



# City of Palo Alto

## City Council Staff Report

(ID # 4725)

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**Report Type: Inter-Governmental Legislative Affairs    Meeting Date: 4/29/2014**

**Summary Title: FAA Metroplex EA**

**Title: Discussion and Direction to City Manager Regarding City of Palo Alto Response to the FAA Draft Environmental Assessment (EA) Regarding the Northern California Optimization of Airspace and Procedures in the Metroplex (NorCal OAPM)**

**From: City Manager**

**Lead Department: Public Works**

On March 25, 2014, the Federal Aviation Administration (FAA) released for public review and comments a draft Environmental Assessment (EA) on potential actions involving the airspace management for flights in the Northern California Metroplex area. This project involves changes in flight routes and altitudes in certain areas and in particular for aircraft arriving and departing from the four major airports in the Bay area: San Francisco, Oakland, San Jose and Sacramento. The proposed action does not require an increase in the number of aircraft operations or involve additional aircraft landings. Over the past few years, the FAA has been implementing airspace management programs nationwide and the Bay area is one of the last regions to be implemented. The FAA has stated these programs are necessary for flight safety as well as fuel economy.

This program is unrelated to the potential flight path change proposed last December by Surf Air that a number of community members were concerned about.

The original deadline for public comments on the EA was April 24. However, the City joined with other agencies to urge the FAA to extend the public comment period, and to provide critical information regarding airplane altitudes (Attachment A, B and C). Staff believes the FAA should provide the altitude information.

At the special request of Congress members Eshoo and Speier, the FAA has extended the comment period to Sunday, May 4, 2014. The requested critical information has still not been released. Therefore, 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). In an abundance of caution, the EA comment letter (Attachment D) was sent on Thursday April 24, 2014. The recently announced extension of public comments to May 4 allows for Council and public discussion, as well as the opportunity to amend the original comment letter.

The full Environmental Assessment of the project can be found at [http://oapmenvironmental.com/norcal\\_metroplex/norcal\\_docs.html](http://oapmenvironmental.com/norcal_metroplex/norcal_docs.html).

**Attachments:**

- Letter from Palo Alto Mayor Shepherd to Secretary of State Transportation Foxx (PDF)
- Letter from Congresswomen Eshoo and Speier to State Secretary of Transportation Foxx (PDF)
- Letter from San Francisco Community Airport Roundtable to FAA (PDF)
- EA Comment Letter from Palo Alto City Manager to FAA (PDF)

April 10, 2014

The Honorable Anthony Foxx  
Secretary of Transportation  
United States Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

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

Dear Secretary Foxx,

The Federal Aviation Administration (FAA) has given notice of proposed changes to the published routes of aircraft landing and taking off from San Francisco International Airport and other airports in Northern California. The published document is generally referred to as the Northern California (Nor Cal) Optimization of Airspace and Procedures in the Metroplex (Nor Cal OAPM) Environmental Assessment. Pursuant to federal law, the FAA published the assessment and invited public comment for 30 days.

The City of Palo Alto concurs with our local Congresswomen and other agencies that additional time is needed to receive critically-needed information about the altitude of airplanes along the new routes. The FAA states that it will determine if the information can be made available and, if so, how quickly it can be disseminated. As things stand at the moment, the 30 day time period would be nearly exhausted before this critically-needed information would become publicly available. The altitude of airplanes over Palo Alto heavily influences how much noise is imposed upon residents. Since the FAA has the information, we believe that the City should also have it. Additionally, the City should be given time to incorporate the information into its comments on the Environmental Assessment.

The City of Palo Alto therefore respectfully urges you to instruct the FAA to extend the public comment period on the Nor Cal OAPM environmental assessment by at least 60 days so that the City of Palo Alto and other entities may make judgments based upon information that the FAA has but that is not currently in the public domain. We feel that the purpose of the Environmental Assessment cannot be well served if critically-needed information is absent from the published document or only available at the very last minute. Thank you for your time and consideration of this request. Because the 30 day written comment period ends only a few weeks from now on April 24<sup>th</sup>, we respectfully ask for your timely attention to this matter.

Sincerely,



Nancy Shepherd  
Mayor, City of Palo Alto

cc: Palo Alto City Council  
Palo Alto City Manager  
Members of the San Francisco Airport Community Roundtable  
Congresswoman Anna Eshoo  
Congresswoman Jackie Speier

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

**Congress of the United States**  
**Washington, DC 20515**

April 4, 2014

The Honorable Anthony Foxx  
Secretary of Transportation  
United States Department of Transportation  
1200 New Jersey Avenue, SE  
Washington, DC 20590

Dear Secretary Foxx,

The Federal Aviation Administration (FAA) has given notice of proposed changes to the published routes of aircraft landing and taking off from San Francisco International Airport and other airports in Northern California. The published document is generally referred to as the Northern California (NorCal) Optimization of Airspace and Procedures in the Metroplex (NorCal OAPM) Environmental Assessment. Pursuant to federal law, the FAA published the assessment and invited public comment for 30 days.

