

# COMMENT LETTER # SA4

**Kyle Simpson**

---

**From:** Sandy Hesnard [sandy\_hesnard@dot.ca.gov]  
**Sent:** Tuesday, May 04, 2010 1:40 PM  
**To:** Kyle Simpson  
**Cc:** Gee, Ronald; mpehl@co.napa.ca.us  
**Subject:** Napa County Pipe Project; SCH# 2008122111 Draft Environmental Impact Report

We offer the following comments with respect to the Napa County Pipe Project, located to the north of the Napa County Airport.

We concur with the concerns and comments expressed by the Napa County ALUC in their February 3, 2010 letter to Mr. Sean Trippi, County of Napa, Conservation, Development and Planning Department.

SA4-1

Additionally, we recommend that the proposal be coordinated with the Napa County Airport Manager, Martin Pehl, at (707) 253-4665 or by email at mpehl@co.napa.ca.us to ensure compatibility with future as well as existing airport operations.

California Public Utilities Code Section 21659 prohibits structural hazards near airports. Depending on structural heights and in accordance with Federal Aviation Regulation, Part 77 "Objects Affecting Navigable Airspace" a Notice of Proposed Construction or Alteration (Form 7460-1) may be required by the Federal Aviation Administration (FAA). Form 7460-1 is available on-line at <https://oeaaa.faa.gov/oeaaa/external/portal.jsp> and should be submitted electronically to the FAA.

SA4-2

Land use practices that attract or sustain hazardous wildlife populations on or near airports can significantly increase the potential for wildlife-aircraft collisions. Wildlife habitat management and other land use strategies on and near airports is fundamental to reducing wildlife use of airports. Safe management of stormwater run-off on and near airports should be designed so as to discourage birds from using these facilities, particularly within airport approach and departure zones. The FAA recommends that landfills, wastewater treatment facilities, surface mining, wetlands and other uses that have the potential to attract wildlife, be restricted in the vicinity of an airport. FAA Advisory Circular 150/5200-33B entitled "Hazardous Wildlife Attractants on or Near Airports" addresses these issues and is available at the FAA website <http://wildlife-mitigation.tc.faa.gov/>. The applicant should coordinate closely with Airport staff to monitor wildlife activity.

SA4-3

Sandy Hesnard  
Aviation Environmental Specialist  
California Department of Transportation (Caltrans) Division of Aeronautics (MS 40) PO Box 942874 Sacramento, CA 94274-0001

(916) 654-5314 fax (916) 653-9531  
Email: sandy.hesnard@dot.ca.gov  
Website: [www.dot.ca.gov/aeronautics](http://www.dot.ca.gov/aeronautics)

**Letter #SA4:** Sandy Hesnard, Aviation Environmental Specialist, State of California, Department of Transportation, Division of Aeronautics. May 4, 2010.

**Response SA4-1**

This comment acknowledges that Caltrans Division of Aeronautics concurs with concerns and comments expressed by the Napa County Airport Land Use Commission (ALUC), as expressed in the letter submitted by the ALUC (included as Letter #LA10). No further response is necessary.

**Response SA4-2**

This comment states that, depending on the height of structures proposed by the project, a Notice of Proposed Construction or Alteration may be required by the Federal Aviation Administration. Part 77 of Federal Aviation Regulations (FAR), as implemented by State law, limits the height of structures near airports in order to protect airport airspace from hazards to flight. As discussed in response to comment LA10-16, the Napa Pipe project site lies under the horizontal and conical surfaces defined by these regulations. The horizontal surface is 150 feet above airport elevation and the conical surface rises up and away from the edge of the horizontal surface at a slope of 1 foot upward per 20 feet horizontally. From the standpoint of FAR Part 77, the proposed maximum structure height of 85 feet would not be an airspace obstruction. The proposed development is not under the approach surfaces for Runway 18L or 18R.

**Response SA4-3**

This comment states that land use practices that attract or sustain hazardous wildlife populations on or near airports can significantly increase the potential for wildlife-aircraft collisions. As discussed in response to Comment LA10-12, the addition of 0.25 acres of new wetlands adjacent to the Napa River and its associated wetlands is unlikely to result in a change of the airport environment with respect to attracting birds.