San Francisco International
Airport/Community Roundtable

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April 13, 2021

Steve Dickson, Administrator
U.S. Department of Transportation
Federal Aviation Administration
Office of the Administrator
800 Independence Avenue, S.W.
Washington, DC 20591

Re: Docket No. FAA-2021-0037 - FAA Aircraft Noise Policy and Research Efforts: Request for Input on Research Activities to Inform Aircraft Noise Policy

Dear Mr. Dickson:

The San Francisco International Airport/Community Roundtable (SFORT) has been in existence for 40 years. The SFORT represents 23 elected or appointed officials from governing bodies in the counties of San Francisco, and San Mateo, representing a population of 1,648,122[1]. The overall purpose of the SFORT is to foster and enhance cooperative relationships to develop, evaluate, and implement reasonable and feasible policies, procedures, and mitigation actions that will reduce the impacts of aircraft and airport noise in neighborhoods and communities in San Francisco, and San Mateo Counties.

At its regular Membership Meeting of February 3, 2021, the SFORT received a presentation from Harris Miller Miller & Hanson (HMMH) President Mary Ellen Eagan, on the FAA Neighborhood Environmental Survey (NES). On March 1, 2021, the SFORT Legislative Subcommittee met to discuss the FAA Aircraft Noise Policy and Research Efforts (Docket No. FAA-2021-0037) where the National Organization to Insure a Sound Controlled Environment (N.O.I.S.E.) provided their Board recommendations, and HMMH gave an overview of the findings and conclusions on FAA's key research, tools, and technology programs. SFORT Members heard the presentations, and community feedback at each meeting.

This letter represents SFORT's consensus recommendations to the FAA on how resources should be directed to address community aircraft noise exposure.

SFORT believes that swift concrete action is necessary to modify the noise measurement methodology, report and share information with communities, and increase noise mitigation measures in communities. The NES results provide evidence to support what has been known anecdotally for years: Even though NextGen increased the efficiency of flight operations, the intensification of flights particularly over residential communities has resulted in cumulative noise disturbance that significantly reduces the quality of life for our residents that cannot be measured properly by the definition of significance at 65 dB CNEL/DNL.

The following are our recommend actions on key research, tools, and technology programs:

[1] U.S. Census, Population Estimate, July 1, 2019.

1. Effects of Aircraft Noise on Individuals and Communities
    a. Develop an Environmental Justice metric that recognizes disadvantaged communities and measures the impact of aviation noise specifically on those communities.
    b. Prioritize all SFO flights, over water instead of over land, for departures and arrivals.
    c. Establish new policy to employ the NES, rather than the FICON/Schultz Curve, to better represent aircraft noise impacts to communities.
    d. Reinstitute the FAA Office of Environment and Energy to address community noise impacts.
    e. Disallow use of the FICON/Schultz curve in Part 150 and NEPA environmental reviews. Add air quality emissions, health impacts (including psychological impact) from flights over land. Add low frequency noise, such as ground-based noise.
    f. Modify the NEPA thresholds of significance based on the findings of the NES and replacement of the CNEL/DNL metric.
    g. Eliminate NEPA Categorical Exemptions for new and updated RNAV procedures such as those for GBAS (SFO specific). Require all go through a full environmental analysis and review process.

