

# SOLANO COUNTY WATER AGENCY



July 10, 2024

Nedzlene Ferrario, Principal Planner  
County of Solano  
Resource Management, Airport Land Use Commission  
675 Texas Street, Suite 5500  
Fairfield, CA 94533

Via Email: [SolanoALUC@SolanoCounty.com](mailto:SolanoALUC@SolanoCounty.com)

Dear Nedzlene:

The Solano County Water Agency has reviewed the proposed amendments to the Travis Air Force Base (AFB) and Rio Vista Airport Land Use Compatibility Plans (LUCPs) with respect to compatibility with implementation of the Solano Habitat Conservation Plan (HCP) and other ongoing natural environmental conservation activities in Solano County.

As you are aware, the Solano HCP establishes a framework for complying with federal endangered species regulations while accommodating future urban growth, development of infrastructure, and ongoing operation and maintenance activities associated with flood control, irrigation facilities, and other public infrastructure undertaken by or under the permitting authority/control of the Plan Participants within the HCP Plan Area encompassing all of Solano County and a portion of Yolo County during the 30-year permit term. Plan members include the cities of Dixon, Fairfield, Rio Vista, Suisun City, Vacaville, and Vallejo and special districts including Solano Irrigation District, Maine Prairie Irrigation District, Dixon Resource Conservation District, Reclamation District 2068, Vallejo Flood and Wastewater District, and Fairfield-Suisun Sewer District.

The proposed Low Altitude Maneuvering Zone (LAMZ) restriction regarding wildlife hazards that prohibits “*New conservation banks or avian habitats to minimize wildlife attractants and bird strikes*” is potentially problematic as written as the term conservation bank is not clearly defined.

The LAMZ overlay encompasses significant portion of Suisun Marsh and most if not all of the Jepson Prairie. Both areas are known for a high diversity of rare and endangered plant and animal species as well as other unique ecological functions including designated critical habitat at least seven threatened and endangered species and the majority of the recovery units designated for Vernal Pools Species. Both areas are also primary targets for multiple ongoing conservation and habitat restoration activities by multiple State and Federal agencies, ongoing actions by SCWA for implementation of the Solano HCP, as well as conservation requirements for maintaining our water

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supply from the State Water Project. Conservation actions in these areas cannot be reasonably moved to a different location because of existing unique ecological functions which are limited to these specific areas.

For example, the Draft Solano HCP projects the need to preserve and manage an estimated 12,050 acres of valley floor grassland and vernal pool habitat to meet the mitigation needs for ongoing urban development in portions of Suisun, Fairfield, Vacaville, and Rio Vista. The majority of the lands supporting the necessary primary elements to achieve the HCP conservation objectives lie primarily within the LAMZ overlay area.

While we agree protection of Travis AFB operations is critical, the LAMZ prohibition for new conservation banks as written is unclear since the term conservation bank is not defined in the ALUP. There are differences in the definitions and intent of these various conservation actions. The term banks refer are market-based systems based on a partnership between a landowner (private or institutional) and one or more governmental agencies. California Fish and Game Code section (§)1797.5 defines conservation banks and mitigation banks. Conservation banks are defined as being primarily intended conserve and manage habitat for threatened, endangered, or other special status species. Mitigation banks can include similar conservation of existing habitats but incorporate wetland creation and restoration. Similar definitions are employed by other agencies such as the US Army Corps of Engineers and US Fish and Wildlife Service.

While conservation banks can include habitat creation and restoration (typically not wetlands), the conservation banks within Solano County, at least on the Jepson Prairie, have been established to preserve existing, high ecologically valuable habitat for threatened and endangered species and associated land uses such as livestock. These conservation banks have not included other actions that could increase wildlife hazards.

We suspect the intent of the prohibition is intended to preclude mitigation banks and other types of conservation efforts such permittee-responsible mitigation projects which incorporate restoring and creating wetlands where there would be a greater expectation to create increased wildlife hazards. As currently written in the Draft ALUP, this prohibition on new conservation banks using accepted and legally defined categories would not prohibit projects that could increase wildlife hazards. A broader, blanket prohibition of land conservation within the LAMZ could also preclude implementation of significant components of the Solano HCP, other ongoing State and Federal conservation efforts, and could result in significant delays and increased economic costs for critical infrastructure and development in the cities of Suisun, Fairfield, Vacaville, and Rio Vista. This prohibition would also affect the ability to implement mitigation requirements for critical infrastructure in the County by other organizations such as California Department of Transportation (Caltrans) and Department of Water Resources by precluding the ability to adequately mitigate project impacts.

To address these considerations, we have two recommendations for the revised ALUP:

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1. Delete the second bullet under Prohibited Uses under the LAMZ:
  - New conservation banks or avian habitats to minimize wildlife attractants and bird strikes.

And then add similar language under Other Development Conditions used for other Zones to address hazards to flight prohibited uses:

- For areas within the LAMZ, reviewing agencies shall prepare a WHA for projects that have the potential to attract wildlife that could cause bird strikes. ALUC will use this information to coordinate with the Travis AFB Bird/Wildlife Aircraft Strike Hazard (BASH) Team. Based on the findings of the WHA and coordination with the Travis AFB BASH Team, all reasonably feasible mitigation measures must be incorporated into the planned land use.

This would allow ongoing and future conservation efforts for unique ecological functions which cannot be replicated in different locations to continue within the LAMZ while minimizing hazards to flight.

2. Revise item (c) under 7. 1.1 Implementation Program to read:
  - (c) Convene a working group to develop policies and approaches to address (b) above in order to implement the Solano Multispecies Habitat Conservation Plan and other regional conservation efforts in a manner consistent with this LUCP. The composition of this working group shall be subject to the approval of the Solano ALUC.

Establishing a technically and diverse working group to address elements (b) and (c) to define limitations for land uses that have the potential to attract wildlife hazards located within the Bird Strike Hazard Zone and LAMZ will facilitate review of conservation actions and implementation of the ALUP.

Thank you for considering our comments and we hope the Airport Land Use Commission will adopt our suggested revisions to the LAMZ prohibited uses.

Sincerely,



Chris Lee,  
General Manager  
Solano County Water Agency  
[clee@scwa2.com](mailto:clee@scwa2.com)

# Holland & Knight

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July 10, 2024

## **VIA FEDERAL EXPRESS AND EMAIL**

Solano County Airport Land Use Commission  
675 Texas Street  
Fairfield, CA 94533  
Attn: Commission Members

*with a copy to:*  
Solano County  
675 Texas Street  
Fairfield, CA 94533  
Attn: Department of Resource Management

### **RE: AC 24-023 Receive a presentation regarding the proposed amendments to the Travis Air Force Base (AFB) and Rio Vista Airport land use compatibility plans (LUCPs)**

Dear Chair and Commission Members,

Holland & Knight LLP is land use counsel to California Forever and has assisted in the preparation of the East Solano Homes, Jobs, and Clean Energy Initiative (“Initiative” or “East Solano Plan”). California Forever is deeply committed to protecting and strengthening the mission of Travis AFB, and supporting the brave men and women who serve on the base.

To that end and in response to cooperative dialogue with stakeholders, California Forever undertook significant revisions to its plan for development, including doubling the security buffer around Travis AFB and ensuring that development would not interfere with base operations. Following these revisions, Travis AFB published a formal statement (attached as **Exhibit A**), explaining (emphasis added):

“California Forever made significant changes to its plans in order to protect Travis’ global mission and local flight operations. With this revised proposal, Travis AFB will be able to continue flying its full mission, including all of our operational, exercise, and local training flights consisting of multiple patterns and landings to all runways, including night vision goggle training to the assault landing zone

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(ALZ) runway. Travis AFB recognizes California Forever’s efforts to minimize impacts to operations and mission capabilities, as well as their project’s potential to improve the wellbeing of our Airmen and families into the future.”

We write with respect to the proposed revisions to the Travis AFB Land Use Compatibility Plan (“Draft Plan”), scheduled for discussion at the Solano County Airport Land Use Commission’s (“Commission”) July 11, 2024 meeting. We understand that the Commission intends to adopt the Draft Plan at the following meeting on August 8, 2024. However, further revisions to the Draft Plan are needed to achieve the aims of Travis AFB and responsible development within Solano County (“County”).

California Forever respectfully requests time for meaningful discussions with all stakeholders and that the Commission defer consideration of any proposed amendments until after the upcoming election. We also ask that this letter be admitted in full as public comment for the meeting, and be made an official part of the administrative record, including being included in and linked to from the officially published minutes of the meeting.

## **I. Ad Hoc Committee Recommendations Are Not Related to Changes in Travis AFB Operations**

In stark contrast to the amendments to the Travis AFB Land Use Compatibility Plan approved in 2015 following the introduction of the Assault Landing Runway, the recommendations of the ad hoc committee have not been prompted by any material change in the operations of Travis AFB.

## **II. Ad Hoc Committee Recommendations Are Not Related to Changes in FAA Regulations**

The agenda report<sup>1</sup> for your July 11, 2024 meeting attempts to create the impression that the recommendations are made in response to new FAA guidance (e.g., the report states “*the FAA has established special use airspace alert area A-682 surrounding Travis AFB to warn other aircraft transiting the area of the potential for a high volume of pilot training, or an unusual type of aerial activity*”). However, FAA alert A-682 has been published since at least 2007, many years before the Commission last revised the Travis AFB Land Use Compatibility Plan, which was adopted on October 8, 2015.

