

From: [Jennifer Landesmann](#)
To: [Angela Montes](#)
Subject: Public comment for Item #4 on "Regular Agenda" for 4/5/23 Meeting
Date: Tuesday, April 4, 2023 11:48:09 AM

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Dear SFO Roundtable,

For those of you who may be new, the term "overlays," it is an arbitrary FAA term that gives the FAA permission to override community notification and input about a change in airspace procedures. It assumes that an airspace change will show the amount of increase or decrease in noise solely by the footprint of the navigation track, and forgets that other issues cause noise, such as a change in traffic patterns if the number of planes flown on the new or amended procedure vary. "Overlays" are nomenclature that also allow the FAA and SFO to defy national environmental laws by relying on the defaulted 65 DNL. And ultimately, the overlays done at SFO use you, and your votes, to give the FAA permission to ignore the 65 DNL NEPA threshold criteria that is in default by any scientific or common sense standard.

Below is an email I sent to the recently cancelled Technical Working Group meeting which I encourage you to look into, as you pursue even more changes done without adequate noise assessment that could end up AGAIN defying national environmental laws that harm thousands of people and especially those near airports?

Jennifer

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From: Jennifer Landesmann <jlandesmann@gmail.com>
Date: Tue, Mar 21, 2023 at 2:38 PM
Subject: public input for item #1 on today's TWG agenda
To: Angela Montes <amontescardenas@smcgov.org>

Hello SFO Technical Working Group Committee,

The following is news about the Catex challenge in LA, which the FAA lost.

<https://www.courthousenews.com/ninth-circuit-wants-to-know-when-lax-flight-paths-will-be-reviewed/>

Among other things, one reason that this NEPA challenge was successful (for communities) was that the agency's documentation to declare a Catex was improper. The FAA is now obligated to do a higher level review and the court has ruled that the FAA provide a timeline for doing so.

This FAA practice of using arbitrary methods to declare Catex (ie the GBAS overlays) is a reminder that the agency has previously always "won," but it doesn't mean that they are respecting the laws, and in my observation they freely just risk take with a "so sue me" attitude. I suggest that all stakeholders think about what role they play in depriving

communities from authentic NEPA reviews. IMHO, any procedures for SFO GBAS should be done with at the minimum- an EA - not Catex.

Thank you,

Jennifer