

City of Palo Alto  
Office of the Mayor and City Council

May 2, 2014

NorCal OAPM EA  
Federal Aviation Administration  
Western Service Center-Operations Support Group  
1601 Lind Avenue SW  
Renton, WA 98057

Re: City of Palo Alto Comments on the FAA Northern California Optimization of Airspace and Procedures in the Metroplex Draft Environmental Assessment Document Release

To Whom It May Concern:

The City of Palo Alto appreciates the FAA 10-day extension to comment on the Northern California Optimization of Airspace and Procedures in the Metroplex (NorCal OAPM) Environmental Assessment (EA). To appropriately evaluate the impacts of this project we reiterate our request for detailed route information and altitudes that have still not been provided. The 10-day extension allowed us to hold a public meeting to discuss the proposal and receive citizen input; however, our review was hampered due to the lack of critical altitude information.

Below is a list of comments the City of Palo Alto has on this proposal. The City of Palo Alto requests that each of these comments be addressed before any further action on this proposal is taken.

1. While the Design & Implementation Team Technical Report shows the anticipated procedure waypoints, it does not show altitudes of the new waypoints or the latitude/longitude of these new locations, which limits the City's ability to effectively comment. It is the City of Palo Alto's understanding that the FAA has this information and has not made it available to the public. This information is critical as there is no way to evaluate the aircraft position/elevations over the City of Palo Alto (i.e. possibility of lower altitudes and increased noise impact).
2. The City of Palo Alto requested that the FAA extend the public comment period on the Nor Cal OAPM environmental assessment by at least 60 days to allow the City of Palo Alto and other entities to make comments based upon complete information. The outcome of the environmental assessment cannot be accurately represented if critical information is absent from the published document or only available at the very last minute. At this time the altitudes have not be released to the public.
3. The City of Palo Alto is concerned that this project will increase or shift noise to the Palo Alto community.
4. The project directly involves airspace over the City of Palo Alto and yet the City was not notified by the FAA of the proposed project. (See attached San Francisco International flight tracks for a 24 hour period on April 18, 2014 the City of Palo Alto is highlight in green.) The City gained knowledge of this project third hand well after the March 25, 2014 release date.
5. The Report's *Design & Implementation Team Technical Report* shows the anticipated procedure waypoints but it does not show the altitudes of the new waypoints or the latitude/longitude of these new locations.
6. A Palo Alto resident testified that he has observed aircraft flying lower than they typically did in the past. Please clarify or confirm:
  - Have flight paths already changed prior to the EA and if so were the proper notification processes followed?

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701-08-01

- Are the aircraft that fly over the City of Palo Alto flying lower now than in the past?
  - Will aircraft be flying lower over the City of Palo Alto once this project is implemented?
7. Our job, as elected officials, is to provide Palo Alto residents with sound precise information from your report. We am not able to do so because of your report is lacking the technical data to do so.

We appreciate the opportunity to participate in this public process on the draft EA; however, it lacks the critical information necessary to properly evaluate the project and give complete comments. We look forward to the release of this critical information and sufficient time to incorporate that information into our response.

