

City of Palo Alto
Office of the Mayor and City Council

May 6, 2019

Mr. Dan Elwell, Acting Administrator
Federal Aviation Administration
800 Independence Ave SW
Washington, D.C. 20024

Subject: City of Palo Alto Response to FAA Initiative to Address Noise Concerns of Santa Cruz/Santa Clara/San Mateo/San Francisco Counties, Further Updates on Phase Two, dated December 2018 and April 2019

Dear Acting Administrator Elwell,

Thank you for the FAA's work to analyze, study, and advance recommendations of the Select Committee and the SFO Roundtable. The City of Palo Alto offers the following questions and requests in response to the December 2018 and April 2019 Updates on Phase Two.

First, we offer an overarching request. We ask the FAA to transparently communicate the rationale for decisions made and actions taken in these Update documents. While we respect the FAA's professional expertise and need to make managerial decisions regarding the feasibility of recommendations, we believe affected communities and constituents deserve to understand the data and analyses supporting these decisions. Simply stating in writing that a recommendation is infeasible does not educate local stakeholders about the contributing factors. If the communities within the region are to work cooperatively with the FAA, then transparency is required.

Class B Redesign

The redesign of the Class B Airspace creates possibilities for future policies and procedures that reduce noise impacts within the Northern California Metroplex. We thank the FAA for undertaking this effort.

The Select Committee supported this recommendation in order to relieve noise impacts. In order to understand if a reduction in noise impacts has occurred as a result of the Class B redesign, the FAA must share data and information regarding (a) if more aircraft have been able to maintain an OPD; and (b) if there has been a decrease in noise levels experienced on-the-ground by affected communities.

The redesign included the creation of additional waypoints, including the SIDBY waypoint which is directly over Palo Alto. The redesign maintained the MENLO waypoint, which also brings air traffic over Palo Alto. The City of Palo Alto asks for the FAA to (a) disclose any noise impacts that were analyzed as part of the redesign or noise impacts that have been recorded since the new airspace has been in use; (b) describe the procedures that use SIDBY and MENLO waypoints, including any changes to the procedures such as minimum altitudes, ground tracks, aircraft speed, air brakes, angles of descent, etc.; and (c) to describe the vectoring used by aircraft using the SIDBY and MENLO waypoints.

BSR Overlay

The City of Palo Alto looks forward to the formation of the Full Working Group and their first meeting in

P.O. Box 10250
Palo Alto, CA 94303
650.329.2477
650.328.3631 fax

June. Based on oral communications at the April 24, 2019 Santa Clara/Santa Cruz Counties Roundtable, the Full Working Group will consist of technical and aviation professionals, the airlines, and representatives from airports. The City asks for the FAA to share in writing the specific membership, scope, authority, and meeting schedule of the Full Working Group. The City of Palo Alto asks for the FAA to ensure that noise impacted communities are included in the conversation. How will the FAA ensure the Working Group considers the perspective of affected communities? What are the Full Working Group's means and methods for gathering input and incorporating public feedback? We ask that the FAA brief the SC/SC Roundtable on the Full Working Group's progress.

The City of Palo Alto also requests that the FAA collaborate with the Full Working Group to consider the Ground-Based Augmentation System (GBAS) system at SFO and the system's capacity to decrease noise impacts. The BSR overlay may achieve even greater relief from noise if combined with the technological advancement the GBAS. In order to take full advantage of the GBAS system, the FAA, SFO, and Full Working Group must work in collaboration to create approved paths of travel for aircraft that are compatible with GBAS.

BDEGA In-Trail Spacing

We appreciate the FAA's consideration of this recommendation from the SF Roundtable. While the Roundtable and neighboring communities hoped this recommendation would result in decreased use of speed brakes and thus minimization of noise impacts, we understand this has been deemed infeasible. We request the analyses be shared so that we can better understand the factors that prevent the implementation of this recommendation.

Revise Woodside VOR OTA

The City of Palo Alto applauds the FAA for formalizing this change that will bring some relief to neighboring communities by flying at higher altitudes. Nevertheless, we are troubled by the lack of community engagement during the planning and execution of the proposed changes. In addition to concerns about the lack of outreach, we are concerned that through the publication of PIRAT STAR TWO, air traffic will increase in volume as more airlines will have access to the route. Traffic will also increase as aircraft en route to Oakland International Airport will also be able to use the route. Lastly, PIRAT STAR TWO ends at the ARGGG waypoint. From that point, air craft are vectored at a 060 heading towards their final destinations. Because the procedure does not address vectoring after ARGGG, the procedure does not address the impacts to Palo Alto and other neighboring communities.

For a complete discussion of the City of Palo Alto's concerns, please see the City's letter to Dan Elwell dated November 13, 2018 (attached).

The FAA use new, more effective, time-based flow management tools for better sequencing

We join with the FAA, the Select Committee, and neighboring communities in recognizing the opportunity for new and emerging technologies to provide relief to communities impacted by air craft noise. We look forward to the FAA's engagement through the SC/SC Roundtable to explore how these efforts may impact local quality of life.

Additionally, we would like to understand if a visual approach to SFO's runway 28L would work with a GBAS landing system. Since the GBAS landing system may be soon used at SFO, we are curious if that system combined with the visual approach alleviates the safety concerns that have been identified.

While the FAA has yet to respond to our inquires and requests for information, we maintain hope that the FAA will work with the City of Palo Alto and our neighbors to resolve the issues challenging our City.

Sincerely,

DocuSigned by:
Eric Filseth
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Eric Filseth, Mayor
City of Palo Alto

Hon. Dianne Feinstein, U.S. Senate
Hon. Kamala D. Harris, U.S. Senate
Hon. Anna G. Eshoo, U.S. House of Representatives
Raquel Girvin, Regional Administrator, FAA Western-Pacific Region
Faviola Garcia, FAA, Senior Advisor, FAA Western-Pacific Region
Palo Alto City Council
Edward Shikada, Palo Alto City Manager
Molly Stump, Palo Alto City Attorney

