



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

PO Box 3144
Los Altos, CA 94024

11/24/2020

Ms. Raquel Girvin
Regional Administrator, AWP-1
FAA Western-Pacific Region
777 South Aviation Boulevard, Suite 150
El Segundo, CA 90245

Subject: BDEGA Arrivals - FAA Questions

Dear Administrator Girvin,

As the FAA is aware, SFO BDEGA arrivals have a substantial negative impact on many Peninsula residents because BDEGA is a high-volume procedure (roughly 25% of SFO arrivals) and planes fly over the Peninsula the majority of the time (typically 70% or more) using the BDEGA-west leg¹ instead of the BDEGA-east leg² down over the Bay.

Both the SFO Roundtable and Select Committee made multiple recommendations to the FAA regarding increasing the use of the BDEGA-east leg, including returning to historical usage where BDEGA-east was used at least 50% of the time:

- See Appendix for data analyses (recent and historical).
- See the [November 2016 SFO Roundtable recommendations](#) (in particular pages 7-9 of the pdf document) and the [November 2016 Select Committee recommendations](#) (in particular section 2.2 on page 10 of report).

Through past FAA updates and comments at Roundtable meetings, the FAA indicated that BDEGA-east usage was constrained by DYAMD arrival volume and that the FAA would reinforce the use of BDEGA-east with Air Traffic Control staff.

If the FAA took specific actions to increase the percentage use of BDEGA-east, the SCSC Roundtable has not seen substantial progress since these recommendations were made. We were hoping, however, that the sharp downturn in SFO operations caused by the COVID-19 pandemic would allow the FAA to

¹ The SCSC Roundtable acknowledges that the FAA uses the term “BDEGA Arrival” instead of the BDEGA-west leg, which has been retained here for historical context.

² The SCSC Roundtable acknowledges that the FAA uses the term “downwind visual for the BDEGA Arrival” instead of the BDEGA-east leg over the Bay, which has been retained here for historical context.

substantially increase the use of BDEGA-east, therefore, reducing the impact on the residential communities of the Peninsula.

The SCSC Roundtable saw some improvement in May and June 2020, which we appreciate very much. Using BDEGA-east 40% of the time is great progress over the typical 28 or 30% usage of the last few years. However, the percentage split for BDEGA-east still falls short of historical values achieved when air traffic was much higher than now. For instance, BDEGA-east was used 57% of the time in May 2005 when traffic was almost three times as high. One would expect that the FAA would be able to achieve similar splits or exceed them when the volume of SFO operations is roughly one-third of what it was then. See the BDEGA-east analysis provided in the Appendix.

Given the limited improvement observed on the percentage use of BDEGA-east, the SCSC Roundtable therefore requests that the FAA address the following BDEGA questions:

1. What is preventing Air Traffic Control from using the BDEGA-east leg more during this period of drastically reduced air traffic volume at SFO?
 - Please list all reasons with supporting data.
 - In particular, please specify whether NIITE/HUSSH departures or OAK departures to FFOIL with transition to YYUNG conflict with BDEGA-east arrivals.
 - Please provide specific reasons why BDEGA-east was used only 40% of the time in May 2020, but 57% of the time in May 2005 when traffic volume was about three times higher.
 - Identify what can be done to encourage ATC staff to use BDEGA-east much more during this very low traffic period.
2. Is the BDEGA-east leg down the Bay considered an integral part of the BDEGA arrivals procedure?
 - If not, please explain why not and what needs to happen to change that.
3. Is the FAA willing to consider changes to enable the use of BDEGA-east at least 50% of the time?
 - Please suggest all possible changes that would increase usage of BDEGA-east.
 - Changes may include but are not limited to increasing in-trail spacing on DYAMD, creating a curved arrival Required Navigation Procedure over the Bay, coordinating SFO or OAK departures to allow BDEGA-east arrivals if conflicts exist, and making BDEGA-east the default leg for SFO arrivals from the north during night time (10 PM to 7 AM).
 - For each possible change, specify if the FAA is willing or not to evaluate the change.
 - If the FAA is willing, describe the process to initiate the change.
 - If the FAA is not willing, please share explanations.

