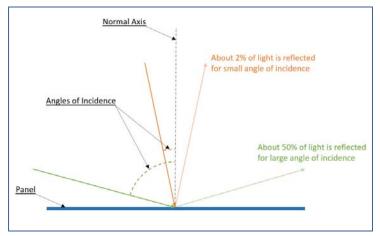


Figure 4: Reflected Light and Angle of Incidence (illustration only) on a reflective surface/panel.

Glass with anti-reflective coating may reflect approximately two percent of incident sunlight on average, which is less than the amount of light open water and uncoated glass typically reflect. Open water and uncoated glass reflect approximately ten percent of incident sunlight.^{8,9} The software models the reflectivity for each angle of incidence based on experiments Sandia National Laboratories performed for a variety of different solar PV module types.¹⁰ Very little light is reflected when the sun is nearly perpendicular to the glass, but more light is reflected when the sun is at a shallow angle to the glass.

All flight paths have been modelled using a +/- 50-degree field-of-view based on the standard approach in the ForgeSolar software and the report entitled "Evaluation of Glare as a Hazard for General Aviation Pilots on Final Approach".¹¹

5.1 Limitations of the Model

This analysis aims to provide an indication of the glare that may be produced by the proposed reflective surfaces on the greenhouse roofs. The prediction methods employed in the analysis have uncertainty. The following lists some of the limitations inherent in the analysis.

- The base model assumes clear skies at all times. The model does not use historical weather pattern data. This results in a total cumulative duration of glare that is likely higher than what will occur over the course of a year.
- The model does not consider shading.

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⁸ Lasnier and Ang, 1990, Photovoltaic Engineering Handbook. Taylor & Francis, New York.

⁹ US EPA, 2013, AERSURFACE User's guide, EPA-454/B-08-001.

¹⁰ Ho, C. K. and Sims, C. A., Sandia National Laboratories, 2016, Solar Glare Hazard Analysis Tool (SGHAT) User's Manual v. 3.0.

¹¹ Rogers, J. A., et al., Federal Aviation Administration, Evaluation of Glare as a Hazard for General Aviation Pilots on Final Approach, 2015.



Section 5, Glare Prediction Method

- Obstructions such as foliage, structures, and hills between the greenhouses and observation points are not modelled by ForgeSolar's GlareGauge software tool.
 - o The model does not consider the impact of trees and foliage as it is variable.
- Ocular and perceived hazards differ from person to person, depending on multiple environmental, optical, and human factors.
- Changes in the site and rooftop elevations from the assumptions may change the results of the analysis.
- Footprints encompassing large areas may have reduced accuracy due to the calculation method limitations.
 - o Subdivided areas may provide more accurate information related to glare spot locations, but the glare spot size will be limited by the smaller subdivided footprint.
 - o The larger, undivided footprint will have more accurate glare spot size results.

A separate analysis could be performed to evaluate the impact of topographical features available in Google Earth on the predicted glare. Combining the corresponding instances of glare from the analysis of subdivided areas with the glare spot sizes from the analysis of undivided footprints partially overcomes the calculation limitations for large footprints. This method provides a more accurate estimate of the potential glare than assessing undivided and subdivided footprints separately.

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6 ANALYSIS RESULTS

The following sections provide the results of the glare analysis and illustrative examples of the predicted glare.

6.1 Wright 13 Glare Results

Solas does not expect the Wright 13 greenhouses to produce red-grade glare or yellow-grade glare at the evaluated flight paths. The model predicts green-grade glare at all flight paths evaluated. Results assume there are clear skies year-round and there is no screening between the greenhouses and the flight paths.

summarizes the results and level of glare at the receptors as minutes per year assuming clear skies. Time of day is provided in standard time year-round. The results of the GlareGauge analysis identified that the following locations will experience green-grade glare:

- FP1 Northwest-bound descent (Runway 31) There is low potential for temporary afterimage (green-grade glare) from the glass roofs for a total of **237 minutes** (approximately four hours) per year. The glare occurs from March to May, and July to September, around 6:00 p.m. standard time (7:00 p.m. daylight savings time) for up to 17 minutes per day. These results assume there are clear skies year-round.
- FP2 Southeast-bound descent (Runway 13) There is low potential for temporary afterimage (green-grade glare) from the glass roofs for a total of **1,165 minutes** (approximately 19 hours) per year. The glare occurs between October and March around 10:30 a.m. standard time (11:30 a.m. daylight savings time) for up to 67 minutes per day. These results assume there are clear skies year-round.
- FP3 Northeast-bound descent (Runway 6) There is low potential for temporary afterimage (green-grade glare) from the glass roofs for a total of **297 minutes** (approximately five hours) per year. The glare occurs from March to May, and August to September, between 6:44 and 9:58 a.m. standard time (7:44 and 10:58 a.m. daylight savings time) for up to 10 minutes per day. These results assume there are clear skies year-round.
- FP4 Southwest-bound descent (Runway 24) There is low potential for temporary afterimage (green-grade glare) from the glass roofs for a total of **862 minutes** (approximately 14 hours) per year. The glare occurs between September and March around 2:20 p.m. standard time (3:20 p.m. daylight savings time) for up to 55 minutes per day. These results assume there are clear skies year-round.

Changes to the modelling assumptions (see Appendix A) will affect these results.

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Table 2: Glare Hazard by Receptor assuming year-round Clear Skies, in Minutes per Year (Wright 13)

Lagation	December	Hazard Level	Roof Elevation		
Location	Receptor	Hazard Level	17.0 ft	18.5 ft	20.1 ft
Northwest-		G	236	236	237
bound descent	FP1	Υ	1	ı	-
(Runway 31)		R	ı	ı	-
Southeast-		G	1,165	1,165	1,161
bound descent	FP2	Υ	-	1	-
(Runway 13)		R	ı	ı	-
Northeast-		G	297	291	289
bound descent	FP3	Υ	-	-	-
(Runway 6)		R	-	-	-
Southwest-		G	862	859	855
bound descent	FP4	Υ	-	-	-
(Runway 24)		R	-	-	-

Table 2 indicates that the southeast-bound landing approach to runway 13, FP2, experiences the most annual green glare from the Wright greenhouses. The effects of green-grade glare are considered negligible as it has a low risk of after-image.

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A summary of the cumulative duration of the highest level of glare predicted for each of the above receptors is provided in Figure 5. These results assume there are clear skies year-round.

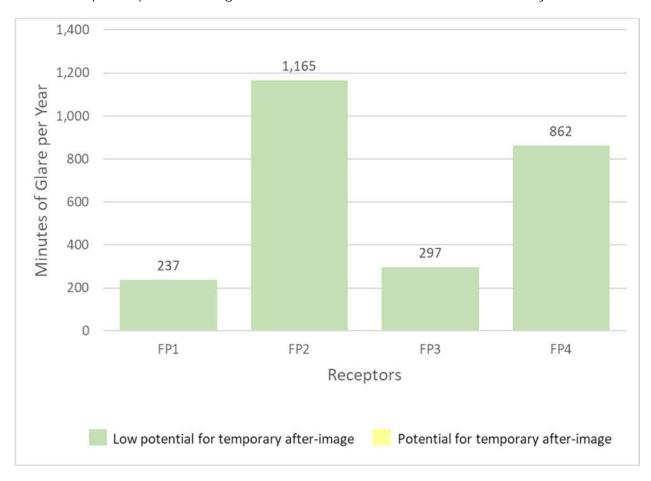


Figure 5: Annual Green-Grade Glare at affected Receptors near the Project (Clear skies year-round, Wright 13)

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Table 3 shows the timeframes for the occurrence of glare and reports only the highest-intensity glare for each case and location. The cells in the table are colour-coded to match the intensity level and show the time of day, dates, and duration of the glare. The results demonstrate that green-grade glare may be present for short periods in the spring and summer at FP1 and FP3. Green glare may also be seen at FP2 and FP4 for up to an hour per day from fall until spring.

Table 3: Seasonality and Duration of the Highest Level of Glare at each Receptor (Clear skies year-round, Wright 13)

Document		Roof Elevation	
Receptor	17.0 ft	18.5 ft	20.1 ft
FP1	5:37 PM-6:30 PM	5:37 PM-6:30 PM	5:37 PM-6:30 PM
	23 Mar-26 May; 15 Jul-18 Sep	23 Mar-26 May; 15 Jul-18 Sep	23 Mar-27 May; 15 Jul-18 Sep
	Up to 17 mins.	Up to 15 mins.	Up to 15 mins.
FP2	9:37 AM-11:25 AM	9:37 AM-11:25 AM	9:37 AM-11:25 AM
	4 Oct-7 Mar	4 Oct-7 Mar	4 Oct-7 Mar
	Up to 67 mins.	Up to 67 mins.	Up to 66 mins.
FP3	6:44 AM-9:58 AM	6:44 AM-9:58 AM	6:53 AM-9:58 AM
	12 Mar-7 May; 3 Aug-28 Sep	12 Mar-7 May; 3 Aug-28 Sep	12 Mar-7 May; 3 Aug-28 Sep
	Up to 10 mins.	Up to 10 mins.	Up to 10 mins.
FP4	1:20 PM-3:13 PM	1:20 PM-3:13 PM	1:20 PM-3:13 PM
	23 Sep-17 Mar	23 Sep-17 Mar	23 Sep-17 Mar
	Up to 55 mins.	Up to 52 mins.	Up to 50 mins.

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6.1.1 Detailed Glare Example for Wright 13 — Southeast-bound Descent with a 2-mile Approach (FP2, Runway 13)

Solas completed a detailed glare example for FP2, representing the highest duration of glare. FP2 represents an airplane landing at runway 13 of the Hollister Municipal Airport with a 2-mile approach from the northwest. The Wright 13 greenhouses remain southeast of the airplane as it lands. The flight path utilizes the standard three-degree descent slope and field-of-view of 50 degrees in either direction from straight ahead. Figure 6 illustrates the time of day and seasonality for glare hazard for FP2 from the roof elevation of 17.0 feet (the bottom extent of the roof). The potential for after-image from green-grade glare occurs between 9:37 and 11:25 a.m. standard time (9:37 a.m. and 12:25 p.m. daylight savings time) from October to March. The effects of green-grade glare are considered negligible as it has a low risk of after-image.



Figure 6: Time of Glare Hazard for FP2 (Clear skies year-round, Wright 13)

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Figure 7 shows the daily duration for each level of glare that may be experienced at FP2. This flight path can experience up to 67 minutes of green glare in a day. All the glare is classified in the green category. These results assume there are clear skies year-round.

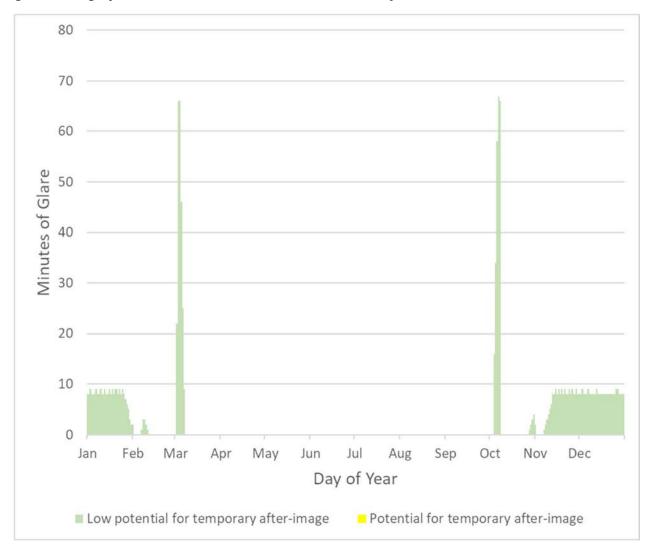


Figure 7: Daily Duration of Glare at FP2 (Clear skies year-round, Wright 13)

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Figure 8 plots the glare hazard according to the size of the glare spot (Subtended Source Angle), brightness of the glare (Retinal Irradiance), and the glare level (green, yellow, and red zones). The size and brightness of the glare spots are displayed using logarithmic scales. At FP1, the glare is 660 times dimmer than staring at the sun but will appear up to two times bigger than the perceived diameter of the sun viewed from the same location. These results assume there are clear skies year-round.

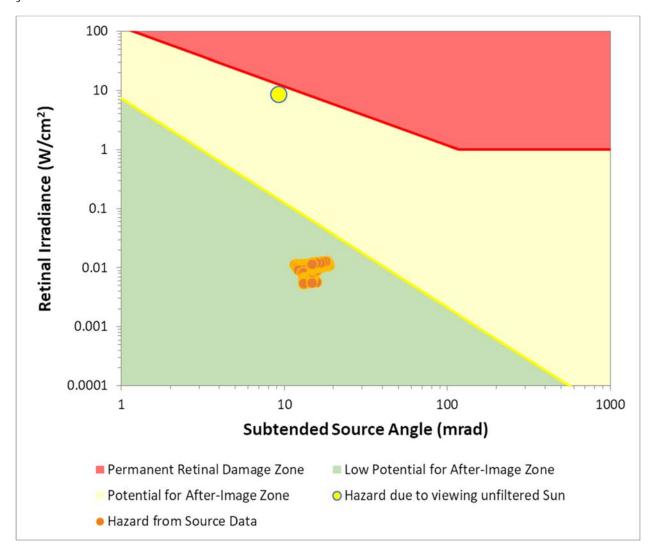


Figure 8: Log-Log Hazard Plot for FP2 (Clear skies year-round, Wright 13)

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6.2 Briggs 17 Glare Results

Solas does not expect the Briggs greenhouse to produce red-grade glare or yellow-grade glare at the evaluated flight paths. The model predicts green-grade glare at FP2, FP3, and FP4. Results assume there are clear skies year-round and there is no screening between the greenhouses and the flight paths.

