

August 16, 2021
Office of Mayor Sam Liccardo
City of San José

SENT BY EMAIL AND FAX

Re: Items 36, 37, 37A, 38 and 126, regarding community lead exposure and the potential closure of Reid-Hillview Airport

Dear President and Board,

Thank you for considering my thoughts on this important matter.

I have publicly and consistently supported the closure of Reid-Hillview Airport. To whatever extent the County's most recent lead study confirms safety and community health concerns, its closure seems all the more imperative. Yet there also remain critical health and safety issues that the County must resolve as a condition to its closure—and not as an afterthought. By approving the draft Resolution (item 126), the County will have precluded any sensible discussion of how Reid-Hillview traffic, which numbered [208,260 operations](#) in 2019, will be absorbed by surrounding airports.

Two years ago, I drafted and co-signed a November 2019 [memorandum](#) with my colleagues, Councilmembers Arenas, Carrasco, Jimenez, and Khamis (*please see attached*). The direction of that memorandum confirmed the City's support for the closure of Reid-Hillview, but urged the County to work with the City and other stakeholders to ensure that the closure of Reid-Hillview would not result in an influx of general aviation (GA) traffic to Norman Y. Mineta San José International Airport. (Mineta) As the County is aware, **under longstanding FAA regulations, neither Mineta nor any other U.S. airport has the discretion to decline to allow GA traffic to use its airstrips.** In practical terms, that means that large commercial jets carrying 300 passengers must circle in the airspace to wait to land while a pilot trainee in a Cessna practices take-off and landing maneuvers on a runway. In a recent conversation with the FAA about the safety implications of closing Reid-Hillview, federal officials confirmed that a significant increase in the mix of GA aircraft at Mineta will “absolutely increase risk”.

The Council unanimously approved that November 2019 memorandum and direction to urge “completion of the tower and navigation capacity at the San Martin airport as outlined in the 2006 South County Airport Master Plan (including any necessary traffic flow and safety improvements).” I sent a letter to each of you at that time, articulating our concerns about safety issues. City staff remain committed to the position articulated in that memorandum.

Nonetheless, to ensure I do not misrepresent any individual councilmember's position, I will confine the remainder of this letter to my own thoughts.

Three primary concerns animate my position in this matter: **environmental justice, safety, and air service**. Allow me to explain each in turn:

1. **Environmental Justice:**

Shifting the exhaust from lead-based Avgas from East San José communities to even lower-income neighborhoods in the Mineta flight path (e.g, Guadalupe-Washington, Tamien, Alma, and Spartan Keyes) will not solve the problem, but merely burdens yet another set of high-poverty, densely-populated community of color.

Close review of census-tract demographic data in the [Social Progress Index](#) reveals that neighborhoods within the flight path of Mineta have a higher rate of poverty—defined as the percentage of residents who earn less than 150% of the poverty line—than those neighborhoods most proximate (and downwind) from Reid-Hillview. That is, that very low-income share of the population ranges from 21.2% in Downtown and Delmas Park (census tract 6085500800) to 39.2% in Guadalupe/ Washington (tract 6085501700), all in the Mineta flight path. In contrast, the neighborhoods surrounding Reid-Hillview range from 17.4% in Tully/Ocala (tract 6085503507) to 20.2% in East Valley (tract 6085503506). Critically, as we the consider environmental justice implications of shifting more lead-based emissions to the neighborhoods near Mineta, one should consider that these same Downtown neighborhoods [already tolerate lead emissions from existing AV operations at Mineta, in addition to heavy daily operations of the region's only airport accommodating jet aircraft with kerosene-based fuel, which emits substantial quantities of airborne ozone and PM2.5](#) in those same neighborhoods. They also bear the burden of emissions from 280, 87, the UP freight line, CalTrain, and other major sources of harmful pollution. In short, the residents of such neighborhoods as Tamien, Gardner, and Washington suffer plenty already from transportation-related air pollution, and likely far more than nearly any other San José residents.

None of us desire to pit the health and safety of one set of high-density neighborhoods against the other. Let's work together to solve the problem, rather than simply moving it, by doing everything possible to halt the use of leaded gas in GA aircraft Countywide, and where necessary, to moving flight operations like these to less densely populated areas of the County.

2. **Safety:**

A significant increase in general aviation traffic—typically, a Cessna that lands and takes off at less than half the speed of a commercial jet—increases operational risks for the 15 million (pre-pandemic) passengers who annually rely on Mineta for safe travel. Conflicts in speeds leave slim margins for error, and GA aircraft generally have far less experienced pilots than large commercial aircraft. Moreover, when commercial jets seek to land at Mineta, but are required to engage in additional circling to accommodate slower GA operations, we see even greater increases in congestion, flight risk, operational error.

Along with operational safety, we also must consider the environmental safety of greater aggregate air pollution resulting from increased congestion at Mineta. The cumulative impact of increased air pollution from airport congestion on respiratory illness and other facets of human health—particularly in highly harmful ozone and PM2.5—[is very significant](#).

