

Correspondence received for the Technical Working Group of the SCSC Roundtable
Attachments:
Page 2 - 4: Robert Holbrook
Page 5 - 12: Sky Posse



SCSC Roundtable <scscroundtable@gmail.com>

Workplan Item 1.3.6 - Flight paths after PORTE

Robert Holbrook <rob.holbrook@alumni.stanford.edu>
To: scscroundtable@gmail.com

Tue, Jun 16, 2020 at 1:34 PM

Technical Working Group Members,
I developed the attached map to help visualize potential impacts to residents under the flight paths named by Work Plan item 1.3.6. I hope you find it useful.

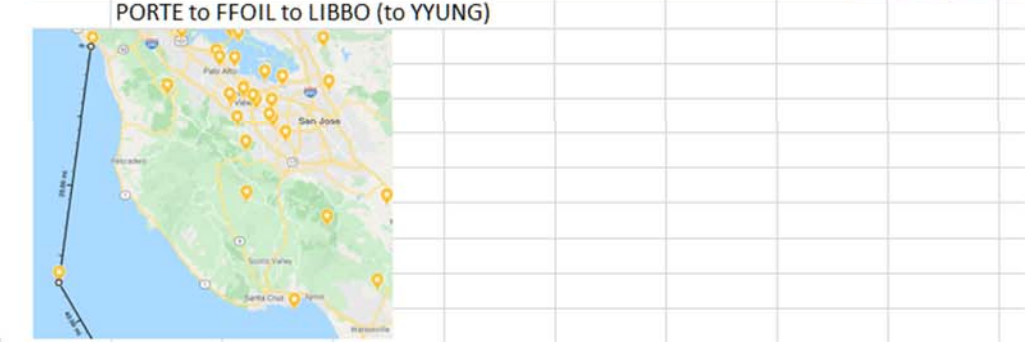
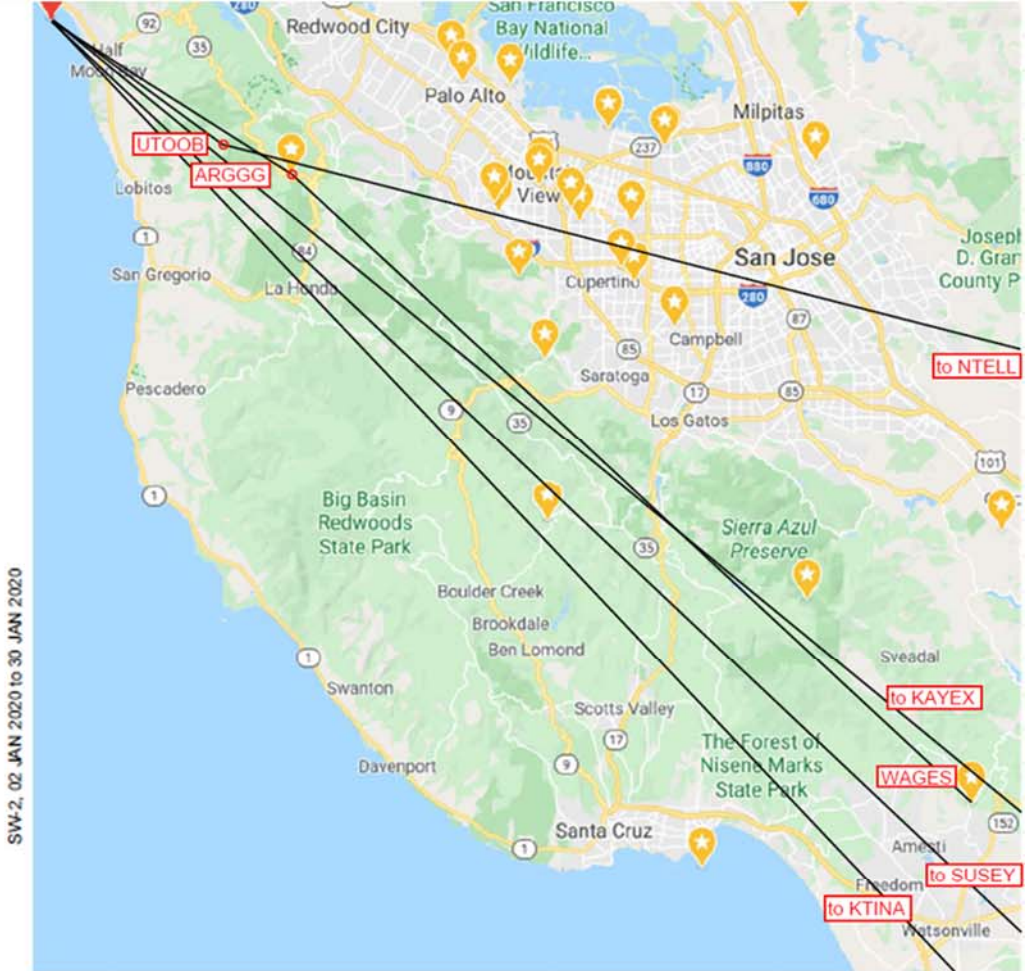
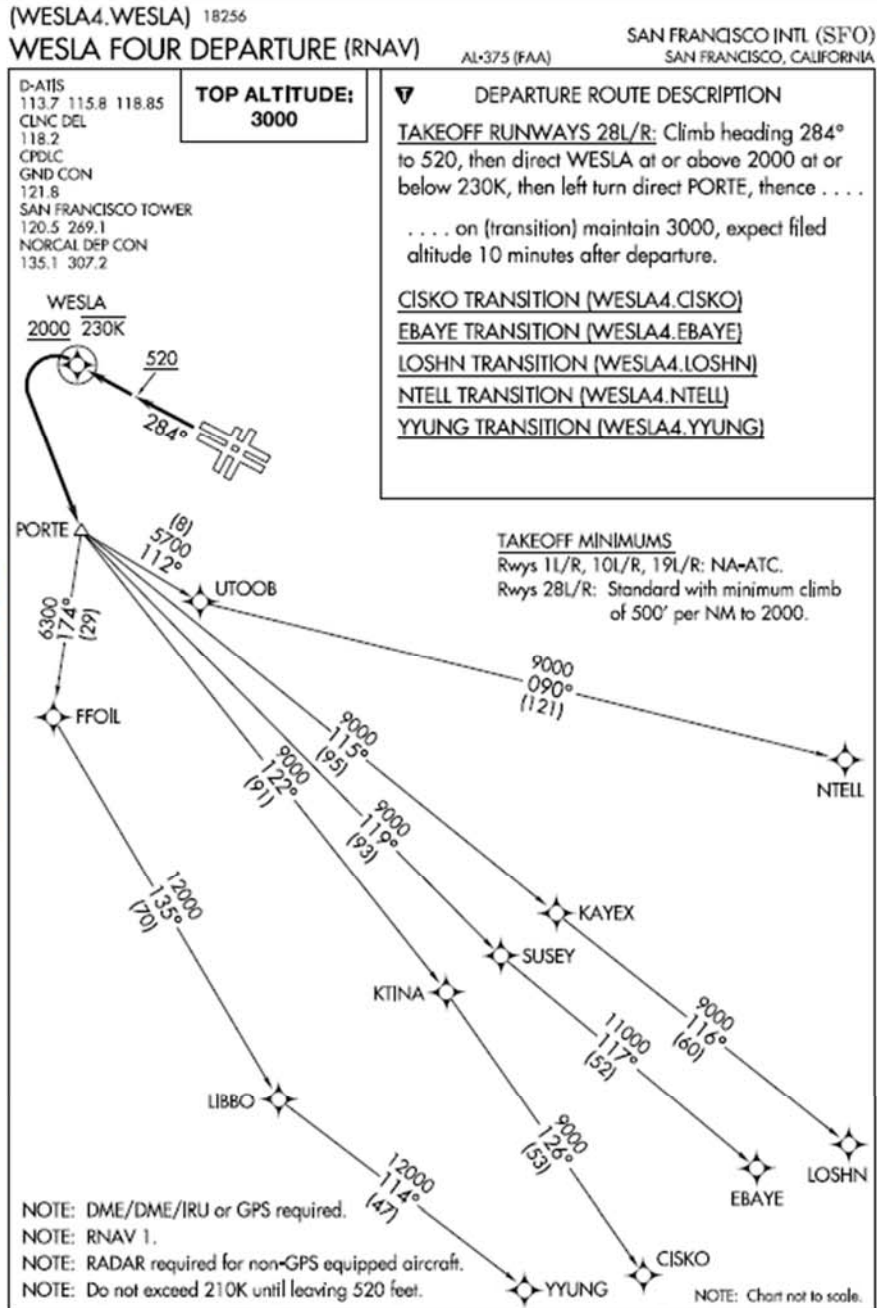
The referenced procedures - SSTIK (SFO), WESLA (SFO) and CNDEL (OAK) - share the same set of flight paths past the PORTE waypoint. I have also included the SKYLINE procedure for flights departing OAK to the West, which also uses PORTE and overflies the same area.