Table 4 summarizes the results and level of glare at the receptors as minutes per year assuming clear skies. Time of day is provided in standard time year-round. The results of the GlareGauge analysis identified that the following locations will experience green-grade glare:

- FP2 Southeast-bound descent (Runway 13) There is low potential for temporary afterimage (green-grade glare) from the glass roofs for a total of **163 minutes** (approximately three hours) per year. The glare occurs in March, October, and December between 9:38 and 10:38 a.m. standard time (10:38 a.m. and 11:38 a.m. daylight savings time) for up to 10 minutes per day. These results assume there are clear skies year-round.
- FP3 Northeast-bound descent (Runway 6) There is low potential for temporary afterimage (green-grade glare) from the glass roofs for a total of **252 minutes** (approximately four hours) per year. The glare occurs in March, in May, and from July to September between 9:07 and 9:58 a.m. standard time (10:07 and 10:58 a.m. daylight savings time) for up to three minutes per day. These results assume there are clear skies year-round.
- FP4 Southwest-bound descent (Runway 24) There is low potential for temporary afterimage (green-grade glare) from the glass roofs for a total of 323 minutes (approximately five hours) per year. The glare occurs between October and February between 1:40 and 2:26 p.m. standard time for up to four minutes per day. These results assume there are clear skies year-round.

FP1 is not expected to experience any glare from the Project. Changes to the modelling assumptions (see Appendix A) will affect these results.

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Table 4: Glare Hazard by Receptor assuming year-round Clear Skies, in Minutes per Year (Briggs 17)

Lagation	December	Harard Lavel		Roof Elevation	
Location	Receptor	Hazard Level	17.0 ft	18.5 ft	20.1 ft
Northwest-		G	•	•	-
bound descent	FP1	Υ	1	1	-
(Runway 31)		R	-	-	-
Southeast-		G	162	163	162
bound descent	FP2	Υ	-	-	-
(Runway 13)		R	-	-	-
Northeast-		G	252	249	252
bound descent	FP3	Υ	-	-	-
(Runway 6)		R	-	-	-
Southwest-		G	322	323	323
bound descent	FP4	Υ	-	-	-
(Runway 24)		R	-	-	-

Table 4 indicates that the northwest-bound landing approach, FP1, experiences no glare. Pilots descending towards the three other runways, however, will experience some green glare. Solas expects FP2 and FP3 to observe glare from the west-facing roof glass, while FP4 will experience glare from the east-facing glass. The effects of green-grade glare are considered negligible as it has a low risk of after-image.

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A summary of the cumulative duration of the highest level of glare predicted for each of the above receptors is provided in Figure 9. These results assume there are clear skies year-round.

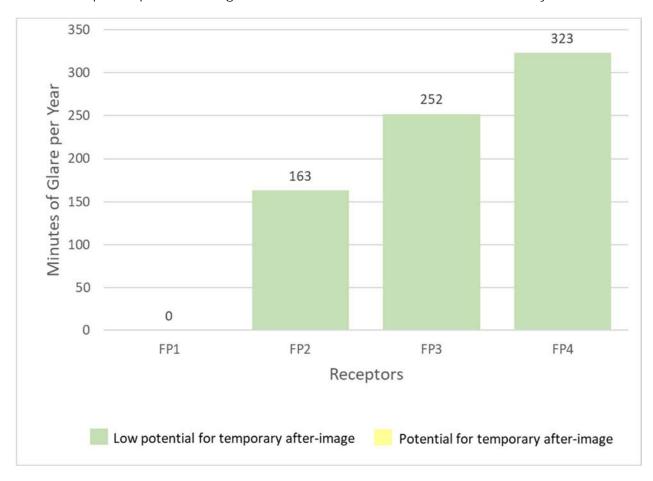


Figure 9: Annual Green-Grade Glare at affected Receptors near the Project (Clear skies year-round, Briggs 17)

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Table 5 shows the timeframes for the occurrence of glare and reports only the highest-intensity glare for each case and location. The cells in the table are colour-coded to match the intensity level and show the time of day, dates, and duration of the glare. The results demonstrate that green-grade glare may be present for short periods in the morning at FP2 and FP3, and in the evening for FP4.

Table 5: Seasonality and Duration of the Highest Level of Glare at each Receptor (Clear skies year-round, Briggs 17)

Docontor		Roof Elevation	
Receptor	17.0 ft	18.5 ft	20.1 ft
FP1	No Glare		
FP2	9:38 AM-10:38 AM	9:38 AM-10:38 AM	9:38 AM-10:38 AM
	1 Mar-10 Mar; 1 Oct-10 Oct;	1 Mar-10 Mar; 1 Oct-10 Oct;	1 Mar-10 Mar; 1 Oct-10 Oct;
	11 Dec-29 Dec	11 Dec-29 Dec	11 Dec-28 Dec
	Up to 10 mins.	Up to 10 mins.	Up to 10 mins.
FP3	9:08 AM-9:58 AM	9:08 AM-9:58 AM	9:07 AM-9:58 AM
	18 Mar-13 May; 29 Jul-22 Sep	18 Mar-13 May; 29 Jul-22 Sep	18 Mar-14 May; 29 Jul-22 Sep
	Up to 3 mins.	Up to 3 mins.	Up to 3 mins.
FP4	1:40 PM-2:26 PM	1:40 PM-2:26 PM	1:40 PM-2:26 PM
	22 Oct-19 Feb	22 Oct-19 Feb	22 Oct-19 Feb
	Up to 4 mins.	Up to 4 mins.	Up to 4 mins.

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6.2.1 Detailed Glare Example for Briggs 17 — Northeast-bound Descent with a 2-mile Approach (FP4, Runway 24)

Solas completed a detailed glare example for FP4. FP4 represents an airplane landing at runway 24 of the Hollister Municipal Airport with a 2-mile approach from the southwest. The Project greenhouses remain on the left side of the airplane as it lands. The flight path utilizes the standard three-degree descent slope and field-of-view of 50 degrees in either direction from straight ahead. Figure 10 illustrates the time of day and seasonality for glare hazard for FP4 from the roof elevation of 17.0 feet (the bottom extent of the roof). Green glare occurs between 1:40 and 2:26 p.m. standard time (2:40 and 3:36 a.m. daylight savings time) between October and February. The effects of green-grade glare are considered negligible as it has a low risk of after-image.

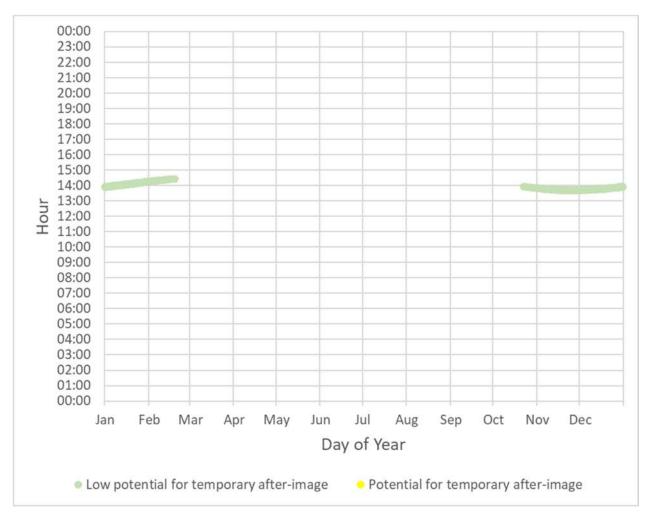


Figure 10: Time of Glare Hazard for FP4 (Clear skies year-round, Briggs 17)

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Figure 11 shows the daily duration for each level of glare that may be experienced at FP4. This flight path can experience up to four minutes of green glare in a day. All of the glare is classified in the green category. These results assume there are clear skies year-round.

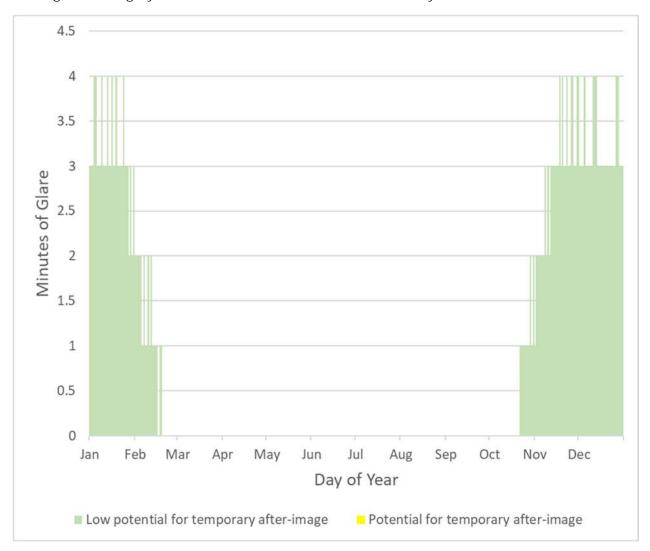


Figure 11: Daily Duration of Glare at FP4 (Clear skies year-round, Briggs 17)

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Figure 12 plots the glare hazard according to the size of the glare spot (Subtended Source Angle), brightness of the glare (Retinal Irradiance), and the glare level (green, yellow, and red zones). The size and brightness of the glare spots are displayed using logarithmic scales. At FP4, the glare is 1520 times dimmer than staring at the sun but will appear up to 3.7 times bigger than the perceived diameter of the sun viewed from the same location. These results assume there are clear skies year-round.

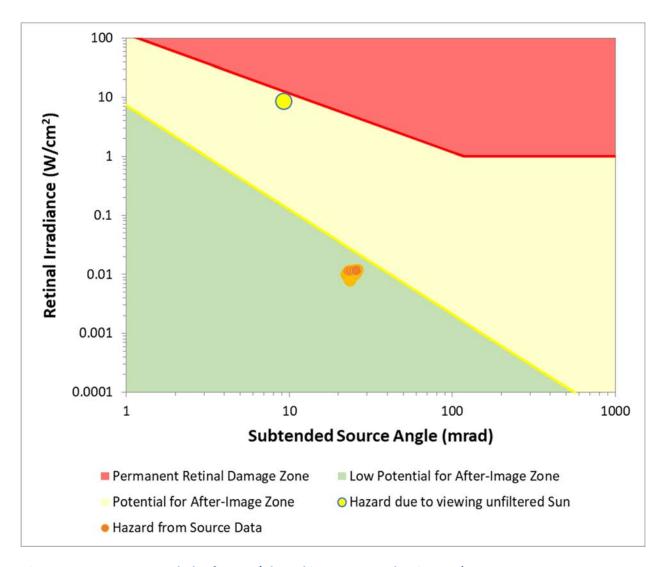


Figure 12: Log-Log Hazard Plot for FP4 (Clear skies year-round, Briggs 17)

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6.3 Glare Visual Representation

Solas developed a catalogue of glare representations to help stakeholders understand and visualize the glare they may experience from reflective surfaces. Solas' glare catalogue includes a range of images depicting glare of varying intensity from actual solar arrays and buildings. The irradiance of the glare shown in Figure 13 is of similar intensity to the glare Solas predicts observers will experience from the Project. Solas expects glare to reach up to 120 watts per square metre (W/m²), while the figure below provides a representation at an irradiance level of 158 W/m².



Figure 13: Solas Glare Catalogue Image (158 W/m²) at a similar irradiance level to those expected at the Project

Figure 14 shows reference points for glare irradiance levels from various solar PV facilities and buildings. This figure is shown to provide context for the glare representation above.

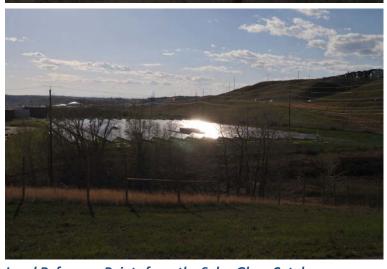
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190 W/m² (yellow)



279 W/m² (yellow)

Figure 14: Glare Irradiance Level Reference Points from the Solas Glare Catalogue

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Section 7, Glare-Mitigating Features

7 GLARE-MITIGATING FEATURES

Glare has been predicted from the greenhouses using base assumptions and the GlareGauge software. Solas completed additional analyses to model real-world features that could reduce the glare impact.

7.1 Cloud Cover and Typical Weather Patterns

The GlareGauge model assumes that clear skies occur every day of the year resulting in glare durations that are higher than observers are likely to experience. Solas obtained the fraction of days with less than 20 percent cloud cover for each month of the year using modelled data normalized over 30 years. Solas incorporated Meteoblue's data for Hollister, which is believed to be somewhat representative.¹²

Clouds reduce reflection by diffusing sunlight. On cloudy days, this diffusion will decrease the intensity of green glare and potentially eliminate the glare completely. According to Meteoblue's data, around 48 percent of days throughout the year are expected to have more than 20 percent cloud cover.

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¹² https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/hollister_united-states-of-america_5357499, accessed: September 15, 2020.



Section 8, Conclusions and Discussion

8 CONCLUSIONS AND DISCUSSION

The analysis results indicate that there is likely no incidence of red or yellow-grade glare from the Wright 13 or Briggs 17 greenhouses. All greenhouses are expected to produce green glare for all four flight paths, with one exception: pilots landing at runway 31 (FP1) of the Hollister Municipal Airport are not expected to experience any glare from the Briggs 17 greenhouse.

Overall, the Wright 13 greenhouses affect the Runway 13 path (FP2) the most. FP2 is expected to observe up to 1,165 minutes of green glare from Wright 13 yearly, between October and March, from 9:37 and 11:25 a.m. Briggs 17 affects the Runway 24 path (FP4) the most, emitting green glare for up to 323 minutes yearly. Green glare at FP4 from Briggs 17 occurs between October and February, from 1:40 to 2:26 p.m. The glare seen from flight paths will look much dimmer than the sun but will appear larger.

