To: Mayor and City Council  
From: Susan Cline, Director, Public Works, Civil Engineering  
Subject: Airport Runway Shortening - Response to NBAA Letter Dated May 19, 2017

This supplemental report addresses the letter dated May 19, 2017, from the National Business Aviation Association (NBAA), received after the posting of the Airport runway shortening options staff report to the City Council. In its letter, NBAA cites a 1985 Report from the Airport Director to the Airport Commission, which describes the Airport Director’s understanding of a consultant’s study whether a 500 feet displaced threshold to Runway 21 could cause aircraft to arrive at the Airport at a higher altitude and thus generate less noise. Although the 1985 Report did not study the effects of noise for departing aircraft since it assumed departing aircraft would have the use of the entire 5,000 feet of runway, NBAA nonetheless asserts that the Report “previously considered the consequences of the reduction of the runway length” and found that it would “have no cognizable benefits, but potentially could result in increased noise.”

NBAA’s letter misstates and misuses the 1985 Report. First, this outdated Report refers to a study that did not consider runway shortening to a length of 3500 feet. According to the 1985 Report, the consultant studied only the noise effects of a displaced threshold at 500 feet for landings on Runway 21 on the existing 5000 foot runway. The runway shortening project before the City Council relocates the runway thresholds, it does not allow for displaced thresholds. The two projects are not comparable. In addition, there is no data or information identifying where the noise monitoring for the 1985 Report occurred. Nor is the speculative assumption in the 1985 Report that a threshold displacement could have a detrimental impact west of the runway supported by any evidence. In fact, the 1985 Report clearly states the opposite: that noise levels were expected to decrease but to a degree that would be insignificant and less than the decibel level necessary to be noticeable to the human ear. Finally, this antiquated study was conducted over 30 years ago, and was based on a completely different aircraft fleet mix that differs from the aircraft fleet mix that would exist under the proposed runway-shortening project. The 1985 Report is not relevant to current conditions and staff has not relied upon it in finding the runway shortening project is categorically exempt.

Second, the City’s consultants have prepared studies made part of the record before the City Council that demonstrate that reducing the runway to an operational length of 3,500 feet will not have a significant adverse impact to the surrounding communities, but rather would offer significant environmental benefits. The basis for this conclusion includes the Coffman Associates Report and a noise study completed by AECOM, which show that shortening the runway to 3,500 feet will change the aircraft fleet mix that operates at the Airport and, in turn, decrease noise exposure to the neighborhood surrounding the airport.

In conclusion, staff believes that the NBAA letter offers no relevant or credible evidence to support its contention that additional studies are required. To the contrary, even the 1985 Report showed that the difference in noise level from the proposed displaced threshold would be a reduction or insignificant.