



**SANTA CLARA/SANTA CRUZ COUNTIES
AIRPORT/COMMUNITY ROUNDTABLE**

PO Box 3144
Los Altos, CA 94024

December 13, 2019

Ms. Rachel Girvin
Regional Administrator, AWP-1
FAA Western-Pacific Region
777 S. Aviation Blvd., Suite 150
El Segundo, CA 90245

Subject: FAA Assistance with the SCSC Roundtable Questions Regarding the SUNNE Flight Procedure

Dear Regional Administrator Girvin:

At the October 23, 2019 regular meeting, the Santa Clara/Santa Cruz Airport/Community Roundtable (SCSC Roundtable) received a presentation regarding the FAA's SUNNE ONE Standard Instrument Departure (SID) procedure development process, and the night departures from SFO and OAK that fly south over the Bay. While questions were raised at the meeting regarding the procedure, it was requested that written questions be provided to the FAA for review and response at a future SCSC Roundtable meeting. Specifically, the questions relate to the FAA's development of the OAK 120/SUNNE ONE departure procedure, and seek to obtain additional information from the FAA. These questions are provided below.

1. Explain the design decisions and operations data for the SUNNE ONE procedure. The FAA's response should address the apparent shift in ground tracks, why a conventional vs. RNAV procedure, altitudes and speeds, waypoints, and operations. See Attachment A for a detailed description of the requested information.
2. Explain why the changes made to the SUNNE ONE procedure will not be applied to SFO 050 departures and explain the possibly missing OAK departure data from the FAA's September 26, 2019 analysis. See Attachment B for a detailed description of the requested information.
3. Describe the expected noise, environmental, and operational impacts of the proposed SUNNE ONE procedure. See Attachment C for a detailed description of the requested information.

On behalf of the SCSC Roundtable, thank you for review of these questions. We look forward to receiving FAA's response and sharing it with the Roundtable members and public.

Sincerely,

Mary-Lynne Bernald
Chairperson, SCSC Roundtable

Appendix A - Flight paths (current and proposed) and design decisions for SUNNE procedure

Flight paths for SFO 050, OAK 120 departures, and proposed SUNNE procedure

Source: FAA presentation at the SFO Roundtable Technical Working Group 09/26/2019 (one week of data: Aug 1 - Aug 7, 2019)



Design decisions on SUNNE procedure:

Ground tracks: If the goal is to reduce controller workload by creating a procedure, then why not design a procedure that follows the historical flight tracks as shown above? Why shift the ground tracks to new residential areas, which for many of them are already under noisy flight paths? The FAA acknowledged in the past that they should not have shifted the ground tracks of the BIG SUR without consulting with communities beforehand. Why do that again?

Conventional vs. RNAV: When the FAA decided to change Oceanic arrivals, they told us that it had to be an RNAV procedure because new procedures or updated procedures must now be RNAV procedures because of NextGen. Why does not the same argument apply to the OAK 120 departures? Furthermore, please clarify why the SUNNE procedure must be a conventional procedure. Is it correct that the aircraft that will use the future SUNNE procedure can only fly conventional procedures? In other words, will non-RNAV-equipped aircraft always be assigned the SUNNE procedure or can carriers/pilots request the SUNNE procedure even if their aircraft is RNAV-equipped?

Altitudes and speeds: What are the proposed altitudes and speeds of the proposed SUNNE procedure at various radial distances from OAK (2 miles, 5 miles, 10 miles, 15 miles, 20 miles, 25 miles, 30 miles, 40 miles, 50 miles). How do these altitudes and speeds compare to the actual altitudes and speeds of the current radar-vectored flights at the same distances from OAK? Please provide a side-to-side comparison table of altitude and speed data for actual traffic and future traffic at the various radii from OAK. In addition, please specify expected horizontal distribution and compare it to historical OAK and SFO departures using conventional procedures based on at least 6 months of data.