Glare predicted to be produced by the greenhouse roofs is only categorized in the "green" level, indicating an observer is unlikely to experience an after-image after looking at a glare spot. The size and intensity of the glare spot and resulting after-image are dependent on the distance between the observer and the array. An increase in the distance between the observer and greenhouses will decrease the impact and after-image created by the glare. The after-image an observer may experience could temporarily appear as a slightly darker or discoloured spot or line in the observer's vision. The effects of green-grade glare are considered negligible as it has a low risk of after-image.

Cloud cover and typical weather patterns provide a variable source of glare mitigation. Clouds may diffuse incident sunlight, lessening the impact of reflections from reflective surfaces. The impact of cloud cover was assessed using modelled weather data normalized over 30 years. Approximately 48 percent of days throughout the year are expected to have more than 20 percent cloud cover.

Based on the information associated with the geographic configuration of the glass panes on the greenhouse roofs, glare from the Project has a low potential to pose a risk to flight operations at the Hollister Municipal Airport. Changes to the Project layout or specifications will affect the results of the analysis.

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Section 8, Conclusions and Discussion

Appendix A ForgeSolar Modelling Assumptions

Wright 13 — Greenhouse Roof Glass Parameters

Roof azimuth (Wright A&B): 93 degrees (east) and 273 degrees (west) Roof azimuth (Wright C): 3 degrees (north) and 183 degrees (south)

Roof tilt/slope: 23 degrees

Glass material: Smooth glass without anti-reflective coating

Vary reflectivity with sun position? Yes

Ground elevation: 253 feet (Wright A&B), 252 feet (Wright C)

Height above ground: assessed at 17.0 feet, 18.5 feet, and 20.1 feet

Briggs 17 — Greenhouse Roof Glass Parameters

Roof azimuth: 93 degrees (east) and 273 degrees (west)

Roof tilt/slope: 23 degrees

Glass material: Smooth glass without anti-reflective coating

Vary reflectivity with sun position? Yes

Ground elevation: 248 feet (minimum elevation)

Height above ground: assessed at 17.0 feet, 18.5 feet, and 20.1 feet

Flight Path Parameters

Glide slope: 3 degrees

Plane height above threshold ground elevation (2 miles from threshold): 603 feet

Plane height above ground (at threshold): 50 feet

Horizontal/Azimuthal viewing angle: 50 degrees from centre Maximum downward viewing angle: 30 degrees from horizontal

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Agenda Item ²

Staff Report

To: Airport Land Use Commission

From: Veronica Lezama, Transportation Planner Telephone: (831) 637-7665

Date: December 17, 2020

Subject: Land Use Consistency Determination

Recommendation:

FIND Project No. 2018-6, Associated with Assessor Parcel Nos. 019-090-026 and 053-350-0030 located on 1100 San Felipe Road in the City of Hollister, **CONSISTENT** with the 2012 Hollister Municipal Airport Land Use Compatibility Plan.

Summary:

The ALUC application associated with assessor parcel numbers 019-090-026 and 053-350-0030 were reviewed in accordance with the adopted 2012 Hollister Municipal Airport Land Use Compatibility Plan.

Financial Considerations:

The Airport Land Use Commission (ALUC) has an adopted application fee structure. The fee consists of a minimum \$300 non-refundable payment that is submitted at the time the application is provided to ALUC.

Background:

Land use actions proposed within the Hollister Municipal Airport Influence Area (Attachment 1) are subject to ALUC review to determine consistency with the Hollister Municipal Airport Land Use Compatibility Plan. The purpose of the Compatibility Plan is to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards.

Staff Analysis:

ALUC staff received an application for a Consistency Determination with the adopted 2012 Hollister Municipal Airport Land Use Compatibility Plan.

Project Description:

The proposed project, Briggs 17, is located at 1100 San Felipe Road in the City of Hollister, San Benito County (Attachment 2). The project area is located in the north/central portion of the Hollister planning area, north of Wright Road, on the west side of San Felipe Road, east of State

Route (SR) 25 in an area known historically as "Cottage Corners." Hollister Municipal Airport is located approximately 1.5 miles to the north. The applicant is proposing the construction of 544,670 square feet of indoor cannabis cultivation, distribution, and manufacturing facilities on San Felipe Road. Specifically, the project would construct a single large warehouse-style structure with a building footprint of 544,670 square feet, including a 64,500 square foot "Head House" which includes offices, employee areas (Attachment 3).

During a project review, the Airport Land Use Commission considers several Compatibility Plan policies including: *Noise, Safety, Airspace Protection*, and *Overflight*. An analysis of each of the four compatibility factors is discussed below.

Noise Policy 3.2.

The Noise Policy objective is to avoid establishment of noise-sensitive land uses in the portions of airport environs that are exposed to significant levels of aircraft noise. The magnitude noise impacts are depicted by four contours, which show the greatest annualized noise impacts anticipated to be generated by the airport over the next 20 years.

The project is proposed outside of the Noise Contours (Attachment 4). As such, the project does not require additional noise attenuation measures beyond what is required by the California Building Code. As a result, the proposed project is consistent with the Hollister Municipal Airport Land Use Compatibility Plan's Noise Policy.

Safety Policy 3.3.

The Safety Policy objective is to minimize the risks associated with an off-airport aircraft accident or emergency landing. The policy focuses on reducing the potential consequences of such events by limiting sensitive land uses (i.e. residential) and intensities of non-residential uses (i.e. commercial, industrial, etc.). This policy is defined in terms of the geographic distribution of where accidents are most likely to occur based on the six safety zones.

The project is proposed within the Safety Zone 6 (Attachment 5)- the least restrictive of the Safety Zones. According to Table 2: Safety Compatibility Criteria, the *Indoor Storage* use is *Normally Compatible* and allowed within Safety Zone 6 (Attachment 6). The applicant is also proposing 64,500 square foot "Head House" which includes offices and employee areas. The proposed office space land use category is also *Normally Compatible* and allowed within Safety Zone 6 (Attachment 6).

As an additional condition of compatibility, the project must also comply with the indicated usage intensity limits and other listed conditions identified in Table 2: Safety Compatibility Criteria (Attachment 6). The cultivation park will operate 24 per day, seven days per week.

Twenty-four employees will be present for each of the three 8-hour shifts. No retail point of sale will take place at the facility. Shifts start and end times are proposed for non-peak hours to avoid peak travel times. As such, the project is consistent with the Compatibility Plan's Safety Policy.

Airspace Protection Policy 3.4.

The Airspace Protection Policy seeks to prevent creation of land use features that can be hazards to the airspace required by aircraft in flight and have the potential for causing an aircraft accident to occur.

In evaluating the airspace protection compatibility of the proposed development, three categories of hazards to airspace shall be considered: physical, visual, and electronic. The categories of hazard applicable to the project are outlined in bold below.

- a. The height of structures and other objects situated near the airport are a primary determinant of physical hazards to the airport airspace.
 - **ALUC Staff Analysis:** The project is proposed outside of the Critical Airspace Protection Zone and any object in this zone is allowed to have a height of up to 35 feet above the ground. The project structures will not exceed 20 feet in height and therefore consistent with the Federal Regulation 49 CFR Part 77, which establishes standards and notification requirements for objects affecting navigable airspace.
- Land use features that have the potential to attract birds and certain other wildlife to the airport area are also to be evaluated as a form of physical hazards (FAA Advisory Circular 150/5200-33B, Hazardous Wildlife Attractants on or Near Airports).
 - **ALUC Staff Analysis:** The applicant is proposing a shared detention basin designed not hold standing water after storm events so as to not attract birds, basin pumps shall be sized and programmed accordingly to drain within 24 hours. The detention basin design is consistent with the Compatibility Plan.
- c. Visual hazards of concern include certain types of lights, sources of glare, and sources of dust, steam, or smoke.
 - **ALUC Staff Analysis:** The applicant is proposing the construction of 544,670 square feet of indoor glass greenhouse buildings for a cannabis cultivation facility. San Benito Airport Land Use Commission staff requested that the applicant provide a glare study as greenhouses may have the potential to pose hazard to pilots in the form of glare. The applicant provided a Solar Glare Analysis Study to evaluate the potential for solar glare from the project for airplanes on the final approach to the airport (Attachment 7).

The impact of glare depends on the interaction between the position of the sun, the angle and orientation of the reflective surface, the reflectivity of the surface, the size of the

project, and the relative location of the observer. "Green" rated glare indicates a low potential for after-image, "yellow" rated glare indicates the potential for after-image exists, and "red" rated glare indicates the potential for retinal damage.

The report concluded that the preparer of the study "Solas does not expect the Briggs greenhouse to produce red-grade glare or yellow-grade glare at the evaluated flight paths." The results of the Glare Gauge analysis identified four locations that will experience greengrade glare as described in detail in the report, page 23. Green rated glare indicates a low potential for after-image.

a. Electronic hazards are ones that may cause interference with aircraft communications or navigation.

Staff Analysis: None

The proposed project is consistent with the Compatibility Plan's Airspace Protection Policy.

Overflight Policy 3.5.

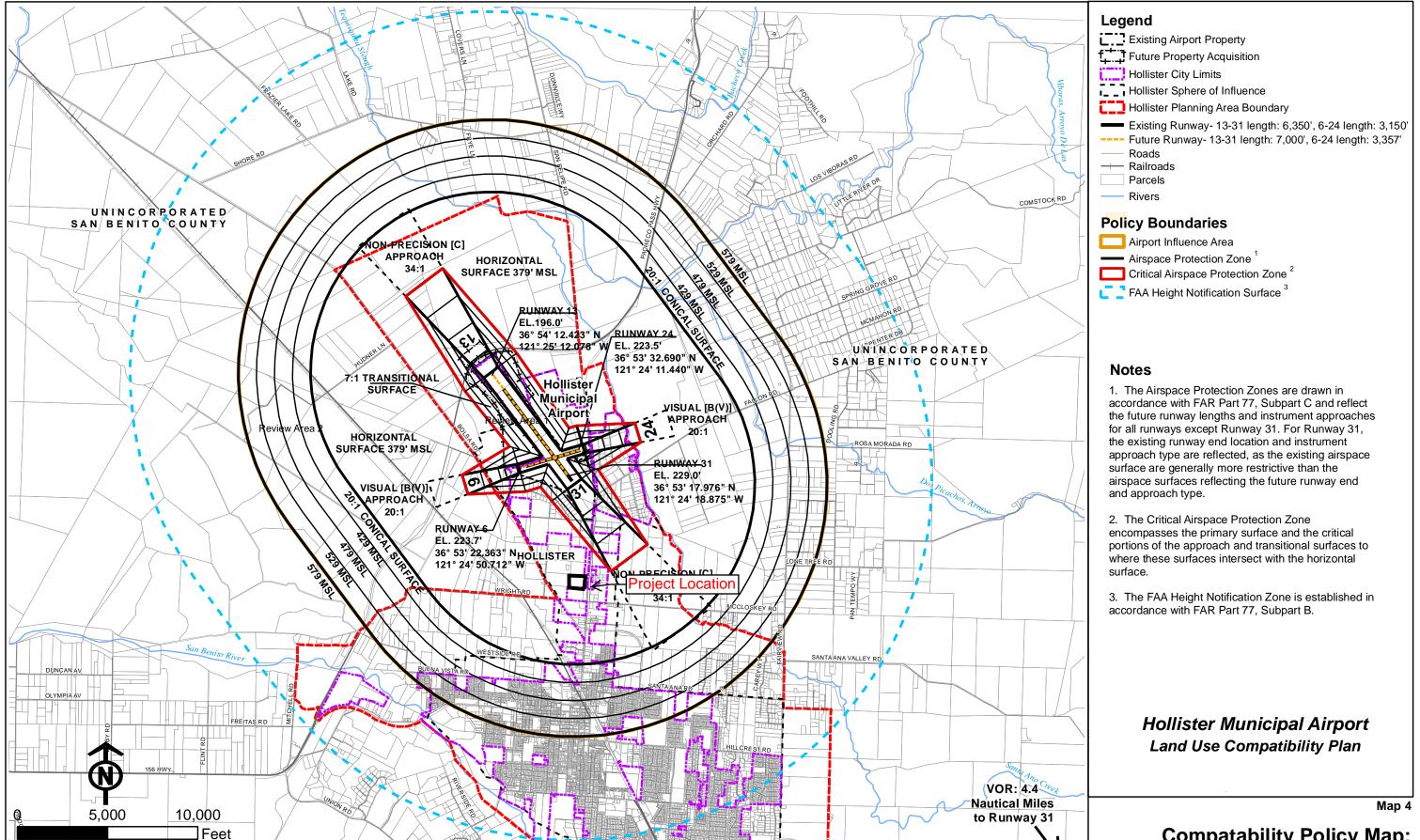
The Overflight Compatibility Policy is intended to help notify people, through real estate disclosures, about the presence of aircraft overflight near airports so that they can make informed decisions regarding acquisition or lease of property in the affected areas. Overflight policies do not apply to non-residential development. The applicant is proposing a non-residential use and is therefore consistent with the Overflight Compatibility Policy.

Executive Director Review: MG

Counsel Review: N/A

Supporting Attachment(s):

- 1. Compatibility Policy Map: Airport Influence Area
- 2. Project Location Map
- 3. Project Site Plan
- 4. Noise Contour Map
- 5. Safety Zones Map
- 6. Table 2: Safety Compatibility Criteria
- 7. Glare Analysis Report



HOLLISTER

Source: Mead & Hunt, Inc.