3. Service:

GA traffic—particularly during peak periods—dramatically slows and encumbers operations at Mineta, which has a ripple effect for commercial jet operations at the airport. Delays in peak periods constrain capacity at the airport, undermining longstanding efforts to improve service and expand routes to better serve a Silicon Valley community that strongly prefers flights to Boston over Bakersfield, and to Guadalajara over Garberville. Those constraints have substantial impacts on airport-related jobs—many of which are held by some of our most economically vulnerable community members—and the economic impact of the airport.

While the City has spent more than \$1 billion in the last two decades to upgrade and expand airport operations—and will invest hundreds of millions more—it cannot expand the number or capacity of its runways. Space constraints make runway capacity fixed, so every take-off or landing of a slow-moving prop airplane will displace the same operations of more than one commercial jet.

Next Steps

Moving forward, the County may find that it has several alternatives to address the City’s—and ultimately, the community’s—concerns. In our November 2019 memorandum, we urged consideration of one obvious one: ensure sufficient capital investment in the South County airport to serve more GA aircraft. I have serious concerns about the Board’s premature consideration of a proposal to preclude any such investment in San Martin until it has identified a better alternative. Approving such a proposal places the health of a relatively sparsely populated and more affluent community over that of much more populated, more diverse, and less affluent set of neighborhoods, violating the very environmental justice principles that the County cites to justify the proposed closure of Reid-Hillview.

Regardless of which option the County chooses--whether by expanding operations at the South County site or by finding another option--that solution must be part of, and a condition of, the County’s closure decision. It cannot be relegated to an afterthought, because once the closure decision is made, the political will simply will not exist to make the “hard decisions.” Avoiding these hard decisions will mean that the Board has not solved this public health and environmental justice problem, but merely has redistributed it to another low-income Latino/a/x community.

We can do better. We all represent the same residents, and the same neighborhoods. Let’s work together to find a collaborative solution that provides a solid plan for how to proceed. We look forward to the County’s partnership in fully exploring options to redistribute the 208,260 operations at Reid-Hillview, which is more than the number of flights at Mineta for the same time period.

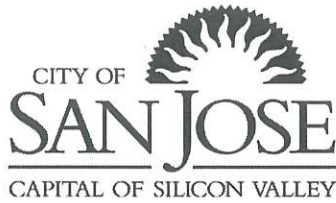
An elemental tenant of good policymaking comes to us from our first lessons in kindergarten: look both ways before you cross the street. A policy decision that helps one group does not relieve the burden on the policymaker to consider other groups who suffer harm. Let's look both ways, to ensure that we can get across safely—together.

I look forward to discussing this further at your convenience.

Sincerely yours,

A handwritten signature in black ink, reading "Sam Liccardo". The signature is written in a cursive style with a large, looping initial "S".

Samuel T. Liccardo
Mayor
City of San José



Memorandum

To: CITY COUNCIL

From: Mayor Liccardo
Councilmember Jimenez
Councilmember Carrasco
Councilmember Arenas
Councilmember Khamis

Subject: SEE BELOW

Date: August 16, 2019

Approved:

[Handwritten signatures: Mayor Liccardo, Councilmember Jimenez, Councilmember Carrasco, Councilmember Arenas, Councilmember Khamis]

SUBJECT: COUNTY OF SANTA CLARA REPORT ON POTENTIAL CLOSURE OF REID-HILLVIEW AIRPORT

RECOMMENDATION

Accept the report from the County of Santa Clara on potential closure of the Reid-Hillview Airport and:

1. Ask staff to convey the importance of capacity-building activities to be addressed by the County prior to site closure and city approval of entitlements, including:
 - a. Completion of tower and navigation capacity at the San Martin airport as outlined in the 2006 South County Airport Master Plan (including any necessary traffic flow and safety improvements),
 - b. Relocation of the San Jose State University (SJSU) Aviation Program to a suitable local alternative site in either San Martin or Hayward, and,
 - c. Relocation of Civil Air Patrol and Cal Fire to a site that allows for emergency/disaster response.
2. Support staff's joint planning efforts with the county, and ask
 - a. The Office of Economic Development to review the potential for increased economic development throughout the Reid-Hillview flight path, and incorporate analysis within the City Wide Retail Strategy Plan.
 - b. Planning to consider economic opportunities in future long range planning efforts.

BACKGROUND

The potential closure of Reid-Hillview Airport by 2031 offers a dual opportunity to both improve neighborhood safety, and to explore the creation of much needed mixed-income housing and expanded economic development, for a region of the city that has often suffered from underinvestment. We appreciate the County presenting to the City Council and their progress in this effort which has been long awaited by the Eastside San Jose community.

As the City and County continue down the path of bringing this vision to fruition, it is important that the City is clear about important prerequisites – a) ensuring the ongoing competitiveness and safety of Mineta San José International Airport by limiting the challenging integration of large and small aircraft, and, b) supporting the training of our next generation of pilots and airline industry professionals from SJSU, and c) ensuring continued air response for emergencies.

COUNCIL AGENDA

August 20, 2019

Subject: Reid-Hillview Airport

Page 2

Brown Act Disclaimer

The signers of this memorandum have not had, and will not have, any private conversation with any other member of the City Council, or that member's staff, concerning any action discussed in the memorandum, and that each signer's staff members have not had, and have been instructed not to have, any such conversation with any other member of the City Council or that member's staff.