

06/04/18

I would like to say that overall I agree with the 2018 RHV Business Plan (BP). All things considered, it is reasonable in its approach, and recommendations. However, there are three comments, and a suggestion, I would like to make in regard to the BP.

**Comment 1:**

My first comment is in regard to a BP statement that I feel should be rewritten for accuracy.

To start, I completely agree that the utter majority of activity at RHV is from the flight schools. It has been this way for decades. I even mentioned in 2000, "Eliminate the flight schools and RHV becomes a ghost town." [1]

RHV is overwhelmingly a recreational airport. This means that when the economy is good then some people with discretionary income will take flying lessons, and maybe a fortunate few will buy a plane. When the economy is weak, or bad, people are more cautious with their discretionary income, will cut back on expensive recreational activities, and sell their planes. This boom and bust cycle has been going on for years, and there is no reason to think the current activity at RHV is not following this model.

This leads to my first comment. In the memo overview to the BP we have this quote; "Nevertheless, the number of operations at the County airports is growing due to the demand for professional pilots and the associated flight schools required to train them.", and on page 11 of the BP we have this quote, "The increase in the number of flight training operations has its roots in several commercial aviation trends that have increased demand for commercial and Airline Transport (ATP) rated pilots:"

All other statements about general aviation in the BP are backed up with references, but as written, these statements appear to be an opinion being presented as a fact.

In regard to the idea that the current activity at RHV is being driven by the airline industry, it needs to be emphasized that **it is not the responsibility of Santa Clara County (SCC) taxpayers to provide the airlines with pilots.** I seriously doubt that the County Supervisors were thinking of the airlines when they purchased the 60 acre Hillview Airport in 1961.

While it is probably true that some student pilots have an aspiration to be a professional pilot, we know from research done by the Aircraft Owners and Pilot Association (AOPA) that most student pilots are doing it for recreation. [2] Additionally, thanks to AOPA we know that 80%, or more, of all student pilots will drop out, and never get their Private Pilot license, let alone become a professional pilots. [3]

There is no reason to assume that RHV somehow deviates from national averages.

Since there is no data to support the statement that the demand for professional pilots is driving the current activity at RHV, I would like to see the sentence on page 11 rewritten to reflect that the good economy is having an effect on increasing the activity at RHV.

For example, instead of "The increase in the number of flight training operations has its roots in several commercial aviation trends that have increased demand for commercial and Airline Transport (ATP) rated pilots:" to be more accurate it should be something like,

“The current increase of activity at RHV mostly appears to be based on the improving Santa Clara County economy of the last five years. Once the economy cools off we most likely will see a decrease in activity at RHV, as we have in the past.”

However, whether the increase of flight school activity has its roots in the economy, or the needs of the airline industry, it is a moot point. The fact is, **no one should be learning how to fly an airplane in the middle of a residential neighborhood.** No SCC resident, and certainly no “students from all over the world, including Japan, China, India and Korea.” [4], should be learning how to fly an airplane at RHV. Flight training is a totally and utterly incompatible activity with a residential neighborhood.

#### **Comment 2:**

The second comment is in regard as to whether to accept, or not accept, future FAA Grant money. Since general aviation, as practiced at RHV, will most likely continue its ongoing decline, it would be wise to hold-off on accepting FAA Grant money. In 2031, we can reevaluate the status of general aviation, RHV, and any other needs of SCC at that time. Based on current data and trends in general aviation, it does not make sense for the county to accept FAA money, and forfeit control of this land. In fact, I feel it would be highly irresponsible for the county to accept FAA money, and forfeit control of the land for an additional twenty years. This is county land, and **the county has a fiduciary responsibility to manage this land in a manner that benefits all county residents**, not just for the few hundred who use RHV.

#### **Comment 3:**

This leads to my third comment. I understand the scope of the BP is explained on pages 7-8 of the BP, and I am disappointed the County Supervisors neglected to include the impact of the airport on the adjacent neighborhood. While the county acts as if RHV is located in the middle of a desert, in reality it is located in the middle of a residential neighborhood. There are easily 5,000 to 10,000 people, and 9 schools, within one-half mile of RHV [5], and I suspect many individuals, and students, are negatively affected by the activity at RHV. Yet the county never gives any consideration to them.

There is plenty of data on the Internet detailing the negative mental and physical health effects from noise in general, and airplane noise in particular. Simply Google “noise negative health effect”, or anything similar.

