

COMMENTS ON THE SELECT COMMITTEE ON SOUTH BAY ARRIVAL'S DISCUSSION DRAFT

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Based in Part on Input from the San Mateo County Delegation

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Principles

A series of principles should be included in the document, including the following:

- Minimizing airline noise must be a priority of the FAA when designing procedures, and of Air Traffic Control when vectoring flights, and should be given greater weight than airline efficiency.
- Noise needs to be disbursed. A small number of communities should not be disproportionately affected when there are ways to avoid or disburse airline noise.
- Reducing noise at night is an urgent priority. Given the availability of airspace in the nighttime hours, it should be extremely rare that a flight path is disruptive to the community.
- When designing new procedures, the FAA must include affected communities as stakeholders. Airline noise not only disrupts quality of life but also has significant and well documented adverse impacts on the health and well-being of individuals residing under flight paths, particularly children.
- No matter how effectively the airspace, or any specific procedure, is re-designed, the value of the change will only be as helpful as the extent to which it is followed. The Select Committee urges Air Traffic Control to adhere to published procedures except when safety considerations require vectoring.

Recommended Edits to the Discussion Draft

Note: Language that is **bolded** is proposed new language. Deleted language is marked with a strikethrough.

Section 1.1: Add the following language to the recommendation:

Any changes to the SFO Class B airspace to fully contain the SERFR procedure, should also allow OPD arrivals on any other arrival procedure from the south that might replace, or supplement, the SERFR procedure.

Section 1.3: Regarding defining “nighttime” as 1:00am-6:00am, see comments on “Nighttime” in Section 2.4 below.

Section 1.4: Regarding defining “nighttime” as 1:00am-6:00am, see comments on “Nighttime” in Section 2.4 below.

Section 1.5: Revise the recommendation to read as follows:

The Select Committee recommends ~~adoption of the FAA implement~~ Feasibility Group 5 **with the goal of having 100% of CNDEL departures stay on the procedure longer and not turn prior to the CNDEL waypoint.**

Section 1.6: Add the following to end of the introductory paragraph:

The Select Committee hopes that the FAA will support the implementation of TSS or TBFM even if that means delaying take-offs at the airport of origin. TSS or TBFM should not be implemented unless the new capacity is used to relieve the concentration of flights over impacted communities (as opposed to increasing flights in so-called noise corridors). In particular, TSS or TBFM should be used to reduce vectoring and decrease the safety concerns of having so many concentrated flights in the area of the MENLO waypoint.

Section 2.1: Revise the recommendation to read as follows:

The Select Committee recommends that the Airbus family aircraft arriving or departing SFO undergo the retrofit at the earliest possible opportunity. ~~The Committee takes notes of the fact that one major airline flying into and out of SFO commends United Airlines for voluntarily agreeing has proposed to retrofit its fleet over the next 2-3 years. The Committee~~ **hopes that other airlines follow suit, and that all retrofits are completed within at least this timeframe, but hopefully sooner.** ~~While the commitment to retrofit is welcome news, the Committee finds that the time period is unnecessarily and unacceptably long.~~

Section 2.2: Replace the recommendation with two separate recommendations as follows:

Recommendation 1: The Select Committee recommends that aircraft flying on the BDEGA procedure utilize the so-called East leg (over the San Francisco Bay) as much as possible, in order to minimize noise over the Peninsula. The Select Committee further recommends that the FAA take steps to formalize this procedure so that it is more likely to be used.

Recommendation 2: The Select Committee recommends that all aircraft flying on the BDEGA procedure during nighttime hours,

when air traffic flows are reduced, use the East leg, unless safety considerations prohibit such a flight path.

Section 2.4: Revise the first paragraph to read as follows:

Reducing noise at night is an urgent priority. ~~During the hours of 11:00pm-6:00am~~ **Between midnight and 6:00am** the number of flights in to and out of SFO is significantly reduced. As a result, there is considerable potential for aircraft to be rerouted over unpopulated or less populated areas, specifically the San Francisco Bay and Pacific Ocean, instead of the Peninsula.