While the path between FOILL and YYUNG flies well over the ocean in our area, many of the flight paths fly over areas served by our Roundtable. East of Skyline, the UTOOB to NTELL leg overflies Palo Alto (Hills), Los Altos Hills, Los Altos, Sunnyvale, Santa Clara and San Jose, as well as Woodside and Portola Valley in San Mateo County, as can be seen in the detail view on the second page.

Robert Holbrook

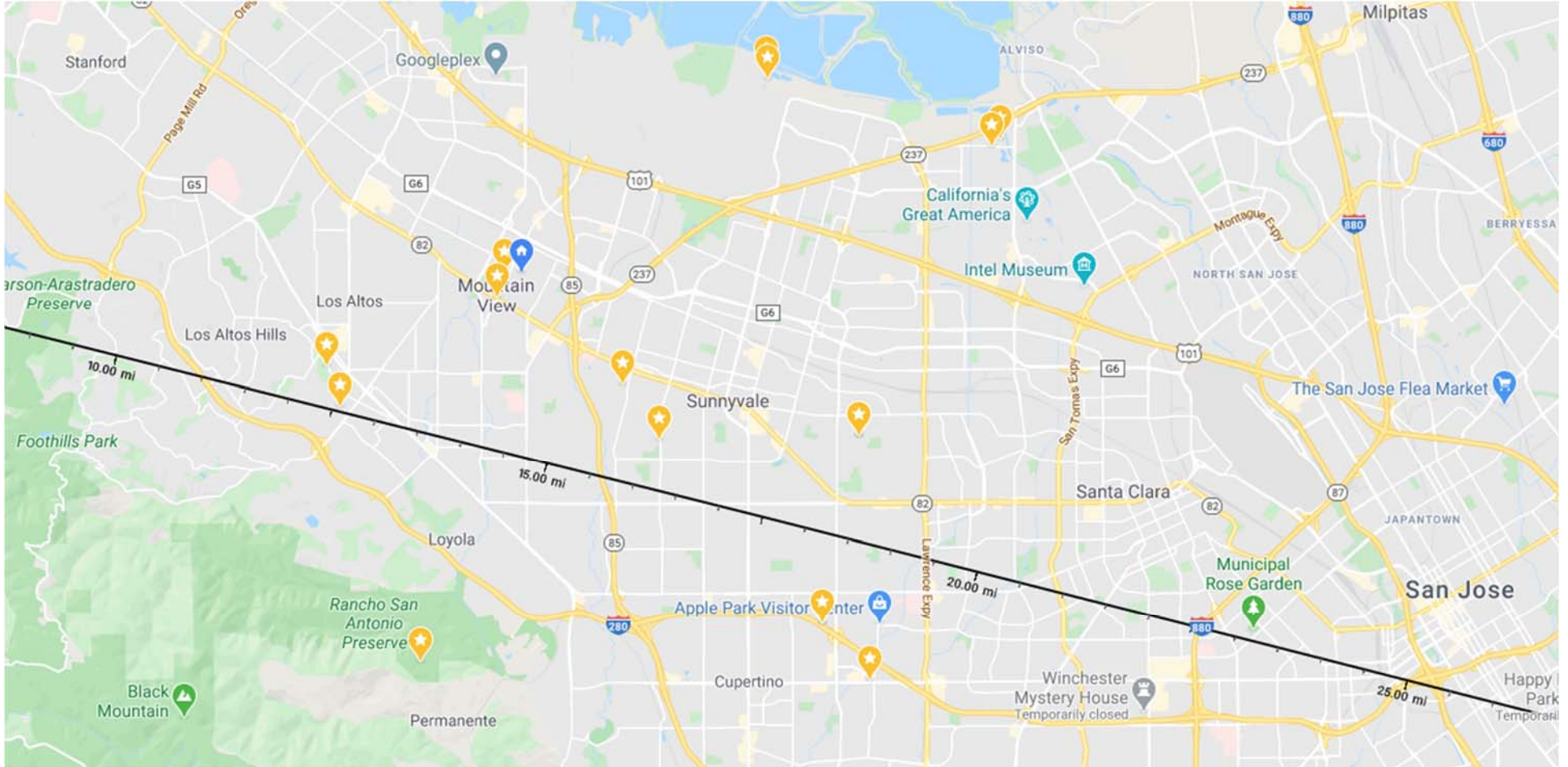
 **SSTIK, WESLA, CNDEL (OAK) SKYLINE (OAK) Flight Paths.pdf**
360K