Sincerely,

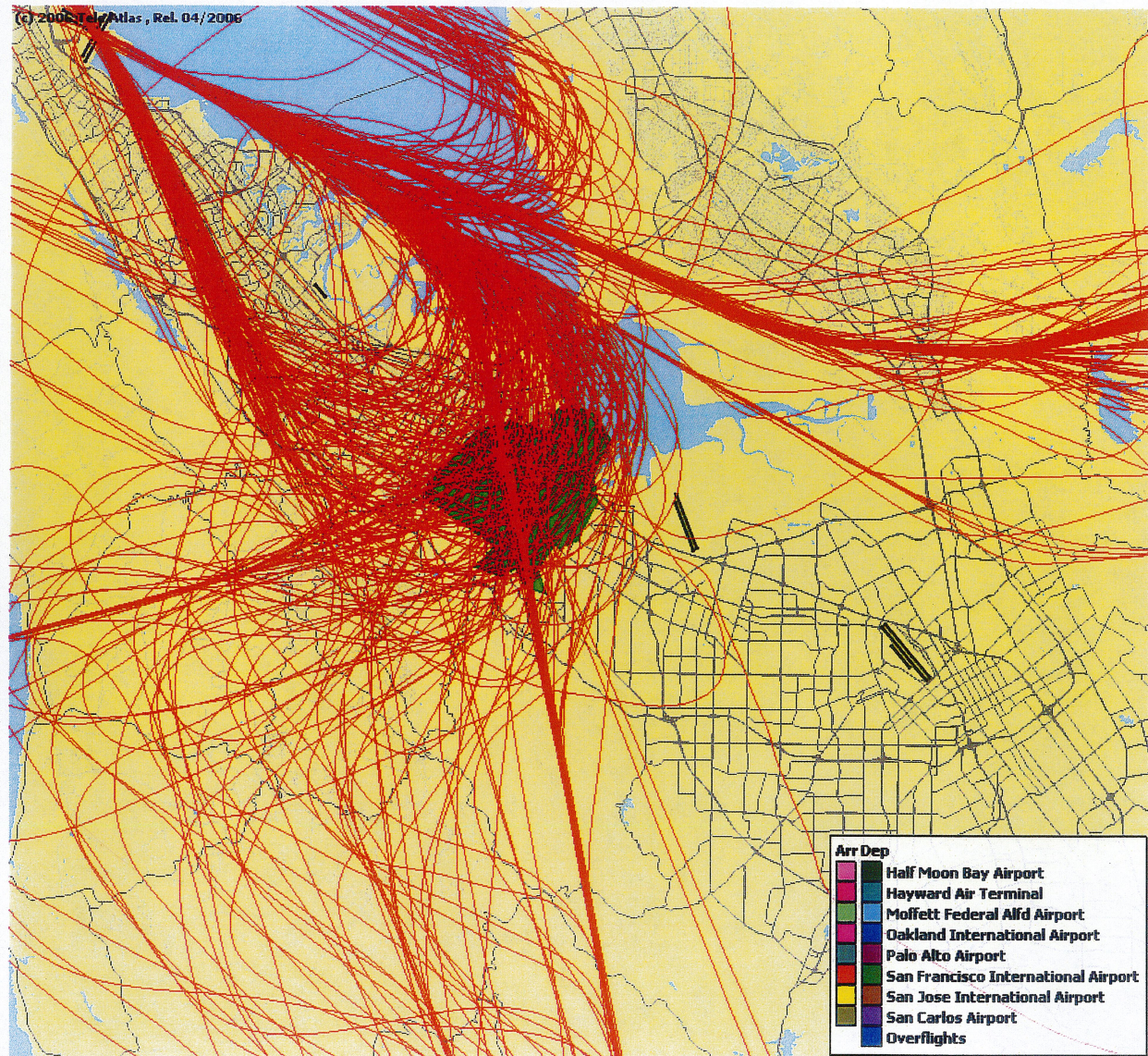


Nancy Shepherd  
Mayor, City of Palo Alto

cc: Congresswoman Anna Eshoo  
Congresswoman Jackie Speier  
Congresswoman Zoe Lofgren  
Congressmen Mike Honda  
San Francisco International Airport/Community Roundtable  
Palo Alto City Council  
James Keene, Palo Alto City Manager  
Molly Stump, Palo Alto City Attorney  
Mike Sartor, Palo Alto Public Works Director  
Andy Swanson, Palo Alto Airport Manager



San Francisco International flight tracks for a 24 hour period on April 18, 2014 the City of Palo Alto is highlight in green:





To: NorCal OAPM EA; Federal Aviation Administration  
Western Service Center – Operations Support Group  
1601 Lind Ave., SW, Renton, WA 98057

From: Madeleine Tammy Skoog, 3974 Bibbits Drive, Palo Alto, CA  
94303

Subject: Northern California Optimization of Airspace and Procedures in  
the Metroplex Draft Environmental Assessment

First, I want to thank the FAA and SFO for their presentations the week of 14 through 18 April 2014 in the San Francisco area. The information provided was very interesting. The presenters and representatives did a good job answering questions and clarifying any issues.

As background, in the city of Palo Alto we have been experiencing an increase in the amount of aircraft traffic. We have an on-line system where the topic of airplane noise is very busy with much information being traded as to policy. We are also familiar with the SFO Flight Tracker System, as well as the San Jose Airport Flight Tracker System which provides data on arriving and departing flights, equipment type, altitude, speed, and visual flight path of individual planes.

People are experiencing different levels of air traffic and noise based on location. Speaking for myself only I live in south Palo Alto near the junction of Louis Road and Charleston / Arastradero – which are well traveled thoroughfares in the city near the southern border of the city at Highway 101.

I am experiencing the following:

1. Flights coming overhead from Asia / Hawaii enter the area coming from the west and make the turn northward for arrival at SFO. These are very large planes.
2. Flights overhead from the northern states – Oregon and Washington come down the peninsula then rotate northward for arrival at SFO. These are both large planes and smaller commuter planes.
3. The staging of flights is producing a lower altitude for 747-400's and other planes which are preparing for their instruction to land. There is acceleration as well as a breaking to slow down depending on the specific flight instructions.
4. There are commuter planes and large plane coming from the Southern California area.

Bottom line: I am at the juncture for a portion of the air traffic – like a giant freeway interchange with on-ramps, slowing and speeding based on time of day and general traffic in the air. This is not all of the SFO bound traffic - it is the Pacific side traffic for the most part which has to speed up and slow down to join the traffic coming from the east US.

There is also traffic from / to the San Jose Airport which changes based on wind directions.

SFO is planning to close some runways from May to September which will disrupt the "normal" traffic routes. This is a concern since it is during the summer months when people are outside. It is unclear at this point how that will turn out. However, last year during a closure of some runways there was continual traffic and noise. There was also a very low altitude with some of the larger planes.

The noise level is varying based on the size and age of the plane. We do not have noise monitors in the Palo Alto area so there is no documentation of noise except people calling in to complain.

The major concern now is that SFO is contemplating a variance in how planes are directed in the flight path in order to save fuel. It is unclear what the end result of that will be. However, Palo Alto being the prescribed flight path for entry into a portion of the SFO arrival queue is problematical.

It would be appreciated if some type of requirement would be imposed that provides a minimum altitude based on size of planes. I have a copy of the SFO TAC Guide but it is clearly not being followed.

There is also a concern that a plane was visibly viewed as discharging while in flight – unclear what was being discharged -concern is toilets. I can appreciate on extremely long flights on very large planes where this could be a large problem but discharge over a populated area is not acceptable. This is like a cruise ship discharging in the bay.

We are aware that there is a San Francisco Airport Commission to coordinate SFO traffic concerns but Palo Alto is not an active member, despite the fact that it is the pivot point for transactions on queue / arrival and departure for aircraft in the air space. Since Palo Alto is a pivot point for aircraft direction then Palo Alto, as part of Santa Clara County needs a place at the table. It appears that SFO is working to support the demands of the San Mateo cities by moving the flow of traffic south.

Thank you for requesting this feedback – we are here to help and assist in the overall SFO experience.

Regards, Madeleine Tammy Skoog, 04/24/14

**Follow Up:**

This topic was discussed at the Palo Alto City Council Meeting 04.28.14. There will be follow-up action as more information is available and evaluated.