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September 25, 2008

Ms. Maywan Krach
Environmental Coordination Services
Community Development Resource Agency
3091 County Center Drive, Suite 190
Auburn, CA 95603

Subject: Notice of Preparation of an Environmental Impact Report (EIR) for the Proposed Timberline at Auburn Project (PEIR T20080139)

Dear Ms. Krach:

The Aircraft Owners and Pilots Association (AOPA) represents the general aviation interests of 414,000 members, more than two-thirds of the nation's pilots – including 50,000 of our members in the state of California. On behalf of our membership, AOPA is committed to ensuring the future viability and development of general aviation airports and their facilities as part of a national transportation system.

AOPA submits the following comments for consideration in the preparation of the above mentioned EIR. As proposed, the Timberline at Auburn Project would be approximately one mile from the Auburn Municipal Airport (AUN). Currently, two of the airport's Compatibility Zones overlay the property that encompasses the project. AUN has a single east-west runway of 3,700 feet in length, approximately 160 based aircraft, and nearly 70,000 annual operations.

High Density Residential Development Adjacent to the Airport - A Bad Idea

According to the proposed plan, the boundary line for nearly 860 residential units of the Timberline at Auburn will abut the Airport Compatibility Zone C1 – an area that allows maximum density of 1 dwelling per 2 acre parcel. AOPA is concerned that allowing high density residential use of this adjacent property will lead to greater community noise and safety concerns due to routine aircraft over flight operations. The site plan shows residential units constructed against the boundary line for Airport Compatibility Zone C1 – in essence going from a very limited to a high density residential development. Unfortunately, an artificial zone boundary will not limit the noise or impacts from normal aircraft operations, and often results in community concerns that arise long after residents have moved in near the existing airport.

Project Does Not Meet Compatibility Criteria

This project is described as a continuing care community and includes assisted living facilities that can be considered in the same category as nursing homes for the purposes of airport

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compatibility. Under the Auburn Airport Compatible Land Use Plan, nursing homes are specifically prohibited uses in both the C1 and C2 airport compatibility zones. However, as proposed, the entire project area falls within both of these zones for Auburn Municipal Airport. While the EIR shows that the noise impacts from aircraft over flights is within acceptable standards, the reality is that future residents will likely notice and be concerned with the airport operations and subsequent noise. In AOPA's experience, these concerns are a leading cause of actions by municipalities, even airport sponsors, to limit access to the airport in an attempt to mitigate residents' concerns with aircraft over flights.

As a result of our concerns, AOPA opposes the use of this property for the Timberline at Auburn project, since it is not compatible with the Auburn Municipal Airport. We respectfully request that all factors concerning the Auburn Municipal Airport's current and future operations be taken into consideration during the EIR and studied fully so that an appropriate determination can be made.

Thank you for your consideration of our views on this issue. If we can be of further assistance please contact our staff at 301-695-2200.

Sincerely,



John L. Collins
Senior Liaison
Airports