It is our opinion and the opinion of local government leaders that additional time is needed to receive critically-needed information about the altitude of airplanes along the new routes. The FAA states that it will determine if the information can be made available and, if so, how quickly it can be disseminated. As things stand at the moment, the 30 day time period would be nearly exhausted before this critically-needed information would become publicly available. The altitude of airplanes over communities heavily influences how much noise is imposed upon residents. One can view a line on paper or on a map but without altitude information one cannot begin to estimate the noise impacts. The FAA has the information. We believe that the public should also have it and, just as importantly, that the public should be given time to incorporate the information into its comments on the Environmental Assessment.

We therefore write to respectfully urge you to instruct the FAA to extend the public comment period on the NorCal OAPM environmental assessment by at least 60 days so that the public and its representatives may make judgments based upon information that the government has, but that is not currently in the public domain. We all want to have a safe, well-functioning aviation system. We believe that this objective is in the public interest. We also believe that the purpose of the Environmental Assessment cannot be well served if critically-needed information is absent

from the published document or only available at the very last minute. Thank you for your time and consideration of this request. Because the 30 day written comment period ends only a few weeks from now—on April 24<sup>th</sup>—we respectfully ask for your timely attention to this matter.

All the best,



Anna Eshoo  
Member of Congress



Jackie Speier  
Member of Congress

cc: Members of the San Francisco Airport Community Roundtable

Ms. Elizabeth Ray, Vice President, Mission Support Services  
Air Traffic Organization  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591



San Francisco International  
Airport/Community Roundtable

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Redwood City, CA 94063  
T (650) 363-1853  
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[www.sforoundtable.org](http://www.sforoundtable.org)

April 3, 2014

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

Re: Extension of OAPM Environmental Assessment Public Comment Period

This comment is in reference to the Draft Environmental Assessment (DEA) released on March 25, 2014. The release included all chapters of the DEA and technical reports except the *Design & Implementation Team Technical Report*, which contains details to the enhancements of IFR procedures. This report was released on March 31, 2014. While the *Design & Implementation Team Technical Report* shows the anticipated procedure way points, it does not show altitudes of the new waypoints or the latitude/longitude of these new locations.

At the April 2, 2014 regular meeting of the SFO Airport/Community Roundtable (Roundtable), the group asked the attending FAA representation for additional design information be made public during the comment period, including altitudes of the way points and the procedure approach and departure plates. Should this information become available during the comment period, we anticipate the existing 30 day comment period will be inadequate to review the changes. We respectfully request a comment period extension of 60 days in anticipation of reviewing the waypoint and associated altitude information.

A key part of the Roundtable's mission is to continually abide by Article II Section 5 of its Memorandum of Understanding, "that the Roundtable members, as a group, will not take an action(s) that would result in the "shifting" of noise from one community to another, related to aircraft operations at San Francisco International Airport." It is our intention to fulfill this article for our stakeholders in San Mateo County and the City and County of San Francisco through a thorough review of the DEA in its entirety, including technical reports.

Regards,

A handwritten signature in blue ink that reads 'Cliff Lentz'.

Cliff Lentz  
City of Brisbane  
Chair, San Francisco Airport Community Roundtable





OFFICE OF THE CITY MANAGER

CITY OF  
**PALO  
ALTO**

250 Hamilton Avenue, 7th Floor  
Palo Alto, CA 94301  
650.329.2392

April 24, 2014

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

*City of Palo Alto Public Comment: FAA Northern California Optimization of Airspace and Procedures in the Metroplex (NorCal OAPM) Draft Environmental Assessment (EA) Document Release.*

These comments are in reference to the Draft Environmental Assessment (DEA) released on March 25, 2014. We have reviewed the draft EA, and provide the following written comments as part of the public comment period.

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 result in the shifting of noise from one community to another related to aircraft operations over the city of Palo Alto.
4. And lastly, 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. The City gained knowledge of this project third hand well after the March 25, 2014 released date.

We appreciate the opportunity to participate in this public process.

Sincerely,

James Keene  
City Manager

Cc: Congresswoman Anna Eshoo  
Congresswoman Jackie Speier  
Mayor and Council Members  
San Francisco International Airport/Community Roundtable  
Molly Stump, City Attorney  
Mike Sartor, Public Works Director  
Andy Swanson, Airport Manager



[CityOfPaloAlto.org](http://CityOfPaloAlto.org)