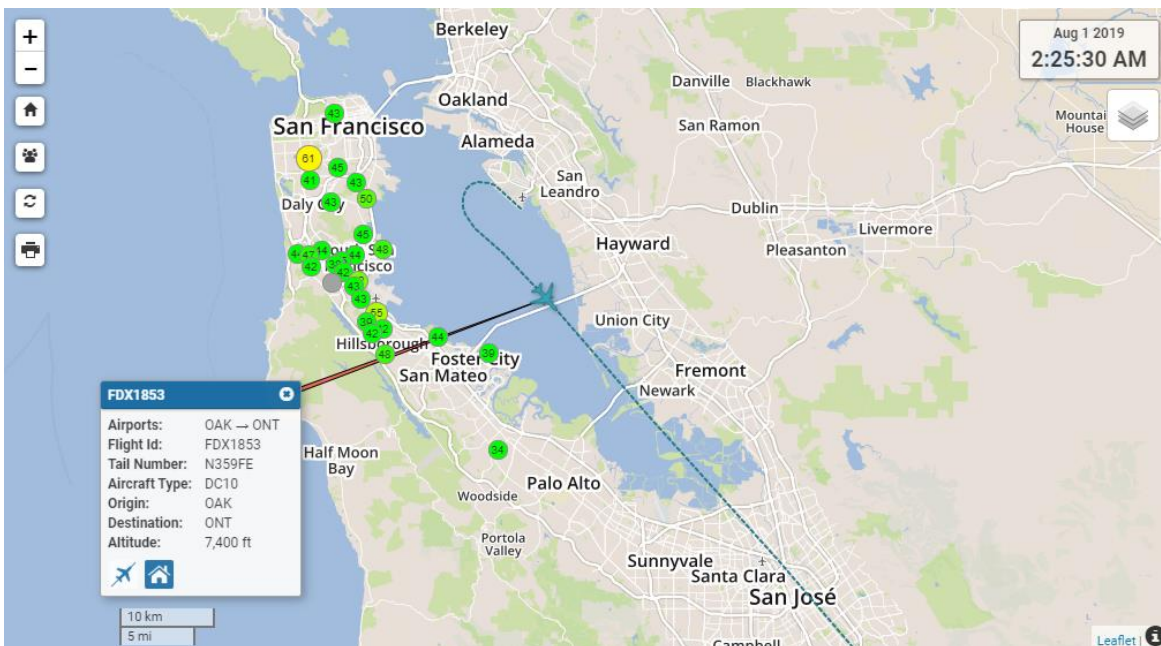
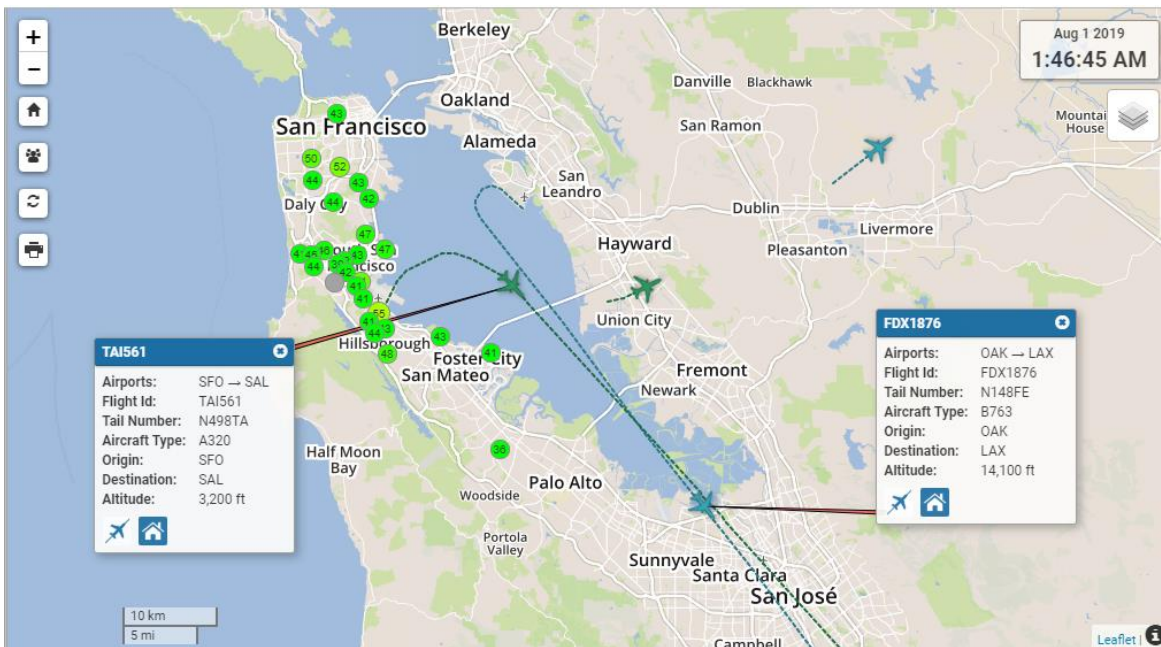
Waypoints: List all waypoints with their altitude and speed requirements of the SUNNE procedure. In addition, describe what happens after waypoint SUNNE (what other waypoints come after SUNNE? Do flights on the SUNNE procedure join another procedure later?)