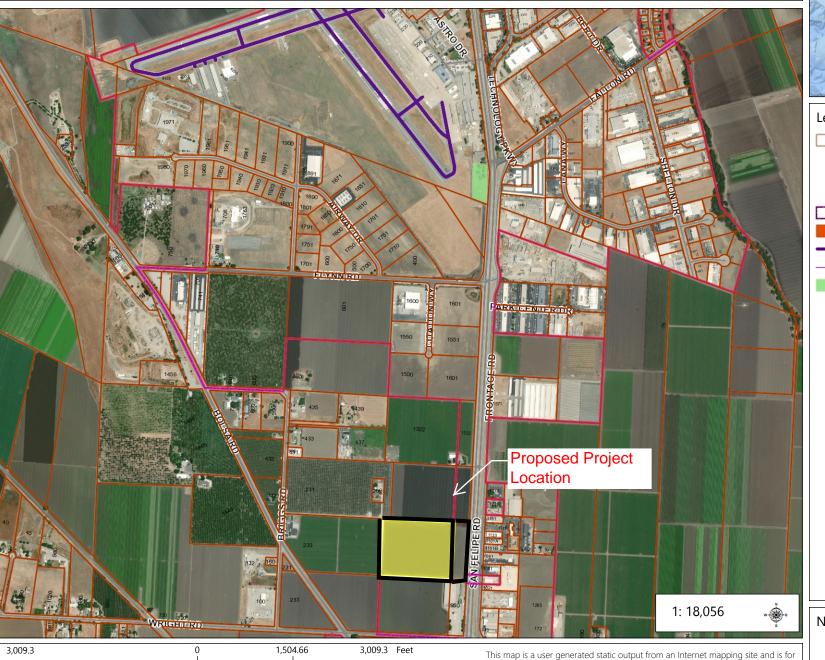
Compatability Policy Map: Airspace Protection Zones



WGS_1984_Web_Mercator_Auxiliary_Sphere ©County of San Benito, GIS Services

County of San Benito

Project Location





Legend

SBC Parcels
California County Boundaries

<all other values>

San Benito

City Limit

City Liiii

Tentative Subdivision

Hollister Airport Runways

Tentative Streets

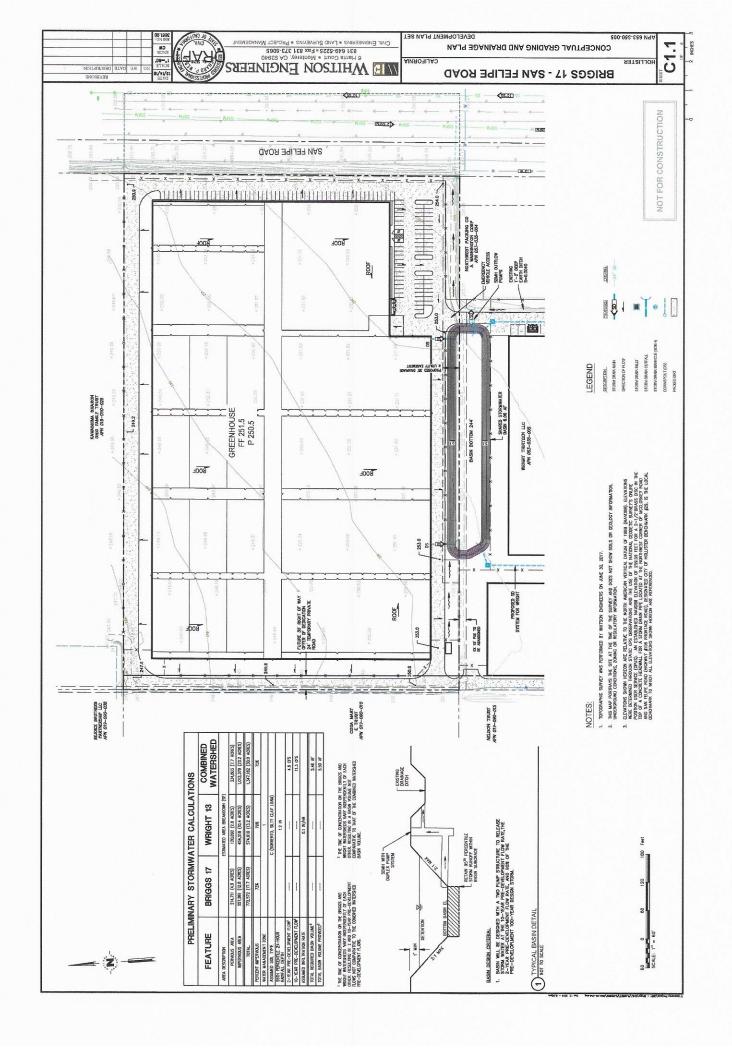
Park

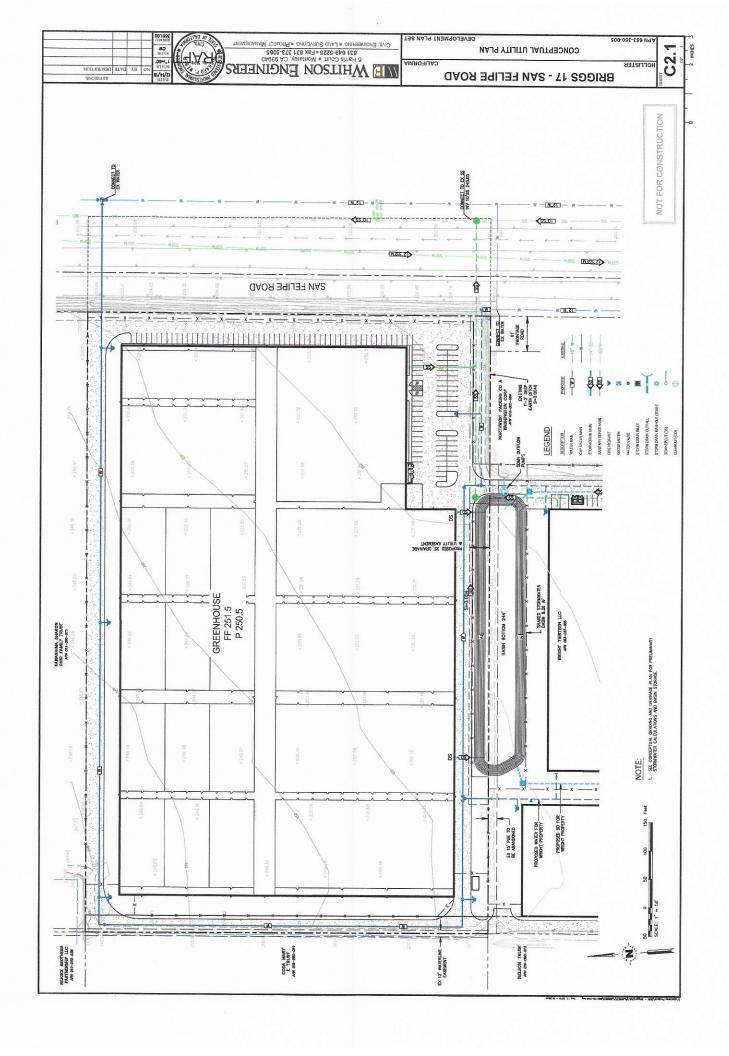
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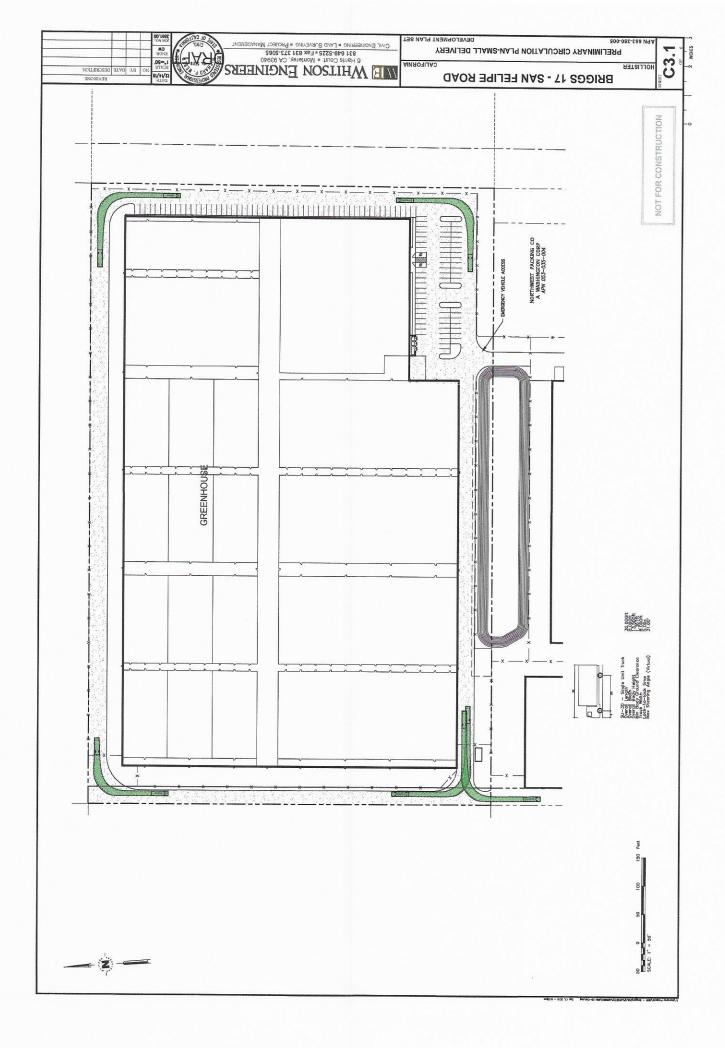
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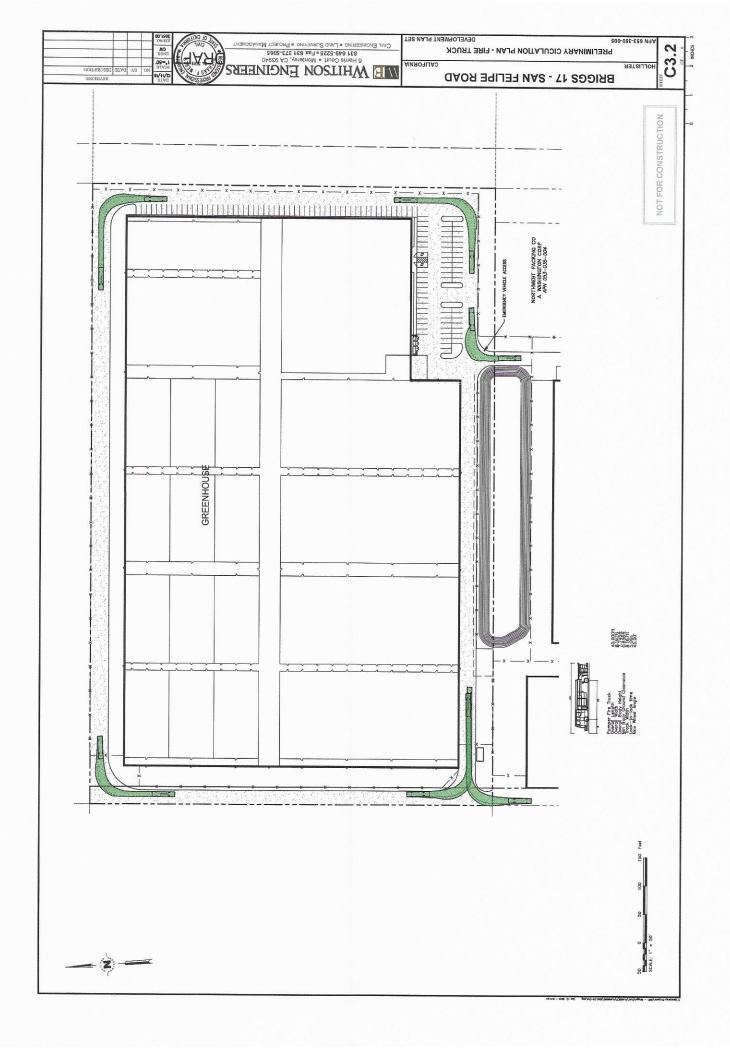
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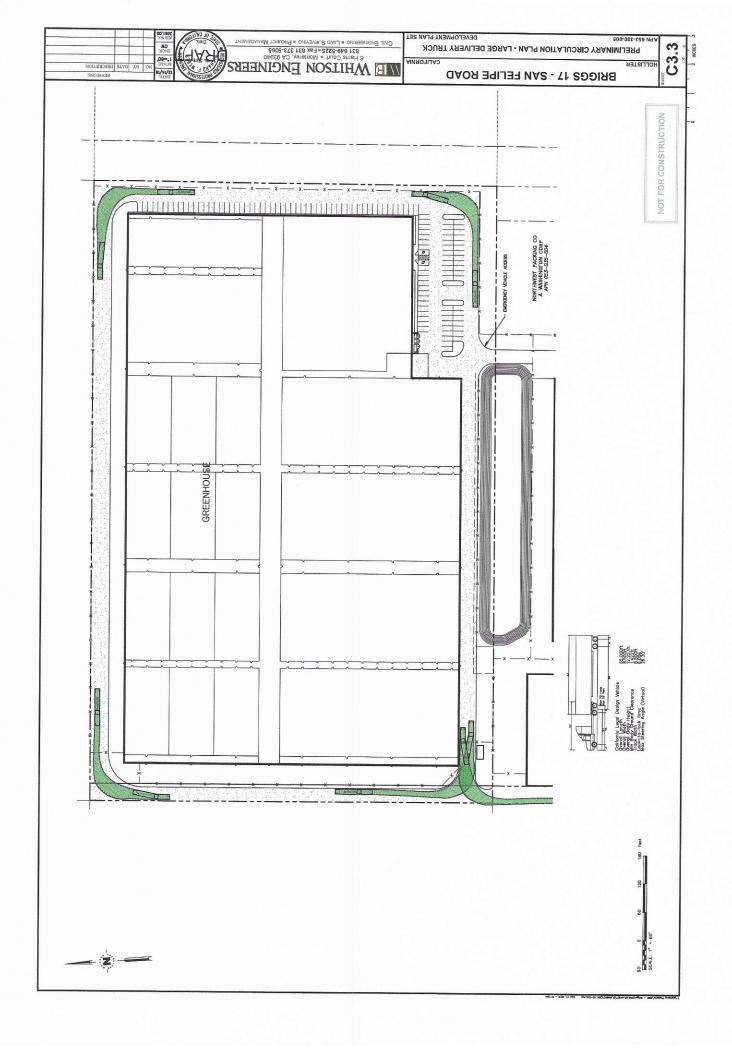