In fact, this Commission discussed and was aware of A-682 as early as November 2012—three years before the Commission adopted the current Travis AFB Land Use Compatibility Plan. At that time, four of the current eight commissioners served on the Commission, including Commissioners Vancil (who was the Chair at the time), DuClair, Randall, and Seiden. For example, the minutes<sup>2</sup> of the November 8, 2012 meeting states that Commissioner Vancil

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<sup>1</sup> <https://www.solanocounty.com/civicax/filebank/blobdload.aspx?BlobID=43207>

<sup>2</sup> <https://www.solanocounty.com/civicax/filebank/blobdload.aspx?blobid=15658>



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Page 3

discussed Travis AFB Alert Area A-682 at that time. Yet, three years later, the Commission adopted the current Travis AFB Airport Land Use Plan, without any restrictions related to A-682.

### III. Ad Hoc Committee Recommendations Unfairly Discriminate East Solano Plan Lands but Exclude Cities of Fairfield, Vacaville, Dixon, All of Which Are Included Inside Travis Alert Area A-682

The agenda report for the Commission’s July 11, 2024 meeting states: *“The LAMZ shown in Figure 1 lies underneath FAA special use airspace alert area A-682, as depicted on the FAA San Francisco sectional aeronautical chart...the FAA has established special use airspace alert area A-682 surrounding Travis AFB to warn other aircraft transiting the area of the potential for a high volume of pilot training, or an unusual type of aerial activity.”*

The FAA San Francisco sectional aeronautical chart is shown below, with area A-682 highlighted in red. As is clear from the chart, all or most of the cities of Fairfield (including Cordelia), Vacaville, and Dixon lie inside area A-682. However, in the Draft Plan, the Low Altitude Maneuvering Zone entirely excludes those cities, including new developments at eastern edges of Fairfield and Vacaville, all of which are much closer to Travis AFB than East Solano Plan, while including a substantial part of the East Solano Plan. This is discriminatory, and unfair.

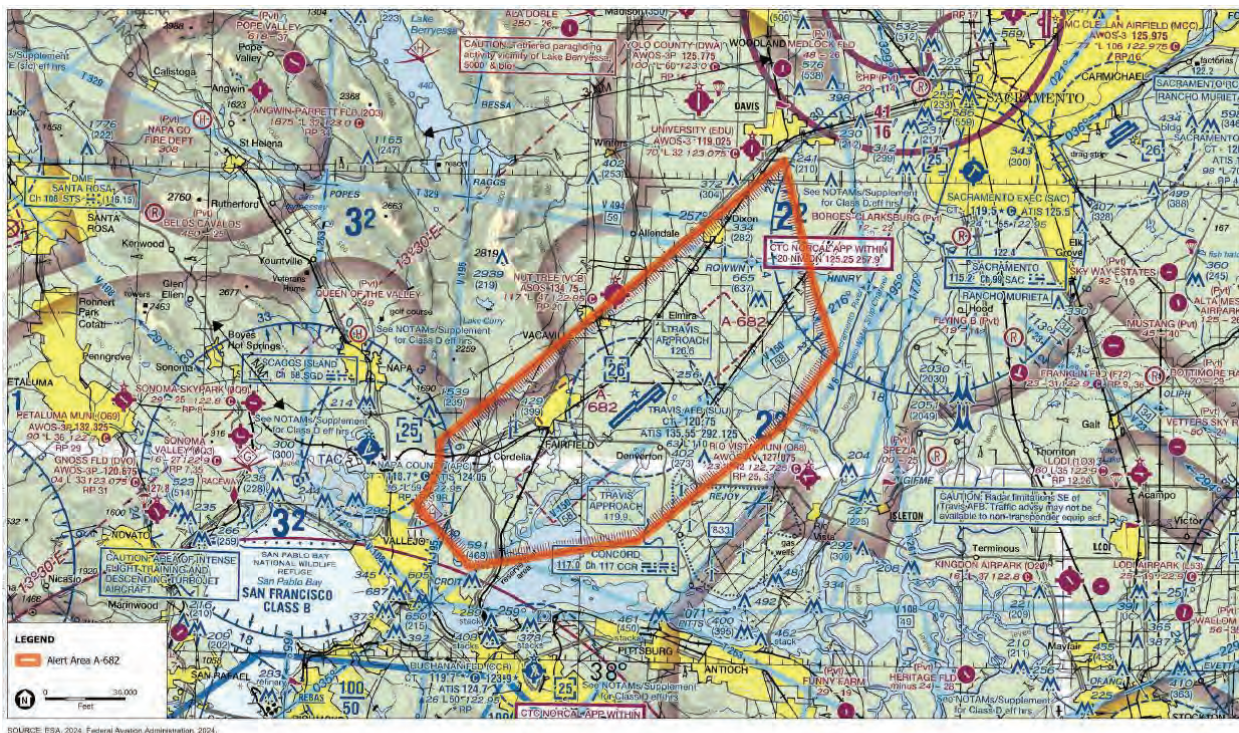


Figure 1  
Alert Area A-682  
with FAA VFR Aeronautical Chart

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#### **IV. Planning Process**

California Forever was disappointed to first learn of the Draft Plan upon publication of the agenda for the upcoming meeting. At its March 14, 2024 meeting, the Commission directed the formation of the ad hoc committee to review the existing Travis AFB and Rio Vista Airport Land Use Compatibility Plans within a six month time period.

Importantly, the minutes reflect that the direction to the ad hoc committee “will not be to draft the recommendations but to report to the Commission on a regular basis.” Instead, the ad hoc committee has in fact drafted recommendations that have the potential to dramatically impact planned development contemplated in the Initiative in an effort that is both preemptive and premature, the timing of which appears to be to politically influence the election.

The ad hoc committee has done so without contacting impacted landowners, including California Forever. The Commission should provide the basis of the committee’s recommendations and an opportunity to provide meaningful feedback to the Commission on the proposal; this is not possible on the accelerated drafting process closed to the public employed by the committee to date. A meaningful opportunity to engage with the Commission is not possible on the unnecessarily accelerated timeframe outlined today.

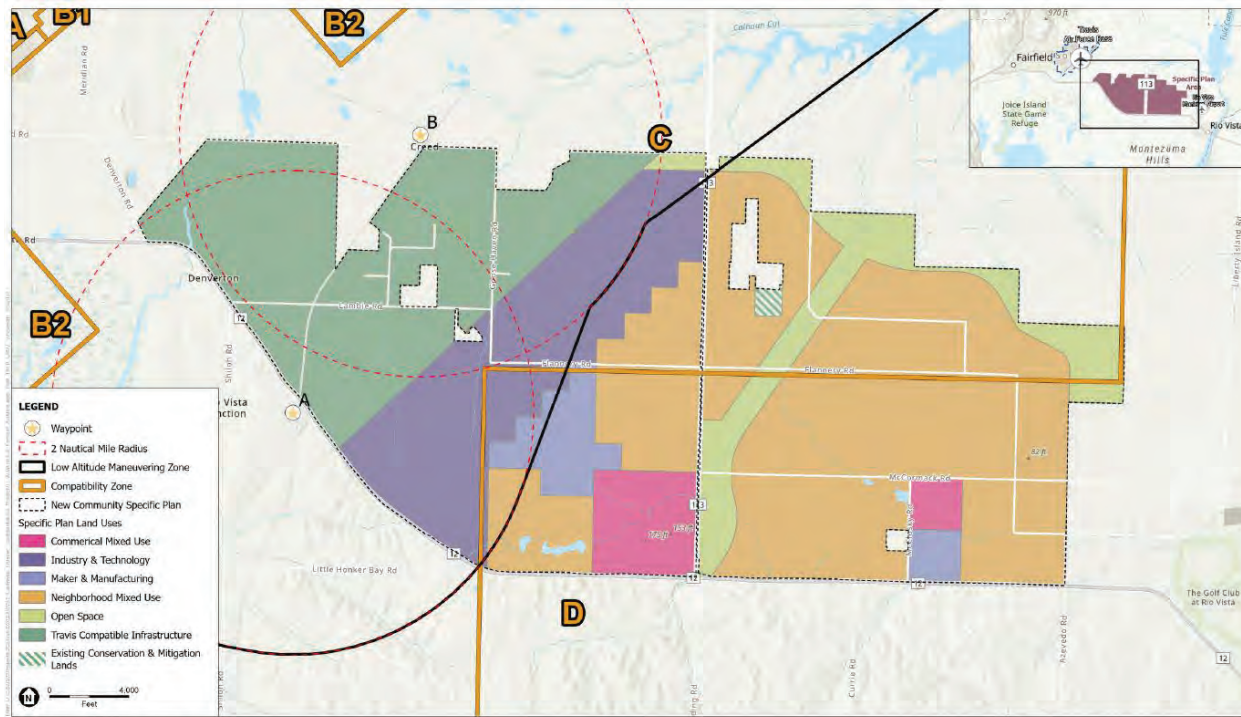
#### **V. Ad Hoc Committee Recommendations Designed to Preemptively Impede Initiative**

While the minutes of the March 14, 2024 Commission meeting indicate that the formation was “not a reaction to California Forever,” the effect of the recommendations are to preemptively impede the development contemplated by the Initiative. While County staff has stated that “[w]e don’t know for sure if there are any impacts on the East Solano Plan since all we have is what is in their initiative and these proposed amendments did not study the East Solano Plan,”<sup>3</sup> the impacts of this proposal are readily apparent, as shown by the figure below which overlays the proposed changes to the Travis AFB Airport Land Use Plan (the Low Altitude Maneuvering Zone, and the two 2-mile radius circles centered on Kreed and Museum tactical waypoints) onto the land use map in the Initiative:

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<sup>3</sup> [https://www.dailyrepublic.com/townnews/politics/commission-to-review-land-use-plan-changes-for-travis-rio-vista/article\\_8afc0d0a-3d56-11ef-af82-8f97d534d84a.html](https://www.dailyrepublic.com/townnews/politics/commission-to-review-land-use-plan-changes-for-travis-rio-vista/article_8afc0d0a-3d56-11ef-af82-8f97d534d84a.html).





