

From: [Jennifer Landesmann](#)
To: [Angela Montes](#)
Subject: Public Comment for 10/5/22 Item #6: The incredible shrinking citizen questions about GBAS
Date: Tuesday, October 4, 2022 4:59:51 PM
Attachments: [6 questions submitted in 2018.pdf](#)

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Dear SFO Roundtable,

I very much appreciate that at the 9/30/22 Roundtable's Technical Working Group, Chair San Hindi asked SFO to present their GBAS 2A Concepts at your regular meeting. One of the problems with the GBAS project that I would like to point to is the manner in which citizen questions to SFO have been handled.

In 2018, citizens submitted the attached six questions to SFO, which **went unattended for three years**. In August 2021 SFO shared 134 questions, 40 answered, and stated that 55 questions needed 1-2 months to be answered. Since then, dozens more questions have been added to the airport's GBAS questions compilations. The six questions have NOT been answered satisfactorily or were simply avoided.

The net effect is that an **appearance** of engagement has been created, but citizens never received a proper response. The most disturbing part is that the FAA did not participate at all in this process and so all these questions and answers were merely part of an unofficial record about noise concerns from federal actions. This contributes to the pattern of excusing the FAA from doing a better level of environmental review which means zero resources from the responsible agency to address citizen concerns.

SFO keeps speeding along with their project; the FAA is still MIA, and again citizens will be left without proper public notice or attention?

As your group is the host to the continuing GBAS meetings, if at all possible, please ask SFO to directly respond to the emails they received from citizens in 2018, and specifically address these questions since nobody that wrote in 2018 has heard back.

Thank you,

Jennifer

GBAS Questions to SFO

- SFO's plan to do "no harm" with GBAS is using current noise levels (post Nextgen implementation) as a baseline for SFO's procedures design, and preliminary estimates already show a projected increase in noise for some areas with GBAS. What noise standards and policies are being used to measure "no harm" - is SFO setting it's own standards and baselines?
- Why is SFO rushing to implement GBAS before the serious problems of traffic concentration and congestion at Menlo vicinity are resolved (including low and loud night flights). What role does SFO see for itself to urgently resolve these problems brought about since 2014?
- How involved is NorCal TRACON in helping SFO with GBAS? Who are the members of the working group developing GBAS? How many are airline and industry representatives? Which FAA departments are on the committee? Who is representing community interests?
- Who is the FAA official in charge of NEPA review for GBAS? How does SFO or United Airlines go about applying for a CATEX, what documentation is involved?
- To qualify for a CATEX (by-passing environmental review) 2012 legislation directed FAA to demonstrate that actions qualifying for a Catex meet a standard of reducing fuel burn, emissions, and noise. How is the noise reduction standard met; how is noise reduction measured?
- To use the "overlays" as noise baselines for proposed GBAS procedures, "overlays" should all have had previous FAA environmental review. What environmental documentation does SFO have for each of the "overlays"?