SSTIK, WESLA and CNDEL (OAK) Flight Paths – These procedures share the same flight paths to NTELL, KAYEX, SUSEY, KTINA and FFOIL starting at PORTE
SKYLINE (OAK) Flight Path – Western departure connects PORTE to ARGGG to WAGES



UTOOB to NTELL Detail

Cities overflow: San Mateo County: Woodside, Portola Valley; Santa Clara County: Palo Alto (Hills), Los Altos Hills, Los Altos, Sunnyvale, Santa Clara, San Jose





SCSC Roundtable <scscroundtable@gmail.com>

Letter for June 17 SCSC Technical Working Group meeting

Sky Posse Post <skypossepost@gmail.com>
To: scscroundtable@gmail.com

Tue, Jun 16, 2020 at 1:58 PM

Dear Chair, and members of the SCSC Technical Working Group,

On the occasion of your inaugural meeting, we want to commend and thank you for Agenda Item 6.
Briefing on Potential Collaborative Work Regarding Night Operations.

Night-time operations are a top community priority and the one item during the Select Committee for which the FAA provided specific recommendations to the Committee to address community concerns. We think it is critical to follow the model FAA recommended - a multi-stakeholder effort, with airports, airlines, FAA, and communities reaching an agreement. We welcome having the SCSC roundtable take the lead on this for the residents of Santa Clara, and Santa Cruz counties, as well as many of the South San Mateo cities, who share similar concerns.

Regarding other items on your [Agenda](#) - the [IFP Gateway](#), the website where FAA publishes new airspace procedures or modifications - we suggest that it is imperative for the SCSC to first establish a position on FAA and Roundtable environmental disclosure processes and practices, which are simply currently not working to adequately advise communities about changes. As the FAA disclaimer on the IFP Gateway states,

*The Instrument Flight Procedure (IFP) Information Gateway is a communication tool the FAA uses to disseminate information about proposed changes to flight procedures to solicit comments from civil aviation organizations, affected military and civil air traffic control facilities, and airport owners and sponsors. The website is intended only for an aeronautical audience who can provide technical aeronautical comments. **The website is not intended to fulfill obligations under the National Environmental Policy Act and/or other applicable environmental regulations, or to solicit comments about environmental impacts of proposed changes to flight procedures.** By clicking "Continue", you acknowledge that comments submitted to the IFP Information Gateway related to potential environmental impacts will not be considered.*

FAA and the SCSC roundtable must strive to develop communications tools and methods to resolve the various problems that result in citizens being "last to know" about changes in impacts on the ground, and so that communities can enjoy the same consideration that is given to airspace users and operators.

