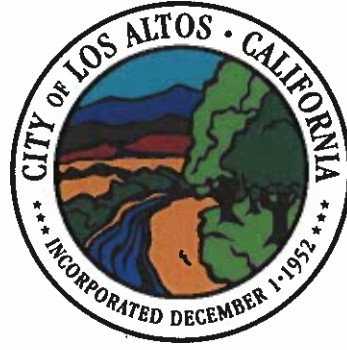




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December 21, 2018

Ms. Camille Garibaldi
Environmental Protection Specialist, SFO—613
Federal Aviation Administration
San Francisco Airports District Office
1000 Marina Boulevard, Suite 220
Brisbane, CA 94005-1835

SAN FRANCISCO INTERNATIONAL AIRPORT, NOISE COMPATIBILITY PLANNING (14
CFR PART 150)

Dear Ms. Garibaldi:

The cities of Mountain View and Los Altos (Cities) are submitting comments that address the SFO Noise Compatibility Study (14 CFR Part 150) that is currently before the FAA. Our cities have consistently heard from our residents that they have been significantly impacted by aircraft noise and emissions from arrival and departure procedures implemented by the Federal Aviation Administration's (FAA) Nor-Cal Metroplex, or OAPM Project, to and from San Francisco International Airport.

The Part 150 Study Update has been reviewed by our consultants. Please find enclosed with this letter specific comments focused on the Noise Compatibility Program Update.

Thank you for your consideration of our comments on this issue.

Sincerely,

Leonard M. Siegel, Mayor
City of Mountain View

Lynette Lee Eng, Mayor
City of Los Altos

Enclosure

LMS/CG/3/MGR
001-12-21-18L

COMMENTS ON NOISE COMPATIBILITY PROGRAM UPDATE

San Francisco International Airport, Noise Compatibility Planning (14 CFR Part 150)

This commentary is prepared on behalf of the cities of Mountain View and Los Altos (collectively "Cities"), located south-southeast of the San Francisco International Airport (KSFO). Both have been materially affected by the changes in arrival and departure procedures implemented by the Federal Aviation Administration's (FAA) Nor-Cal Metroplex, or OAPM Project, and in part, directly in support of the KSFO.

These comments are necessitated by the current discomfort on the Cities from current and potential increases of noise and other environmental impacts. They are now being asked to become the recipients of the Airport's additional noise, overflight, and other environmental impacts without participation, or consideration, in the Part 150 Study (Consultation and Public Involvement, §1.6, Table 1-1, Page 1-7).

Noise Exposure Maps (NEM) (Part 150, Subpart B)

- 2019 Noise Exposure Map, August 13, 2015, does not display DNL noise exposure contours below 65 dBa.
- INM Arrival and Departure Flight Tracks for Runways 01L/01R appear to have been cropped, built solely on Instruments Procedures. This oversight fails to fully disclose low-altitude RADAR vectoring to final approaches, or early turns on departures, consistently directed by NorCal TRACON (FAA NCT), as Standard Operating Procedures (SOPs). Full disclosure would have shown their environmental effect near surrounding cities such as Brisbane and South San Francisco, and the full Peninsula. This operational shortcut has been noted in two Congressional Subcommittee hearings (the Nor Cal Class B Study and, most recently, San Francisco Short-Term Noise Monitoring Report, October 31, 2018). These reports also display the additional impact of Oakland departures (CNDEL) of which 80 percent are being turned across the Bay to Brisbane, comingled with the San Francisco departures, and turned southbound down the middle of the Peninsula.
- The INM Arrival and Departures Maps have omitted ALL aircraft on RADAR vectors.
- The INM Arrival and Departure Maps have omitted ALL noise contours below 65 dBa.

- The INM Arrival and Departure Maps did not stratify, parse, or color-code tracks data by altitudes.

Purpose of the Current 14 CFR Part 150 Update

Congress mandated that NextGen, “take into consideration, to the greatest extent practicable, design of airport approach and departure flight tracks to reduce the exposure of noise and emissions pollution on affected residents” (per the “VISION 100-Century of Aviation Reauthorization Act of 2003”).

This “Purpose” section fails to discuss any effort to reduce noise, emissions, or other environmental impacts produced by the Metroplex and Air Traffic. This demonstrates that the Part 150 Study does not meet the goals established by Congress.

The Forecast planning intent in this Purpose section covers a period of 2014 through 2019. This is not a forecasted period, but a validation of historical fact. The only forecast information is for next year and remaining days of 2018.

The environmental ramifications of the Nor Cal Metroplex (OAPM) were entirely omitted from this document.

Airspace (3.6)

Full disclosure, relative to the Class B Airspace change was omitted from this update.

Air Traffic Control (3.7)

Nor Cal TRACON has promoted and amplified the use of navigable airspace over the Cities, and unbalanced usage, as a “sort box” for the sequencing of arrival traffic to the RWYS 28 L/R at San Francisco, below 5,000’ MSL. From the total arrival flow into KSFO, following are the percentage of each:

- BDEGA (25 PERCENT SFO ARRIVALS)
- SERFR (30 PERCENT SFO ARRIVALS)
- OCEANIC (5 PERCENT SFO ARRIVALS)

The BDEGA arrivals are split into two routes, *east / west*. Of the total volume, 70 percent are issued the west, vectoring them over the Cities, descending below 4,000 MSL, with consistent noise and environmental impacts (CO₂ emission).

The SERFR flow from the south has also caused 55 percent of approaching aircraft to be vectored for over 35 miles for sequencing to the final approach course. This is due to track compaction, poor traffic management (Oakland ARTCC), and Class B Airspace. This causes excessive vectoring of flights over the Cities.

OCEANIC arrivals impact the peninsula and Cities during "nighttime" hours from unnecessarily low approaches over populated noise-sensitive areas.

During "South Flow" weather conditions, to San Jose Airport (RWYS 12L/R) and northwest flow into KSFO, an additional noise and environmental impact (CO₂ emission) is incurred (amplified) by low-altitude vectoring of arrival aircraft to both airports.

The Part 150 documents fail to include any evaluation or mitigation for the arrival areas as they did for areas surrounding the departures.

Standard Terminal Arrival (STARs) and Departure Procedures (DPs) (3.8)

This section fails to address any procedure implemented by the Nor Cal Metroplex in the Bay Area during the forecasted period.

Instrument Procedures 3.8.2

Table 3-5 is an incomplete, noncurrent listing of SFO Instrument Approach Procedures (IAPs).

Departures 3.8.3

Table 3-6 is an incomplete, noncurrent listing of SFO DPs.

Mountain View and Los Altos appreciate this opportunity to comment, and look forward to working with the FAA toward a legally supportable environmental review and successful implementation of an environmentally compliant and properly mitigated PART 150, Noise Compatibility Study for the KSFO.

LMS/CG/3/MGR

~~001-12-21-18L-Enclosure~~