SOURCE: ESA, 2024; Solano County, 2015; SITELAB, 2024.

Figure 1  
New Community Specific Plan Area  
with Travis AFB LUCP Low Altitude Maneuvering Zone and Waypoints

In designing the Initiative, California Forever worked closely with stakeholders to ensure that the East Solano Plan protected Travis AFB’s operations. To that end, the East Solano Plan expressly incorporates and complies with both the Air Force Installations Compatible Use Zones study prepared by Travis AFB, and with the Airport Land Use Compatibility Plan prepared by the Commission.

The initial version of the East Solano Plan was published on January 17, 2024. While the initial plan complied with all land use regulations include the above-named airport compatibility plans, California Forever learned that Travis AFB had some residual concerns regarding the potential impacts of the Initiative’s proposal following its initial publication.

Demonstrating its commitment to the successful operations of the base, California Forever worked tirelessly to revise the Initiative, and on February 14, 2024, submitted an updated plan to Solano County. This plan was significantly altered, at significant negative and ongoing impact to the value of our client’s landholdings.

Travis AFB recognized these significant modifications, as well as the doubling of the protective buffer zone around Travis AFB through creation of the Travis Security Zone. The changes led Travis AFB to conclude (see Exhibit A): “With this revised proposal, Travis AFB will be able to continue flying its full mission, including all of our operational, exercise, and local training flights consisting of multiple patterns and landings to all runways, including night vision goggle training





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to the assault landing zone (ALZ) runway. Travis AFB recognizes California Forever's efforts to minimize impacts to operations and mission capabilities, as well as their project's potential to improve the wellbeing of our Airmen and families into the future."

The recommendations of the ad hoc committee are inconsistent with Travis AFB's own conclusions. The Draft Plan imposes numerous additional restrictions on land uses in the proposed East Solano Plan—even though Travis AFB itself clearly stated publicly that no such additional restrictions are required, and that they can continue to fly their full mission with the East Solano Plan as proposed. These new restrictions are not compatible with the East Solano Plan, and not compatible with Travis AFB's own conclusions. In particular, California Forever has identified in **Exhibit B** a non-exhaustive list of inconsistencies between the Draft Plan and the development program approved by Travis AFB.

By way of example, the Draft Plan proposes a new zone, the Low Altitude Maneuvering Zone ("LAMZ"), that prohibits any non-residential use outside of Lambie Industrial Park, residential uses within two miles of two waypoints, and even conservation banks regardless of the purpose of the bank.

As illustrated in the figure above, the effect of the LAMZ is to preemptively impede the creation of the Industry & Technology Zone in the East Solano Plan. The Industry & Technology Zone is expected to provide thousands of new good paying jobs for Solano residents, including the home for [twelve major employers we announced earlier in May](#), and dozens of other employers with whom California Forever is in discussions. These new employment opportunities are critical to addressing the chronic shortage of good paying jobs in Solano County, and they are at the core of why over 20,000 Solano residents signed the petition to put the East Solano Plan on the ballot, and why dozens of the plan's supporters publicly spoke in favor of the project at the County's June 25, 2024 Board of Supervisors meeting.

At the same time, the Draft Plan allows and finds the same industrial uses compatible in the Lambie Industrial Park, which is substantially closer to Travis AFB than the proposed uses in the East Solano Plan. It is therefore difficult not to see the Draft Plan restrictions as an arbitrary and political act aimed at undermining the will of the people of Solano County despite their possible adoption of the East Solano Plan.

The many restrictions California Forever voluntarily created in the East Solano Plan have done more to protect Travis AFB than any other developer has in Solano County, including voluntarily putting thousands of acres of California Forever's properties under development prohibitions and doubling the security buffer around Travis AFB through the creation of the Travis Security Zone.

To reiterate, California Forever shares the Commission's commitment to protecting Travis AFB, and California Forever would look forward to working with the Commission to ensure solutions that meet the needs of Travis AFB and the many needs of the residents of Solano County. However, given the clear position that Travis AFB has taken on the East Solano Plan – confirming in clear terms that "[w]ith this revised proposal, Travis AFB will be able to continue flying its full

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mission”—changes to the Travis AFB Airport Land Use Plan should not create new restrictions on lands subject to the East Solano Plan beyond those already contained in the Initiative.

## **VI. Conclusion and Request for Deferral**

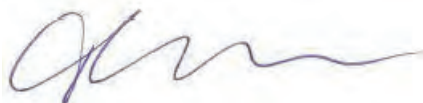
With only four months to the November 2024 election, the Draft Plan is premature and an apparent attempt to undermine any favorable determination of the voters on the Initiative. California Forever respectfully requests that the Commission defer amendments to both Travis and Rio Vista Airport Land Use Compatibility Plans so that California Forever and other stakeholders may work together with the Commission towards good and mutually acceptable plans after the voters have had an opportunity to vote on the Initiative.

A deferral would also provide stakeholders and the public with the opportunity to meaningfully study the proposed changes and, even more importantly, the analysis upon which those modifications are based to better inform participation in the Commission’s process. If approved by the voters, the East Solano Plan would further be subject to review under the California Environmental Quality Act and the provisions of an enforceable development agreement, the terms of which may fully obviate whatever concerns are causing the Commission’s current preemptive proposal. The language of the Initiative expressly recognizes that future Land Use Compatibility Plan consistency determinations will address the Land Use Compatibility Plan that is in effect at the time of such a determination. There is therefore no reason to rush through premature and preemptive amendments.

Thank you for your work in protecting our airports, and we look forward to working with you to ensure that this goal is balanced with the equally important goals of creating homes, jobs, clean energy, and economic opportunity for Solano County residents.

Sincerely yours,

HOLLAND & KNIGHT LLP



Jennifer Hernandez

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## EXHIBIT A



NEWS



UNITED STATES AIR FORCE

### Travis airspace needs considered

Published Feb. 15, 2024

60th Air Mobility Wing Public Affairs

**TRAVIS AIR FORCE BASE, Calif.** – Two weeks ago, Travis AFB expressed concerns regarding the impact on our mission of the proposed land uses in the northwestern portion of the new community proposed by California Forever. We have now learned that in response to our concerns, California Forever filed an amended version of the initiative with the Solano County Registrar of Voters yesterday, February 14, 2024.

California Forever made significant changes to its plans in order to protect Travis' global mission and local flight operations. With this revised proposal, Travis AFB will be able to continue flying its full mission, including all of our operational, exercise, and local training flights consisting of multiple patterns and landings to all runways, including night vision goggle training to the assault landing zone (ALZ) runway.

Travis AFB recognizes California Forever's efforts to minimize impacts to operations and mission capabilities, as well as their project's potential to improve the wellbeing of our Airmen and families into the future.



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## EXHIBIT B

The following is a non-exhaustive list of issues where the Draft Plan imposes additional restrictions on the East Solano Plan which are not appropriate, given that Travis AFB clearly confirmed in its statement from February 15, 2024 that “[w]ith this revised proposal, Travis AFB will be able to continue flying its full mission.”