Additionally, we know RHV aircraft use leaded fuel (2.12 grams per gallon), and 90% (2 grams) of the lead is emitted in the exhaust. We also know that the majority of aircraft activity at RHV is from pilots simply flying in circles (local operations) around the airport, and putting lead into the air that is then inhaled by residents in the neighborhoods surrounding the airport. We also know that inhaled airborne lead is absorbed into the blood, and we know that any amount of lead in the blood of a child can result in permanent, measurable cognitive impairment (brain damage).

**This is not speculation. This is not hypothetical. This is a fact. The research is done, and the data is irrefutable.** [6]

In the Mercury News of 3/11/18 page B3, the paper states that Supervisor Yeager argues that the ordinance to remove gun shows from the Fairgrounds “is consistent with the county’s mission to promote public health and safety.” [7]

While I agree with the removal of gun shows from the fairground, I am not aware of anyone being injured at these shows. Yet, we know for a fact that RHV is negatively affecting the health of county residents on a daily basis, and the county does absolutely nothing about it. This strikes me as being hypocritical. At best.

**Suggestion:**

Finally, my suggestion for the BP is that until RHV is closed we should consider redesigning RHV to satisfy most general aviation needs, make RHV much more compatible with the surrounding neighborhood, and benefit all county residents.

This suggestion consists of these items, and I will explain each below.

1. Stop accepting FAA Grant money
2. Ban all flight schools from RHV
3. Close runway 31L/13R.
4. Limit airport hours of operation between 7 AM and 10 PM
5. Remove 31L/13R and make the land on the west side a park for all county residents.

Each item.

1. By no longer accepting FAA money the county is free of prior grant obligations. The FAA enforces grant violations by no longer giving grant money to a sponsor. So, by not taking grant money, the restrictions are moot.
2. The flight schools generate the vast majority of aircraft operations at RHV. No one should be learning how to fly an airplane in the middle of a residential neighborhood. Additionally, removing the flight schools will greatly reduce the noise and lead pollution from RHV.
3. Without the flight schools, aviation activity at RHV will drop to near zero. Therefore, runway 31L/13R is no longer needed. The remaining runway (31R/13L) is more than adequate for the few operations that are not flight school related. Plus, RHV is still a reliever airport for SJC.
4. These hours are the same hours the FAA Control Tower is open. This is more than adequate for the few non-student flights that occur at night. Even more important, it provides much needed peace and quiet for neighborhood residents, many of whom get up at 4-5 AM for work.
5. By removing 31L/13R, and building a park on the west side of the airport we can provide much needed soccer fields, and other facilities for all county residents to use and enjoy. Of course, they will be exposed to the lead pollution from RHV, but without the flight schools it will be minimal.

Granted, some people will oppose this, but it is the right thing to do. It benefits both the aviation community, and everyone else.

Thank you for the opportunity to comment on the 2018 RHV Business Plan.

Bud Beacham  
ESJ resident since July 1990  
SCC Airport Commissioner

[1] <http://www.reidhillview.com/#3>

[2] [http://download.aopa.org/epilot/2011/AOPA\\_Research-The\\_Flight\\_Training\\_Experience.pdf](http://download.aopa.org/epilot/2011/AOPA_Research-The_Flight_Training_Experience.pdf)

“Recreational goals are the most common reason for learning to fly and most students learn outside the Part 141 environment.”, page 44

[3] [http://download.aopa.org/epilot/2011/AOPA\\_Research-The\\_Flight\\_Training\\_Experience.pdf](http://download.aopa.org/epilot/2011/AOPA_Research-The_Flight_Training_Experience.pdf)

“Approximately 60 percent of those who earn a student pilot certificate never earn a higher pilot certificate (e.g., private, recreational, or sport). And many more drop out before ever obtaining a student pilot certificate—**placing the overall dropout rate at an estimated 70 to 80 percent.**”, page 2

[4] Santa Clara County Airports Business Plan, 2018 draft, page 11.

“A number of flight training schools operate at RHV and attract students from all over the world, including Japan, China, India and Korea.”

[5] [http://www.reidhillview.com/RHV\\_brochure.pdf](http://www.reidhillview.com/RHV_brochure.pdf)

[6] <http://www.reidhillview.com/#lead>

[7] The quote is from the article, which I suspect is paraphrasing Supervisor Yeager.