

May 31, 2022

Ivar Satero
Airport Director
San Francisco International Airport
P.O. Box 8097 San Francisco, CA 94128

TRANSMITTED VIA EMAIL

Subject: City of Palo Alto requests regarding SFO GBAS project and airplane noise

Mr. Satero,

The City of Palo Alto (Palo Alto) was surprised and disappointed to learn that the San Francisco International Airport (SFO) submitted GBAS Innovative Approaches (IAs) to the Federal Aviation Administration's (FAA) IFP Gateway without receiving input from affected communities such as Palo Alto that are not represented at the SFO Roundtable. In fact, Palo Alto did not learn of this submittal until hosting the April 25, 2022, SFO Ground Based Augmentation System (GBAS) Community Meeting. There was no notification made to the affected communities prior to taking this action. This letter is a follow-up to that action and to SFO findings from its GBAS efforts.

No SFO Roundtable member, except Menlo Park, is directly affected by the SERFR Overlay. Therefore, the SFO Roundtable is not the proper body to recommend a noise monitoring plan because the SFO Roundtable can only represent Menlo Park and does not represent Palo Alto or Los Altos. The same three directly affected communities will also need to be involved in the future to evaluate the noise data and criteria that will determine whether a GLS approach must be discontinued if it creates more noise. Therefore, Palo Alto requests that the IAs submittals be withdrawn until proper coordination of the affected communities can occur.

Community Engagement Process for Directly Affected Communities Not Represented by Roundtables

The SFO Roundtable voted at its April 6, 2022 meeting in favor of submitting the IAs to the IFP Gateway. The vote at the SFO Roundtable was far from unanimous, with eight members voting to submit the IAs and six voting against. Menlo Park, the only city on the SFO Roundtable that is directly affected by some GLS approaches, voted against submitting the proposed IAs. The submissions included four GLS approaches that will directly impact Palo Alto and additional

mid-Peninsula communities: GLS-A 28R EDDYY, GLS-TT 28R EDDYY, GLS-TT 28L EDDYY, and GLS BVE 28R EDDYY. It is notable that the United test flights showed a noise increase for the GLS-A 28R EDDYY compared to its RNAV counterpart.

Past comments from SFO gave the impression that Palo Alto would be an important stakeholder in SFO decisions, and we expected that Palo Alto's concerns and positions would be considered before the decision to submit the IAs was made. At the March 18, 2022, SFO RT - TWG meeting, in response to the following question (timestamp 1:14:23) "What recourse would communities who are not part of the Roundtable have if a GLS procedure is producing more noise in their community?", it was stated that: "We don't draw a line based on the membership of this Roundtable. I would point to what we have been working on and what cities we have been meeting with over the past years on GBAS as an indicator that we are really looking to tackle issues that come up in the Roundtable regardless of the membership composition. And I hope that answers the question because that's certainly how we would look at it moving forward" (timestamp: 1:15:19).

Additionally, the timing of the third SFO GBAS Community Meeting hosted by Palo Alto was problematic. SFO initially wanted to schedule the final community meeting before the GBAS test flight results were available. Once the results were available and Palo Alto attempted to schedule the meeting, the SFO team was not available until after the April 6, 2022 SFO Roundtable meeting that included the vote to support the IAs. In summary, SFO's submittal of the GBAS IAs to the IFP Gateway without obtaining Palo Alto's input is problematic given the expectation to demonstrate community support during the FAA review.

Noise Impact Assessment of GLS Approaches, Including GLS Overlays

SFO has stated multiple times that it will monitor the noise impact of GLS approaches, including the overlays, and cease GBAS operations if noise is increased. Therefore, assessing the noise impact of GLS approaches is critical. It is also urgent given that the Overlays started in March 2022. However, the SFO team has not yet provided a noise monitoring plan.

Given that GBAS Overlays began in March 2022 and SFO has committed to monitor the GBAS Overlay and IAs, Palo Alto requests that SFO begin uninterrupted monitoring of the SERFR Overlay at SIDBY as soon as possible. Uninterrupted noise monitoring must occur given the anticipated low usage of GBAS. Temporary monitors are unacceptable because of the anticipated low usage of GLS approaches: temporary monitors placed for two weeks every quarter will take years of monitoring to capture sufficient data to assess the noise impact of the SERFR Overlays and future GLS IAs and to assess the validity of the noise modeling of GLS approaches. Noise monitoring must occur at SIDBY given that SIDBY is documented in the GLS

approaches and is over a quiet residential neighborhood with low ambient noise. Furthermore, SFO already operates temporary noise monitoring in a private location at SIDBY.

SFO staff have stated that installation of permanent noise monitors could constitute revenue diversion, but we believe SFO has discretion to use its own funds for noise monitoring. For example, at the ANE Symposium May 1-3, 2022, the San Diego Airport mentioned that they paid from their own funds, not Airport Improvement Program (AIP) funds, for flight procedure modifications outside the CNEL 65 contour. The City of Palo Alto is requesting uninterrupted noise monitoring for the duration of the GBAS rollout, not permanent noise monitoring. SFO has made a very significant investment in the GBAS project to date, and noise monitoring needed to support the project objectives should be viewed as an expense, and a relatively minor one, of the GBAS project.

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). To the best of our knowledge, such communities would include Menlo Park, Los Altos, and Palo Alto. No SFO Roundtable member, except Menlo Park, is directly affected by the SERFR Overlay.

Current SERFR Noise at EDDYY and SIDBY

Palo Alto appreciates the GBAS analyses performed by SFO which demonstrated the over-energy problem of the SERFR STAR procedure that ends at EDDYY. It is clear that the current design forces pilots to deploy flaps and speed brakes at EDDYY and SIDBY, increasing the noise impacts on many residential neighborhoods.

The SFO team has stated that knowledge gained from GBAS can be applied to current procedures, and it therefore stands to reason that the GLS-A 28R and 28L EDDYY knowledge can be used to reduce the SERFR noise starting at EDDYY. 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. Again, this topic does not directly affect SFO Roundtable members, except for Menlo Park, which will need to be included in any next step that may be taken.

Group 2 GBAS Innovative Approaches

Palo Alto is hopeful that Group 2 IAs could provide notable noise reductions and that they will take advantage of the full use of GBAS technical capabilities, such as starting as far away as 23 nautical miles. The SFO team has mentioned that some modeling has been done for Group 2 EDDYY IAs, although the team has not shared the preliminary information yet. In the spirit of

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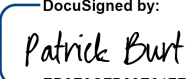
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transparency and collaboration, Palo Alto requests that SFO share scenarios that have already been modeled in a forum such as the GBAS Community Meetings. The forum cannot be the SFO Roundtable given that non-represented communities who would be directly affected by Group 2 IAs cannot dialogue with the SFO team in the Roundtable meetings.

The City of Palo Alto also requests the opportunity to engage directly on Group 2 discussions with the SFO team. If SFO is amenable to this request, Palo Alto staff would appreciate a conversation in the near term with the SFO team about timing, process, and potential positive outcomes.

We hope that you will consider our requests favorably and look forward to your responses.

Sincerely,

DocuSigned by:

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