

September 10, 2018

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

Subject: November 2017 Update and April 2018 Further Update on Phase Two of the FAA Initiative to Address Noise Concerns of Santa Cruz/Santa Clara/San Mateo/San Francisco Counties

Dear Acting Administrator Elwell,

Thank you for the on-going work by FAA staff to address noise and safety issues Palo Alto and our neighbors have experienced since NextGen was implemented in the Northern California Metroplex. Specifically, the City would like to thank the FAA for strengthening the language in your standard operating procedures for Northern California TRACON to recognize BDEGA East as the preferred route during nighttime hours. A delegation of council members and I discussed this matter with your agency representatives when we met with them at your headquarters in early March 2018, and were appreciative to see your responsiveness on this issue. However, it is only one of our many concerns.

NextGen has significantly impacted Palo Alto and nearby cities because it concentrated air traffic in narrow aerial corridors, lowered altitudes, and increased the frequency of flights due to reduced separation between planes. As documented by the FAA in the Select Committee meetings, three SFO arrival procedures – totally 60% of SFO arrival traffic – fly within 2 miles of the MENLO waypoint and, therefore, directly over the City of Palo Alto. Our residents are subjected to about 350 noisy SFO arrivals per day, almost on a 24-hour basis. In addition, approximately 15% of the time, Palo Alto is impacted by SJC south flow arrivals. According to the FAA presentation to the Ad Hoc Advisory Committee on South Flow Arrivals in early 2018, approximately 50% of SJC south flow arrivals now make their turns over Palo Alto at altitudes below 3,000 ft. For health and safety reasons, it is imperative to redress this shifted, concentrated noise.

As you know, a new roundtable is being established to address the impacts of SFO and SJC arrivals on Santa Clara and Santa Cruz counties. In a commitment to regional problem solving and collaboration, the City Council of Palo Alto voted unanimously to join as founding member of this new roundtable. We look forward to the FAA's active engagement in and support of the Santa Clara/Santa Cruz Counties Airport/Community Roundtable.

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Regarding the FAA's November 2017 Phase Two response and April 2018 Update, the City of Palo Alto formally requests the FAA to consider the following actions:

- **Approach solutions holistically.** As the NorCal Metroplex is complex, a system-level and fact-based discussion would allow stakeholders to make progress on how to address the severe NexGen-induced noise problems. The FAA is the most qualified party to consider the system as a whole and suggest alternatives to garner relief. Please work with us via the new Roundtable towards this end.
- **Share estimated impact of FAA proposed changes before implementing.** While recent changes made by the FAA in the NorCal metroplex may be based on SFO Roundtable or Select Committee requests, none of the affected communities (including Palo Alto) are made aware of potential impacts before changes are implemented. We ask the FAA to share with community officials (or the Santa Clara/Santa Cruz Roundtable) the expected impact of proposed changes at least 60 days prior to their implementation. Examples of expected impacts would include changes in number and concentration of aircraft, ground tracks, altitudes, speeds, estimated noise levels as modeled by AEDT, and waypoints. We specifically request that the FAA provide an estimated impact of the upcoming PIRAT procedure for Oceanic arrivals including all assumptions made in the calculations.
- **Adhere to Select Committee conditions.** As stated in our November 15, 2017 letter to Mr. Huerta, reversions to the BSR ground track (recommendation 1.2 R1) were supported by members of the Select Committee on the condition of meeting nine requirements set forth by the Committee (recommendation 1.2 R2), including specific noise, altitude, and idle power criteria. We look forward to receiving an update from the FAA on this topic. We also hope that the FAA will be conducting an Environmental Impact Statement (EIS) for the proposed BSR overlay given the severity of the noise problem caused by eliminating the pre-NextGen BSR procedure. The FAA Environmental Assessment (EA) for SERFR concluded that there would be no significant impact, yet residents have filed millions of noise complaints since SERFR and its successor SERFR3 were implemented.
- **Provide additional explanations on proposals that could reduce noise, including but not limited to:**
 - a. Increased usage of BDEGA East over the Bay
We appreciate the FAA updating and strengthening its BDEGA East Standard Operating Procedure as stated in the FAA NorCal April 2018 Update. However, BDEGA East remains underused even though opportunities exist during early morning or late hours when DYAMD and OAK traffic is minimal.
 - b. Decreased usage of BDEGA West for flights coming from the east (ORD, JFK, BOS, PHL, etc.)
From an efficiency perspective, routing these planes through DYAMD seems to be a more appropriate route given the geography.
 - c. Consider a nighttime route for Oceanic arrivals that would connect to the BDEGA procedure over the Pacific Ocean and then use BDEGA East afterwards.
Although not included in the Select Committee or SFO Roundtable recommendations, we encourage the FAA to investigate such procedure as it would provide much

needed relief to our residents who experience several daily Oceanic arrivals during night time hours.

d. Create a night procedure to route southern SFO arrivals through the east side of the Bay.


The SFO Roundtable recommended a procedure similar to the LAX-OAK procedure for southern arrivals at night (recommendation B9). The FAA captured the recommendation under item 2.9 on page 25 in the FAA Update on Phase Two Report. The FAA answer pointed to item 2.9 on page 111 of appendix D, and then to item 1.23 on page 108 of appendix D, but it is not clear how either section addressed the recommendation. Palo Alto supports the SFO Roundtable's recommendation to develop a procedure for southern SFO arrivals, particularly at night, when traffic on DYAMD is significantly reduced.

In addition, we request that the FAA:

1. **Work with SFO on their GBAS implementation to reduce noise over mid-Peninsula communities.**
 - a. Coordinate with SFO to ensure that STAR procedures over the Peninsula take advantage of, and terminate at, higher and more dispersed final paths to SFO through RNP to GLS approaches.
 - b. Support making the BDEGA East an RNP to GLS charted approach, so it can be used more extensively, including during busy times.
2. **Investigate safety issues.** Our residents are concerned that the concentrated air traffic merging and mixing over Palo Alto at low altitudes is a safety hazard because large planes create substantial wake turbulences that may be hazardous to smaller aircraft. We ask the FAA to examine the safety of multi-airport traffic over Palo Alto.
 - a. SFO arrivals and SJC south flow arrivals frequently appear to fly in close proximity to each other (both in terms of minimum vertical and lateral separations) over densely populated residential areas at altitudes typically between 2,000 and 4,000 ft, and with vertical separations approaching or possibly violating the minimum 1,000 ft requirement.
 - b. In addition, regular SJC departure traffic, heading west and north, fly at about 4,000 ft. over Palo Alto.

The City of Palo Alto remains committed to working with the FAA, local airports, Congressional leaders, the new Santa Clara/Santa Cruz Roundtable, our neighboring cities, and all stakeholders to identify reasonable solutions to ensure safety and minimize noise over Silicon Valley residents as the FAA proceeds with its modernization of airspace and procedures in the NorCal Metroplex.

Sincerely,


Liz Kniss
Mayor

Cc: Hon. Dianne Feinstein, United States Senate
Hon. Kamala D. Harris, United States Senate
Hon. Anna G. Eshoo, United States House of Representatives
Dennis Roberts, Western-Pacific Regional Administrator, Federal Aviation Administration
Palo Alto City Council
James Keene, City Manager
Molly Stump, City Attorney