- (1) **Low Altitude Maneuvering Zone.** The current proposed boundary and land uses conflict with East Solano Plan, which the Travis AFB statement confirms are compatible with the base’s full mission.
- (2) **Density Calculations.** Under California planning laws, accessory dwelling units are not included in the calculation of residential density. The East Solano Plan has established density requirements consistent with the existing Travis AFB Land Use Compatibility Plan, which the Travis AFB statement confirms are consistent with its mission.
- (3) **Waypoint Restrictions and Areas.** The Draft Plan proposes a two mile radius around N38 12.32’ W121 52.65’ (“Tactical Waypoint Museum”) and N38 14.64’ W121 51.36’ (“Tactical Waypoint Kreed”) in which all residential uses are prohibited. The East Solano Plan already includes height limitations in the vicinity of these tactical waypoints, which the Travis AFB statement confirms are consistent with its mission.
- (4) **Conservation Banking.** The Draft Plan prohibits “new conservation banks” in the LAMZ without regard to the purpose of the conservation bank which may be for the preservation of species or habitats that are not attractants to aviation wildlife hazards, including plant species. The East Solano Plan already includes provisions regarding avian habitat uses, which the Travis AFB statement confirms are consistent with its mission.
- (5) **Outdoor Lighting.** The Draft Plan adds to section 5.4.6 describing other hazards to flight “[o]utdoor sources that may diminish the effectiveness of night vision goggles used by pilots of military aircraft performing ALZ & LAMZ training maneuvers.” The East Solano Plan already includes provisions regarding lighting, which the Travis AFB statement confirms are consistent with its mission.
- (6) **Deed Restriction.** The Draft Plan proposes substantial modifications to the required deed restriction notice to include language that is highly specific to certain current operations that will inevitably evolve as the Travis AFB mission and aviation technology changes, thus making the specifics inappropriate for recordation on deeds. Further, the draft Rio Vista ALUCP includes the same deed restriction as provided in the draft Travis AFB LUCP, including provisions that are completely unrelated to Rio Vista Airport. The East Solano Plan already includes provisions regarding deed notices, which the Travis AFB statement confirms are consistent with its mission.



From: [Joe Livaich](#)  
To: [Solano ALUC](#)  
Cc: [Vincent K. Wong \(vwong@murphyaustin.com\)](mailto:vwong@murphyaustin.com)  
Subject: 7/11/24 Agenda item AC 24-023  
Date: Thursday, July 11, 2024 4:19:01 PM  
Attachments: [TravisALUCP Consistency Analysis 20240308.pdf](#)

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Solano ALUC,

Please submit the attached into the administrative record. If too late in the day, I will bring hard copies for the commission and deliver them during public comment tonight.

Thank you.

Joe Livaich | Senior Vice President, Development and Entitlements  
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[joelivaich@buzzoates.com](mailto:joelivaich@buzzoates.com)  
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From: [Jim Bermudez](#)  
To: [Bezek, James M.](#)  
Cc: [Bret Prebula](#); [Ferrario, Nedzlene N.](#); [Calder, Allan M.](#); [Emlen, Bill F.](#)  
Subject: Airport Land Use Commission meeting  
Date: Thursday, July 11, 2024 4:44:17 PM  
Attachments: [image001.png](#)  
[Comment letter to Solano County ALUC re LAMZ.pdf](#)

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Mr. Bezek,

The City of Suisun City has been notified about tonight's discussion regarding amendments to the Travis Air Force Compatibility Plan. Attached is a letter from Buzz Oates, Inc. expressing their concerns about the potential impact of these changes on their plan to develop 2.1 million square feet of logistics space in Suisun City. We firmly support the developer's position and believe it would be in the interest of the City and County to postpone tonight's discussion allowing for a comprehensive review and collective discussion of the proposed changes between City and County staff. Please consider our request.

Regards,

Jim



**Jim Bermudez**  
Development Services Director  
701 Civic Center Blvd. | Suisun City, CA 94585  
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C: 707-372-2055



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From: [Vincent K. Wong](#)  
To: [Solano ALUC](#)  
Subject: Comment Letter re: AC 24-023  
Date: Thursday, July 11, 2024 9:45:08 AM  
Attachments: [Comment letter to Solano County ALUC re LAMZ.pdf](#)

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Please see attached letter delivered in connection with tonight's ALUC meeting. Please include this letter in the administrative record.



**Vincent K. Wong** // Attorney at Law  
Murphy Austin Adams Schoenfeld LLP  
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**E:** [vwong@murphyaustin.com](mailto:vwong@murphyaustin.com)  
Teleconference No.: 1.833.548.0282 Meeting ID: 715841727  
[murphyaustin.com](http://murphyaustin.com)

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VINCENT K. WONG  
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vwong@murphyaustin.com

July 11, 2024

**VIA E-MAIL**

Solano County Airport Land Use Commission  
Nadzlene Ferrario, Principal Planner  
SolanoALUC@SolanoCounty.com

**Re: AC 24-023: Notice of Objection to Proposed Amendments to TAFB LUCP**

To Nadzlene Ferrario and the Solano County Airport Land Use Commission:

This letter is delivered in connection with the Solano County Airport Land Use Commission's ("ALUC") July 11, 2024 public hearing regarding File # AC 24-025. Based on the ALUC's undated Courtesy Notice, this hearing is an informational hearing regarding proposed amendments to the Travis Air Force Base Land Use Compatibility Plan (as amended through 2015, "TAFB LUCP"), among other things. The ALUC proposes the addition of the Low Altitude Maneuvering Zone ("LAMZ") to the TAFB LUCP.

Our office represents Buzz Oates LLC, a California limited liability company, ("Buzz Oates") the beneficial owner of property subject to the TAFB LUCP and proposed LAMZ.

**I. The ALUC must provide property owners a fair opportunity to comment on the LAMZ.**

Neither my client, nor I suspect, many of the other impacted property owners, have been afforded an adequate opportunity to review the LAMZ. This is particularly troubling given the uncompensated, material, and adverse impact of the LAMZ on adjacent property rights as further detailed below. The Courtesy Notice casually references "minor amendments" to the TAFB LUCP and then directs those few parties who actually received the Courtesy Notice to download and review a 218 page document.

Putting aside the lack of any summary or specific call-out of proposed changes to this lengthy document as the ALUC has circulated in the past, these interlineated "redline" changes misleadingly suggest that these were the only changes compared to the TAFB LUCP approved years ago. However, based on our initial review, these redlines do not appear to be a complete and accurate representation of changes against the 2015 TAFB LUCP.

Lastly, framing this public hearing as "informational only" does negate the ALUC's obligation to provide stakeholders an adequate opportunity to review and comment on a proposal



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that has such a material impact on its property rights in the short- and long-term. Indeed, this accelerated process to adopt the amended TAFB LUCP conflicts with the policies set forth in the Travis AFB Sustainability Study Report adopted in 2018, where representatives from the County, incorporated cities, and the Travis AFB expressly identified the importance of early engagement with stakeholders and public participation to equitably address compatibility issues.

**II. There is insufficient evidence supporting the breadth of the LAMZ’s uncompensated and material impact on the development of hundreds of acres of private property.**

The LAMZ proposes a set of blanket restrictions that would effectively preclude any significant development of property within its area, apparently including those projects that would have otherwise been in compliance with the approved TAFB LUCP and all other implicated land use regulations. Of specific concern are the hardline caps on structural heights, prohibition of non-agricultural uses, and expanded application of the already overbroad “hazards to flight” restriction. These restrictions, as specifically applied to those projects Buzz Oates has been processing with the City of Suisun, will not just eliminate the highest and best use of Buzz Oates’ property, but will result in those properties being effectively worthless – particularly relative to the forecasted value of the property should Buzz Oates’ active entitlement applications be finalized without being superseded by the proposed TAFB LUCP changes.

No specific justification is given for these proposed changes, other than a general reference to “FAA requirements for low altitude flying below 1000 feet.” To the extent that these FAA requirements are those attached as Appendix G (page 171 of 218), we note that this Advisory Circular was issued in August 2007, eight years before the TAFB LUCP was first amended. Any concerns about compliance with these FAA requirements should have been proposed and addressed years ago. Basing the LAMZ boundary lines on Alert Area A-682 is also misguided, as this Alert Area is intended to alert pilots to the presence of military aircraft performing training maneuvers. The proposed TAFB LUCP fails to explain how this navigational and warning device is an appropriate land use planning tool.

While the LAMZ is intended to protect areas under which military aircraft conduct low altitude maneuvers and to avoid encroachment by land uses which could be considered “congested areas” as described in 14 CFR Part 91, Section 91.119, it is unclear whether there is a direct nexus between those regulations and the traffic pattern for Travis Air Force Base. Per the regulations in Part 91, the enumerated altitude thresholds would not apply when necessary to take off or land aircraft. The FAA further clarified<sup>1</sup> that aircraft in a traffic pattern are not subject to these minimum altitudes.

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<sup>1</sup> <https://www.faa.gov/media/14411>

Solano County Airport Land Use Commission  
July 11, 2024  
Page 3

The “Summary of LUCP Changes” attached as Appendix J do not offer any more insight, other than general assertions of changes in community attitudes and development over the past years.

### **III. Conclusion.**

For years, my client, along with other property owners, have navigated the complex land use restrictions in collaboration with Solano County, the ALUC, incorporated cities, and the Travis Air Force Base. In fact, Buzz Oates has several entitlement applications in process with local agencies that may be impacted should these proposed amendments to the TAFB LUCP be approved. Indeed, the City of Suisun issued a Notice of Preparation for an Environmental Impact Report (EIR) for the proposed Suisun Logistics Center more than three years ago (January 6, 2021), and the Draft EIR for that project is set to be issued for public review and comment in the very near future. This proposed project is within the City’s long-standing sphere of influence, a planning fact on which Buzz Oates has financially relied.

It is patently unfair to now undermine those efforts with a summary expansion of restrictions without providing affected parties a fair opportunity to review the restrictions and a reasonable opportunity to be heard and comment on them. Consistent with the 2018 Sustainability Study Report and general principles of equity, we are only asking for the time to review and substantively respond to these proposed amendments in a manner.