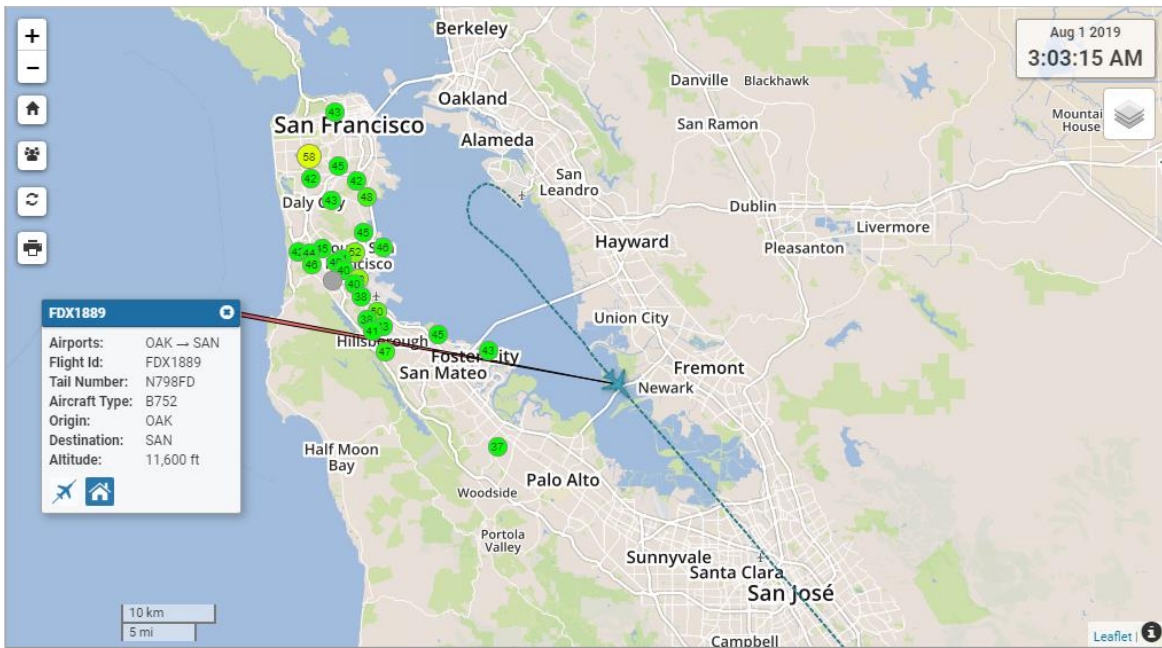
Operations: Please provide flight usage data, including volume of aircraft and flight details (e.g., flight number, departure time, frequency (daily, weekly, etc.), origin airport, destination airport) in Excel format for the following:

- Current departures from OAK or SFO that currently have a ground track similar to the proposed SUNNE procedure (e.g. aircraft fly all the way to the south of the Bay)
- Current OAK 120 departures
- Future OAK and SFO departures that are expected to use the SUNNE proposed procedure.

Appendix B - Some OAK and SFO departures already following SUNNE proposed ground tracks

- There are nightly OAK and SFO departures that have ground tracks similar to the ones of the SUNNE procedure (see below screenshots for August 1 examples; source SFO Webtracker). Will these OAK and SFO departures use the SUNNE procedure? Were these OAK departures (such as the nightly FedEx departures around 2 or 3AM) included in the Sep 26, 2019 FAA presentation to the SFO Roundtable Technical Working Group? If not, why not?
- If the goal is to reduce controller workload, why is the FAA not making the current radar-vector'd SFO 050 departures follow the SUNNE procedure? It seems that the numbers of OAK 120 departures and SFO 050 departures are similar in magnitude and, as mentioned above and shown in appendix A, some SFO 050 departures already follow the proposed SUNNE ground tracks.





Appendix C - Expected impact of the proposed SUNNE procedure

- Describe the weekly number of flights with their scheduled departure times of
 - Current OAK 120 and SFO 050 departures.
 - Current OAK and SFO departures that fly down the Bay, over the Dumbarton Bridge all the way down to the end of the Bay
 - Expected OAK departures that could use the SUNNE procedure.
 - Expected SFO departures that could use the SUNNE procedure.
- Show potential noise impact on our communities, including cumulative impact on communities already affected by other air traffic.
- Explain how noise impact was calculated and provide all data and assumptions used in the calculations.
- Describe how the proposed SUNNE procedure could potentially affect SFO BDEGA-east and DYAMD arrivals as well as future SFO arrival procedures that could potentially fly more over the Bay.
- Describe the conditions and circumstances that would allow carriers to use the SUNNE procedure instead of the HUSSH/NIITE procedure.
- Confirm in writing that
 - HUSSH/NIITE departure procedure will be the assigned departure procedure both OAK and SFO during night times for all RNAV-equipped aircraft.
 - Arrivals will have priority over the proposed SUNNE procedure (in other words, departing planes will be held back to allow arrivals to SFO to use the Bay). It was mentioned that planes using the SUNNE procedure would be held back, but the issue remains that the volume of flights using SUNNE could increase and fly over SCSC communities.
 - The proposed SUNNE procedure will not be an obstacle to evaluating new arrival paths to SFO that could potentially make use of the full length of the Bay.