

Chair Ortiz and Vice Chair Hindi,

The SFO Roundtable should ask the airport to pause the implementation of GBAS overlays. GBAS could easily be NextGen 2; the main difference is the airport is driving the GBAS project, not the FAA.

1. The airport has not provided data to support the claim that the GBAS RNP overlay arrivals will not increase concentration in areas, shift traffic, lower altitudes or worsen noise. This is an airport project NOT an FAA edict. There is no reason to rush the review process. The Airport Director likes to say GBAS is for community benefit. If that is true, then the Airport should be able to support the assertion with data. However, there is no reason to believe GBAS at SFO, like NextGen before it, is anything but an airline efficiency project at community expense.

The airport doesn't have a desire to do an environmental analysis of the traffic using GBAS but it did have time to do a demonstration with the airlines in 2016. From the issued report, "It enabled stakeholders to study the benefits of the approaches, evaluate the performance of the procedures, and understand infrastructure impacts of GLS operations..." Why does the airline industry get the benefit of real data to make decisions and communities are left with specious assertions about harmless "overlays". Has the TWG been provided with the limited data collected from the noise monitoring during that demonstration?

The issued report provides insight into the true objectives of GBAS and some of the implications for communities.

https://laas.tc.faa.gov/documents/Docs/KSFO_RNP_to_GLS_Report_13_Dec_16.pdf.

The second sentence of the Executive Summary states, "The objective of these flights was to improve airport efficiency at SFO with new approach procedures." That is the same objective NextGen had.

2. The Technical Working Group has not applied sufficient time or resources to fully or partially understand the implications of GBAS overlays. The impact of narrowing and concentrating paths, "overlays", will be significant. The negative impact will be felt by SFO Roundtable member communities, and by many communities beyond the artificial SFO Roundtable borders.

You cannot depend on the FAA or airport to provide an accurate assessment of the impact. The FAA always issues a CATEX or Finding of No Significant Impact. It is only after implementation that the truth about community impact is known. It is impossible to undo the damage after a change is made, as the SFO Roundtable learned too late with NextGen.

We know for sure that the FAA models do not reflect reality. The FAA told communities NextGen would **"not result in significant noise impacts or reportable noise increases"**

Complaints at SFO went from 14,726 in 2014 before NextGen to 3,547,192 in 2016 with the same number of airport operations.

3. Real-world data is needed. As mentioned, the airport did a demonstration of the overlay procedures with the airlines in 2016.

The report notes that the typical 19R vector routes exposes people to the 55 dBA LAMAX contour

The report then describes a fairly significant difference between the expected noise, based on their model, and the actual noise measured during the demonstration. See page 36, 5.3.1.

The analysis for the demonstration shows why real-world monitoring data is necessary, not models:

“ the SFO Noise Abatement office correlated noise measurements with the two airline demonstration aircraft. Of interest to this study, both airplanes registered noise levels at NMT 25 during the approaches to 19R. Flight Tracks for United 2138 and Delta 9984 are shown as they initiated the GLS R 19R track in Figure 31. **Both 737-900ER aircraft were measured at approximately 60 dBA LAMAX. The INM analysis indicated the noise in this area would be less than 55 dBA.** Differences between measured noise and analytical models can be due to differing ambient conditions (e.g., temperature, humidity, or winds) as well as pilot actions and airplane configuration.” (Emphasis added).

Those obvious differences are why models need to be verified with real-world data to understand true impacts.

4. The Full Scope of GBAS needs to be understood before proceeding with the overlays. The airport and FAA are about incrementalism. Each change sets the stage for the next change.

For example, 7.1.2 of the report notes,

“Implementation of this procedure would represent the first step toward simultaneous approaches to runways 19L and 19R. “

5. I am closing with the most important reason you need to reject the overlays. Communities who will be severely impacted by the airport implementation of GBAS have been shut out of the process because they are not SFO Roundtable members. Two minutes of speaking time is not inclusion in a process. The Airport Director delegated, to the SFO Roundtable review of GBAS routes. The Airport Director and SFO Roundtable know that Palo Alto, where the SIDBY Waypoint resides, Los Altos and Los Altos Hills where the EDDYY Waypoint resides, are not part of the official Roundtable. Neither is East Palo Alto where the lowest arrivals traffic traverses to the Bay. Those Waypoints are used in the GBAS overlays for runway 28 where the vast majority

of arrivals traffic is concentrated. The Roundtable does not have the right to make decisions that impact communities outside its purview, including those it has blocked from membership, even though it has taken it upon itself to do so in the past. That is unethical and anti-democratic.

The TWG needs to recognize what it is being asked to review and not be misled by the airport and FAA use of the “overlay” term. In 2015 Bert Ganoung told Palo Alto City Council members that the coming NextGen route from the south was just an overlay, **“Bert Ganoung, San Francisco Airport, stated the route being referred to was an overlay for arrivals coming from the south.”**, *Policy & Services Committee, page 7, Draft minutes 2/10/2015*. That “overlay” turned out to be the tightest concentration of SFO arrivals traffic. As documented by the 2019, SFO noise monitoring report for Palo Alto, it is also the noisiest of all arrivals, “Generally, the aircraft generate similar noise levels from all procedures, with **the highest from the SERFR tracks that fly straight on the procedure** without radar vectoring”. Concentration of traffic, and associated consequences, is what the airport and FAA consider an “overlay”.

The FAA inflicted NextGen on communities. GBAS is an airport initiative and will be a self-inflicted problem if the SFO Roundtable moves forward with a rubber stamp for the overlays without truly understanding their impact. The airport needs to conduct real-world environmental review to support the claim of no-impact overlays, outline their overall implementation strategy and plan, and involve all impacted communities.

Rebecca Ward
Palo Alto