Include the following two recommendations:

Recommendation 1: The Select Committee recommends that all efforts must be made to reduce airline noise over populated areas during “nighttime” hours when residents need a reprieve from airline noise so that they can sleep. For purposes of this report, “nighttime” should be defined as 12 midnight to 6am, but should be expanded to include the hours of 11pm-12am and 6am-7am whenever possible. During nighttime hours, the following actions should be implemented as quickly as possible:

- The BDEGA procedure should use the East leg only (See Section 2.2), and it should be determined if it is feasible to establish a formal procedure for the East leg.
- The NITTE procedure should remain on the defined procedure until the NITTE waypoint (See Section 1.4).
- Flights arriving on the OCEANIC and SERFR (or whatever replaces or supplements it) procedures should fly a route that allows for an approach over the SF Bay.
- Air traffic control should make every effort to coordinate traffic arrivals to create a single stream of traffic to land only on Runway 28R. Depending on weather conditions, aircraft would be expected to fly the FMS Bridge Visual 28R, the RNAV (RNP) Runway 28R, or, if conditions require, the ILS 28R or other approach to Runway 28R which minimizes noise impact to Foster City and other Bayside communities.
- Aircraft should fly at higher altitudes when over land.

Recommendation 2: The Select Committee recommends that the FAA, SFO, **the SFO Roundtable, representatives of congressional offices,** and industry users convene with the purpose of establishing new additional overnight noise abatement procedures within the next six months.

Section 2.7: Revise the recommendation to read as follows:

The Select Committee recommends that the FAA determine the feasibility of increasing the glide slopes of SFO Runways 28R and 28L **to the maximum amount consistent with safety.**

Section 2.9: Delete the third sentence from the second paragraph.

~~On the other hand, if the vectoring directive is unrestricted, with the pilot not being given a speed or altitude restriction, it is unlikely that noise will result.~~

Section 2.10: Change the last word of second paragraph from “residents” to “communities.”

Section 3.1: Include the following three recommendations:

Recommendation 1: The Select Committee recommends that an ad-hoc subcommittee of the Select Committee consisting of two members from each Congressional District convene to develop a structure for supporting the continued work of the Select Committee. Among other tasks, the Select Committee would receive reports on the implementation of the recommendations included in this report. Issues to be considered by the ad-hoc subcommittee would include: the financial and administrative resources needed to support the Select Committee, funding, frequency of meetings, and the expected duration of the Select Committee. The ad-hoc subcommittee would consult with the FAA, SFO and local jurisdictions in developing a framework to support the Select Committee going forward and report back to the full Select Committee with its recommendation within 90 days.

Recommendation 2: The Select Committee recommends that a permanent entity be established to address issues of aircraft noise throughout the region (“region” yet to be defined). While the Select Committee’s schedule did not permit time to develop a recommended governance structure, ~~some possibilities could include: (1) an adjunct committee of one of the existing community roundtables at either the San Francisco or Oakland International Airports; (2) Association of Bay Area Governments, Regional Airport Planning Committee; (3) Metropolitan Transportation Commission; and/or (4)~~ **a potential approach would be to create** a wholly new, independent, stand-alone committee/commission devoted to airport noise and/or other regional airport issues.

Recommendation 3: The Select Committee recommends that long-term planning be conducted, under the auspices of the regional body

created in Recommendation 2, to consider and mitigate the noise impacts of increasing airline traffic in the years ahead arriving and departing from the regions three major airports.

Section 3.3: Revise the recommendation to read as follows:

The Select Committee recommends that ~~the U.S. Congress require the FAA to adopt supplemental metrics for aircraft noise~~ **our Congressional representatives continue to support the efforts of the Quiet Skies Caucus to require the FAA to lower the acceptable DNL threshold from 65 to 55 and use supplemental metrics** that characterize the true impact of airline noise experienced by people on the ground.

Section 4.2: Edit the recommendation to read as follows:

The Select Committee recommends that the FAA **and/or SFO** monitor and document noise exposure of any feasible solutions before and after implementation to ensure impacts are verified, and to determine whether results are of a discernible benefit.

Section 4.3: Edit the recommendation to read as follows:

The Select Committee recommends ongoing compliance monitoring for any set of solutions accepted and implemented by the FAA. The Committee recommends that the Members of Congress ensure that the FAA takes the appropriate steps to measure and guarantee ongoing compliance. **As was recently agreed to by the FAA and Massachusetts Port Authority, the FAA should use real-world single-event noise data from communities to develop a supplemental metric to measure and track noise and flight concentration. Noise and compliance reports would be submitted to the Select Committee on a regular basis.**