OFFICE OF THE CITY MANAGER

CITY OF PALO ALTO

250 Hamilton Avenue, 7th Floor
Palo Alto, CA 94301
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March 2, 2016

Glen A. Martin, Western Regional Administrator
Federal Aviation Administration
Western - Pacific Region Headquarters
15000 Aviation Blvd
Lawndale, CA 90261

Subject: FAA Initiative to Address Noise Concerns of Santa Cruz / Santa Clara / San Mateo / San Francisco Counties

Dear Mr. Martin,

On behalf of the City of Palo Alto and residents of Palo Alto, I would like to thank you and staff at the Federal Aviation Administration (FAA) for your commitment to providing the safest and most efficient aerospace system in the world. As a government agency we understand the pressures placed on your department with regard to the lack of budget predictability, the challenge of responding to diverse stakeholder interests, and ever present labor challenges to retain, recruit and train capable staff. We are also aware of the ongoing discussions about the privatization of the Air Traffic Control division through the upcoming 2016 FAA Reauthorization Act as well as the increased demand on the FAA with the advent of Unmanned Aircraft Systems (UAS) technology. Naturally, we are also cognizant of the increased workload that the NextGEN implementation is creating for your agency. Therefore, we are truly grateful for your willingness to work with Congresswoman Eshoo, Congresswoman Speier, and Congressman Farr to explore solutions to the significant negative impacts from the NextGEN implementation in our region, with attention to our concern about lost legacy routes that affect our city.

Overall we support the implementation of NextGEN, as the goals of reducing fuel consumption and carbon emissions align with our City's strong commitment to sustainability and protecting the environment. Furthermore, from an economic development standpoint, we value advances in technology which modernize our airspace management and the increase predictability of air travel. With that said, the NextGEN Optimization of Airspace & Procedures in the Metroplex (OAPM) redesigns have had significant negative impacts for our community, as flight paths have been changed.

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For these reasons, we have retained the service of Freytag & Associates to assist us in working with you and the region, to generate needed solutions to those impacts. Freytag & Associates will assist us with the three phases of the November 16, 2015 *FAA Initiative to Address Noise Concerns of Santa Cruz / Santa Clara / San Mateo / San Francisco Counties*. Specifically, Freytag & Associates will evaluate potential alternative air traffic routes and other mitigations, conduct operational and noise assessments, as well as sleep interference, classroom disruption and property valuation studies. Our representative for discussions with the FAA and other regional groups will be Dennis Hughes of the Freytag team.

The *Initiative* states that the first phase will conduct an "analysis and a preliminary feasibility study focusing on flight procedures criteria and overall fly-ability of the new Performance Based Navigation (PBN) procedures, potential procedural modifications including speed/altitude adjustments, airspace changes and possibility of moving existing waypoints."

The City's concern is that the FAA developed procedures which were implemented that have resulted in the current conditions. Those conditions have dramatically affected the quality of life for our citizens, due to noise and significant increases in flights and turns over Palo Alto.

In line with the letter issued by Congresswoman Eshoo and Congressman Farr on February 2, 2016, the City supports an FAA Select Committee for the cities and counties in the South Bay and Santa Cruz areas. In addition to the FAA Select Committee, the City recommends a *Task Force* similar to other FAA task forces at the request of the affected cities and counties. A good example of the *Task Force* we seek would have a similar composition to the task force resolving issues with the Palos Verdes Peninsula and the operational impacts of the Los Angeles International Airport.

The City, based on recommendation from our consultants, recommends that the *Task Force* include the FAA's Regional Offices of Flight Standards, Western Operations Support Group (WOSG), and Airports Division to be in attendance as the agenda or issues dictate. They would help provide the needed Subject Matter Expertise (SME) to resolve the task or issues on-site and help save time, expense and reduce misunderstanding. The key staff elements would be offered by the Managers of the NorCal Terminal Radar Approach Control (TRACON), and Oakland Air Route Traffic Control Center (ARTCC). Each facility would dedicate staff (one or two) from their respective Airspace and Procedures Department who are proficient with TARGETS (Terminal Area Route Generation, Evaluation, and Traffic Simulation) software and

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PDARS (Performance Data Analysis and Reporting System) and would be in attendance as the agenda or issues dictated. This composition would allow us to provide validation of flight procedures criteria, assess overall fly-ability, and identify potential procedural conflicts including speed/altitude adjustments, any new airspace boundary changes and the possibility of moving existing waypoints. Any additional coordination could be resolved at this level within their established protocols. The amended procedural packages would then be forwarded to the WOSG for final review and processing by the Flight Procedures Team (FPT) who would in turn post them to the Procedure Track System (PTS) for publication. The WOSG would facilitate at least ten production slots for the calendar year 2016. At least two of these would be facilitated by FAST TRAK processing. This methodology and process would be used to resolve all three phases.

We understand that the FAA will conduct the formal environmental and safety reviews, coordinate and seek feedback from existing and/or new community roundtables, members of affected industry, and the National Air Traffic Controllers Association (NATCA), as a matter of due process, before submitting any amended procedure for publication. The *Task Force* should be a collaborative effort of all vested entities, specifically technical consultants of the San Francisco International Airport (SFO) Community Roundtable, the City's technical consultant and professional technical consultants from impacted cities, counties, community noise groups and other airports. The *Task Force* would then present the findings to the SFO Community Roundtable and FAA Select Committee for review and approval.

The City believes that the Oakland Air Route Traffic Control Center (ARTCC) located in Fremont, CA, in conjunction with representatives from NorCal Terminal Radar Approach Control (TRACON), would be best to serve, initially, as the facility for preliminary fact finding and the central meeting location for the *Task Force*.