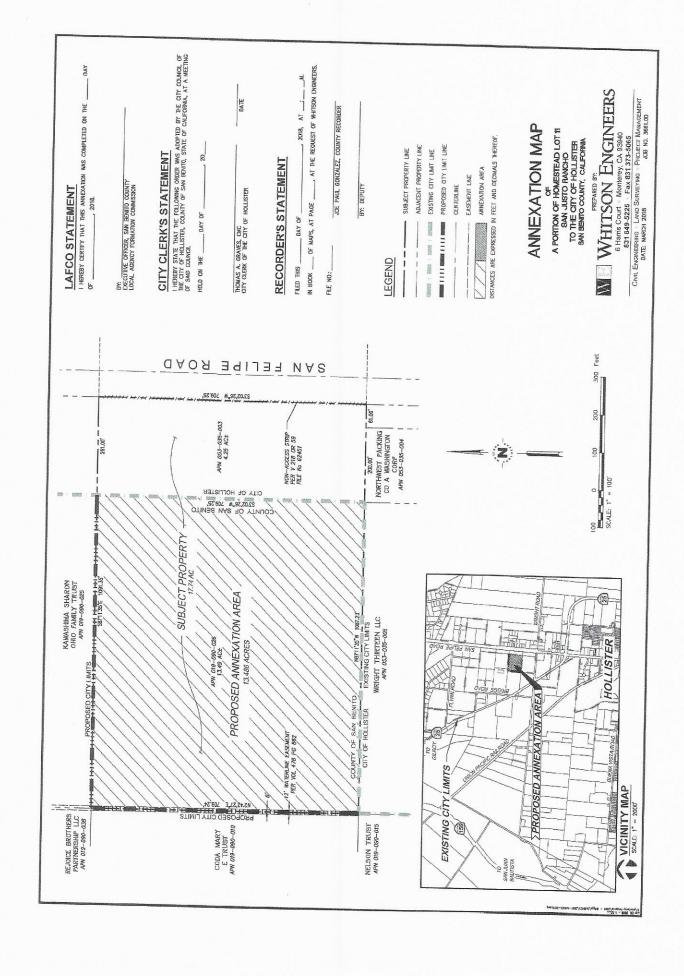








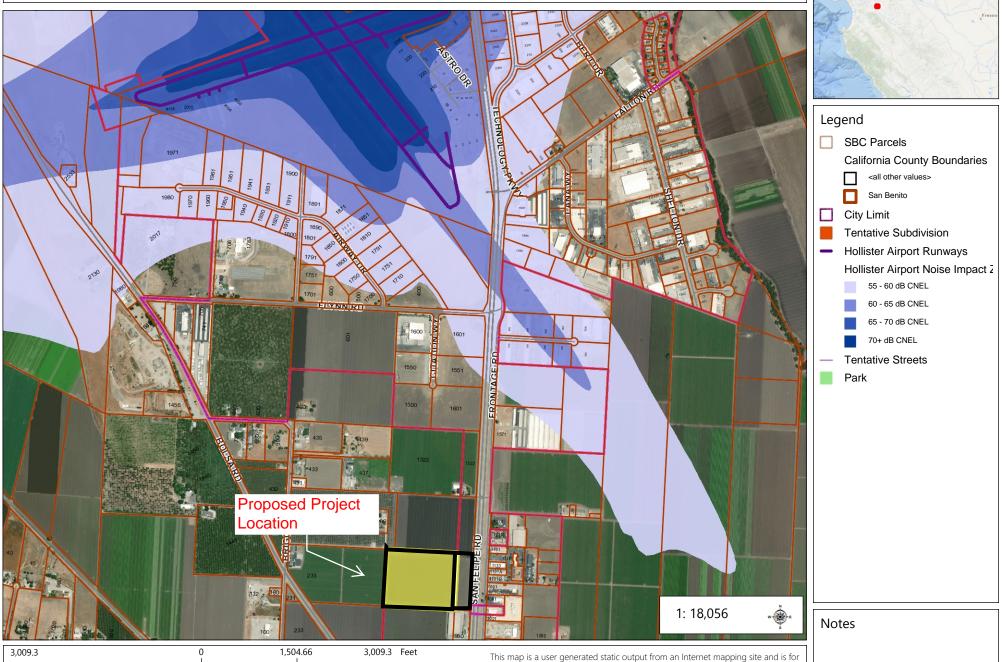






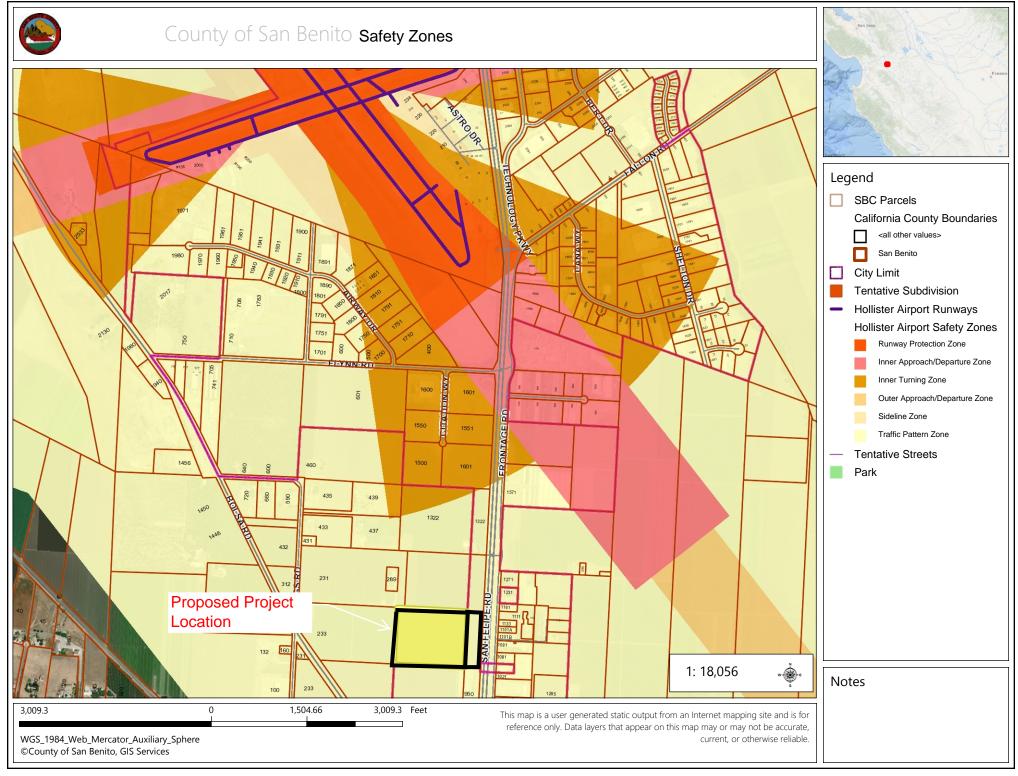
WGS_1984_Web_Mercator_Auxiliary_Sphere ©County of San Benito, GIS Services

County of San Benito Noise Contours



reference only. Data layers that appear on this map may or may not be accurate,

current, or otherwise reliable.



Harris Later to City of 1	C-C-4-7						1188 108
Usage Intensity Criteria ¹		Safety Zone					Additional Criteria
Max. Sitewide Average Intensity (people/acre) Max. Single-Acre Intensity (people/acre)	1 10 20	60 120	3 100 300	150 450	5 100 300	300 1,200	Numbers below indicate zone in which condition applies
Land Use Category ²			Use A				
Eating/Drinking Establishments: restaurants, fast-food dining, bars [approx. 60 s.f./person] 6							2-5: Intensity limits as indicated
Limited Retail/Wholesale: furniture, automobiles, heavy equipment, lumber yards, nurseries [approx. 250 s.f./person] ⁶							2, 5: Intensity limits as indicated; design site to place parking inside and bldgs outside of zone if possible
Offices: professional services, doctors, finance, civic; radio, television & recording studios, office space associated with other listed uses [approx. 215 s.f./person] ⁶						X	2-5: Intensity limits as indicated
Personal & Miscellaneous Services: barbers, car washes, print shops [approx. 200 s.f./person] ⁶							2-5: Intensity limits as indicated
Vehicle Fueling: gas stations and fueling facilities at trucking & transportation terminals							5: Allowed only if airport serving
Industrial, Manufacturing, and Storage Uses							
Hazardous Materials Production: oil refineries, chemical plants							3-6: Allowed only if alternative site outside zone would not serve intended function; Fire Marshal to determine if special design features should be incorporated into structure to withstand damage from aircraft collision; exercise caution with uses creating plumes and other airspace hazards 3
Heavy Industrial			_				2-5: Avoid bulk production/storage of hazardous (flammable, explosive, corrosive, or toxic) materials; permitting agencies to evaluate possible need for special measures to minimize hazards if struck by aircraft
Light Industrial, High Intensity: food products preparation, electronic equipment [approx. 200 s.f./person] ⁶							2-5: Intensity limits as indicated; avoid bulk production/storage of hazardous (flammable, explosive, corrosive, or toxic) materials; permitting agencies to evaluate possible need for special measures to minimize hazards if struck by aircraft
Light Industrial, Low Intensity: machine shops, wood products, auto repair [approx. 350 s.f./person] ⁶							2 - 4: Intensity limits as indicated 5: Single story only; max. 10% in mezzanine 2-5: Avoid bulk production/storage of hazardous (flammable, explosive, corrosive, or toxic) materials; permitting agencies to evaluate possible need for special measures to minimize hazards if struck by aircraft
Indoor Storage: wholesale sales, warehouses, mini/other indoor storage, barns, greenhouses [approx. 1,000 s.f./person] ⁶						X	2: Single story only; max. 10% in mezzanine

Table 2, continued

Land Use	Acceptability	Interpretation/Comments
	Normally Compatible	Normal examples of the use are compatible under the presumption that usage criteria will be met. Atypical examples may require review to ensure compliance with usage intensity criteria. Noise, airspace protection, and/or overflight limitations may apply.
	Conditional	Use is compatible if indicated usage intensity limit and/or other listed conditions are met.
	Incompatible	Use should not be permitted under any circumstances.

Notes

- ¹ Usage intensity criteria applicable to all nonresidential development (i.e., Normally Compatible as well as Conditional land uses). Nonresidential development must satisfy both forms of intensity limits (see Policy 3.3.6). See Note 6 below and Policy 3.3.7 for information on how to calculate nonresidential intensity. Up to 10% of total floor area may be devoted to ancillary use (see Policy 3.3.6(c)).
- Multiple land use categories and compatibility criteria may apply to a project. Land uses not specifically listed shall be evaluated using the criteria for similar uses.
- These uses may pose hazards to flight as they may attract birds or other wildlife; generate dust or other visual hazards; or create physical hazards (e.g., power lines or other tall objects). See *Section 3.4* for applicable airspace protection policies.
- Capacity of people for Large and Major Assembly Facilities obtained from International Building Code.
- Residential density limits provided in terms of dwelling units per acre (du/ac). Construction of a single-family home, including a second dwelling unit as defined by state law, allowed on a legal lot of record if such use is permitted by local land use regulations. A family day care home (serving \le 14 children) may be established in any dwelling. See *Policies 1.4.5* and 3.3.5(h).
- Common occupancy load factors (approximate number of square feet per person) source: Mead & Hunt, Inc. based upon information from various sources including building and fire codes, facility management industry sources, and ALUC surveys. The common occupancy load factors represent the maximum occupancy during a normal peak period occupancy, not on the highest attainable occupancy used in building and fire codes. Common occupancy load factors provided in the table for specific land uses may be used as a means of calculating the usage intensity of a proposed development. See Policy 3.3.7 for other methods of calculating usage intensities.



Solar Glare Analysis Report – Wright 13 and Briggs 17 Greenhouses

Wright 13, LLC and Briggs 17, LLC, Hollister, California

Version 2.0

Issued For Use

09 October 2020

Delivered to: Geary Coats, Coats Consulting





Acknowledgement

Prepared by: Keith Knudsen

Jason Mah Paula McGarrigle Gabriel Risbud-Vincent

Document Purpose

This report provides an assessment of glare hazard from the proposed Wright 13 and Briggs 17 Greenhouse Projects in Hollister, California, USA.

Document History

Wright 13 and Briggs 17 Solar Glare Analysis

Version	Date	Comments
1.0	07 October 2020	Issued for Review
2.0	09 October 2020	Issued for Use

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Appendix A ForgeSolar Modelling Assumptions



Glossary

Term	Description	
After-image	Visual image that persists after the stimulus that caused it has stopped.	
ALUC	Airport Land Use Commission	
Azimuth	Horizontal angle of the Sun around an object. North is 0°, east is 90°, south is 180°, and west is 270°.	
Coats	Coats Consulting	
FAA	Federal Aviation Administration	
FP	Flight path	
mrad	Measure of angle, 1/1000 th of a radian	
SGHAT	Solar Glare Hazard Analysis Tool	
Subtended Angle	Size of an object divided by the distance from the observer.	
W/m ²	Watts per square metre	

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Section 1, Introduction

1 INTRODUCTION

The Wright 13, LLC and Briggs 17, LLC are proposing to build multiple greenhouses in the city of Hollister, California. The Wright 13 and Briggs 17 projects (Projects) will be located at the north end of the city in San Benito County, approximately 1.25 miles south of the Hollister Municipal Airport.

