



U.S. Department
of Transportation

**Federal Aviation
Administration**

Western-Pacific Region
Office of Airports

777 S. Aviation Blvd., Suite 150
El Segundo, CA 90245

October 18, 2019

Joe Simitian
President
Board of Supervisors
County of Santa Clara
70 West Hedding Street
East Wing, 10th Floor
San Jose, CA 95110

Dear Supervisor Simitian:

It is the Federal Aviation Administration's (FAA) understanding that the Santa Clara County (County) Board of Supervisors (Board) has publicly announced plans to close the Reid-Hillview Airport (RHV) and would like to use the land for low income housing. It is also our understanding that the Board voted to no longer accept Airport Improvement Program (AIP) grant funding for needed airport infrastructure projects at RHV. The purpose of this letter is fourfold:

1. To clearly articulate the FAA's objection to the Board closing RHV,
2. To convey federal obligations the Board must consider with respect to RHV,
3. To notify the Board of the FAA's safety concerns associated with respect to RHV airfield conditions,
4. To encourage the Board to reconsider requesting AIP funding to address safety concerns expressed by both the FAA and CALTRANS.

Reid Hillview Airport Serves a Critical Role

The FAA strongly opposes the closure of RHV. The FAA would like for the Board to revisit RHV's functional importance and consider alternatives that would enhance airport safety and its contribution to the surrounding community.

RHV serves a critical need for the greater San Jose area as well as the National Airspace System (NAS). In particular:

- RHV is an important asset in the National Plan of Integrated Airports System (NPIAS). The FAA has designated RHV as a reliever airport to both San Jose International Airport (SJC) and San Francisco International Airport (SFO). As a designated reliever airport, RHV has aviation facilities that support usage by a large number of smaller, slower, aircraft that may otherwise operate out large airports like SJC that serve the region's air carrier and corporate demand.
- Based on public comments received at your December 2018 meeting as well as the County's Airports Business Plan, RHV has nine Fixed Based Operators and complements the general aviation activities of the Palo Alto, San Martin and San Carlos airports.

- RHV serves users that are training to fly under Instrument Flight Rules (IFR) conditions that need to operate at an airport with an Airport Traffic Control Tower (ATCT). If RHV were to close, these aviation users would need to relocate to an airport with an ATCT.
- RHV is currently utilized by San Jose State University to conduct classes offered by the Department of Aviation and Technology. If RHV becomes unavailable, the program would need to relocate to another airport, most likely in relatively close proximity to the main university.

We understand that some on the Board may believe that upon closure of RHV the County's other airport, San Martin (E16), will accommodate traffic currently at RHV. This expectation is unrealistic given the limited facilities currently at E16. The Board will need to make substantial improvements at E16, prior to the closure of RHV, if it intends for that airport to serve the same role as RHV. Some of the improvements may not be eligible for AIP funding and would therefore need to be funded by the County. Simply put, if RHV were to close, the Board would need to ensure that E16 had the following facilities in place if E16 were to accommodate users currently at RHV:

- RHV has an ATCT whereas E16 has no ATCT. An ATCT would be needed at E16 to support the IFR flight training currently offered at RHV.
- RHV has two parallel runways that are about 3100' long x 75' wide whereas E16 has one runway that is about 3100' long and 75' wide. E16 will need two runways to support users and traffic currently at RHV.
- RHV has 4 box Precision Approach Path Indicator (PAPI) whereas E16 has a 2 box PAPI. E16 would require a 4 box PAPI to provide the same level of safety currently at RHV.
- RHV has Non-Precision Runway Markings whereas E16 has basic runway markings. E16 would require upgraded runway markings to provide the same level of safety currently at RHV.
- RHV has Runway End Identifier Lights (REIL) whereas E16 has no REIL. E16 would require REILs to provide the same level of safety currently at RHV.
- The Board will need to invest in additional hangers and/or tie down areas at E16 to accommodate aircraft currently at RHV.

