

County of Santa Clara
Roads and Airports Department



101 Skyport Drive
San Jose, California 95110-1302
1-408-573-2400

November 8, 2019

Mark A. McClardy
Federal Aviation Administration
777 S. Aviation Blvd. Suite 150
El Segundo, CA 90245

Dear Mr. McClardy:

Thank you for your letter of October 18, 2019 to County of Santa Clara Board of Supervisors President Simitian regarding Reid-Hillview Airport (RHV) and related issues. This letter provides the County's initial response to the issues raised in your correspondence.

In order to ensure that the FAA has a clear understanding of the County's recent actions regarding Reid-Hillview Airport, the County believes it is important to understand what the Board of Supervisors did and did *not* decide last December. On December 4, 2018 the Board of Supervisors considered recommendations from the administration regarding an update to the Business Plans for the County Airports which include RHV and San Martin airports. The manager and assistant manager of the FAA's San Francisco Airport District Office were in attendance and provided testimony during the public comment portion of the hearing. At the conclusion of the hearing the Board of Supervisors approved a motion to direct the administration to perform eleven distinct items of work. Attached are official minutes from the meeting as well as a summary of the eleven items in the motion.

As indicated, the motion did not contain any direction to close RHV and replace it with affordable housing. Instead the Board directed the administration to evaluate key issues to better inform the Board and the community about the impact of the existing airport on its neighbors, the possible uses of the land if the airport were to close, implications for San Martin Airport, and direction to pursue property releases for airport parcels not needed for aviation purposes. The Board specifically adopted a policy statement that the County would not apply for Airport Improvement Program (AIP) grants for RHV and directed the administration to apply for AIP grants at San Martin. As you can see, there is a great deal of study and public discourse that will have to occur before any decision is made regarding the future of RHV.

Your letter also references improvements that the FAA believes would be necessary at San Martin Airport should RHV close. The County is aware of the capacity and constraints at San

Martin and believes that a discussion on the impacts to San Martin should RHV close are premature at this time. Significant study of the surrounding airports' aviation capacity would be necessary for the BOS to consider alternative uses at RHV.

Your letter goes on to describes the airfield conditions at RHV and asserts some perceived discrepancies with FAA and Caltrans standards. At the outset, the FAA should be aware that the County is cognizant of the signage issues identified in your letter. It is important to understand, however that when RHV was constructed, the design standards were considerably different than they are today. As a result, at RHV, the distances between runways and taxiways and the size of the Runway Safety Area (RSA) do not meet current FAA standards and are unlikely to change. This results in many challenges when attempting to apply current signage standards to a non-standard airport. Older airports often do not meet current design standards in a number of respects and yet are considered safe.

Further, the County does not agree with the FAA's characterization of the RHV runway condition as poor. In fact the County has invested significant capital in the airfield surfaces recently though a repaving and marking project that was completed in early 2019. The citation of runway incursion increases in your letter does not indicate a correlation to signage and marking issues raised in your letter. The County would welcome an open exchange of information so that we can better understand your concerns.

As detailed below, the County has acted over the years to address signage issues to assure that pilots can navigate across the airfield considering the limitations imposed by the physical layout and geometry of the airfield and the actual sightlines pilots experience.

Most of the signage at RHV was previously approved by the FAA and included in federally funded Airport Capital Improvement Program (ACIP) grants.

The County is very mindful of the desire of the FAA to standardize the pilot's experience at airports nationwide and believes that is a worthwhile endeavor, however given the multitude of different airport sizes and configurations across the country a one size fits all approach is not feasible. With that said, the County will continue to work on these concerns as resources allow.

With those general comments, below are responses to the specific signage issues raised in your letter.

Comments from FAA site visit of August 16, 2019

1. *Non-standard exit signs at the southeast end of Runway 13L-31R* - These signs were installed as part of an FAA approved Airport Capital Improvement Program (ACIP) 3-06-0225-10 and partially paid for and approved by the FAA. At the time of installation, the sign was approved by the FAA.
2. *Taxiway Z directional signage* – The geometry of Taxiway Z is such that it is not possible to install upright signs in their “standard” location and have them visible to pilots that have just exited the runway. As part of the paving project completed in

2018 surface painted signage was added to the airport and the upright signs were removed.