The City does understand that the FAA faces time and resource challenges. Therefore, secondarily, we would like to provide some specific proposals for the three SFO arrival routes (SERFR, OCEANIC, POINT REYES) that impact our City.

Proposal for SERFR:
The SERFR route has had a very negative impact on the quality of life in Palo Alto. The City's recommended solution is that one or more new WAYPOINTs be created and used in lieu of MENLO (FIX / WAYPOINT), to take advantage of the full length of the bay at much higher altitudes, as well as the full capability of Air Navigation (RNAV) to assign flights along multiple entry points to the Bay. The ability to have aircraft fly over water during much of the approach provides a unique solution for Silicon Valley communities.

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The City would like to use that ability as much as possible. We understand that a South-of-the-Bay entry is an adjustment which we think could be reviewed as part of the *Task Force*. We would also like to request a re-evaluation of the crossing altitude and position given to Standard Terminal Arrival Route (STAR) termination point.

Proposal for OCEANIC / POINT REYES:
The City endorses the *Initiative's* effort to develop a Required Navigation Performance (RNP) approach to Runways 28L/R from the west which would couple to a new RNAV STAR eliminating the current conventional POINT REYES ONE ARRIVAL. The new STAR would also provide vertical guidance for an Optimize Profile Descent (OPD). This would offer greater operational efficiency to the user and provide for a predictable ground track for the City and enhanced safety for general aviation users. Any development would be inclusive of the *Task Force* input. Oceanic arrivals could also use the RNP approach, thus eliminating low altitude vectoring and unstable descent which produces increased fuel flow engine thrust and increases noise and emissions.

Proposal for Nighttime Arrivals
The City requests that the FAA review proposals regarding nighttime flights within the first set of considerations. The City has received numerous complaints about sleep being disturbed late night and early morning.

In addition to our proposed solutions, the City has participated in many conversations with individuals and local community noise groups about proposed solutions. We are very appreciative of the time, energy and hard work of these individuals and noise groups. Their concern and passion has been critical to advancing this issue. But we are cognizant that our region's efforts require consensus; and also that earnest proposals from individuals and groups may create unintended consequences which professionals in the field of airspace management would not overlook. We encourage our neighboring City and County jurisdictions to retain professional consultants on behalf of their citizens who would bring forth qualified technical knowledge and assist with community education efforts.

In regards to the proposals from Quiet Skies of NorCal (QSNC), their results only address OCEANIC and SERFR flight tracks which are two of three routes that impact Palo Alto and the Mid-Peninsula. For OCEANIC, the City requests the FAA consider our proposed solution. With respect to SERFR, we believe that their solution is, at best, a short term solution. At this point there are conflicting opinions as to whether there will be relief for Palo Alto. We request that the FAA demonstrate the benefits to Palo Alto and the Mid-Peninsula cities before implementing changes to SERFR. Concurrently, we request that a

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comprehensive regional solution be developed by the proposed *Task Force*. We remain concerned that the proposal being presented by QSCN, or by any other group or individual, is not sanctioned or approved by any local government jurisdiction or a represented airport roundtable. Additionally, these proposals may satisfy certain perspectives without considering a comprehensive regional alternative. With that said, we do understand that all solutions being presented are preliminary steps in this *Initiative* process. Finally, we are also aware of additional letters being drafted by Mid-Peninsula residents and noise groups. To date neither the City nor our consultant have reviewed any such letters. Therefore we are not in a position to comment on them.

We look forward to working with the FAA and all stakeholders to find long term solutions for the airspace over Silicon Valley through the *Task Force*. The results of the *Task Force* would be shared with the FAA Select Committee and SFO Community Roundtable. And we again encourage our neighboring local City and County jurisdictions to retain professional consultants on behalf of their residents who could bring forth professional technical knowledge and assist with community education efforts. We appreciate the opportunity to comment on the *Initiative* and look forward to meeting you on March 7, 2016. Thank you very much for taking time to visit Silicon Valley.

Sincerely,

James Keene
City Manager

Cc. Congresswoman Anna Eshoo
Palo Alto Mayor and City Council
Santa Clara County Supervisor Joe Simitian

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February 2, 2016

Mr. Glen Martin, Western Regional Administrator
Federal Aviation Administration
15000 Aviation Boulevard
Lawndale, California 90261

Dear Mr. Martin,

Thank you for working with us to explore standing up a new FAA Select Committee made up of local elected officials from the cities and counties in the South Bay and Santa Cruz County.

As you know, the vast majority of our constituent complaints involve aircraft coming into the San Francisco Airport, not the San Jose Airport. We understand the SFO Airport Roundtable is considering adding an additional city, Palo Alto, to its existing membership of 23 elected officials. This, in our view, will not resolve the issues at hand and we do not support this approach. Santa Clara County has 15 cities within its jurisdiction and adding only one city as a voting member is not an equitable solution. Additionally, Santa Cruz County must have representation as well. Given the focus of the SFO Airport Roundtable on many issues that are not relevant to the South Bay, we believe a new Select Committee representing the entire region (three congressional districts) is necessary.

We greatly appreciate your leadership and support in helping to ensure that our constituents have a direct voice in FAA matters with you and FAA leadership through a new Select Committee with equal regional representation of local elected officials appointed through an appropriate body within each county that we represent. We recommend the new Select Committee hold regular meetings in each county so constituents can have easier access to the meetings.

Most gratefully,

Anna G. Eshoo
Member of Congress

Sam Farr
Member of Congress

cc: The Honorable Jackie Speier (CA-14)
Mr. John Martin, San Francisco International Airport Director
Mr. Cliff Lentz, Chairperson, SFO Airport Roundtable