We appreciate the County's interest in finding adequate locations to build low income housing, however, we ask the Board to also consider the adverse impacts of closing RHV. RHV is part of a system of airports that support the economic viability of the County. Closing RHV will force aviation users accounting for about 165,000 annual operations to relocate to other airports in the area. Please understand that many of the public use airports in the Bay Area are physically constrained and may find it difficult to absorb the air traffic activity currently served by RHV.

Federal Obligations For Maintaining A Safe and Efficient Airfield At County Airports

The top priority for the FAA is maintaining safety in the NAS. One important component of our ongoing efforts to manage surface safety within the NAS, is to ensure airport infrastructure is properly maintained at airports such as RHV. When the County accepted AIP funds (most recently in 2011), it agreed to certain obligations (or assurances). A list of these Federal Grant Assurances is attached. These assurances obligate the County to maintain and operate their airport facilities safely and efficiently, and in accordance with specified safety standards, including, but not limited to Assurance 11, *Pavement Preventive Maintenance*; and Assurance 19, *Operation and Maintenance*. The County's obligations related to Assurance 19 at RHV are of great concern to the FAA. We point out that regardless of the Board's desire to close RHV in 2031, the County's investment in RHV must commence immediately to ensure the airport's facilities are maintained and operated safely and efficiently, and in compliance with Federal Grant Assurances.

On December 4, 2018, airport management made a presentation to the Board where they outlined about \$10 million that would be required over the next 10 years to maintain RHV's infrastructure in a safe manner and in compliance with both State and Federal requirements. While the Board may choose to use other sources, such as loans or General Funds, to maintain RHV please note that AIP grant funding would cover about 90% of the County's cost for addressing existing AIP airfield discrepancies at RHV.

Regardless of the funding source chosen to address airfield concerns at RHV, it is the FAA's expectation that the Board will make the appropriate investment to ensure a safe operating environment for aircraft and tenants currently operating out of the airport.

Airfield Conditions at Reid-Hillview Airport

The FAA's Runway Safety Action Team (RSAT) recommended changes to markings and signage at RHV in fiscal year 2009. The FAA San Francisco Airports District (ADO) and Regional Office of Airports, along with the California Department of Transportation Division of Aeronautics have identified safety concerns based on their airport inspections and site visits over the past 10 years. On June 4, 2019, an RHV user notified the FAA that RHV still had several uncorrected discrepancies related to Airport signage and markings. The FAA personnel conducted a site visit on August 16, 2019, confirming that RHV had uncorrected discrepancies. Those items include but are not limited to the items listed below.

1. Runway 13L - 31R (at the southeast end of the runway): The Runway Exit Sign (sign with the arrow) is non-standard and in a non-standard location. Signs for runway exits are located prior to the runway/taxiway intersection on the side and in the direction to which the aircraft is expected to exit. This Runway Exit Sign must include the single-letter designation of the applicable taxiway being used to exit the runway, along with one arrow, and be repositioned to a location prior to the exit taxiway.
2. Taxiway Z Direction Sign(s) are incorrectly located on the west side of Taxiway Z. The sign(s) should be relocated to the other side of Z, for use by aircraft entering from ramps/taxilanes. The sign(s) should consist of the letter Z, with an arrow on each side of the

character, and should be of a standard size, as indicated in Advisory Circular 150/5340-18G, *Standards for Airport Sign Systems*.

3. Install Holding Position Signs for Runway 13L on Taxiway E. As indicated by Advisory Circular 150/5340-18G, Runway Holding Position Signs are always placed on the left side of the taxiway as seen by the pilot of an aircraft approaching the runway from the taxiway. Install this sign to the left of the taxiway, in a standard location. Delineate the new boundary of the run-up area with a taxiway edge marking.
4. Remove the Runway 31-13 destination sign, located at the right side the runway holding position marking, at Taxiway D. The RSAT recommendation is that the sign is not in a good location because it could distract an aircraft operator or possibly contribute to a runway incursion.
5. Remove Taxilane G & F signs located just west of Taxiway Z. The signs are non-standard in appearance and placed in a non-standard location. In addition, these signs are obscuring the view of what appears to be a Taxiway direction sign for Taxiway G.