3. *Holding positioning signs for Runway 13L on Taxiway E* - There is a holding position sign installed on the right side of the taxiway. This sign location was approved by the FAA and included in ACIP 3-06-0225-10. At that time an evaluation was made based on the current configuration of the airport and it was determined that placing the sign in the "standard" (pilots side) location would move the sign so far left of the taxiway centerline that its placement would cause potential runway incursions. New markings of the boundary of the runup area were installed in 2018.
4. *Runway 31-13 destination sign on the right side of Taxiway D* - The sign placement was included in ACIP 3-06-0225-10, which was approved and funded by the FAA. The RSAT team suggested removing the sign. Airport administration did not agree with that suggestion because there was no data to suggest that the sign was a contributing factor to any V/PD or PD.
5. *Taxilane G & F signage located just west of Taxiway Z* - The sign placement was included in ACIP 3-06-0225-10, which was approved and funded by the FAA. Those are the only situational signs for Taxilane F and G and removal of the signs may confuse pilots and lead to potential V/PD. At this time there is no plan to remove these signs. The additional sign referenced in this item was a Taxiway Z sign that was removed as part of the 2018 paving project (item 2 above).

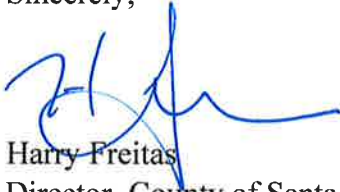
Comments from the Caltrans compliance inspection of March 21, 2019

1. *Helicopter pads* - These pads are on County property leased to a private entity and were installed and marked by the leaseholder. Airport administration has reviewed the findings of the inspection with the leaseholder who has since remarked the helicopter pads.
2. *Runway Safety Area for 31R and 31L* - The FAA approved Airport Layout Plan for RHV shows a shift of the runways to the north to accommodate the newly mandated RSA area. This project will be implemented by the County when funds become available.
3. *Abandoned Visual Approach Slope Indicator* - That abandoned equipment belongs to the FAA and was recently replaced with Precision Approach Path Indicators. A request has been placed with the FAA to have the equipment removed. Your assistance encouraging the FAA to remove your abandoned equipment would be greatly appreciated.
4. *Segmented circle issue* - The existing configuration of the segmented circle was approved by the FAA and installed as part of ACIP 3-06-0225-08. This is a new finding by the inspector and may be addressed when the County completes a lighting and signage project.

We appreciate the opportunity to continue to work with the FAA on issues regarding the County's airports. Should you have any questions, please call me at 408-573-2438.

We appreciate the opportunity to continue to work with the FAA on issues regarding the County's airports. Should you have any questions, please call me at 408-573-2438.

Sincerely,



Harry Freitas

Director, County of Santa Clara Roads & Airports Department

Enclosures:

1. Meeting Minutes;
2. Summary of Actions at December 2018 BOS Meeting

Cc: Supervisor Mike Wasserman, District 1, County of Santa Clara
Supervisor Cindy Chavez, District 2, County of Santa Clara
Supervisor Dave Cortese, District 3, County of Santa Clara
Supervisor Susan Ellenberg, District 4, County of Santa Clara
Supervisor S. Joseph Simitian, District 5, County of Santa Clara
John Carr, Airports Commission, County of Santa Clara
John Aitken, Director, Norman Y. Mineta San Jose International Airport
Raquel Girvin, FAA Regional Administrator
Tony DiBernardo, FAA Air Traffic Organization (ATO)
Joe Santoro, Runway Safety Program Manager, FAA Air Traffic Organization (ATO)
Laurie Suttmeier, Manager, San Francisco ADO, FAA Office of Airports
Amy Choi, Division Chief, Caltrans Division of Aeronautics

17 RESULT: APPROVED [UNANIMOUS]
MOVER: Cindy Chavez, Vice President
SECONDER: Dave Cortese, Supervisor
AYES: Wasserman, Chavez, Cortese, Yeager, Simitian

18. Held from November 20, 2018 (Item No. 23): Consider recommendations relating to bids for Capital Project 263-CP19003 "Relocate 2nd Floor Dental Suite at Main Jail North." (Facilities and Fleet Department) (ID# 93983)

Possible action:

- a. Award contract to Agbayani Construction Corporation in the amount of \$709,000 with a construction time of 160 working days.
- b. Approve encumbrance of additional \$100,000 as Supplemental Work Allowance for a total encumbered amount of \$809,000.
- c. Authorize County Executive, or designee, to issue Change Orders, as necessary, against the allowance for Supplemental Work and to approve modifications to the construction time consistent with Public Contract Code Section 20142.
- d. Ratify Addendum to Bid Documents Nos. 1 through 3 which modified or clarified the Bid Documents in response to contractor questions.

Added to the Consent Calendar at the request of Supervisor Wasserman.

18 RESULT: APPROVED [UNANIMOUS]
MOVER: Cindy Chavez, Vice President
SECONDER: Dave Cortese, Supervisor
AYES: Wasserman, Chavez, Cortese, Yeager, Simitian

Time Certain - Airports Business Plan - To Be Heard No Earlier Than 1:00 p.m.