2. Noise Modeling, Noise Metrics, and Environmental Data Visualization
    a. Replace agency-wide use of the CNEL/DNL metric with a supplemental metric such as NA (Number Above) number of events above a certain decibel level such as in NEPA, Part 150, and AIP/PFC Funding of Noise Mitigation.
    b. Consider duration within the agency approved metric(s). Use a supplemental metric that factors in duration, such as TA (Time Above).
    c. Break out noise metric standards in terms of frequency (such as low and high frequencies).
    d. Include actual real-time noise metrics, not a 24-hour average noise metric, to include the NIITE HUSSH and GBAS (SFO specific) concentrated air traffic corridors, leaf blower, freeway, and the airplane when determining community impact.
    e. Overlay on mapping, disadvantaged communities using new Environmental Justice metric recognizing communities already over-burdened by pollution, socioeconomic, and health impacts. FAA should prioritize expenditure in these communities to reduce noise pollution and recognize the relationship between NextGen or GBAS (SFO specific) narrowing and focusing of flight paths.
    f. Recommend transparent dialogue and sharing of data and information between the FAA and its partners such as the ASCENT Program to partner with Roundtables on pilot programs to test noise metrics, noise measurement in varied topography, and inclusion and testing of ground-based noise and mitigation.
    g. Implement the environmental visualization tool to help communicate aircraft noise data to the public.
    h. Update the Aviation Environmental Design Tool (AEDT) to account for aircraft vibration, and tones of multi-rotorcraft.
    i. Vet, thru Roundtables, the use of updated noise screening tool to simplify modeling processes, to facilitate expedited review of proposed Federal actions where significant noise impacts are not expected (where it could qualify for a categorical exclusion).
    j. Provide funding to Airports to accommodate sound insulation treatments on properties that opted out previously or are outside the 65 CNEL/DNL contour but underneath a flight path, or where noise reduction treatments have worn out and no longer effective. Promote the installation and

use of HEPA air filters as part of sound insulation treatment packages to purify air from aircraft emissions; ultra-fine particles are of upmost concern.

k. Develop Noise and Operations Monitoring System (NOMS) standards and consider the use of noise monitoring data to calibrate noise modeled contours.
l. Establish a framework for tracking and including ground-based-noise, using the SFORT funded ground-based noise study, completed on January 19, 2021, as a baseline study.

3. Reduction, Abatement and Mitigation of Aviation Noise
    a. Include broader definition of noise in Continuous Lower Energy, Emissions, and Noise (CLEEN) Program, to include all types of noise such as vibration.
    b. Develop Advanced Air Mobility (AAM) operational standards and procedures and noise abatement procedures for multi-rotor and vertical aircraft. Consider municipal-level standards for uses such as air taxies, or local good delivery and interface and transition to municipal multi-model transportation hubs.
    c. The likelihood of home-based package deliveries trending upward is likely to continue. In planning for increases in cargo (whether as part of larger aircraft types or within bellies of smaller commercial aircraft), include nighttime curfews for airports in urban areas.

4. Miscellaneous: Range of Factors / Additional Categories
    a. Clarify the role of the Community Engagement Officers (CEO) to actively engage in a transparent, complete, and forthright collaboration, sharing, and pilot testing programs with Roundtables.
    b. Address the Final Recommendations of the Select Committee on South Bay Arrivals dated November 17, 2016; and the SFORT recommendations.
    c. FAA should provide guidance to airports on the removal and relocation of Noise Monitoring Systems (NMT) as part of an existing noise monitoring system.
    d. Complete the Certification of Supersonic Airplanes SFORT recommendations (FAA-2020-0316) dated June 8, 2020.
    e. Voluntarily implement provisions of proposed legislation on community noise reduction, such as Rep. Jackie Speier REST Act, to enable airports to impose noise deterrence penalties and impose access restrictions between 10:00p-7:00a, or SNORE Act to noise insulate 200+ homes annually; or FAIR Act to add to the FAA Mission noise and health impacts, along with safety; and LEAVE Act to create standards and remedies related to ground-based noise.
    f. Partner with regional governments to discuss electric and vertical aircraft (such as air taxies) on municipal buildings and provide standards, suggested zoning, and best practices for interface with multi-model transportation hubs and emergency services.

Please consider the SFORT a partner to the FAA. We are interested in discussing in more detail the challenges in the San Francisco Bay Area. Thank you.

Sincerely,

Ricardo Ortiz, City of Burlingame, Vice Mayor
Chairman of the Roundtable