



**CALIFORNIA PILOTS ASSOCIATION**  
1414 K ST., 3RD FLOOR, SACRAMENTO, CA 95814

July 23, 2018

***VIA EMAIL (jfunderburg@sjgov.org)***

John Funderburg, Principal Planner  
San Joaquin County Community Development Department  
1810 East Hazelton Ave  
Stockton, CA 95295

***Re: Notice of Preparation of a Supplemental Environmental Impact Report (SEIR)  
App. No. PA-1800090 (UP) – Forward Landfill Expansion Project  
Comment On Scope Of SEIR***

Dear Mr. Funderburg:

The California Pilots Association (“CalPilots”) submits this comment letter in response to the above-referenced notice of preparation of a SEIR. Comments were requested by July 23, 2018. CalPilots submits these comments in compliance with the Department’s request.

Stockton Airport is a vital economic link for the Central Valley. It currently provides non-stop airline service to Mesa, AZ, Las Vegas, NV, and San Diego, CA (Allegiant Airlines). The airport is equipped with an ILS/Localizer approach and an RNAV (GPS) approach. As a result, it routinely serves as a training airport for instrument pilots. Many central valley airports do not have an ILS approach, meaning those airports with such approaches serve an important purpose, allowing aircraft to land during the Tule fog months. As a result, those approaches which bring aircraft low over the ground are critical for aviation safety during those months.

The site of the current landfill is approximately 2 miles from the end of Runway 29 at Stockton Airport. The site is offset to the north of the final approach course. According to your notice, the plan is for the landfill to expand both to the northeast and to the south. The southern expansion would bring the landfill closer, or potentially under, the final approach course for the ILS, Localizer, and the GPS approaches. In each approach, aircraft will be at an altitude at or above 500’ (RNAV) or 520’ (ILS/LOC) above ground level when abeam or over the landfill site.

Landfills have numerous qualities that interact poorly with aviation, two of which are wildlife and lighting. They attract birds, who present a danger to low flying aircraft as Captain Sully learned by losing two engines. They often operate 24/7, requiring the use of light towers and lights to illuminate the work area, lights that may confuse pilots as they descend through fog looking for lights.



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These issues are just some of the issues that should be addressed by an aviation study as part of the SEIR. CalPilots request such a study be included in the SEIR.

Please keep me informed of all notices, hearings, staff reports, briefings, meetings, and other events related to the proposed project. In addition, please notify me of the release of the draft supplemental EIR for the proposed landfill project to ensure CalPilots has an opportunity to comments.

Regards,

/s/Karl Schweikert

Karl Schweikert  
General Counsel  
California Pilots Association

Via Email ([Counsel@CalPilots.org](mailto:Counsel@CalPilots.org))