



LONG TERM MANAGEMENT STRATEGY

December 6, 2001

John Martin, Director
San Francisco International Airport
P.O. Box 8097
San Francisco, CA 94128

Dear Mr. Martin:

As you know, the LTMS agencies (the U.S. Army Corps of Engineers, the U.S. Environmental Protection Agency, the San Francisco Bay Regional Water Quality Control Board and the Bay Conservation and Development Commission) are also members of the Multi-Agency Task Force which is working with the lead agencies on the environmental review of SFO's proposed runway reconfiguration project. We are writing to you at this time to offer our advice and guidance on the project alternatives we believe should be fully evaluated in the environmental documents on SFO's proposed project. We are providing this guidance now so it can be reflected in the formal request for our concurrence on the alternatives. We understand we will receive this concurrence request in the next few months. We believe this approach will facilitate our positive concurrence on the project alternatives and expedite the completion of the environmental documents.

The following issues, which our staffs have raised over the last year, should be resolved before the alternatives are selected.

Project Purpose and Need. We find the current expressions about the purpose of and need for the runway reconfiguration project quite confusing. Even before the tragic events of September 11th, San Francisco Mayor Willie Brown stated that the primary purpose of the reconfiguration project is to address current safety problems at the airport. SFO's press statement of October 1st linked the runway reconfiguration project to passenger safety and security. If this is so, the purpose and need statement should be revised accordingly. It is our understanding that SFO is operated in a manner that meets the highest standards of safety.

Moreover, any assertions that the current runway configuration is unsafe or that new runways might make the airport safer need to be substantiated with analytical information. For example, the proposed reconfigured project will increase runway crossings at critical points. Because FAA studies have shown that aircraft are quite vulnerable to runway incursions, we believe that safety objectives must be addressed with the same degree of rigorous analysis as all other project objectives.

U.S. Environmental Protection
Agency, Region IX
75 Hawthorne Street
San Francisco, CA 94105

San Francisco Bay Conservation
and Development Commission
50 California Street, Suite 2800
San Francisco, CA 94111

U.S. Army Corps of Engineers
South Pacific Division
&
San Francisco District
333 Market Street, 6th Floor
San Francisco, CA 94105

San Francisco Bay Regional
Water Quality Control Board
1515 Clay Street, Suite 1400
Oakland, CA 94612

California State Water
Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

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If one of the purposes of the project is to reduce delays, information should be provided on how much of the total average annual delay can be fairly attributed to local weather conditions. Also, SFO's capacity objective remains unclear. Various goals have been attributed to SFO from maintaining the current (60 flights per hour) arrival rate to increasing capacity to meet projected flight demand. To overcome this confusion we request that you specify SFO's capacity goals in terms of hourly arrival and departure rates for 2010 and 2020.

To get this important matter settled, and before we can concur on an appropriate suite of alternatives to be analyzed in the draft EIR/EIS, we would appreciate having an opportunity to review a revised draft purpose and need chapter of the EIR/EIS as soon as possible and at very least prior to receiving the concurrence request letter.

No Fill Alternatives. We continue to be concerned that the lead agencies may not be considering the no-build alternatives on an equal basis with the fill alternatives. Specifically, the Airports Division of the FAA does not seem to share the perspective of other branches of the FAA regarding Air Traffic Control (ATC) technology, airspace rationalization and demand management measures. We believe these alternatives need to be fully evaluated even if the ultimate conclusion is that they cannot or should not be implemented. Based on the information we have at this point in time, it appears that a mix of these techniques, with or without additional runways at SFO, will be necessary. Therefore, a carefully crafted combination of various systems management measures should be fully examined in the federal as well as the state environmental documents. We strongly believe that such an analysis will be needed to meet the requirements of the National Environmental Policy Act, the California Environmental Quality Act, the Federal Clean Water Act, and the McAteer-Petris Act.

