



03/01/2021

Honorable Mayor and San Jose City Council
City of San Jose
200 East Santa Clara Street
San Jose, CA 95113

City Council Item 5.1 - Construction Crane Height Guidance Study Findings and Recommendations

Airlines for America (A4A) represents ¹10 Major US Air Carriers, all of which have daily operations at the Mineta San Jose International Airport (SJC). Prior to the pandemic, these airlines accounted for approximately 200 flights a day.

Our members have worked with the airport staff at SJC over the years to provide airspace procedure protection and appropriate building heights that allow us to operate safely. Through continued reviews of FAA Aeronautical Study Determinations and continued dialog with airport staff at SJC, we understand that there are several proposed high-rise building developments throughout the City of San Jose, many of which are under the approach and departure paths to/from SJC, about a mile or two from the southeast ends of the runways.

While these high-rise buildings are not anticipated to significantly impact operations, it is our understanding that many of these temporary construction cranes will likely be significantly higher than the proposed buildings and in place for many months, and cumulatively for many years, which may significantly impact operations at SJC.

It is critical to the safety and efficiency of aviation operations that the approach and departure procedures at SJC and associated minimums, are fully protected. We understand that the FAA makes modifications to procedures and minimums to accommodate temporary construction activities. However, we request that the FAA protect the critical approach and departure procedures we rely on most heavily that overfly the area southeast of SJC.

Given the low visibility weather conditions that can occur at SJC, it is important to the safety of operations to protect these procedures for normal operations. We also request that FAA ensure protection for the one-engine inoperative procedure capability to the extent practical so that we can maintain longer-range services.

¹ A4A's members are Alaska Airlines, Inc.; American Airlines Group, Inc.; Atlas Air, Inc.; Delta Air Lines, Inc.; Federal Express Corp.; Hawaiian Airlines; JetBlue Airways Corp.; Southwest Airlines Co.; United Continental Holdings, Inc.; and United Parcel Service Co. Air Canada is an associate member.

We understand the need to continue to develop the City of San Jose but ask that you provide the protections needed so the airlines can maintain safe and efficient operations at SJC. Thank you and we look forward to working with the FAA and the City of San Jose on this matter. Please feel free to reach out to us if you have any questions.

Respectfully submitted,



Jack Allen
Managing Director
Air Traffic Management



Honorable Mayor and San Jose City Council
City of San Jose
200 East Santa Clara Street
El Segundo, CA 90245

March 2, 2021

Re: City Council Item 5.1 – Construction Crane Height Guidance Study Findings

Dear Mayor and City Council:

Alaska Airlines serves the San Jose community with non-stop flights to over a dozen markets from SJC, including Hawaii, Mexico, and the East Coast. Pre-COVID, Alaska operated 40+ daily departures, but even with reduced operations, today we provide 26 daily departures. We have partnered with the San Jose Airport staff over the years to ensure airspace protection, as well as enabling lower approach minimums which helps us better-serve the community.

Through our continued reviews of FAA Aeronautical Study Determinations and continued dialog with airport staff at SJC, we understand there are a number of proposed high-rise building developments throughout the City of San Jose, many of which are under the approach and departure paths for SJC airport. Even though these proposed buildings are only one to two miles southeast of the runways, we do not anticipate the structures will significantly impact our operations. However, our analysis determined that the cranes needed to construct these buildings may cause a significant adverse impact to our scheduled flight operations at SJC. It is our understanding that many of these temporary construction cranes will be much higher than the proposed buildings and each crane will be in place for many months; cumulatively for up to a decade.

It is critical for the safety and reliability of our operation that the approach and departure procedures at SJC and associated minimums, are fully protected. We understand that the FAA makes modifications to procedures and minimums to accommodate temporary construction activities. However, we request that the FAA protect the critical approach and departure procedures we rely on most heavily that overfly the area southeast of SJC including:

- ILS or LOC Rwy 30L/ILS or LOC Rwy 30L SA CAT II
- RNAV (RNP) Z Rwy 30L
- ILS or LOC Rwy 12R missed approach
- RNAV (GPS) Y Rwy 12L missed approach
- Rwy 12L/12R ALMDN, BMRNG, TECHY, and SUNOL SIDS

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Given the low visibility weather conditions that can occur at SJC, it is important to protect these procedures for normal operations.

We also request that FAA ensure protection for our one-engine inoperative procedure capability to the extent practical so that we can maintain our longer-range service to cities such as EWR, HNL, KOA, LIH and OGG. The proposed crane options would impact our departure performance, causing 6000-8000 lb. weight penalty, resulting in us leaving 26-36 passengers behind.

We understand the need for the City of San Jose's development and ask that you provide the protections needed for Alaska Airlines to maintain and grow our operations at SJC.

Thank you for your time and we look forward to working with the FAA and the City of San Jose on this matter. Please feel free to reach out to me for coordination or if you have any questions.

