

Dear SFO Roundtable members:

At the July 22 meeting of the Santa Clara|Santa Cruz Roundtable, FAA representative Sky Laron briefed members on the status of a proposed change to the current SERFR STAR track. As stated in the FAA's Guidelines For Community Involvement, "A roundtable can assist and advise the FAA on community outreach or information needs, and help the FAA understand community priorities".

To date there has been remarkably little discussion among Roundtable members on two crucial aspects of the proposed change to the SERFR track: (1) in light of the repeated retractions by the City of Los Altos Hills to its Nov. 2016 vote as part of the Select Committee along with frequently-voiced objections by Santa Cruz City and County officials, does community consensus support the proposed track shift? and (2) do the changes the FAA proposes to implement align with what the Select Committee voted on?

With regards to the second question, please note the attached letter to the FAA Ombudsman's office regarding discrepancies between the two Full Working Group (FWG) meetings held by the FAA to assess the proposal. It's apparent from the minutes of the 2018 FWG meeting that FAA internal offices **unanimously** opposed the proposed track shift.

"FWG consensus: Do not proceed with the redesign/relocation of the SERFR STAR track to the BSR arrival track".

Shifting SERFR arrivals to the West will concentrate flight traffic over a narrower region as vectored flights are never routed East; the change would therefore reduce dispersion and concentrate noise. The impact will be greatest on Santa Cruz residents, though the city and county have no representatives on the SFO Roundtable. Local communities need to be informed as to why this proposal should proceed in light of strong opposition from both affected residents and internal FAA offices responsible for flight traffic control.

Thank you for your consideration,

Alastair Fyfe

Brookdale, CA

January 23, 2021

Dear Mr. Laron,

I am writing to you as the designated contact for the FAA Aviation Noise Ombudsman Office for the Western-Pacific Region to request your office provide information on the FAA's internal design meetings for the "Big Sur Overlay" route proposed for SFO southern arrivals.

The FAA is investigating changes to the current SERFR STAR track in response to recommendations 1.2R1 and 1.2R2 of the 2016 report of the Select Committee on South Bay Arrivals. In response to these recommendations, the FAA convened two meetings of a Full Working Group (FWG) to evaluate the feasibility and design of changes to the current SERFR STAR. The first meeting occurred May 8, 2018 and the second on June 4-5, 2019. The minutes of both meetings were obtained through the Freedom of Information Act and are available at the urls:

<https://www.dropbox.com/s/tx3dlya8qmcnpya/fwg2018.pdf>

<https://www.dropbox.com/s/dhxjkuwqo52ywf6/fwg2019.pdf>

The meeting minutes raise two specific questions I hope your office will address.

1) With respect to recommendations 1.2R1 and 1.2R2, the two meetings reached opposite conclusions. This discrepancy needs to be explained to the public. The minutes for the 2018 meeting conclude with the following statement **"FWG consensus: Do not proceed with the redesign/relocation of the SERFR STAR track to the BSR arrival track"**.

In summarizing that meeting's discussions, Josh Haviland, FWG Co-Lead, asked attending representatives for the stakeholders involved whether "the request to reposition the SERFR arrivals track back to BSR arrival track was feasible, flyable, and operationally acceptable". The unanimous reply, from representatives of NCT (Northern California TRACON), ZOA (FAA Oakland ARTCC) and industry was "No".

Notwithstanding the above consensus, the June 2019 meeting moved in the opposite direction. Significantly, none of the objections raised at the 2018 meeting in opposition to the proposed changes were re-evaluated on the basis of additional information. Instead, the meeting focused on the details of implementing a route design, regardless of whether it was "feasible, flyable, and operationally acceptable".

The public needs to be informed as to why the 2018 evaluation of the proposed route change by seasoned FAA professionals was overridden and replaced with a design implementation, regardless of impact.

2) The mission statements approved at both meetings are nearly identical "Per the Select Committee recommendations: Develop a new procedure to transition SERFR traffic to the Big Sur (BSR) STAR track" (2018) and "Per the select committee recommendations: amend the SERFR RNAV STAR tracks to transition the Big Sur (BSR) STAR track at WWAVS" (2019). Nevertheless, the nine criteria set out by the Select Committee in 1.2R2 as conditions to accompany the track shift of 1.2R1 were only considered at the 2018 meeting. There is no record of any discussion of these criteria at the 2019 meeting.

The Select Committee's Final Report clearly states that the twin recommendations be considered jointly. Why were these criteria ignored at the 2019 meeting?

From the available record, the inescapable conclusion is that the route design that emerged from the 2019 FWG meeting does not implement what the Select Committee voted to recommend. Furthermore, the 2019 meeting summarily ignores the earlier 2018 assessment that the track shift is not "feasible, flyable, and operationally acceptable"

The proposed track, if implemented, will significantly reduce arrival flight traffic dispersion, particularly over Santa Cruz County. This will concentrate noise and adversely impact communities to the west of the current SERFR track. Clarity on both these questions is crucial to the communities that would be affected by this proposal.

Thank you for your consideration,
Alastair Fyfe
Brookdale, CA

Cc:
FAA Supervisory Senior Administrator Faviola Garcia
FAA Western Regional Administrator Raquel Girvin
Congressperson Anna Eshoo
Congressperson Jimmy Panetta