Please also consider the following list of questions that Sky Posse Palo Alto gathered since the Select Committee, which remain unanswered. We hope these can serve as a starting point for discussion by your group.

[Unanswered Questions to SFO on GBAS](#)

submitted October 16, 2018 to SFO

[Unanswered Questions to FAA about FAA Initiative](#)

submitted April 20, 2018 via our Member of Congress

Kind regards,

Sky Posse Palo Alto



Letter to SCSC Technical WG June 16.pdf

45K

Sky Posse Palo Alto

2225 East Bayshore Avenue, Suite 200, Palo Alto, CA 94303

June 16, 2020

SCSC Roundtable
Technical Working Group

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Night-time operations are a top community priority and the one item during the Select Committee for which the FAA provided specific recommendations to the Committee to address community concerns. We think it is critical to follow the model FAA recommended - a multi-stakeholder effort, with airports, airlines, FAA, and communities reaching an agreement. We welcome having the SCSC roundtable take the lead on this for the residents of Santa Clara, and Santa Cruz counties, as well as many of the South San Mateo cities, who share similar concerns.

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February 22, 2019

Page 2

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Kind regards,

Sky Posse Palo Alto

Sky Posse Palo Alto is a grassroots group of citizens deeply concerned about increased aircraft noise and pollutants from Nextgen. Many have invested substantial effort in studying the issues, attending public hearings and meetings, and engaging in outreach.

For more info see: <http://www.quietskiesmidpeninsula.org> and www.skypossepaloalto.org

GBAS Questions to SFO

- SFO's plan to do "no harm" with GBAS is using current noise levels (post Nextgen implementation) as a baseline for SFO's procedures design, and preliminary estimates already show a projected increase in noise for some areas with GBAS. What noise standards and policies are being used to measure "no harm" - is SFO setting it's own standards and baselines?
- Why is SFO rushing to implement GBAS before the serious problems of traffic concentration and congestion at Menlo vicinity are resolved (including low and loud night flights). What role does SFO see for itself to urgently resolve these problems brought about since 2014?
- How involved is NorCal TRACON in helping SFO with GBAS? Who are the members of the working group developing GBAS? How many are airline and industry representatives? Which FAA departments are on the committee? Who is representing community interests?
- Who is the FAA official in charge of NEPA review for GBAS? How does SFO or United Airlines go about applying for a CATEX, what documentation is involved?
- To qualify for a CATEX (by-passing environmental review) 2012 legislation directed FAA to demonstrate that actions qualifying for a Catex meet a standard of reducing fuel burn, emissions, and noise. How is the noise reduction standard met; how is noise reduction measured?
- To use the "overlays" as noise baselines for proposed GBAS procedures, "overlays" should all have had previous FAA environmental review. What environmental documentation does SFO have for each of the "overlays"?

1. Spacing vs “Holding Tank:”

What is the status of [Time Based Flow Management](#) (TBFM) for SFO, SJC and OAK?

Better organization of traffic flows was brought up as a promising solution for the noise problems during the Select Committee - by FAA, Committee members, and SFO. At the first Select Committee meeting on May 6, 2016, then SFO President John Martin stated that flow management would fix the noise problems experienced in the Menlo area within three years. What we have heard since is that metering causes delays (?); therefore airlines/airports may prefer the current bunching of planes over Palo Alto, East Palo Alto, Menlo vicinity. There is also concern that TBFM can and will be used in a way which makes noise worse. The FAA site touts efficiency gains with TBFM, not noise reduction. FAA and airports need to provide a thorough analysis and update about this topic, with both technical and policy explanations. Clearly, even with the technical challenges that FAA had mentioned about TBFM, planes do depart with plenty of time for Air Traffic Management organize their landings earlier, is it a choice that Air Traffic Control does not execute sufficient communications early on to manage the planes so that they are not amassing in what has been called a “holding tank” in the Mid-Pen area, possibly also causing many planes to fly lower?