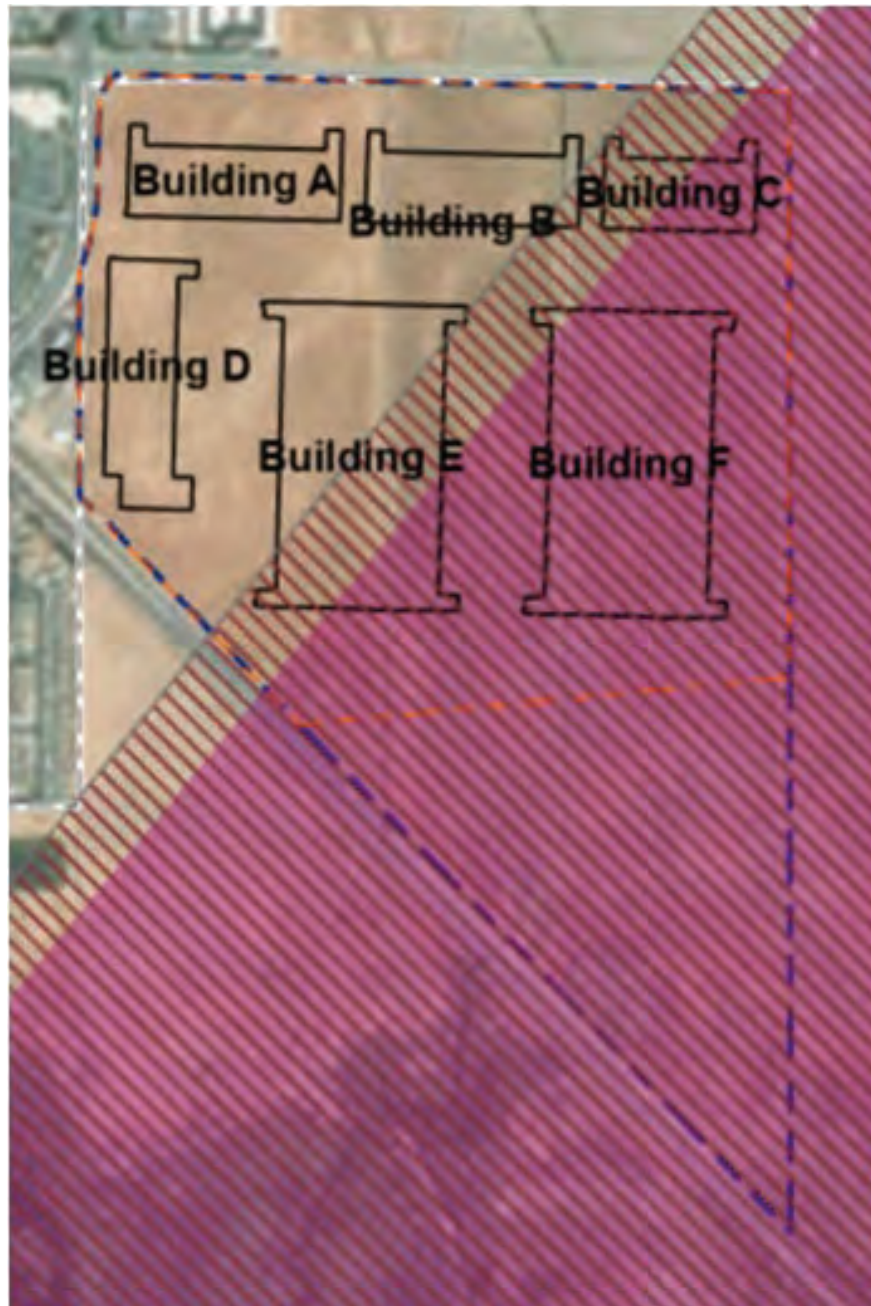
This letter is intended to be part of the administrative record. The foregoing letter is sent without prejudice to our client’s rights.

Sincerely,

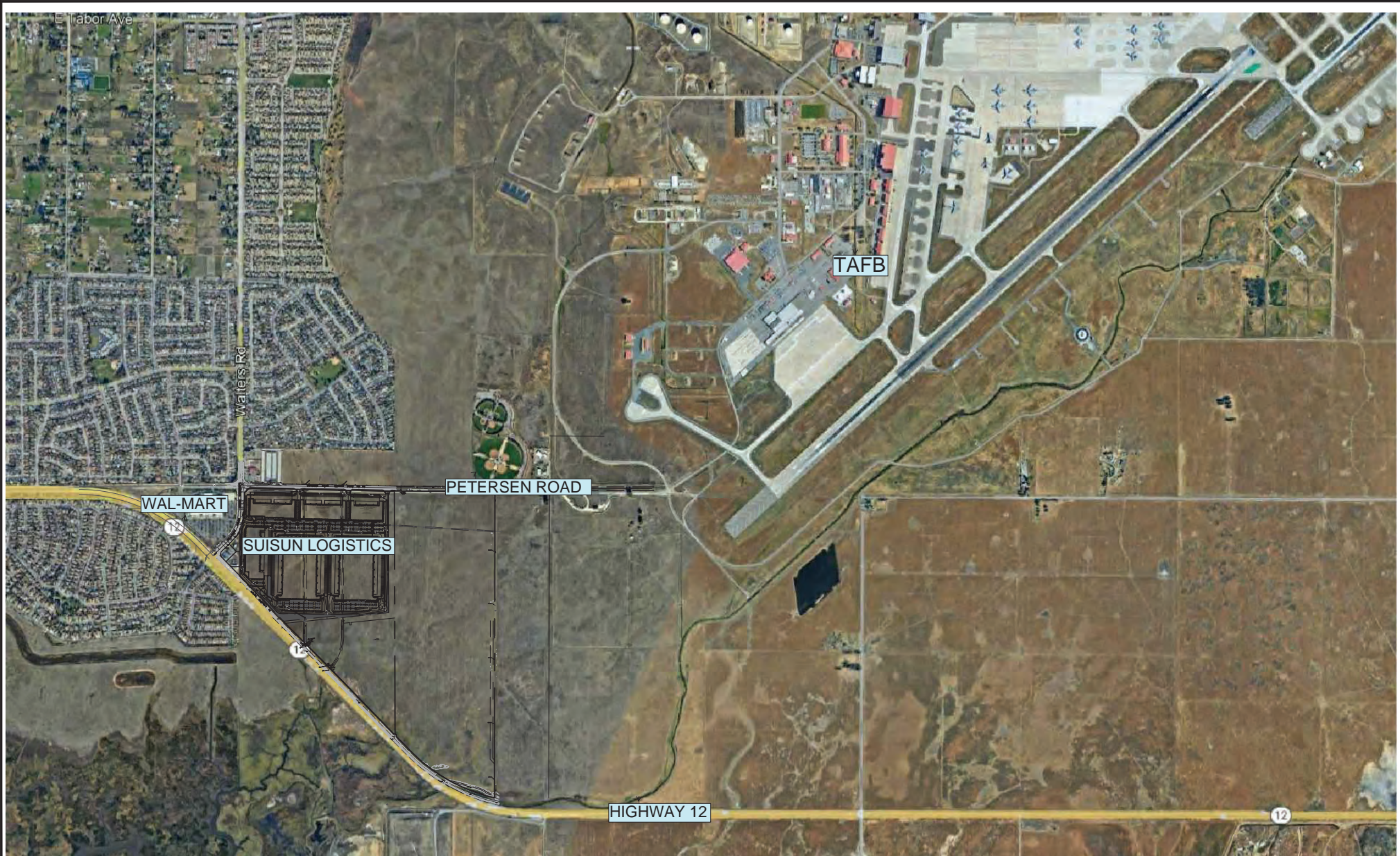
Murphy Austin Adams Schoenfeld LLP

/S/ VINCENT K. WONG

Cc (via email):  
Client  
Jim Moose, Esq.







SUISUN LOGISTICS CENTER

VICINITY MAP

SUISUN, California





2355 Northside Drive  
Suite 100  
San Diego, CA 92108  
619.719.4200 [phone](#)  
619.719.4201 [fax](#)

Attachment H  
File # [AC-24-027](#)

# memorandum

date March 8, 2024

to Joe Livaich, Vice President, Buzz Oates Construction, Inc.

cc Neal Wolfe, Director of Aviation Sustainability and Resilience

from Patrick Hickman, AICP, Managing Planner

subject Suisun Logistics Center – Travis Air Force Base Land Use Compatibility Plan Consistency Evaluation

## Introduction

The Suisun Logistics Center has been proposed for development on a site located within the airport influence area (AIA) for Travis Air Force Base as delineated in the Travis Air Force Base Land Use Compatibility Plan (Travis AFB LUCP) published by the Solano County Department of Resource Management.<sup>1</sup> The project site is approximately 6,440 feet (1.2 miles) from the 03L runway end and is offset approximately 1,300 feet from the extended Runway 03L/21R extended centerline. This memorandum discusses the compatibility of the proposed Suisun Logistics Center development (Proposed Project) with the aviation activities occurring on Travis AFB. Elements of the Proposed Project include approximately 2.1 million square feet of warehouses with associated vehicle circulation, parking, and stormwater infrastructure as well as approximately 47 acres of preserved open space on the 167-acre site.