The San Benito County Airport Land Use Commission (ALUC) reviews development proposals that may affect operations at the Hollister Municipal Airport, Frazier Lake Airpark, and surrounding areas. The ALUC has requested that the project applicants provide an analysis of potential impacts to aviation due to solar glare from the Projects. Reflective surfaces, like the glass roof sections of the greenhouses, may reflect sunlight and produce glare along flight paths at the Hollister Municipal Airport. In addition, ALUC is charged with ensuring new proposed projects within the ALUC area of responsibility are consistent with the ALUC land use plan.

Solas Energy Consulting Inc. (Solas) was retained by Coats Consulting (Coats) to conduct a solar glare analysis for flight paths at the Hollister Municipal Airport. This report documents the potential for solar glare from the Projects for airplanes on final approach to the airport.

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Section 2, Project Description

2 PROJECT DESCRIPTION

Wright 13 will include three greenhouses situated on a 13-acre parcel of land, and Briggs 17 will include a single greenhouse on a 17-acre parcel. Both sites are at the north end of the City of Hollister, California. The Projects are on the west side of San Felipe Road, with California State Route 25 to the west and Wright Road to the south. The end of the nearest runway at the Hollister Municipal Airport is about 0.8 miles north of the Briggs site, and one mile north of the Wright site. The immediate surrounding area includes residential buildings, industrial/commercial establishments, and agricultural land. The approximate location of the Projects is shown in Figure 1. The parcels are currently being used for agriculture. The greenhouses will be approximately two storeys tall, and they will incorporate tempered glass for the roofs.

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Section 2, Project Description

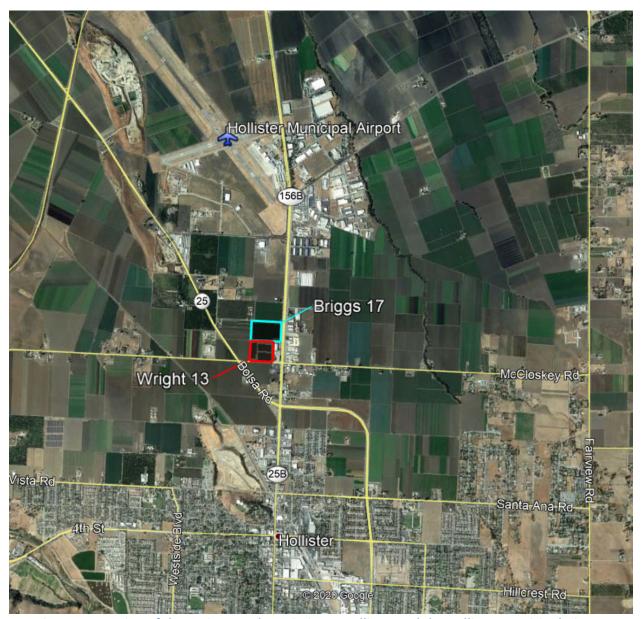


Figure 1: Location of the Projects and proximity to Hollister and the Hollister Municipal Airport

Figure 2 outlines the Wright site in red, and the Briggs site in blue. The greenhouse footprints are shown as the dark interior areas.

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Section 2, Project Description



Figure 2: Project Boundaries and Proposed Wright 13 and Briggs 17 Greenhouses

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Section 3, Project Assumptions

3 PROJECT ASSUMPTIONS

The Wright site consists of approximately 13 acres of land, with the greenhouses occupying about eight acres. The Briggs site encompasses 17 acres with a greenhouse footprint of about 12 acres. Solas used multiple sources to determine the site elevations, including publicly available topographic contours from the Google Maps interface, and preliminary drawings provided by Coats. Solas assumed a constant ground elevation of about 252 feet above sea level for the entire Wright site, and 248 feet for the Briggs site. These values represent the current minimum elevations at the sites, which result in a conservative glare analysis. A change of grade will affect the results of the glare analysis.

The Project greenhouses will have sections of their roofs built with tempered glass. The roofs are designed with peaks at regular intervals and a slope of approximately 23 degrees. The glass panes will face east and west (azimuth angles of 93 and 273 degrees, respectively) for Wright A and B, while the glass will face north and south (three and 183 degrees, respectively) for Wright C. The glass panes of the Briggs greenhouse will face east and west. The roof line starts 17.0 feet above ground level, extending to a height of 20.1 feet at the top. Solas modelled the roofing as smooth glass without anti-reflective coating. The side walls of the greenhouses were not modelled in this analysis.

The model assumes the reflective surface lies in a plane defined by the outlined area, so the analysis was completed at the top and bottom extents of the roof to determine glare from different parts of the glass panes. The analysis was also run at an intermediate height above ground of 18.5 feet to help identify trends in the frequency and size of glare.

Solas based the location of the greenhouses on the satellite imagery maps provided by Coats. A single footprint was evaluated instead of two buildings for Wright A and B, resulting in a more conservative analysis. Overlapping footprints with identical dimensions were plotted for each greenhouse to model the different roof azimuths. Only the more conservative values were kept for simultaneous instances of glare from each set of footprints.

Detailed input parameters and assumptions can be found in Appendix A.

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¹ Data provided by Coats.

Section 4, Glare Regulations and Receptors

4 GLARE REGULATIONS AND RECEPTORS

The Federal Aviation Administration (FAA) reviews solar PV facilities that are proposed in proximity to airstrips for the potential of glare. A similar review may be completed for other glare-producing objects like mirrored or highly reflective building features. The FAA may accept an evaluation using one of the following levels of assessment:²

- 1. a qualitative analysis of potential impact in consultation with the Air Traffic Control Tower, pilots, and airport officials;
- 2. a demonstration field test with solar panels at the proposed site in coordination with Air Traffic Control Tower personnel; or,
- 3. a geometric analysis to determine days and times when there may be an ocular impact.

This analysis falls into the third category referenced above. This report summarizes the results using geometric analysis (ForgeSolar's Solar Glare Hazard Analysis Tool (SGHAT), or GlareGauge³) for the Projects.

The Hollister Municipal Airport Land Use Compatibility Plan states that developments that may produce visual hazards, such as glare, are subject to additional review by the ALUC. Along with the review conducted by the ALUC, sources of glare must be consistent with FAA rules and regulations.⁴

Solas evaluated multiple flight paths (FPs) for airplane landing approaches at the Hollister Municipal Airport. Standard flight landing paths (FP1-4) were modelled using standard FAA evaluation parameters. Solas did not model an air traffic control tower since the Hollister Municipal Airport does not have a control tower. Specific parameters used to analyze flight operations can be found in Appendix A.

Solas analyzed the potential for glare at the receptors shown in Figure 3. Four flight paths (landing approaches represented by green lines) were evaluated.

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² https://www.faa.gov/airports/environmental/policy_guidance/media/FAA-Airport-Solar-Guide-2018.pdf, accessed: September 16, 2020.

³ Copyright, Sims Industries, 2015

⁴ http://sanbenitocog.org/wp-content/uploads/2018/10/ADOPTED-ALUCP-June-2012.pdf, accessed: September 16, 2020.

Section 4, Glare Regulations and Receptors

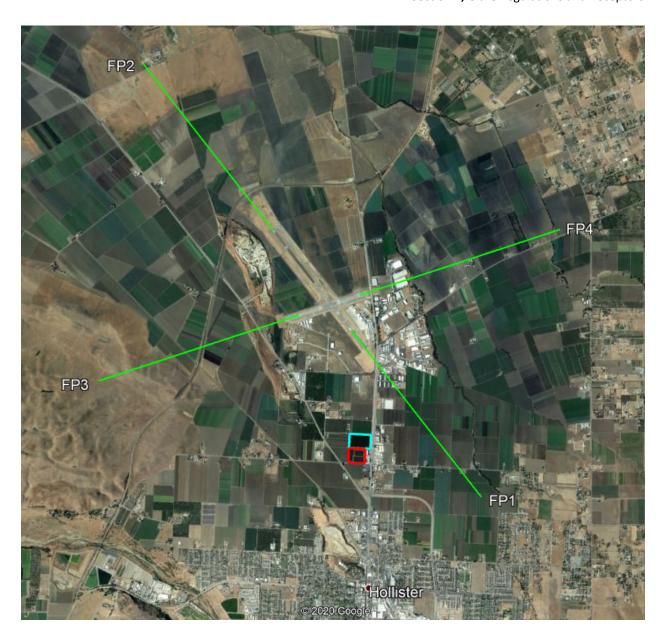


Figure 3: Wright 13 and Briggs 17 Projects with Flight Paths Identified

Table 1 describes the receptors used in the analysis. The horizontal viewing angle for flight routes is limited to 50 degrees in either direction from the direction of travel. Solas does not consider glare outside of this field of view to be a risk to the pilot.⁵

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⁵ Rogers, J. A., et al., Federal Aviation Administration, Evaluation of Glare as a Hazard for General Aviation Pilots on Final Approach, 2015.



Section 4, Glare Regulations and Receptors

Table 1: Description of Receptors

Receptor Number	Location	Description
FP1	Hollister Municipal Airport	Northwest-bound descent at runway 31, 2-mile approach from 603 feet above landing threshold
FP2	Hollister Municipal Airport	Southeast-bound descent at runway 13, 2-mile approach from 603 feet above landing threshold
FP3	Hollister Municipal Airport	Northeast-bound descent runway 6, 2-mile approach from 603 feet above landing threshold
FP4	Hollister Municipal Airport	Southwest-bound descent at runway 24, 2-mile approach from 603 feet above landing threshold

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Section 5, Glare Prediction Method

5 GLARE PREDICTION METHOD

The impact of glare depends on the interaction between the position of the sun, the angle and orientation of the reflective surface, the reflectivity of the surface, the size of the project, and the relative location of the observer. The modelling software assumes there is no cloud cover and does not include screening effects from existing or proposed foliage, terrain, buildings or other obstacles. The model is therefore considered to be conservative.

The sun's position is described using the angle of elevation and solar azimuth. The angle of elevation is the angle between the horizon and the centre of the sun. The azimuth is measured as the angle from true north in a clockwise direction.

Solas performed the glare analysis using the ForgeSolar GlareGauge⁶ software tool. This tool uses project inputs and solar positioning calculations to determine if glare will occur at identified observation points. If glare is found, the tool calculates the retinal irradiance (brightness) and subtended angle (size divided by distance) of the glare source. These two factors predict ocular hazards ranging from temporary after-image to retinal burn. Minor topographic features are not always identified in GlareGauge due to the resolution of topographic contours from Google Earth.

"Green" rated glare indicates a low potential for after-image, "yellow" rated glare indicates the potential for after-image exists, and "red" rated glare indicates the potential for retinal damage. Glare that is beyond 50 degrees from a driver's or pilot's line-of-sight does not constitute a safety hazard.⁷

The amount of light reflected by a surface depends on the sunlight's angle of incidence at the surface as illustrated in Figure 4.

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⁶ Copyright, Sims Industries, 2015

⁷ Ho, C. K. and Sims, C. A., Sandia National Laboratories, 2016, Solar Glare Hazard Analysis Tool (SGHAT) User's Manual v. 3.0.

Section 5, Glare Prediction Method

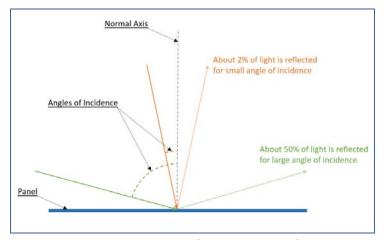


Figure 4: Reflected Light and Angle of Incidence (illustration only) on a reflective surface/panel.

Glass with anti-reflective coating may reflect approximately two percent of incident sunlight on average, which is less than the amount of light open water and uncoated glass typically reflect. Open water and uncoated glass reflect approximately ten percent of incident sunlight.^{8,9} The software models the reflectivity for each angle of incidence based on experiments Sandia National Laboratories performed for a variety of different solar PV module types.¹⁰ Very little light is reflected when the sun is nearly perpendicular to the glass, but more light is reflected when the sun is at a shallow angle to the glass.

All flight paths have been modelled using a +/- 50-degree field-of-view based on the standard approach in the ForgeSolar software and the report entitled "Evaluation of Glare as a Hazard for General Aviation Pilots on Final Approach".¹¹

5.1 Limitations of the Model

This analysis aims to provide an indication of the glare that may be produced by the proposed reflective surfaces on the greenhouse roofs. The prediction methods employed in the analysis have uncertainty. The following lists some of the limitations inherent in the analysis.

- The base model assumes clear skies at all times. The model does not use historical weather pattern data. This results in a total cumulative duration of glare that is likely higher than what will occur over the course of a year.
- The model does not consider shading.

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⁸ Lasnier and Ang, 1990, Photovoltaic Engineering Handbook. Taylor & Francis, New York.

⁹ US EPA, 2013, AERSURFACE User's guide, EPA-454/B-08-001.

¹⁰ Ho, C. K. and Sims, C. A., Sandia National Laboratories, 2016, Solar Glare Hazard Analysis Tool (SGHAT) User's Manual v. 3.0.

¹¹ Rogers, J. A., et al., Federal Aviation Administration, Evaluation of Glare as a Hazard for General Aviation Pilots on Final Approach, 2015.



