



June 15, 2020

Raquel Girvin, Regional Administrator – Western Pacific Region
Federal Aviation Administration (FAA)
777 Aviation Boulevard
El Segundo, CA 90245

Re: Information Request for the FAA for the July 2020 SFO Airport/Community Roundtable Technical Working Group (TWG) Meeting

Dear Ms. Girvin,

Per the agreement to provide your agency with information requests 45 days in advance, the SFO Airport/Community Roundtable hereby requests response to the items listed in Attachments A and B for the Federal Aviation Administration (FAA) to discuss at the next Technical Working Group (TWG) meeting, to be scheduled for the week of July 27, 2020. In order to have appropriate time to review the agency response and to lead a productive public conversation about these items at the meeting, we request that the specific visuals/maps outlined in Attachment B be provided at least two days in advance of the meeting.

That said, the major focus of our inquiry is to better understand the FAA's proposal to route nighttime SFO southbound aircraft by using a portion of the NIITE Departure procedure combined with ATC vectoring. Please provide all known information for this proposed procedure, including the hours of operation and proposed paths for aircraft after the GOBBS waypoint. We would also like to understand the FAA's proposed timing and process for the implementation of these changes

In addition to providing technical responses to the specific questions and requests in the attachments, we also hope that FAA staff will come to the meeting prepared to discuss possible alternative solutions should suggestions emerge.

We appreciate your willingness to respond to this request for information so that we may better understand the proposal. If you have any questions, or require additional follow up, please direct inquiries to Angela Montes, SFO Airport/Community Roundtable Administrative Secretary, who can determine who from our team is best able to help you. She can be reached at amontescardenas@smcgov.org.

Regards,

Ricardo Ortiz, Chairperson
San Francisco International Airport/Community Roundtable

cc: Faviola Garcia, FAA
Sky Laron, FAA

Attachments: A: Detailed Technical Questions and B: Request for Visuals

Attachment A: Detailed Technical Questions

1. NIITE/HUSSH Departure Procedures, Part 1 (Technical):

Please articulate the FAA's proposal for routing nighttime SFO southbound aircraft by using a portion of the NIITE Departure procedure along with ATC vectoring.

 - a. Using the visuals requested in Attachment B, please point out the NIITE Departure path and the SSTIK departure with all transitions. Explain the difference between the requested published NIITE Southbound transition and the FAA's substitute proposed southbound ATC vectors for these procedures. Will the ATC vector plan be applied to HUSSH as well as NIITE for southbound aircraft?
 - b. Using the visuals requested in Attachment B, please demonstrate the possible paths/vectors for a southbound NIITE aircraft after GOBBS intersection.
 - i. Please indicate the direction of turn and their approximate path.
 - ii. Will aircraft will be given a heading to intersect a fix on one of the SSTIK transitions or will they be given a heading to intercept a course to a fix?
 - iii. Is there any fix or point on any of the SSTIK transition paths that will not be used for an aircraft to be vectored to?
 - c. What options have been discussed for providing vectors for NIITE southbound aircraft before reaching GOBBS intersection? Where is the estimated location for the start of such early turns before GOBBS intersection.
 - d. Using the visuals requested in Attachment B, please point out the over ocean southbound paths of other departures such as the OFFSHORE, COAST and NUEVO.
 - e. What are the current maximum hours of operation for the NIITE/HUSSH departure procedures for aircraft northbound and eastbound?
 - f. What are the planned maximum allowable hours of operation for southbound aircraft flying the the NIITE departure procedure with the FAA substitute proposal of new southbound ATC vectors? Would the maximum hours be any different if the FAA were to design a published southbound transition for NIITE?
 - g. What noise modeling assumptions were used in proposing this substitute ATC vectoring in place of a NIITE Southbound Transition?:
 - i. What geographical areas (eg Marin County, San Francisco County, San Mateo County, or other) will be assessed for potential noise impacts from the proposed changes?
 - ii. What other modeling inputs beside geographic area are being considered?
 - iii. Please provide the noise modeling files.
2. Special Use Airspace (SUA)
 - a. What are the operational and other requirements with regard to SUA?
 - b. How far laterally and vertically must an aircraft remain from the limits of the SUA when it is active?
 - c. How does SUA affect the airspace available for a NIITE Southbound Transition? Using the visuals requested in Attachment B, please point out what airspace is available for such a South Transition
3. NIITE/HUSSH Procedures, Part 2 (Process):
 - a. Please explain the rationale for proposing changes to utilization of an existing procedure

- rather than the FAA's traditional path of proposing revisions through the IFP Gateway process.
- i. Does the current proposal allow opportunity for public comment other than post-design comment during the environmental process?
 - ii. How does this proposal respond to the recommendations of the San Francisco Airport/Community Roundtable and the Select Committee on South Bay Arrivals to create a NIITE Southbound transition? (The FAA has stated that it will not implement a published transition from GOBBS, but rather vector aircraft from the vicinity of GOBBS to the plane's filed route using existing SSTIK transitions)
- b. What is the process for the environmental review being conducted for proposed new ATC vectoring after GOBBS? What assumptions are being used?
- i. If altitude, include altitude at NIITE intersection, eastern entry to the Golden Gate, mid-way through the Golden Gate, exit from the Golden Gate, 5NM east of GOBBS intersection, and GOBBS intersection.
 - ii. What is the range of aircraft type and other unique features (payload, engine type) and impact on presumed altitudes. Is the assumption that aircraft will routinely climb unrestricted to at least 10,000' before being required to level off? Where do you assume a 10,000' altitude will be attained by ~75% of the aircraft?

Attachment B: Request for Visuals

The Roundtable requests the FAA to create a dynamic visual depiction of the airspace with flexible viewing layers for presentation at the July 2020 Technical Working Group meeting to enable productive discussion of the proposal. Specifically, we request the creation of a Google map that can be downloaded and edited (KML file), whereby each layer can be individually toggled on or off for display and editing and new map layers can be added (map images are unlocked for editing).

The map image should be scalable using normal Google Map/Google Earth controls. When all map layers are displayed simultaneously, the combination map should display:

1. LAYER: base map of Google Satellite image
 - a. Include distance scale (note nautical miles or statute miles)
2. LAYER: All Special Use Airspace (SUA) along the coastline and for 20NM west of the coastline from vicinity PYE to vicinity KMRY to include altitudes from the surface to FL240.
 - a. If space allows on the layer, annotate map with information on altitudes and hours of scheduled use for each SUA and whether unscheduled use is also possible. (if this information cannot be added to map, please attach a document with relevant information).
3. LAYER: All published SSTIK transitions to include (FFOIL) YYUNG, CISKO, EBAYE, LOSHN, NTELL, along with PORTE and all fixes on these transitions.
 - a. Are all of these transitions available to use today for SSTIK?
 - b. Any planned modifications to any of the SSTIK transitions?
4. LAYER: NIITE Departure to include GOBBS
 - a. Also include a point indicating the earliest point east of GOBBS where aircraft may be vectored to their route of flight.
 - b. Also include any notation as to the lowest altitude at which an aircraft can be turned to on-course at the earliest point east of GOBBS.
5. LAYER: areas of maximum altitude based on airspace constraints (for example, but not limited to, arriving BDEGA and BRIXX)
6. LAYER: Display all FAA planned paths from GOBBS and from the vicinity 5NM east of GOBBS to intercept all possible published SSTIK transitions.
7. LAYER: display the fixes and tracks used in the OFFSHORE Departure
8. LAYER: display the fixes and tracks used in the COAST (OAK) Departure
9. LAYER: displaying the fixes and tracks used in the NUEVO (OAK) Departure