Airport land use typically concerns four areas, or factors, of compatibility: noise, safety, airspace protection, and overflight notification.<sup>2</sup> Noise, safety, and airspace protection are generally applicable to all development proposals in the airport environs. However, overflight notification specifically relates to notifying potential purchasers of residential property that a prospective home is subject to frequent overflights and any associated annoyance. As the Proposed Project does not include a residential component, and therefore overflight notification does not apply, this evaluation focuses on the project's relationship to aviation noise, safety, and airspace protection with additional focus on wildlife and other hazard avoidance.

## Noise

Noise compatibility policies and criteria are utilized to protect people on the ground from the harmful effects of exposure to high levels of aviation noise. Land uses of particular concern in noise compatibility planning include residences, children's schools, hospitals and similar facilities for the infirmed, and places of worship. Warehouses

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<sup>1</sup> County of Solano, Department of Resource Management, Travis Air Force Base Land Use Compatibility Plan, October 8, 2015. Available online at

[https://www.solanocounty.com/depts/rm/boardscommissions/solano\\_county\\_airport\\_land\\_use\\_commission/documents.asp](https://www.solanocounty.com/depts/rm/boardscommissions/solano_county_airport_land_use_commission/documents.asp)

<sup>2</sup> State of California Department of Transportation, California Airport Land Use Planning Handbook, October 2011, p. 3-1. Available online at <https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf>

and storage facilities are generally considered more compatible with airfields, as the storage of goods does not typically draw large numbers of people or sensitive receptors. The typical noise receptors for warehouse and storage facilities are employees. Warehouses are also frequently associated with industrial uses that generate their own ambient noise, which can render aviation noise less perceptible. For example, sounds associated with shipping trucks and loading and unloading equipment can diminish the effect of nearby aircraft noise.

The Travis AFB LUCP noise policies and criteria are applicable within the Community Noise Equivalent Level (CNEL) 60 decibel (dB) contour based on the 2015 forecast maximum mission aircraft activity scenario for the air base.<sup>3</sup> The outer boundary of Compatibility Zone C, one of six compatibility zones surrounding Travis Air Force Base, generally encompasses the CNEL 60 dB contour. As depicted in **Figure 1**, the area of the project site which would accommodate human activity would be located within Travis AFB LUCP Compatibility Zone C and would be exposed to noise levels up to CNEL 70 dB. Of the six proposed warehouse buildings, two (Buildings A and D) would be exposed to noise CNEL 60-65 dB, and four (Buildings B, C, E, and F) would be exposed to noise CNEL 65-70 dB. Table 2: *Noise Compatibility Criteria* of the Travis AFB LUCP enumerates the criteria applicable to the CNEL 60-65 and 65-70 dB contour ranges and indicates “warehousing” is “Normally Acceptable” in the CNEL 60-65 dB contour range and “Marginally Acceptable” in the CNEL 65-70 dB contour range. Per the Travis AFB LUCP, “Normally Acceptable” means conventional construction materials and practices will prevent outdoor aviation noise from interfering with indoor activities.<sup>4</sup> Therefore, as the project will employ conventional construction materials and practices, Buildings A and D within the CNEL 60-65 dB contour range would not present any incompatibilities with the LUCP noise criteria. Buildings B, C, E, and F, located within or partially within the CNEL 65-70 dB contour range, would be “Marginally Acceptable” in this area meaning a warehouse would be “acceptable on the condition that outdoor activities are minimal and construction features which provide sufficient noise attenuation are used”.<sup>5</sup> Examples of noise attenuating construction features meeting this criterion would include closeable windows and climate controls adequate to maintain indoor temperatures sufficiently comfortable to keep windows closed.<sup>6</sup> Buildings B, C, E, and F would meet this criterion by incorporating closable doors and windows along with inclusion of air conditioning. No special sound insulation would be required under this criterion. Furthermore, no noise-sensitive activities, such as outdoor theaters, residences, schools, or libraries, are proposed for the warehouse complex. Thus, the Proposed Project is compatible with the Travis AFB LUCP noise compatibility criteria.

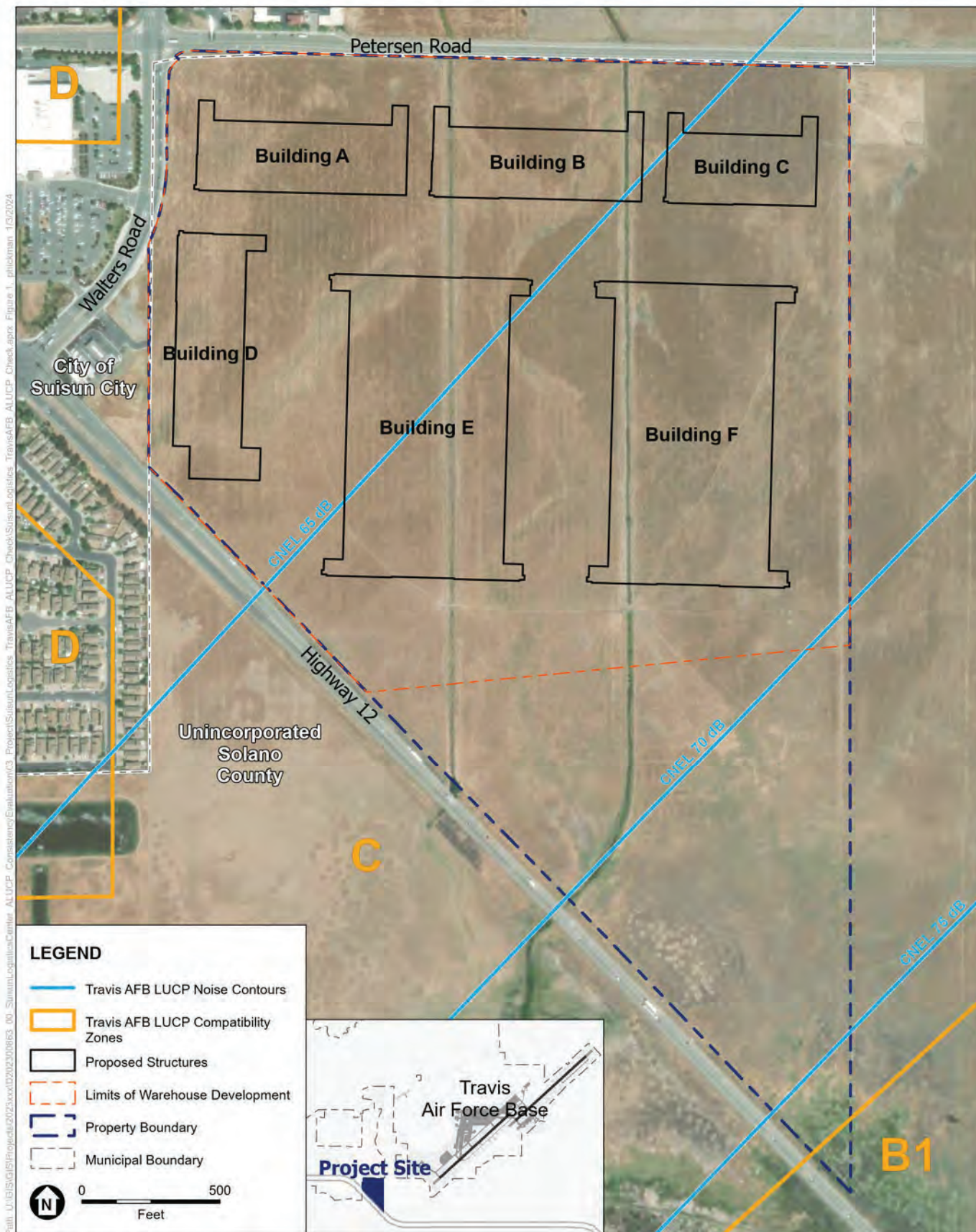
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<sup>3</sup> County of Solano, Department of Resource Management, *Travis Air Force Base Land Use Compatibility Plan*, Appendix F, October 8, 2015.

<sup>4</sup> County of Solano, Department of Resource Management, *Travis Air Force Base Land Use Compatibility Plan*, October 8, 2015, p. 28.

<sup>5</sup> *Ibid.*

<sup>6</sup> *Ibid.*



SOURCE: ESA, 2023; Solano County, 2015, 2023; ESRI, 2023.

Suisun Logistics Center – Travis Air Force Base ALUCP Consistency Evaluation

**Figure 1**  
Noise Contour Ranges and Compatibility Zones  
Suisun Logistics Center Project Site



## Safety

Safety compatibility policies and criteria are intended to avoid concentrations of people on the ground in locations where aircraft accident risk is greatest.<sup>7</sup> Historically, aircraft accident crash sites have tended to cluster along the extended runway centerline with increasing concentration toward the runway end. In addition to avoiding concentrations of people generally, land uses of special concern for safety compatibility include children's schools, hospitals, nursing homes, and other facilities accommodating potentially vulnerable low-mobility users. The Travis AFB LUCP measures concentrations of people, or use intensity, in people per acre. Warehouses are typically considered a low-intensity land use presenting fewer safety compatibility concerns in areas of otherwise moderate risk.