Sincerely,



Captain Bret Peyton
Director, Flight Operations Engineering and Fleet Technology

cc: Ryan Sheelan, Mineta San Jose International Airport



Southwest Airlines Co.
2702 Love Field Drive
Dallas, Texas 75235



February 18th, 2021

Mr. John Aitken
Director of Aviation
Norman Y. Mineta San Jose International Airport (SJC)
1701 Airport Blvd, Suite B1130
San Jose, Calif, 95110

Re: Airspace Procedure Protection at Norman Y. Mineta San Jose International Airport (SJC)

Dear Mr. Aitken,

Southwest Airlines has been operating at SJC since June 1st, 1993 and currently serves 16 markets with approximately 32 daily operations. We have worked with the airport staff at SJC over the years to provide airspace procedure protection and appropriate building heights that allow us to operate safely and continue to serve our existing markets and expand to new markets.

Through our continued reviews of FAA Aeronautical Study Determinations and continued dialog with airport staff at SJC, we understand that there are several proposed high-rise building developments throughout the City of San Jose, many of which are under the approach and departure paths to/from SJC, about a mile or two from the southeast ends of the runways.

While these high-rise buildings are not anticipated to significantly impact our operations, the construction cranes needed to construct these buildings may significantly impact our operations at SJC. It is our understanding that many of these temporary construction cranes will likely be significantly higher than the proposed buildings and in place for many months, and cumulatively for many years.

It is critical to the safety and efficiency of our operation that the approach and departure procedures at SJC and associated minimums, are fully protected.

We understand that the FAA makes modifications to procedures and minimums to accommodate temporary construction activities. However, we request that the FAA protect the critical approach and departure procedures we rely on most heavily that overfly the area southeast of SJC including the following:

- ILS or LOC Rwy 30L
- ILS Rwy 30L SA CAT I
- ILS Rwy 30L SA CAT II
- RNAV (GPS) Y Rwy 30L
- RNAV (RNP) Z Rwy 30L
- RNAV (GPS) Y Rwy 30R
- RNAV (RNP) Z Rwy 30R

John Aitken
Feb 18th, 20212

- Runway 12L and 12R ALMDN FOUR, BMRNG FOUR, TECHY THREE and SUNOL ONE Departures.

Given the low visibility weather conditions that can occur at SJC, it is important to our operations to protect these procedures for normal operations. We also request that FAA ensure protection for our one-engine inoperative procedure capability to the extent practical so that we can maintain our longer range service to cities such as OGG, KOA, HNL, MDW, and AUS.

We understand the need to continue to develop the city of San Jose but ask that you provide the protections needed so Southwest Airlines can maintain and continue to expand its operations at SJC. We look forward to continuing working with the FAA and the City of San Jose on this matter in the future.

Please do not hesitate to contact me at any time with any additional questions, concerns, or information (contact information located below).

Sincerely,



Richard Dalton

Richard W. Dalton
Director Airspace and ATM
Network Operations Control
Email: rick.dalton@wnco.com
O: 469-603-0925
C: 214-674-6930



Via email

March 5, 2021

Honorable Mayor Liccardo and City Council
City of San Jose
200 E Santa Clara Street, 18th Floor
San Jose, CA 95113

RE: Proposed Construction Crane Height Guidance Study Findings and Recommendation

Dear Mayor Liccardo and Councilmembers:

Thank you for leading San Jose during these times of unprecedented challenges. As we emerge from the pandemic, we are encouraged by Council's continued focus on positioning San Jose for success. In regards to the above subject matter, we offer our thoughts and concerns pertaining to the proposed construction crane height guidance study findings and the recommendations outlined in the Memorandum to Council dated February 12, 2021.

As you may be aware, there is concern amongst the development community that the proposed guidance will greatly impact many of the major projects under construction, entitled, or seeking entitlement. Many of these projects have based their plans around maximizing the newly allowed building heights permitted by the City as of March 12, 2019. While the memorandum's findings have been presented as guidance, we are concerned that this guidance could become defacto limitations on crane heights and durations in the future. In particular, the six-month and October–March maximum crane height limitations would prove difficult for most major downtown projects and could result in major project delays and infeasible projects if strictly enforced. Given the FAA has ultimate approval authority over a specific project's crane plan, we feel it is essential that any adopted policy make clear that it is simply guidance and not binding and should encourage projects to engage with the FAA as early as possible for crane plan review and approval.

In addition, impacts to carrier services outlined in the memorandum do not account for specific weather conditions or discuss a method for developers and the airport to work together on operational adjustment plans based on real world construction conditions and timelines to mitigate or reduce impacts. The impacts are presented in a manner that assumes a worst-case scenario for the South flow months and sends an overly negative message to the public regarding the impacts construction will have on the

airport and by default, the local economy. Before adopting a final policy, the City should also consider the significant positive economic impacts of redevelopment and future Airport revenues, which we would argue far exceed the interim loss of airport revenue. Further, while airport operations could be altered, the airport's true revenue loss may not be significant depending on the weather, time of year and TERPs surface(s) impacted. If a fee is ultimately adopted, it should include methodology to consider the actual impacts of each project based on its FAA approved plan and define an equitable apportionment of the fee if multiple projects are constructed simultaneously. A fee cap should also be considered to provide developers with certainty of their financial exposure.

We remain committed to working with our City partners and the local community to achieve an ambitious vision for San Jose but feel the guidance as currently proposed falls short in weighing potential impacts against the true economic benefits of downtown redevelopment.

Thank you for your time and consideration.

Sincerely,



Janette R. D'Elia
COO