2. Noise Reduction from airspace and altitude changes:

Complaints with the SERFR 3 procedure seem to be the same as SERFR 2, residents from diverse neighborhoods are reporting that noise, frequency and number of planes is more noticeable. Can FAA please provide an analysis of the reasons why “SERFR’s noise-reducing, idle-power descent benefits” explained in Phase Two, are not evident?

FAA stated in Phase Two Report that "The current SFO Class B airspace does not fully contain the entire SERFR route. As a result, aircraft on the SERFR must level off to stay within the protected airspace. Leveling off requires pilots to use speed brakes and increase thrust, which reduces the SERFR’s noise-reducing, idle- power descent benefits. A proposed modification of Class B airspace, if approved, should allow more SERFR arrivals to fly quieter idle-power descents. We also are evaluating proposals to raise altitudes of aircraft on the SERFR as well as aircraft that are vectored off the route. "

These concepts (ideas) of noise reducing benefits from fixing the Class B issue, “idle-power descents,” overwhelmed the Select Committee community discussions and are the recommendations that FAA seems more happy to do, but SERFR 3 seems to be showing that minimally tweaking altitudes is not a solution, nor are idle power descents if these happen

where it's irrelevant to noise on the ground. Given the apparent non-results from the Class B and idle-descent ideas, can FAA help refine the unanimous recommendation from the Select Committee to assess using the full length of the Bay, 2.5R5, and the ideas to reduce the concentration of low altitude traffic at MENLO (now SIDBY)?

3. Air Traffic Flow & Altitude Prioritization:

New Nextgen procedures are being built for Oceanic and BDEGA, we would like to know how these interactions will affect communities at or near these paths.

Also, given the build up in the Mid Peninsula when planes from the North (BDEGA), South (SERFR), West (OCEANIC), and SJC South Flow are landing (with all using the same vicinity to cross), not all can cross at the exact same altitude as they proceed to land. We would like to understand scenarios of how decisions are made as to which traffic flows are given higher or lower altitudes as they are being sequenced to land. Or what criteria is used to organize the respective flows and altitudes.

4. AEDT Noise Analysis for SERFR 2 vs SERFR 3:

At the Select Committee Organizational meeting on May 6, 2016, we were promised that any changes would be evaluated using FAA's state of the art AEDT tool (which has not happened yet). The public otherwise does not have expected noise analysis to understand changes.

On March 29th, FAA published SERFR 3 (S3) to replace SERFR 2 (S2). There are new and confusing terms and a new waypoint not previously discussed with the communities it impacts. With S3, instead of MENLO (Willow Rd/101), there is a replacement (new) waypoint SIDBY (Palo Alto residential neighborhoods). The S2 STAR ended with MENLO, but SIDBY is not in the S3 STAR. Instead, there are instructions "Expect assigned instrument approach (Rwy 28L/R)." In Phase Two FAA explained that the airlines set the altitude at MENLO at 4000 feet. SIDBY crossing (not that far from MENLO) does not have the altitude restriction to 4000 feet. We would like understand what's behind the relocation of the problematic "single" waypoint used for so much traffic, from MENLO to SIDBY; also what appear to mixed messages from FAA about altitudes at MENLO/SIDBY vicinity, and why the final part is now outside the STAR. What is SERFR 3 meant to accomplish overall, and specifically the action to create SIDBY.

Most important, we would like to see AEDT noise impacts analysis of the introduction of any new waypoint but especially one created in a highly congested area.

5. Notice of Actions, data and environmental analysis:

Last but not least. There must be a better way to know which FAA actions impact our communities than the IFP Gateway. There are ongoing and several actions for the various

airports. There is no environmental data or analysis for the procedures. It's a virtual puzzle and with that communities have just 60 days to challenge an action. The City's expert attorney on page 3 of their report states they could not find the CATEX for SERFR 3. It was buried in one of the 10 actions on the CATEX. It should not take legal actions to have the agency provide BASIC community outreach info. It is inexcusable given the problems caused by these lax practices and a failure of the agency to seek to make informed decisions about how their actions impact people and our natural environment. What will FAA do to change this?