Section 5, Glare Prediction Method

- Obstructions such as foliage, structures, and hills between the greenhouses and observation points are not modelled by ForgeSolar's GlareGauge software tool.
 - o The model does not consider the impact of trees and foliage as it is variable.
- Ocular and perceived hazards differ from person to person, depending on multiple environmental, optical, and human factors.
- Changes in the site and rooftop elevations from the assumptions may change the results of the analysis.
- Footprints encompassing large areas may have reduced accuracy due to the calculation method limitations.
 - o Subdivided areas may provide more accurate information related to glare spot locations, but the glare spot size will be limited by the smaller subdivided footprint.
 - o The larger, undivided footprint will have more accurate glare spot size results.

A separate analysis could be performed to evaluate the impact of topographical features available in Google Earth on the predicted glare. Combining the corresponding instances of glare from the analysis of subdivided areas with the glare spot sizes from the analysis of undivided footprints partially overcomes the calculation limitations for large footprints. This method provides a more accurate estimate of the potential glare than assessing undivided and subdivided footprints separately.

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6 ANALYSIS RESULTS

The following sections provide the results of the glare analysis and illustrative examples of the predicted glare.

6.1 Wright 13 Glare Results

Solas does not expect the Wright 13 greenhouses to produce red-grade glare or yellow-grade glare at the evaluated flight paths. The model predicts green-grade glare at all flight paths evaluated. Results assume there are clear skies year-round and there is no screening between the greenhouses and the flight paths.

summarizes the results and level of glare at the receptors as minutes per year assuming clear skies. Time of day is provided in standard time year-round. The results of the GlareGauge analysis identified that the following locations will experience green-grade glare:

- FP1 Northwest-bound descent (Runway 31) There is low potential for temporary afterimage (green-grade glare) from the glass roofs for a total of **237 minutes** (approximately four hours) per year. The glare occurs from March to May, and July to September, around 6:00 p.m. standard time (7:00 p.m. daylight savings time) for up to 17 minutes per day. These results assume there are clear skies year-round.
- FP2 Southeast-bound descent (Runway 13) There is low potential for temporary afterimage (green-grade glare) from the glass roofs for a total of **1,165 minutes** (approximately 19 hours) per year. The glare occurs between October and March around 10:30 a.m. standard time (11:30 a.m. daylight savings time) for up to 67 minutes per day. These results assume there are clear skies year-round.
- FP3 Northeast-bound descent (Runway 6) There is low potential for temporary afterimage (green-grade glare) from the glass roofs for a total of **297 minutes** (approximately five hours) per year. The glare occurs from March to May, and August to September, between 6:44 and 9:58 a.m. standard time (7:44 and 10:58 a.m. daylight savings time) for up to 10 minutes per day. These results assume there are clear skies year-round.
- FP4 Southwest-bound descent (Runway 24) There is low potential for temporary afterimage (green-grade glare) from the glass roofs for a total of **862 minutes** (approximately 14 hours) per year. The glare occurs between September and March around 2:20 p.m. standard time (3:20 p.m. daylight savings time) for up to 55 minutes per day. These results assume there are clear skies year-round.

Changes to the modelling assumptions (see Appendix A) will affect these results.

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Table 2: Glare Hazard by Receptor assuming year-round Clear Skies, in Minutes per Year (Wright 13)

Location Receptor		Hazard Level	Roof Elevation		
Location	Receptor	Hazard Level	17.0 ft	18.5 ft	20.1 ft
Northwest-		G	236	236	237
bound descent	FP1	Υ	1	ı	-
(Runway 31)		R	ı	ı	-
Southeast-		G	1,165	1,165	1,161
bound descent	FP2	Υ	-	1	-
(Runway 13)		R	ı	ı	-
Northeast-		G	297	291	289
bound descent	FP3	Υ	-	-	-
(Runway 6)		R	-	-	-
Southwest- bound descent		G	862	859	855
	FP4	Υ	-	-	-
(Runway 24)		R	-	-	-

Table 2 indicates that the southeast-bound landing approach to runway 13, FP2, experiences the most annual green glare from the Wright greenhouses. The effects of green-grade glare are considered negligible as it has a low risk of after-image.

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A summary of the cumulative duration of the highest level of glare predicted for each of the above receptors is provided in Figure 5. These results assume there are clear skies year-round.

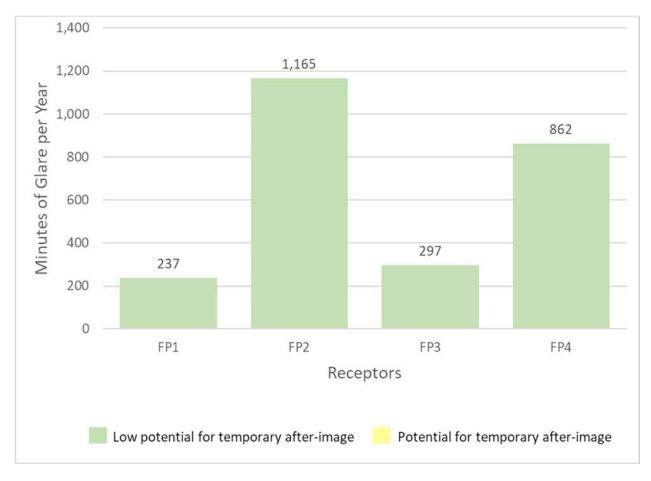


Figure 5: Annual Green-Grade Glare at affected Receptors near the Project (Clear skies year-round, Wright 13)

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Table 3 shows the timeframes for the occurrence of glare and reports only the highest-intensity glare for each case and location. The cells in the table are colour-coded to match the intensity level and show the time of day, dates, and duration of the glare. The results demonstrate that green-grade glare may be present for short periods in the spring and summer at FP1 and FP3. Green glare may also be seen at FP2 and FP4 for up to an hour per day from fall until spring.

Table 3: Seasonality and Duration of the Highest Level of Glare at each Receptor (Clear skies year-round, Wright 13)

Roof Elevation				
Receptor	17.0 ft	18.5 ft	20.1 ft	
FP1	5:37 PM-6:30 PM	5:37 PM-6:30 PM	5:37 PM-6:30 PM	
	23 Mar-26 May; 15 Jul-18 Sep	23 Mar-26 May; 15 Jul-18 Sep	23 Mar-27 May; 15 Jul-18 Sep	
	Up to 17 mins.	Up to 15 mins.	Up to 15 mins.	
FP2	9:37 AM-11:25 AM	9:37 AM-11:25 AM	9:37 AM-11:25 AM	
	4 Oct-7 Mar	4 Oct-7 Mar	4 Oct-7 Mar	
	Up to 67 mins.	Up to 67 mins.	Up to 66 mins.	
FP3	6:44 AM-9:58 AM	6:44 AM-9:58 AM	6:53 AM-9:58 AM	
	12 Mar-7 May; 3 Aug-28 Sep	12 Mar-7 May; 3 Aug-28 Sep	12 Mar-7 May; 3 Aug-28 Sep	
	Up to 10 mins.	Up to 10 mins.	Up to 10 mins.	
FP4	1:20 PM-3:13 PM	1:20 PM-3:13 PM	1:20 PM-3:13 PM	
	23 Sep-17 Mar	23 Sep-17 Mar	23 Sep-17 Mar	
	Up to 55 mins.	Up to 52 mins.	Up to 50 mins.	

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6.1.1 Detailed Glare Example for Wright 13 — Southeast-bound Descent with a 2-mile Approach (FP2, Runway 13)

Solas completed a detailed glare example for FP2, representing the highest duration of glare. FP2 represents an airplane landing at runway 13 of the Hollister Municipal Airport with a 2-mile approach from the northwest. The Wright 13 greenhouses remain southeast of the airplane as it lands. The flight path utilizes the standard three-degree descent slope and field-of-view of 50 degrees in either direction from straight ahead. Figure 6 illustrates the time of day and seasonality for glare hazard for FP2 from the roof elevation of 17.0 feet (the bottom extent of the roof). The potential for after-image from green-grade glare occurs between 9:37 and 11:25 a.m. standard time (9:37 a.m. and 12:25 p.m. daylight savings time) from October to March. The effects of green-grade glare are considered negligible as it has a low risk of after-image.



Figure 6: Time of Glare Hazard for FP2 (Clear skies year-round, Wright 13)

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Figure 7 shows the daily duration for each level of glare that may be experienced at FP2. This flight path can experience up to 67 minutes of green glare in a day. All the glare is classified in the green category. These results assume there are clear skies year-round.

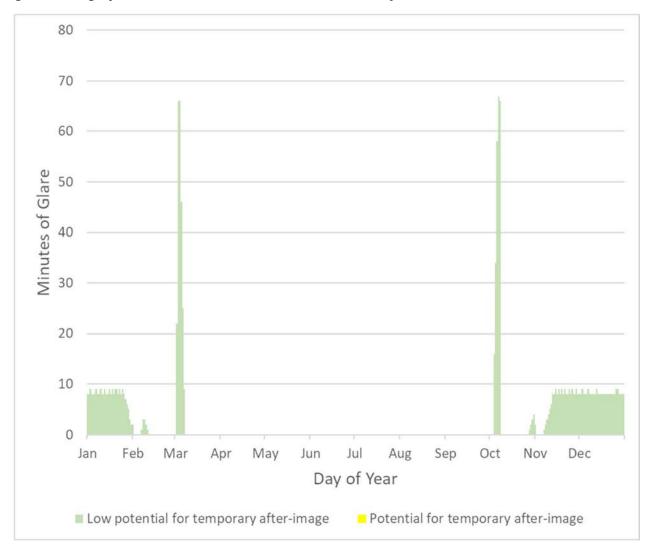


Figure 7: Daily Duration of Glare at FP2 (Clear skies year-round, Wright 13)

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Figure 8 plots the glare hazard according to the size of the glare spot (Subtended Source Angle), brightness of the glare (Retinal Irradiance), and the glare level (green, yellow, and red zones). The size and brightness of the glare spots are displayed using logarithmic scales. At FP1, the glare is 660 times dimmer than staring at the sun but will appear up to two times bigger than the perceived diameter of the sun viewed from the same location. These results assume there are clear skies year-round.

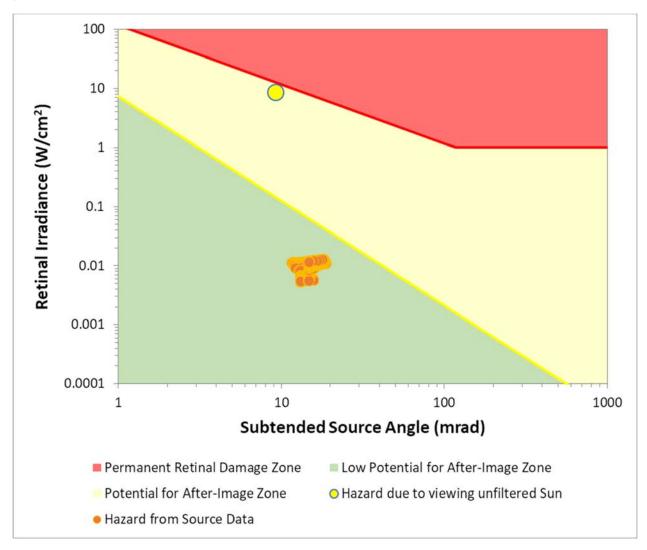


Figure 8: Log-Log Hazard Plot for FP2 (Clear skies year-round, Wright 13)

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6.2 Briggs 17 Glare Results

Solas does not expect the Briggs greenhouse to produce red-grade glare or yellow-grade glare at the evaluated flight paths. The model predicts green-grade glare at FP2, FP3, and FP4. Results assume there are clear skies year-round and there is no screening between the greenhouses and the flight paths.

Table 4 summarizes the results and level of glare at the receptors as minutes per year assuming clear skies. Time of day is provided in standard time year-round. The results of the GlareGauge analysis identified that the following locations will experience green-grade glare:

- FP2 Southeast-bound descent (Runway 13) There is low potential for temporary afterimage (green-grade glare) from the glass roofs for a total of **163 minutes** (approximately three hours) per year. The glare occurs in March, October, and December between 9:38 and 10:38 a.m. standard time (10:38 a.m. and 11:38 a.m. daylight savings time) for up to 10 minutes per day. These results assume there are clear skies year-round.
- FP3 Northeast-bound descent (Runway 6) There is low potential for temporary afterimage (green-grade glare) from the glass roofs for a total of **252 minutes** (approximately four hours) per year. The glare occurs in March, in May, and from July to September between 9:07 and 9:58 a.m. standard time (10:07 and 10:58 a.m. daylight savings time) for up to three minutes per day. These results assume there are clear skies year-round.
- FP4 Southwest-bound descent (Runway 24) There is low potential for temporary afterimage (green-grade glare) from the glass roofs for a total of 323 minutes (approximately five hours) per year. The glare occurs between October and February between 1:40 and 2:26 p.m. standard time for up to four minutes per day. These results assume there are clear skies year-round.

FP1 is not expected to experience any glare from the Project. Changes to the modelling assumptions (see Appendix A) will affect these results.

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Table 4: Glare Hazard by Receptor assuming year-round Clear Skies, in Minutes per Year (Briggs 17)

Lagation	December	Hozord Lovel	Roof Elevation		
Location	Receptor	Hazard Level	17.0 ft	18.5 ft	20.1 ft
Northwest-		G	-	-	-
bound descent	FP1	Υ	-	-	-
(Runway 31)		R	-	-	-
Southeast- bound descent FF		G	162	163	162
	FP2	Υ	-	1	-
(Runway 13)		R	ı	ı	-
Northeast-		G	252	249	252
bound descent	FP3	Υ	-	-	-
(Runway 6)		R	-	-	-
Southwest- bound descent	FP4	G	322	323	323
		Υ	-	-	-
(Runway 24)		R	-	-	-

Table 4 indicates that the northwest-bound landing approach, FP1, experiences no glare. Pilots descending towards the three other runways, however, will experience some green glare. Solas expects FP2 and FP3 to observe glare from the west-facing roof glass, while FP4 will experience glare from the east-facing glass. The effects of green-grade glare are considered negligible as it has a low risk of after-image.