On March 21, 2019, California Department of Transportation conducted a compliance inspection and noted discrepancies including, but not limited to, the items listed below.

1. Three helicopter pads located near the self-service fuel pumps, marked on the airport as established heliports, do not meet the minimum FAA and State design standards for a designated heliport and must be removed or remarked.
2. The Runway Safety Area prior to the approach ends of Runways 31R and 31L do not meet the minimum design standards described in Advisory Circular 150/5300-13A, *Airport Design*. The RSA for Runway 31R is currently cleared out to 147 feet and 161 feet for Runway 31L.
3. Visual Approach Slope Indicators (VASIs) for 31R are inoperative and were replaced with Precision Approach Path Indicators (PAPIs). Because the VASIs are no longer functional they should be removed as soon as possible.
4. The segmented circle visual indicator system is missing traffic pattern indicators for Runway 31L/13R.

Call To Action to the Santa Clara County Board of Supervisors

The FAA raises these specific, previously noted safety discrepancies to the Board to ensure that the County, as the owner and operator of RHV, immediately addresses the aforementioned airfield signage and markings issues. The presence of non-standard signage, and the poor condition of the airfield signage and markings at RHV increases the risk of the loss of situational awareness for pilots and vehicle drivers. The loss of situational awareness has contributed to an increase of Runway Incursions (RI) at RHV, particularly in the form of Vehicle/Pedestrian Deviations (V/PD) and Pilot Deviations (PD). Combined V/PDs and PDs increased three hundred fifty (350) percent from Fiscal Year (FY) 2018 (two occurrences) to FY 2019 (seven occurrences). V/PDs at RHV increased from two (2) occurrences in FY 2018 to three (3) occurrences in FY 2019. PDs increased from no occurrences in FY 2018 to four (4) occurrences in FY 2019. The County has been unresponsive to

FAA's adjudication requests regarding the latest V/PDs that occurred on March 11, 2019, and July 10, 2019. Recent inspection and site visits suggest the County should develop financial strategies and identify resources to address operational and maintenance issues to reduce impacts to airport safety.

This letter serves as a Call to Action from the FAA for the Board to address the conditions outlined in this letter immediately. The trends pertaining to increased RIs at RHV combined with the poor airfield condition concerns the FAA and should also concern the Board. Failure of the Board to address these conditions not only ignores liability but also supports an environment that has risk factors that could result in a potentially catastrophic incident at RHV. The FAA would like to assist the Board but as owner and operator of RHV, the County needs to take the lead on addressing safety improvements at RHV. The FAA requests that the County submit an action plan to address critical airfield concerns at RHV within 10 days of receipt of this letter. Please include in your action plan whether the Board plans to fund the improvements with AIP or from other sources. Please submit the action plan to Laurie Suttmeier, Manager, FAA San Francisco Airports District Office.

In closing, the FAA desires to work with, and to have further dialogue with Board in the future to assist with correcting airfield discrepancies, and ensuring RHV continues to play a critical role for the region. FAA would willingly provide federal assistance to the Board to cover about 90% of the costs associated with the AIP eligible airfield improvements at RHV that are identified in this letter. We would appreciate a timely written response from the Board on this matter (i.e., within 30 days).

If you have any questions concerning this letter, please contact either Brian Armstrong, FAA Manager, Safety and Standards Branch, at 424-405-7303 or Laurie Suttmeier, Manager, FAA San Francisco Airports District Office, at (650) 827-7600

Sincerely,



Mark A. McClardy
Director, Office of Airports
Western-Pacific Region

Enclosures:

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