The Travis AFB LUCP safety compatibility criteria are encompassed in Compatibility Zones. As depicted in Figure 1, the southernmost 0.41 acres of the overall Proposed Project site is located in Compatibility Zone B1 where indoor uses should be limited to an intensity of 15 people per acre and outdoor uses would be limited to 20 people per acre.<sup>8</sup> This area of the project site would remain open space, and little or no intensity of use would be anticipated. The remainder of the approximately 120-acre site is situated in Compatibility Zone C where indoor uses should be limited to an intensity of 75 people per acre, and outdoor uses should be limited to 100 people per acre.<sup>9</sup> An intensity limit of 300 people per acre on any single acre would also apply. The only uses prohibited by the Compatibility Zone C criteria include uses associated with vulnerable users. Thus, warehouses are compatible uses subject to the use intensity limits.

The developed portion of the site would cover approximately 73 acres. The Proposed Project is anticipated to accommodate 2,843 employees once fully operational. Assuming warehouse operations would be conducted in a single shift with all 2,843 employees occupying the site at once, this would result in an intensity of 41 people per acre. This would be well below the 75 people per acre limit for indoor uses. However, warehouse operations are likely to occur in multiple continuous shifts among which the total employees would be divided. When assuming employees would work in two 12-hour shifts, this would result in approximately 1,500 employees on site under typical conditions. This would equate to an overall intensity of 22 people per acres with much of it anticipated to occur indoors and would be well below the 75 people per acre limit for Compatibility Zone C and a significant reduction in intensity from the conservative single-shift scenario.

The warehouse operations would be distributed across six buildings encompassing 1.2 million square feet (27.5 acres) which would equate to approximately 55 people per acre in the two-shift scenario, and under normal operating conditions, no single acre would experience the maximum concentration of 300 people per acre. Thus, the Proposed Project is compatible with the Travis AFB LUCP safety compatibility criteria.

## Airspace Protection

Airspace Protection strategies focus on two types of hazards to flight: 1) airspace obstructions and 2) wildlife and other hazards to flight. The compatibility of the proposed Suisun Logistics Center with the airspace protection policies of the Travis AFB LUCP is discussed in the context of each of these strategies in the sections below.

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<sup>7</sup> California Department of Transportation, Airports Division, *California Airport Land Use Planning Handbook*, October 2011, p. xi.

<sup>8</sup> County of Solano, Department of Resource Management, *Travis Air Force Base Land Use Compatibility Plan*, October 8, 2015, p. 16.

<sup>9</sup> *Ibid.*



## Airspace Obstructions

Protecting airports and air installations from airspace obstructions is accomplished by limiting the heights of structures and other objects such as trees to heights not exceeding certain imaginary airspace projection surfaces<sup>10</sup> associated with the facility. One such set of imaginary surfaces is established in Title 14 Code of Federal Regulations Part 77, *Safe, Efficient Use, and Preservation of the Navigable Airspace* (Part 77). The Part 77 surfaces are incorporated into the Compatibility Zones discussed under the Safety section above. As depicted in Figure 1, the structures proposed for development are located in Compatibility Zone C where development conditions require ALUC review for any objects higher than 100 feet.<sup>11</sup> The Notice of Preparation issued for the Proposed Project indicates the highest proposed structure would be 42 feet,<sup>12</sup> falling significantly below the 100-foot threshold. Since the ground elevation for the portion of the site proposed for development of structures is generally within a range of 10 to 20 feet above mean sea level (AMSL),<sup>13</sup> this height would also be well below the Part 77 horizontal surface which, at 213 feet AMSL, is the lowest Part 77 imaginary surface under which a building is proposed. Meteorological towers are specifically cited as presenting hazards to pilots, and any meteorological towers higher than 100 feet must be reviewed by the Solano County Airport Land Use Commission when proposed in Compatibility Zone C.<sup>14</sup> However, no meteorological towers are proposed as part of the warehouse development. Thus, no incompatibility regarding airspace obstructions would occur.

As depicted in **Figure 2**, the portion of the Proposed Project site to be developed is situated outside of all approach glide slopes for Travis AFB. The Assault Landing Zone (AZL) Training Area Overlay overlaps the Proposed Project site on the southeast and intersects the proposed locations for three warehouse buildings (Buildings C, E, and F). Structures higher than 200 feet above ground level are prohibited within the AZL Training Area Overlay. However, as just discussed, the Proposed Project does not feature any structures exceeding 42 feet in height. Thus, the Proposed Project would not obstruct airspace or otherwise be incompatible with applicable obstruction regulations.

## Wildlife and Other Flight Hazards

### Wildlife

The Travis AFB LUCP establishes two wildlife hazard zones around the airfield: the 1) Bird Strike Hazard Zone and 2) the Outer Perimeter. The Bird Strike Hazard Zone represents the area within a 14,500-foot distance measured outward from the Travis AFB runway centerlines, and the Outer Perimeter marks the boundary of an area encompassing a 5-mile distance measured outward from the air operations area (AOA) perimeter of the base. As such, the Bird Strike Hazard Zone is situated entirely within the Outer Perimeter. Per Section 5.8.2(a) of the Travis AFB LUCP, a wildlife hazard analysis (WHA) must be prepared for “*new or expanded land uses involving discretionary review [with] potential to attract wildlife and cause bird strikes*”. This policy specifies that reviewing agencies are responsible for WHA preparation for projects with potential to attract birds which could imperil aircraft in flight. Per Section 5.8.2(b) of the Travis AFB LUCP, any proposed new or expanded land uses within the Outer Perimeter, but outside the Bird Strike Hazard Zone with potential to attract movement of wildlife and cause bird strikes, require a WHA. A new or expanded land use in these cases refers to “*newly created areas and increases in enhanced or restored areas*”. Section 5.8.2 goes on to establish requirements for including

<sup>10</sup> Imaginary airspace surfaces refer to areas in space delineated in relation to an airfield and the applicable runway ends in which an object extending above the surface would be an obstruction to aircraft in flight.

<sup>11</sup> County of Solano, Department of Resource Management, *Travis Air Force Base Land Use Compatibility Plan*, October 8, 2015, p. 16.

<sup>12</sup> City of Suisun City, *Suisun Logistics Center Project - Notice of Preparation*, January 6, 2021.

<sup>13</sup> U.S. Geological Survey, *The National Map*, <https://apps.nationalmap.gov/viewer/> accessed October 3, 2023.

<sup>14</sup> County of Solano, Department of Resource Management, *Travis Air Force Base Land Use Compatibility Plan*, October 8, 2015, p. 39.

evaluations for potential to attract wildlife hazardous to aircraft be included in applicable project California Environmental Quality Act documentation.

The Proposed Project site is situated within the Bird Strike Hazard Zone and includes approximately 47 acres of retained open space and 7.6 acres of stormwater management infrastructure including bioswales and detention basins. In March of 2021, a WHA was completed and concluded none of the site features would exacerbate bird activity potentially hazardous to Travis AFB operations.<sup>15</sup>

Agriculture and water treatment are the primary land use types associated with the Proposed Project that are known to attract wildlife in the vicinity of Travis AFB.<sup>16</sup> Because the 167-acre site is currently managed for cattle grazing, the proposed reduction to a 47-acre open space parcel for continued cattle grazing is not expected to increase hazards to Travis AFB flight operations—in fact it could decrease hazards associated with birds from existing conditions by reducing the amount of agricultural land. Furthermore, preservation of 47 acres of open space would not present any unusual or novel circumstance surrounding an air installation. Examples of military air installations with similar operations and fleets with off-installation parks and/or preserved open space located within two miles of a runway end include Joint Base McGuire-Dix-Lakehurst, Dover Air Force Base, and Joint Base Lewis-McChord. Other similar facilities such as Scott Air Force Base, Pope Army Airfield, and Joint Base Andrews also feature undeveloped open space and riparian areas that are not part of formal parks or preserves and that are located near runway ends.

In keeping with Federal Aviation Administration (FAA) recommendations for new stormwater management facilities within 5 miles of airports, the proposed stormwater basins have been designed to drain within 48 hours of a storm event.<sup>17</sup> The stormwater management infrastructure would be maintained to be kept free of vegetation and would remain dry between rain events. By minimizing or eliminating standing water and vegetative growth, the basins are less likely to attract hazardous wildlife such as waterfowl.<sup>18</sup>

During construction of the developed portion of the property, species such as gulls, ravens, and crows may be temporarily attracted to the site immediately following major ground disturbances such as excavation and grading, because these types of construction activities often expose prey such as insects and rodents that attract these bird species. However, the attractiveness of disturbed soil to these bird species would be temporary and would become negligible following the initial ground movement and with continued use of heavy equipment in the vicinity. Attraction of wildlife to the construction area would be further minimized by implementing standard construction best management practices such as properly containing and disposing of garbage, which are measures anticipated to be included as part of the stormwater pollution prevention plan to be prepared for the Proposed Project. A planting plan would be developed and include landscape design elements to prevent congregations of birds, such as sufficiently spacing tree plantings to prevent dense roosting or nesting cover. Furthermore, tree and shrub varieties that are attractive to wildlife (i.e., dogwood, elderberry, or other species that produce seeds, fruits, or berries) would not be used for landscaping. Post-construction, features of the proposed structures that have potential to attract birds such as rooftops and exterior light fixtures would be designed and maintained as to minimize attractiveness for roosting and nesting (i.e., installing deterrents or exclusion devices such as spikes or wire on gutters, eaves or peaked roof ridges, and avoiding use of flat platforms on pole lighting fixtures). Thus, the Proposed Project would not increase or otherwise exacerbate wildlife activity that could be potentially hazardous to Travis AFB operations, and in fact would decrease bird-related hazards by decreasing agricultural acreage that currently attracts birds.