Build Alternatives. We congratulate SFO on its decision to significantly reduce the size and scale of the proposed build alternatives. However, we believe that Alternative A-3 can further be reduced in size. The footprint of Alternative BX-R might also be reduced in size. We urge SFO to consider whether Alternative BX-2 is still a viable alternative; its elimination might reduce costly assessment efforts and reduce the review timeframe. Finally, we are pleased by SFO's formulation of Alternative BX-6 and the decision to drop Alternative F.

This new suite of build alternatives reduces, but does not eliminate, our concerns regarding the dredging and filling of San Francisco Bay. We urge SFO, in addition to attempting to minimize the need for Bay fill and the impacts from Bay dredging, to continue to pursue dredged material disposal strategies that would be fully consistent with LTMS policies. A detailed description of each alternative's dredging and disposal needs to be included in the EIR/EIS.

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Finally, we remain available to work with SFO to develop a viable mitigation strategy should a build alternative be selected.

SFO Studies. The various studies produced for SFO over the past several months have generated media reports on conclusions being reached on demand management, air traffic control technology, mass transit links between Oakland Airport and SFO, and upland alternative airport siting. However, the status of the reports on which these conclusions are based is unclear. Will these studies be incorporated into the EIR/EIS? In any event, we believe the studies need to be independently evaluated if the conclusions drawn from the studies are to be relied upon by the FAA, SFO, regulatory agencies and the public.

For example, the Charles Rivers & Associates report, while concluding that no single demand management technique will solve SFO's problems, clearly states that construction of Alternative BX-R will result in an "unacceptable" (using FAA criteria) 8-minute average annual delay in 2015. This independent assessment is twice the projected delay figure promoted by SFO's staff. We are concerned that unless a systems management component is incorporated into any runway reconfiguration project, no amount of additional runways will ever keep up with unconstrained demand projections. On the other hand, we believe that the conclusions of the Technology Panel are realistic and deserve full consideration.

We acknowledge that there are no certainties about demand management, technology or runway expansion. But in an effort to add some enlightenment to this issue, we have attached a summary of BCDC's consultants' review of the Charles Rivers & Associates' and the Technology Panel's reports. We will provide the full report to your staff.

NOAA Science Panel and Multi-Agency Task Force. We appreciate SFO's support and collaboration on the NOAA Science Panel. The value of the peer review process is its ability to reassure both the public and regulators that the environmental documents will be scientifically above reproach. We all agree that good science is essential to making good public policy decisions.

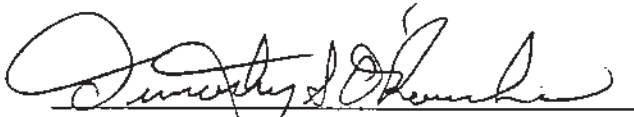
Finally, we want to renew our commitment to continue the productive Multi-Agency process and timely review of the environmental documents. We continue to believe a joint federal-state EIR/EIS will expedite our review.

Conclusion. The past few months have created considerable uncertainty about the future of air transportation in America. We expect that it will take some time until this situation changes. In the meantime, we remain committed to working with SFO as you try to forge a credible strategy for addressing the region's air transportation needs. We suggest that we continue to meet to discuss issues regarding dredging and dredged material disposal as your planning process proceeds.

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Thank you for attention to our concerns.

Very truly yours,



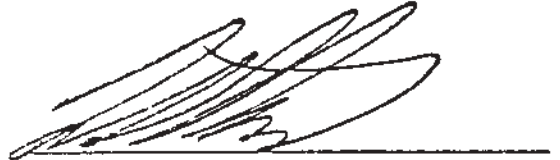
LT. COL. TIMOTHY O'ROURKE
District Engineer
U.S. Army Corps of Engineers
San Francisco District



LORETTA BARSAMIAN
Executive Officer
Regional Water Quality Control Board,
San Francisco Bay Region



ALEXIS STRAUSS
Director, Water Division
U.S. Environmental Protection Agency



WILL TRAVIS
Executive Director
San Francisco Bay Conservation
and Development Commission