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A summary of the cumulative duration of the highest level of glare predicted for each of the above receptors is provided in Figure 9. These results assume there are clear skies year-round.

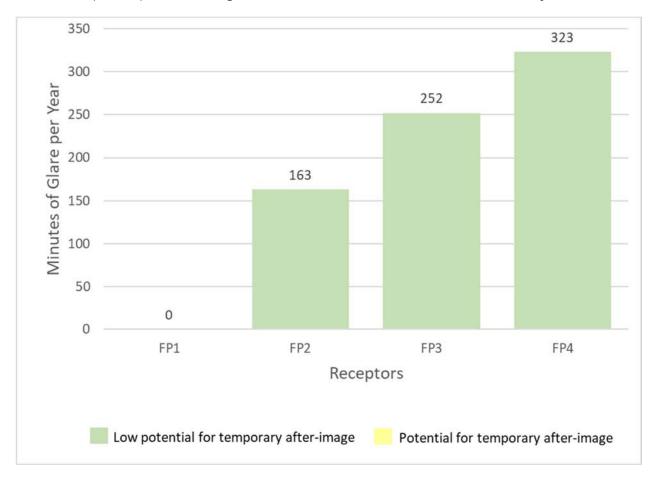


Figure 9: Annual Green-Grade Glare at affected Receptors near the Project (Clear skies year-round, Briggs 17)

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Table 5 shows the timeframes for the occurrence of glare and reports only the highest-intensity glare for each case and location. The cells in the table are colour-coded to match the intensity level and show the time of day, dates, and duration of the glare. The results demonstrate that green-grade glare may be present for short periods in the morning at FP2 and FP3, and in the evening for FP4.

Table 5: Seasonality and Duration of the Highest Level of Glare at each Receptor (Clear skies year-round, Briggs 17)

Docenter	Roof Elevation				
Receptor	17.0 ft	18.5 ft	20.1 ft		
FP1	No Glare				
FP2	9:38 AM-10:38 AM	9:38 AM-10:38 AM	9:38 AM-10:38 AM		
	1 Mar-10 Mar; 1 Oct-10 Oct;	1 Mar-10 Mar; 1 Oct-10 Oct;	1 Mar-10 Mar; 1 Oct-10 Oct;		
	11 Dec-29 Dec	11 Dec-29 Dec	11 Dec-28 Dec		
	Up to 10 mins.	Up to 10 mins.	Up to 10 mins.		
FP3	9:08 AM-9:58 AM	9:08 AM-9:58 AM	9:07 AM-9:58 AM		
	18 Mar-13 May; 29 Jul-22 Sep	18 Mar-13 May; 29 Jul-22 Sep	18 Mar-14 May; 29 Jul-22 Sep		
	Up to 3 mins.	Up to 3 mins.	Up to 3 mins.		
FP4	1:40 PM-2:26 PM	1:40 PM-2:26 PM	1:40 PM-2:26 PM		
	22 Oct-19 Feb	22 Oct-19 Feb	22 Oct-19 Feb		
	Up to 4 mins.	Up to 4 mins.	Up to 4 mins.		

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6.2.1 Detailed Glare Example for Briggs 17 — Northeast-bound Descent with a 2-mile Approach (FP4, Runway 24)

Solas completed a detailed glare example for FP4. FP4 represents an airplane landing at runway 24 of the Hollister Municipal Airport with a 2-mile approach from the southwest. The Project greenhouses remain on the left side of the airplane as it lands. The flight path utilizes the standard three-degree descent slope and field-of-view of 50 degrees in either direction from straight ahead. Figure 10 illustrates the time of day and seasonality for glare hazard for FP4 from the roof elevation of 17.0 feet (the bottom extent of the roof). Green glare occurs between 1:40 and 2:26 p.m. standard time (2:40 and 3:36 a.m. daylight savings time) between October and February. The effects of green-grade glare are considered negligible as it has a low risk of after-image.

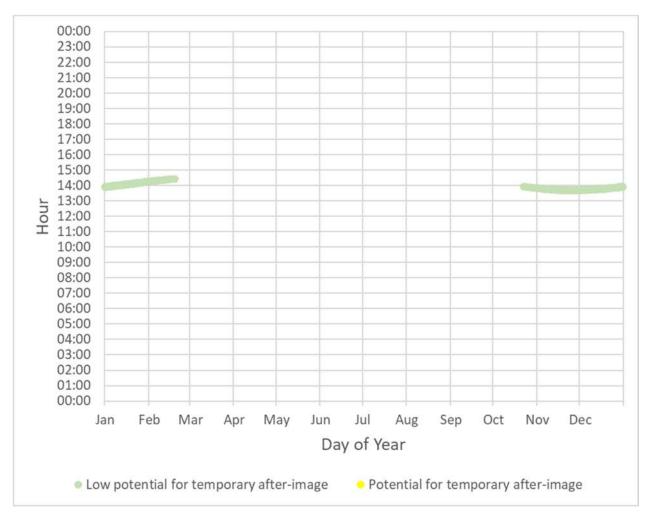


Figure 10: Time of Glare Hazard for FP4 (Clear skies year-round, Briggs 17)

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Figure 11 shows the daily duration for each level of glare that may be experienced at FP4. This flight path can experience up to four minutes of green glare in a day. All of the glare is classified in the green category. These results assume there are clear skies year-round.

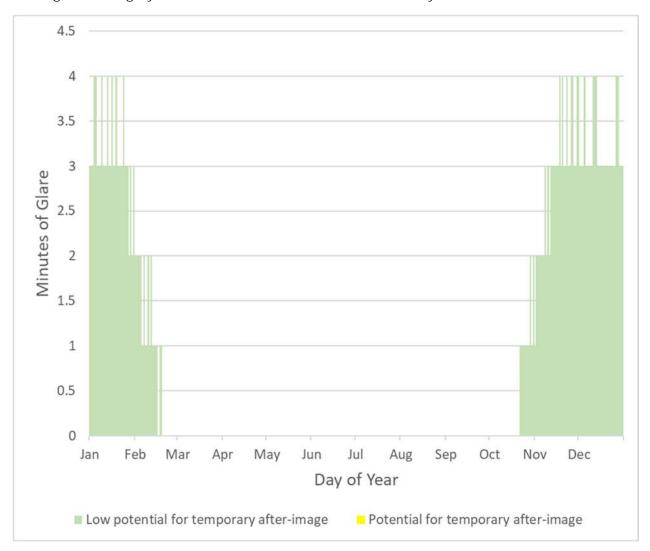


Figure 11: Daily Duration of Glare at FP4 (Clear skies year-round, Briggs 17)

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Figure 12 plots the glare hazard according to the size of the glare spot (Subtended Source Angle), brightness of the glare (Retinal Irradiance), and the glare level (green, yellow, and red zones). The size and brightness of the glare spots are displayed using logarithmic scales. At FP4, the glare is 1520 times dimmer than staring at the sun but will appear up to 3.7 times bigger than the perceived diameter of the sun viewed from the same location. These results assume there are clear skies year-round.

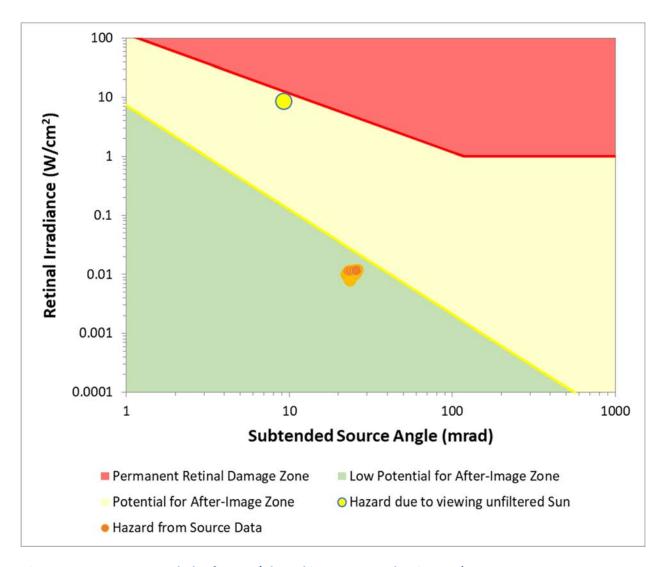


Figure 12: Log-Log Hazard Plot for FP4 (Clear skies year-round, Briggs 17)

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6.3 Glare Visual Representation

Solas developed a catalogue of glare representations to help stakeholders understand and visualize the glare they may experience from reflective surfaces. Solas' glare catalogue includes a range of images depicting glare of varying intensity from actual solar arrays and buildings. The irradiance of the glare shown in Figure 13 is of similar intensity to the glare Solas predicts observers will experience from the Project. Solas expects glare to reach up to 120 watts per square metre (W/m²), while the figure below provides a representation at an irradiance level of 158 W/m².



Figure 13: Solas Glare Catalogue Image (158 W/m²) at a similar irradiance level to those expected at the Project

Figure 14 shows reference points for glare irradiance levels from various solar PV facilities and buildings. This figure is shown to provide context for the glare representation above.

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190 W/m² (yellow)



279 W/m² (yellow)

Figure 14: Glare Irradiance Level Reference Points from the Solas Glare Catalogue

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Section 7, Glare-Mitigating Features

7 GLARE-MITIGATING FEATURES

Glare has been predicted from the greenhouses using base assumptions and the GlareGauge software. Solas completed additional analyses to model real-world features that could reduce the glare impact.

7.1 Cloud Cover and Typical Weather Patterns

The GlareGauge model assumes that clear skies occur every day of the year resulting in glare durations that are higher than observers are likely to experience. Solas obtained the fraction of days with less than 20 percent cloud cover for each month of the year using modelled data normalized over 30 years. Solas incorporated Meteoblue's data for Hollister, which is believed to be somewhat representative.¹²

Clouds reduce reflection by diffusing sunlight. On cloudy days, this diffusion will decrease the intensity of green glare and potentially eliminate the glare completely. According to Meteoblue's data, around 48 percent of days throughout the year are expected to have more than 20 percent cloud cover.

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¹² https://www.meteoblue.com/en/weather/historyclimate/climatemodelled/hollister_united-states-of-america_5357499, accessed: September 15, 2020.



Section 8, Conclusions and Discussion

8 CONCLUSIONS AND DISCUSSION

The analysis results indicate that there is likely no incidence of red or yellow-grade glare from the Wright 13 or Briggs 17 greenhouses. All greenhouses are expected to produce green glare for all four flight paths, with one exception: pilots landing at runway 31 (FP1) of the Hollister Municipal Airport are not expected to experience any glare from the Briggs 17 greenhouse.

Overall, the Wright 13 greenhouses affect the Runway 13 path (FP2) the most. FP2 is expected to observe up to 1,165 minutes of green glare from Wright 13 yearly, between October and March, from 9:37 and 11:25 a.m. Briggs 17 affects the Runway 24 path (FP4) the most, emitting green glare for up to 323 minutes yearly. Green glare at FP4 from Briggs 17 occurs between October and February, from 1:40 to 2:26 p.m. The glare seen from flight paths will look much dimmer than the sun but will appear larger.

Glare predicted to be produced by the greenhouse roofs is only categorized in the "green" level, indicating an observer is unlikely to experience an after-image after looking at a glare spot. The size and intensity of the glare spot and resulting after-image are dependent on the distance between the observer and the array. An increase in the distance between the observer and greenhouses will decrease the impact and after-image created by the glare. The after-image an observer may experience could temporarily appear as a slightly darker or discoloured spot or line in the observer's vision. The effects of green-grade glare are considered negligible as it has a low risk of after-image.

Cloud cover and typical weather patterns provide a variable source of glare mitigation. Clouds may diffuse incident sunlight, lessening the impact of reflections from reflective surfaces. The impact of cloud cover was assessed using modelled weather data normalized over 30 years. Approximately 48 percent of days throughout the year are expected to have more than 20 percent cloud cover.

Based on the information associated with the geographic configuration of the glass panes on the greenhouse roofs, glare from the Project has a low potential to pose a risk to flight operations at the Hollister Municipal Airport. Changes to the Project layout or specifications will affect the results of the analysis.

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Section 8, Conclusions and Discussion

Appendix A ForgeSolar Modelling Assumptions

Wright 13 — Greenhouse Roof Glass Parameters

Roof azimuth (Wright A&B): 93 degrees (east) and 273 degrees (west) Roof azimuth (Wright C): 3 degrees (north) and 183 degrees (south)

Roof tilt/slope: 23 degrees

Glass material: Smooth glass without anti-reflective coating

Vary reflectivity with sun position? Yes

Ground elevation: 253 feet (Wright A&B), 252 feet (Wright C)

Height above ground: assessed at 17.0 feet, 18.5 feet, and 20.1 feet

Briggs 17 — Greenhouse Roof Glass Parameters

Roof azimuth: 93 degrees (east) and 273 degrees (west)

Roof tilt/slope: 23 degrees

Glass material: Smooth glass without anti-reflective coating

Vary reflectivity with sun position? Yes

Ground elevation: 248 feet (minimum elevation)

Height above ground: assessed at 17.0 feet, 18.5 feet, and 20.1 feet

Flight Path Parameters

Glide slope: 3 degrees

Plane height above threshold ground elevation (2 miles from threshold): 603 feet

Plane height above ground (at threshold): 50 feet

Horizontal/Azimuthal viewing angle: 50 degrees from centre Maximum downward viewing angle: 30 degrees from horizontal

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