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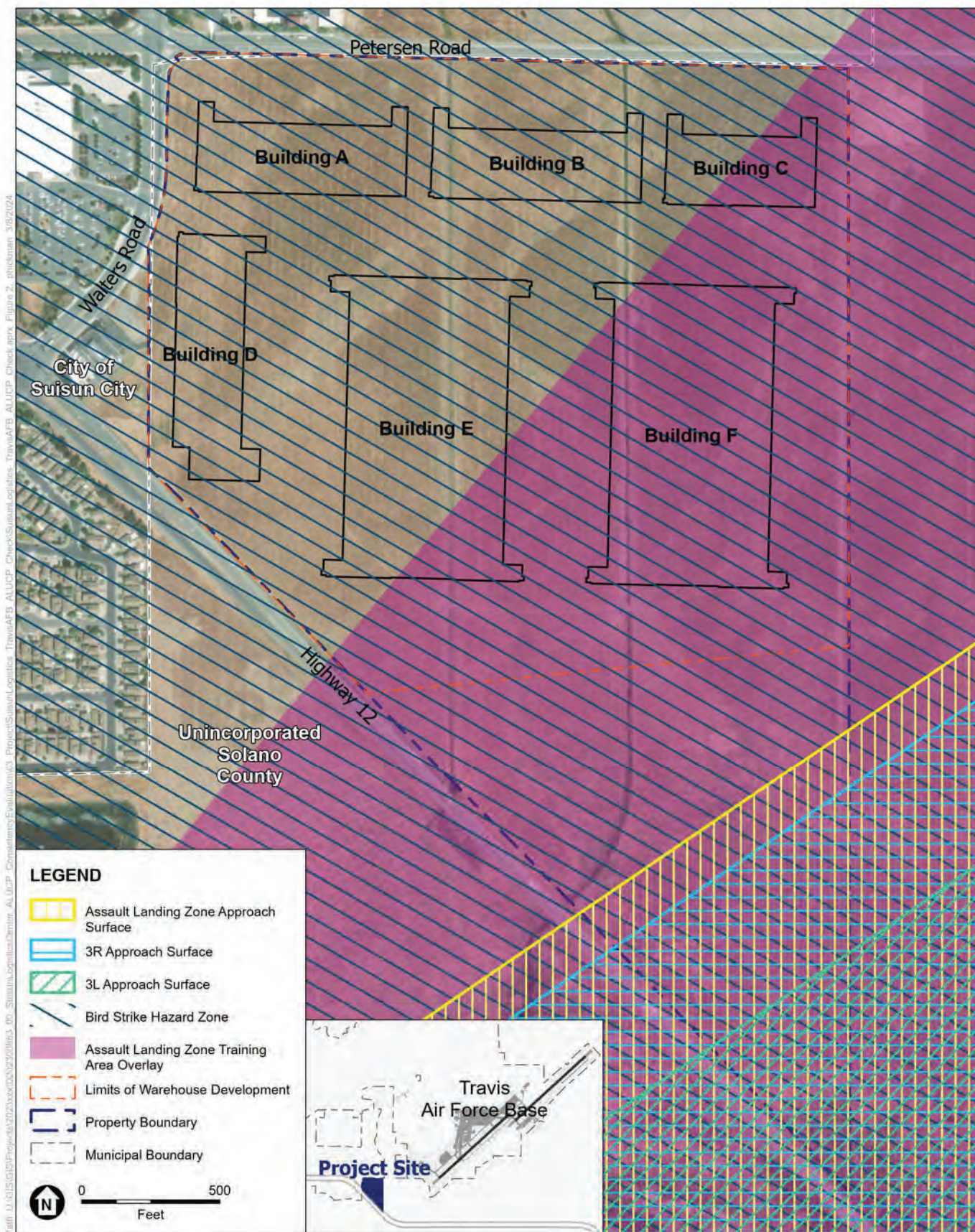
<sup>15</sup> AECOM, *Wildlife Hazards Assessment for the Suisun Logistics Center Property*, March 29, 2021.

<sup>16</sup> County of Solano, Department of Resource Management, *Travis Air Force Base Land Use Compatibility Plan*, October 8, 2015, p. 43.

<sup>17</sup> U.S. Department of Transportation, Federal Aviation Administration, *Advisory Circular 150/5200-33C: Hazardous Wildlife Attractants on or near Airports*, February 21, 2020.

<sup>18</sup> AECOM, *Wildlife Hazards Assessment for the Suisun Logistics Center Property*, March 29, 2021.





SOURCE: ESA, 2023; Solano County, 2015, 2023; ESRI, 2023.

Suisun Logistics Center – Travis Air Force Base ALUCP Consistency Evaluation

**Figure 2**  
Airspace Protection Surfaces and Overlays  
Suisun Logistics Center Project Site



## Other Flight Hazards

Per Section 5.4.6 of the Travis AFB LUCP, other hazards to flight, aside from wildlife, include sources of electromagnetic and visual disturbances. Specific characteristics cited include:

- Glint, glare, and flashing lights
- Dust, steam, smoke, and thermal plumes
- Electrical interference affecting aircraft communications or navigation
- Radar interference

Wind turbines and solar facilities are specifically addressed as potentially problematic for Travis AFB operations in Sections 5.6.1 and 5.6.2, respectively. Wind turbines are noted as potential generators of radar interference, and solar facilities are described as potential sources of glint and glare. To address these hazards, any wind turbines or commercial-scale solar facilities proposed in Compatibility Zone C are required to meet special conditions to demonstrate compatibility.<sup>19</sup> Specifically, new or expanded commercial-scale solar facilities require an analysis based on the Solar Glare Hazard Analysis Tool (SGHAT) model developed by Sandia National Laboratories to be submitted for ALUC review. As the Proposed Project would potentially introduce rooftop solar arrays for energy generation, such an analysis would be required. The glint and glare analysis would need to demonstrate the following:

- No potential for glint or glare in an existing or planned Airport Traffic Control Tower cab at Travis AFB
- No potential for glare or more than a low potential for after-image along the final approach path for any existing landing threshold or future landing threshold (including any planned interim phases of the landing thresholds) as shown on the Layout Plan for Travis AFB

The SGHAT and other similar models can recommend mitigation measures and design alternatives to avoid impacts related to glare.<sup>20</sup> Therefore, a glint and glare study using the SGHAT, or other similar model<sup>21</sup>, will be performed as part of the design review submittal requirements for the Proposed Project. The proposed facilities will be assessed for potential to emit glint, glare, or distracting lights which could impair pilot visibility. Any such potential for hazard identified during this analysis would be addressed by modifications to the proposed design. Thus, no proposed characteristics of the development would significantly contribute to any visual or communications interference, and there would be no conflicts with the Travis AFB LUCP airspace protection policies regarding other hazards to flight.

## Summary

The proposed Suisun Logistics Center development would not present any new incompatibilities or conflicts with the Travis AFB LUCP. Standard sound attenuating construction features like climate control systems and closeable windows would need to be incorporated into the design of four warehouse buildings. However, inclusion of these features would meet the applicable noise compatibility criteria. The Proposed Project would also be compatible with the safety criteria based on its planned use intensity. No concentrations of vulnerable populations would be accommodated on the site, and the number of occupants reasonably expected on the site would not exceed the specified people-per-acre limits at any time. The Proposed Project would not introduce any new obstructions that would conflict with airspace protection policies of the Travis AFB LUCP, and the

<sup>19</sup> County of Solano, Department of Resource Management, *Travis Air Force Base Land Use Compatibility Plan*, October 8, 2015, p. 16.

<sup>20</sup> County of Solano, Department of Resource Management, *Travis Air Force Base Land Use Compatibility Plan*, October 8, 2015, p. 38.

<sup>21</sup> The FAA no longer specifically endorses use of the SGHAT model per policy guidance enacted in May 2021 (86 Federal Register 25802). The FAA notes there are several glint and glare analysis tools available on the market.

preserved open space and stormwater management features have been assessed in a WHA that determined the project would have no significant potential to attract hazardous bird activity. Also, open space and stormwater management features would be maintained in a manner to avoid attractiveness to birds. Any other features which could pose a hazard to aircraft in flight such as sources of glare, steam, smoke, or electromagnetic or radar interference are either not proposed or would be addressed by incorporating any necessary mitigation measures prescribed during the glint and glare analysis. All compatibility factors considered, the Suisun Logistics Center development would be consistent with the policies and criteria enumerated in the Travis AFB LUCP and compatible with aviation operations at the base. Furthermore, the establishment of a logistics center proximate to Travis AFB could also potentially be utilized to expedite resupply of needed materials at Travis AFB in emergencies. Thus, the Proposed Project could provide a benefit to the base by supplying a critical supply chain node.