June 17, 2022

Patrick Burt
Mayor
City of Palo Alto
250 Hamilton Avenue
Palo Alto, California 94301

Subject: SFO Response to GBAS Letter

Dear Mr. Burt:

I am writing to respond to your June 1, 2022 letter regarding the Ground-Based Augmentation System (GBAS) project and airplane noise at the San Francisco International Airport (Airport or SFO). I want to begin by clarifying that none of the GBAS procedures the Airport has submitted reflected any increases in noise in computer modeling. SFO GBAS team secured a small number of GBAS evaluation flights to create a sample of noise measurements and test the proposed flight paths. This exercise does not replace the need to conduct noise measurement on hundreds of GBAS flights to provide a robust noise measurement report. Typically, modelled noise is not compared to measured noise, because modelled noise is an average based on total number of annual flights while measured noise is single flight even. However, SFO will continue to address any discrepancies between modelled noise and measured noise, to fulfill our commitment to be full transparent with the public on our proposals. Therefore, we will conduct real-world monitoring to validate the computer modeling when GBAS innovative procedures are implemented, and we are committed to deactivate any procedure that demonstrates a negative impact.

Given that your letter made a series of requests, I will respond individually to each request as follows:

“Palo Alto requests that the IAs submittals be withdrawn until proper coordination of the affected communities can occur”

I am confident that the Airport’s public engagement process has allowed for a full range of viewpoints and concerns to be expressed, and the residents of Palo Alto have played a very active role throughout this process, both in specific meetings with the City of Palo Alto as well as in regularly-scheduled Roundtable meetings.

The feedback received from Palo Alto residents directly influenced many aspects of how the Airport has approached GBAS, ranging from the Community Flight Procedure Packets to an online resource that provides answers to every question asked in GBAS public presentations, dating back to 2018.

The Airport has also heard loud and clear the concerns expressed by residents that the Group 1 Innovative Approach (IA) submittals may not produce sufficient reductions in noise, which is why the Airport is committed to moving forward with this process. As we have often stated, we know that the process will take multiple steps toward achieving truly meaningful reductions in noise. Achieving these reductions is why the Airport pursued GBAS in the first place. And again, the Airport is committed to deactivating any procedure that demonstrates a negative impact. For these reasons, the Airport plans to continue to move forward with this process in order to achieve meaningful noise reductions for affected communities.
“Palo Alto requests that SFO begin uninterrupted monitoring of the SERFR Overlay at SIDBY as soon as possible”

The Airport has been very responsive to requests for deployment of our portable noise monitors in Palo Alto. While we cannot commit to continuous uninterrupted monitoring, we are agreeable to portable noise monitoring in support of this request. We recommend that you work with your elected representatives to pursue alternatives that would allow Palo Alto to establish permanent, ongoing noise monitoring capabilities – potentially through the FAA Reauthorization process.

“The City of Palo Alto is requesting uninterrupted noise monitoring for the duration of the GBAS rollout”

As GBAS IA Procedures are approved for real-world use, the Airport will be conducting active noise monitoring to ensure the sound levels are consistent with what the computer modeling demonstrated. Again, while we cannot commit to continuous uninterrupted monitoring in your area, we will be monitoring noise impacts through portable deployments, and recommend Palo Alto pursue other options for obtaining permanent noise monitoring.

“Palo Alto also requests that communities directly affected by the SERFR Overlay, which starts at EDDYY, have a seat at the table to discuss the SFO noise monitoring plan and report (content, format, and frequency of reporting)”

The Airport understands that the process of overlaying existing procedures with GBAS is a particular area of concern for your residents, but this was a critical step to take before pursuing the innovative procedures that might offer real relief to your residents in the future. This overlay process was not a referendum on existing procedures, nor an endorsement of these procedures. Because SFO GBAS overlay procedures are identical to the existing non-GBAS approach procedures, the Airport will not be monitoring these GBAS procedures.

“Palo Alto requests a technical meeting with SFO to explore how to best leverage the learnings and how to proceed with other directly affected communities”

The Airport has invested $11 million and conducted extensive community engagement to pursue aircraft noise reduction through the GBAS system. Starting from 2016, SFO has conducted numerous informational and technical public outreach meetings with Roundtable and non-Roundtable cities and counties to provide technical information regarding SFO’s GBAS. These presentations and Q&A are online at https://noise.flysfo.com/2021/05/17/presentations-and-answers-to-public-questions-regarding-gbas/ The Airport’s GBAS innovative approach procedure proposals will continue to seek reduced aircraft noise impacts to all communities. The Airport continues to be available to meet with Roundtable and non-Roundtable cities and counties to share any technical information and learning derived from our GBAS experience, though the focus of our resources is now on GBAS IA Group 2A procedures development that aim to reduce noise impact in communities, including Palo Alto.
“Palo Alto requests that SFO share scenarios that have already been modeled in a forum such as the GBAS Community Meetings”

Through the many public presentations made by Airport staff, and through the Community Flight Procedure Packets, we believe the Airport has shared all scenarios behind our GBAS IA Procedure development in a detailed and transparent manner, and we will continue to do so for future GBAS Group 2 and 3 procedures when ready.

“The City of Palo Alto also requests the opportunity to engage directly on Group 2 discussions with the SFO team”

We are grateful for the engagement the Airport has had with the residents of Palo Alto throughout this process, and look forward to continuing that level of interaction, both in Roundtable meetings and city-specific meetings like those the Airport has hosted with your residents throughout the process.

Very truly yours,

Ivar C. Satero
Airport Director

Enclosures

cc: Sean Elsbernd, Mayor’s Chief of Staff, City and County of San Francisco
    Eric Henslall, Senior Legislative Assistant, Office of U.S. Congresswoman Anna Eshoo
    Nicholas Hargis, Field Representative, Office of U.S. Congresswoman Anna Eshoo
    C. Widener, SFO Acting Chief Officer, External Affairs
    G. Neumayr, SFO Chief Development Officer
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