



U.S. Department
of Transportation
**Federal Aviation
Administration**

Federal Aviation Administration
San Francisco Air Traffic Control Tower
T2-6-30
San Francisco, CA 94128

December 18, 2007

California Energy Commission
1516 Ninth Street
Sacramento, California 95614-5512

DOCKET	
06-AFC-6	
DATE	DEC 18 2007
RECD.	DEC 19 2007

Dear Commissioners and Staff:

This correspondence is in response to the November 16, 2007 letter from the Commission requesting comments on the Final Staff Assessment (FSA) regarding the Eastshore Energy Center (Eastshore) project.

As District Manager of the Air Traffic Control function in the Bay Area, I oversee air traffic operations at both Hayward Executive and Oakland International Airports. I am very concerned about the impacts of the Eastshore project as it relates to both airports.

I agree with the your staff assessment which states that "the project site's proximity to the traffic pattern for the Hayward Executive Airport and the downwind departure route for Runway 28L would unreasonably complicate aircraft maneuverability". The project site will also impact departure procedures for runway 10R when the airport is in a southeast configuration. Additionally, based on the information I have researched in your docket, we have conducted a preliminary review of the impacts to the airport and the traffic pattern. I would like noted in the record that altering the Hayward Airport traffic pattern for plume avoidance is not a reasonable alternative.

Any alteration to the Hayward Airport traffic pattern would not only impact local Hayward pilots, but also affect aircraft arrivals into Oakland International Airport. Raising the pattern altitude would place the aircraft at Hayward in an unsafe proximity to turbojet aircraft arrivals to runway 29 at Oakland International Airport. The raised traffic pattern would not have the separation the FAA requires to have both airports operate independently. If not operated independently, both airports would suffer from greatly reduced efficiency.

Before the Air Traffic Organization (ATO) considers any alterations to the National Airspace System, a complete safety and risk analysis must be completed. The Airport Sponsor would have to put in a request to change the airport air traffic operation, and then the ATO would take the request under consideration. Additionally, any change would require the appropriate environmental analysis based on the current federal standards.

Thank you for considering our input in your decision-making process. If you have any additional questions, please contact me at (650) 348-6168 or e-mail at andy.richards@faa.gov.

Sincerely,

Andy Richards
District Manager, San Francisco Air Traffic Control District

cc.
City Manager, City of Hayward
California Pilots Association