19. Under advisement from the December 12, 2017 Board meeting (Item No.21): Receive report from the Roads and Airports Department relating to the Airports Business Plan Update. (ID# 93897)

Taken out of order after Item No. 22.

Seventy-two individuals addressed the Board.

On motion of Vice President Chavez, seconded by Supervisor Cortese, the Board approved a policy statement that the County will not apply for Airport Improvement Program grants for Reid-Hillview Airport and will make General Fund-funded improvements necessary to safely operate Reid-Hillview; and, directed Administration or its designee to accept \$1 million in Federal Aviation Administration (FAA) entitlement funding related to the airfield repaving project at the San Martin Airport to help pay down the outstanding General Fund loan, to apply for property releases at Reid-Hillview Airport from the FAA consistent with the Business Plan Update, to invite

the City of San Jose to engage in a joint planning process within the next two years relating to use of the Reid-Hillview and Eastridge areas, including possible alternative uses after 2031, to develop a plan, including a transparent community engagement process that includes, but is not limited to, engaging the City of San Jose, to consolidate the County's aviation uses at San Martin Airport based on the Housing, Land Use, Environment, and Transportation Committee's Option 3 identified in staff's presentation, to develop a plan to implement improvements necessary to ensure adequate traffic flow and safety on East San Martin Avenue, Highway 101, and adjacent roadways, to establish a Capital Plan to implement improvements at the San Martin Airport, including both General Fund-funded and FAA-funded improvements, to report to the Board with a recommended plan to analyze and address any concerns regarding airborne lead and associated concerns, to engage San Jose State University relating to negotiations for possible accommodation at the San Martin Airport, to engage Office of Emergency Services partners relating to consideration of capacity for emergency and disaster response should a change of use occur at Reid-Hillview Airport, and to engage the aviation community in determining the feasibility of allowing only non-lead aviation fuel at the Reid-Hillview and San Martin Airports.

19 RESULT: APPROVED AS AMENDED [3 TO 2]
MOVER: Cindy Chavez, Vice President
SECONDER: Dave Cortese, Supervisor
AYES: Chavez, Cortese, Yeager
NAYS: Wasserman, Simitian

Board Referrals

20. Approve referral to Santa Clara County Fire District and Administration to report to the Board of Supervisors no later than February 2019 relating to preparedness planning and County Fire needs given the ever-increasing threats of large-scale fire incidents in the County and throughout California. (Chavez) (ID# 94470)

Taken out of order after Item No. 9.

Approved as amended to direct Administration and the Administration of the Santa Clara County Central Fire Protection District to report to the Board in March or April 2019, at the request of Tony Bowden, Chief, Santa Clara County Fire Department, to ensure sufficient time to coordinate with the South Santa Clara County Fire District and California Department of Forestry and Fire Protection.

At the request of Supervisor Wasserman, the Board further directed Administration to involve the Roads and Airports Department in the assessment of resources.

20 RESULT: APPROVED AS AMENDED [UNANIMOUS]
MOVER: Cindy Chavez, Vice President
SECONDER: Ken Yeager, Supervisor
AYES: Wasserman, Chavez, Cortese, Yeager, Simitian

SCC Airports Business Plan Referral

At the request of Vice President Chavez, the Board approved:

1. A policy statement that the County will not apply for Airport Improvement Program grants for Reid-Hillview Airport and will make General Fund-funded improvements necessary to safely operate Reid-Hillview,
2. Directed Administration or its designee to accept \$1 million in Federal Aviation Administration (FAA) entitlement funding related to the airfield repaving project at the San Martin Airport to help pay down the outstanding General Fund loan
3. To apply for property releases at Reid-Hillview Airport from the FAA consistent with the Business Plan Update
4. To invite the City of San Jose to engage in a joint planning process within the next two years relating to use of the Reid-Hillview and Eastridge areas, including possible alternative uses after 2031
5. To develop a plan, including a transparent community engagement process that includes, but is not limit to, engaging the City of San Jose, to consolidate the County's aviation uses at San Martin Airport based on the Housing, Land Use, Environment, and Transportation Committee's Option 3 identified in staff's presentation
6. To develop a plan to implement improvements necessary to ensure adequate traffic flow and safety on East San Martin Avenue, Highway 101, and adjacent roadways
7. To establish a Capital Plan to implement improvements at the San Martin Airport, including both General Fund-funded and FAA-funded improvements
8. To report to the Board with a recommended plan to analyze and address any concerns regarding airborne lead and associated concerns

9. To engage San Jose State University relating to negotiations for possible accommodation at the San Martin Airport
10. To engage Office of Emergency Services partners relating to consideration of capacity for emergency and disaster response should a change of use occur at Reid-Hillview Airport
11. And to engage the aviation community in determining the feasibility of allowing only non-lead aviation fuel at the Reid-Hillview and San Martin Airports.