Most Sincerely,



Mary-Lynne Bernald
Chairperson, SCSC Roundtable

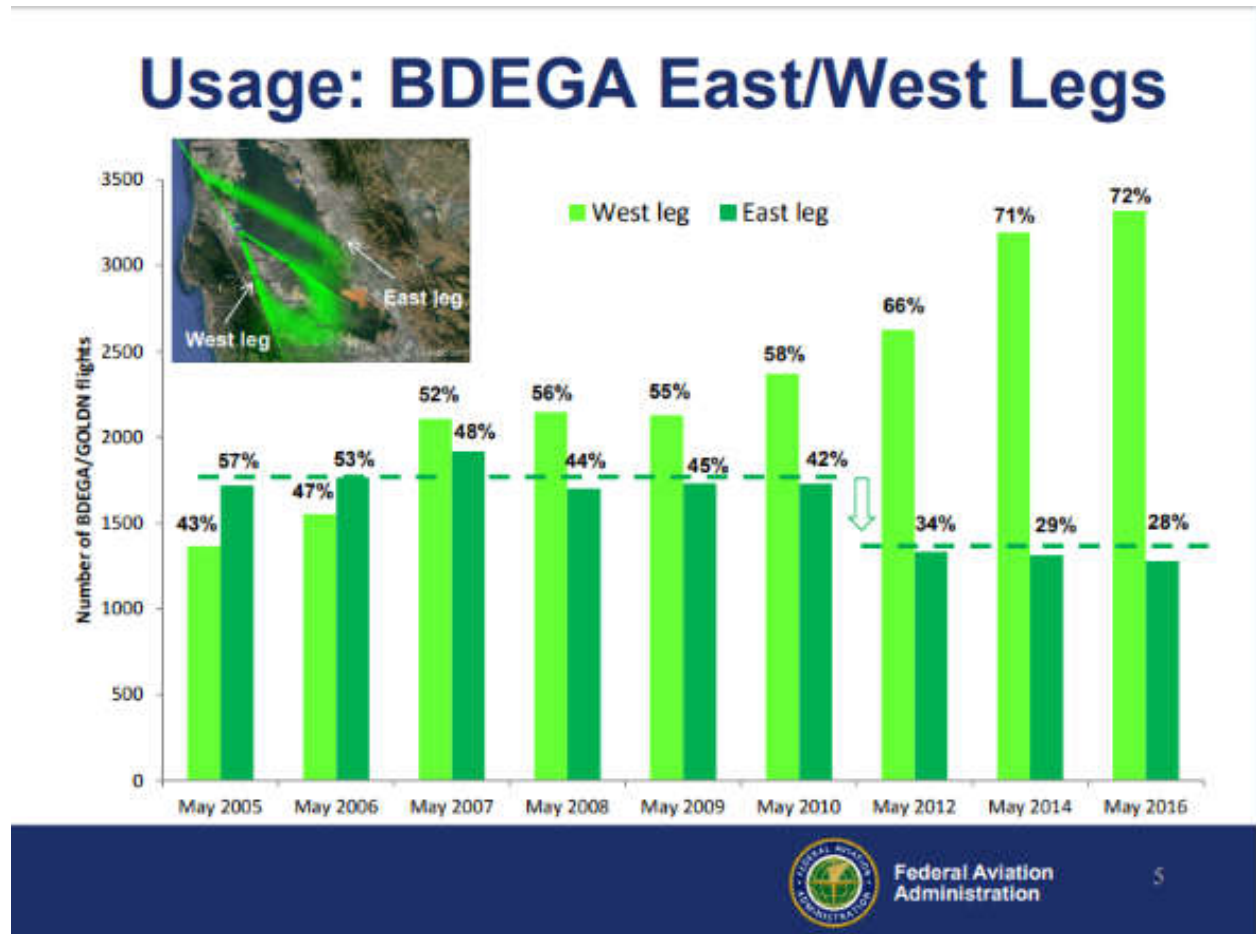
APPENDIX

BDEGA usage analysis

Sources: FAA data presented at the 09/29/2016 Select Committee meeting (see figure below), 2020 data provided by the SFO Noise Abatement Office (see table below), and [SFO Airport Director Reports](#).

- All BDEGA arrivals:
 - Current BDEGA arrivals are much lower than before: all BDEGA arrivals in May 2020 (~ 1150) were about 37% of all BDEGA arrivals in May 2005 (~ 3100).
 - The decrease in all BDEGA arrivals is consistent with the decrease in all SFO arrivals for the same months:
 - May 2020 SFO total arrivals (~ 4,400) were about 35% of the May 2005 SFO total arrivals (~ 12,500).
- BDEGA-east arrivals:
 - Between 2005 and 2016, the percentage use of BDEGA-east declined steadily:
 - Between May 2005 and May 2016, the percentage use of BDEGA-east was cut in half: 57% usage in May 2005 versus 28% usage in May 2016.
 - Since 2014, the percentage use of BDEGA-east has remained below 30% except for May and June 2020 when usage rose to 39.7% and 37.4%, respectively.
 - BDEGA-east was used 57% of the time in May 2005 versus 40% of the time in May 2020 even though there were almost 3 times as many BDEGA arrivals in May 2005 than in May 2020 as described above.
- Key observations:
 - Recent percentages of BDEGA-east usage remain low when compared to historical percentages given that current SFO traffic is much lower than historical values due to COVID-19.
 - The FAA was able to use BDEGA-east 57% of the time in May 2005 when SFO traffic was roughly three times higher than in May 2020.
 - In comparison, BDEGA-east was used only 40% of the time in May 2020 when traffic was about one third of what it was in May 2005.

FAA presentation at 09/29/2016 Select Committee meeting



BDEGA-east & BDEGA-west arrivals into SFO from January through June 2020

2020	SFO Total Operations*	SFO Arrivals (assumption: 1/2 of total operations)	BDEGA Arrivals		BDEGA East Arrivals		BDEGA West Arrivals	
			Number*	% SFO Arrivals	Number*	% split	Number*	% split
January	36,473	18,237	4,781	26.2%	1,300	27.2%	3,481	72.8%
February	33,991	16,996	4,636	27.3%	1,443	31.1%	3,193	68.9%
March	29,674	14,837	3,935	26.5%	1,028	26.1%	2,907	73.9%
April	7,576	3,788	906	23.9%	257	28.4%	649	71.6%
May	8,726	4,363	1,162	26.6%	461	39.7%	701	60.3%
June	11,275	5,638	1,491	26.4%	558	37.4%	933	62.6%
Totals:	127,715	63,858	16,911	26.5%	5,047	29.8%	11,864	70.2%

*Data source: SFO Airport Noise Abatement Office

Notes:

1. BDEGA is a major SFO arrival route, typically representing about 26.5% of SFO arrivals in the first 6 months of 2020.
2. In the first 3 months of 2020, the % split between BDEGA East and BDEGA West was aligned with the typical split observed for the last few years: BDEGA East was used between 26% and 31% of the time.
3. SFO Arrivals in April 2020 were only 20.7% of the January 2020 arrivals. Despite this sharp decrease in traffic, BDEGA East was used only 28.4% of the time in April 2020.
4. In May and June 2020, SFO arrivals started to increase again and the percentage usage of BDEGA East increased substantially to 39.7% and 37.4%, respectively.