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[www.aopa.org](http://www.aopa.org)

April 3, 2012

Mr. John Funderburg  
Principal Planner  
San Joaquin County  
Community Development Department  
Stockton, CA 95205

Dear Mr. Funderburg:

The Aircraft Owners and Pilots Association (AOPA) is a not-for-profit individual membership organization of more than 400,000 pilots. AOPA's mission is to effectively serve the interests and needs of its members as aircraft owners and pilots and establish, maintain, and articulate positions of leadership to promote the economy, safety, utility, and popularity of flight in general aviation aircraft. Representing two thirds of all pilots in the United States, AOPA is the largest civil aviation organization in the world.

In response to the Notice of Scoping Session for Environmental Impact Report PA-0800105 for the Expansion of Forward, Inc. Landfill Site AOPA wishes to submit the following concerns to be addressed in the EIR. Both concerns fall under the Land Use section and relate to the landfill in relation to the Stockton Metropolitan Airport (SCK).

Of primary concern to AOPA and our members is the potential for an increase in bird activity near the expanded landfill that may result in bird strikes by aircraft and could result in significant property damage, injury and even loss of life. The new section of the landfill is directly under the extended runway centerline and approach for Runway 29 at SCK. Despite actions taken to minimize bird strikes they still occur, 17 since the beginning of 2010. We are concerned that the number of interactions between aircraft operating normally to the airport and birds attracted by the landfill will increase. We respectfully request that the Planning Department give full consideration to that and consult with wildlife experts to determine the increased risk to aircraft and best possible mitigation practices consistent with Federal Aviation Administration and state guidelines and compatible land use criteria.

Our other concern is the potential impact the added acreage will have on instrument approaches to Runway 29. As you may be aware, the FAA takes into account local terrain when they develop instrument approaches and apply a safety margin to ensure separation of aircraft and terrain. In general, terrain does not usually change but at a landfill, it is possible for it to grow in height and in doing so decrease the safety margin. The FAA then must raise the height that an aircraft can descend to over the terrain feature and in doing so may make the approach useless

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because the aircraft cannot descend low enough to make a safe landing at the airport. Again we respectfully request that this be addressed in the EIR and that the Planning Department consult with the FAA and state aviation office to ensure all instrument approach design criteria are evaluated and mitigated for without harm to the existing and planned instrument approaches at SCK.

Thank you for your consideration of our views in this scoping process. If you have any questions please contact one of our staff or myself at 301-695-2119.

Sincerely,

A handwritten signature in black ink, appearing to read "John L. Collins". The signature is written in a cursive style with a large, stylized initial "J".

John L. Collins  
Manager  
Airport Policy

cc:

Ms. Susan Palmeri, Manager, Stockton Metropolitan Airport  
Ms. Robin Hunt, Manager, FAA San Francisco Airports District Office  
Mr. Gary Cathey, Chief, Division of Aeronautics, CalTrans  
Mr. Richard Mesa, AOPA Airport Support Network Volunteer SCK