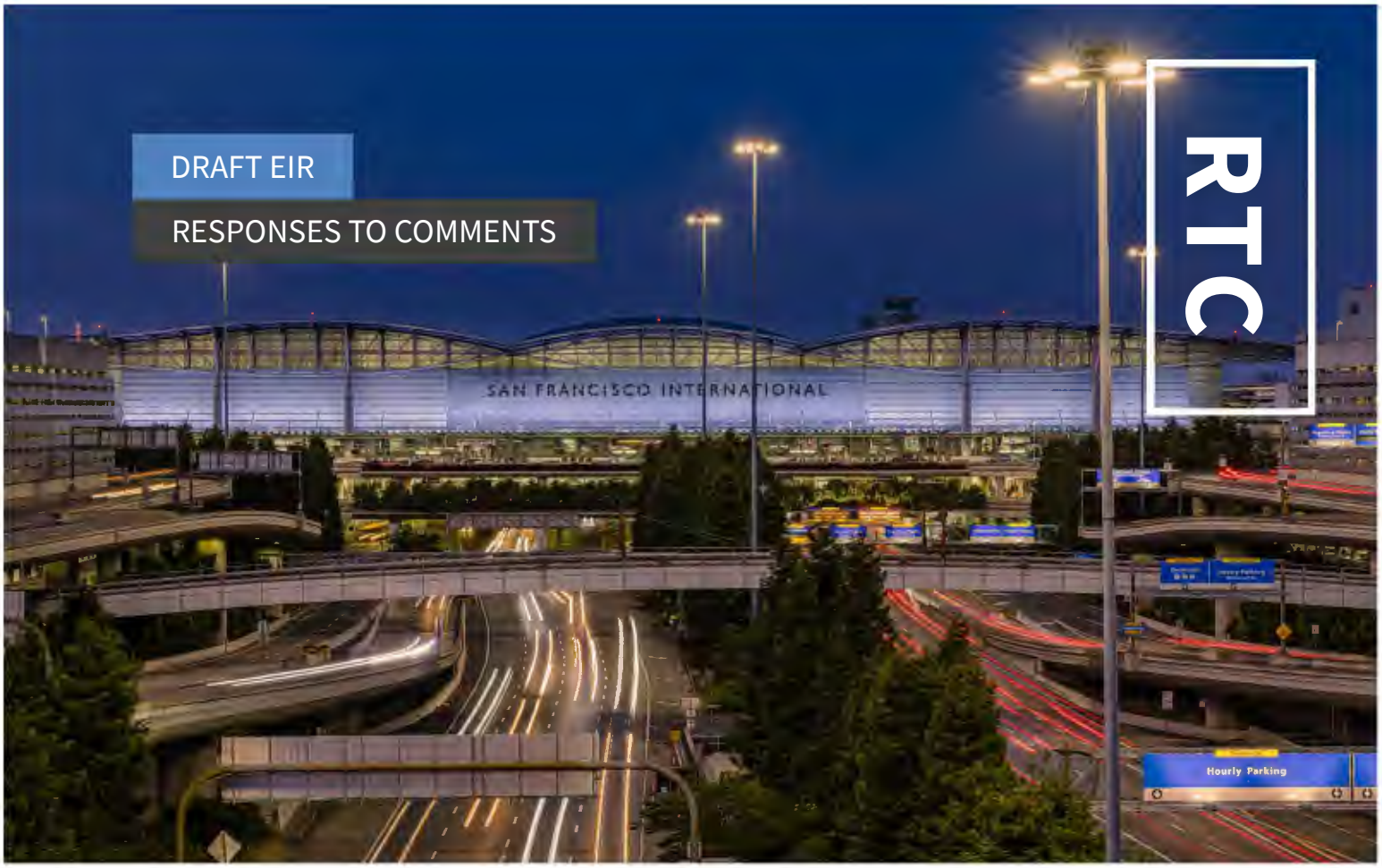

DRAFT EIR

RESPONSES TO COMMENTS

RTC

SFO RECOMMENDED AIRPORT DEVELOPMENT PLAN

San Francisco Planning
Case No. **2017-007468ENV**

State Clearinghouse No. 2019050013

Draft EIR Publication Date:	April 16, 2025
Draft EIR Public Hearing Date:	May 22, 2025
Draft EIR Public Comment Period:	April 16, 2025–June 2, 2025
Final EIR Certification Hearing Date:	November 20, 2025

San Francisco Planning

San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
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MEMORANDUM

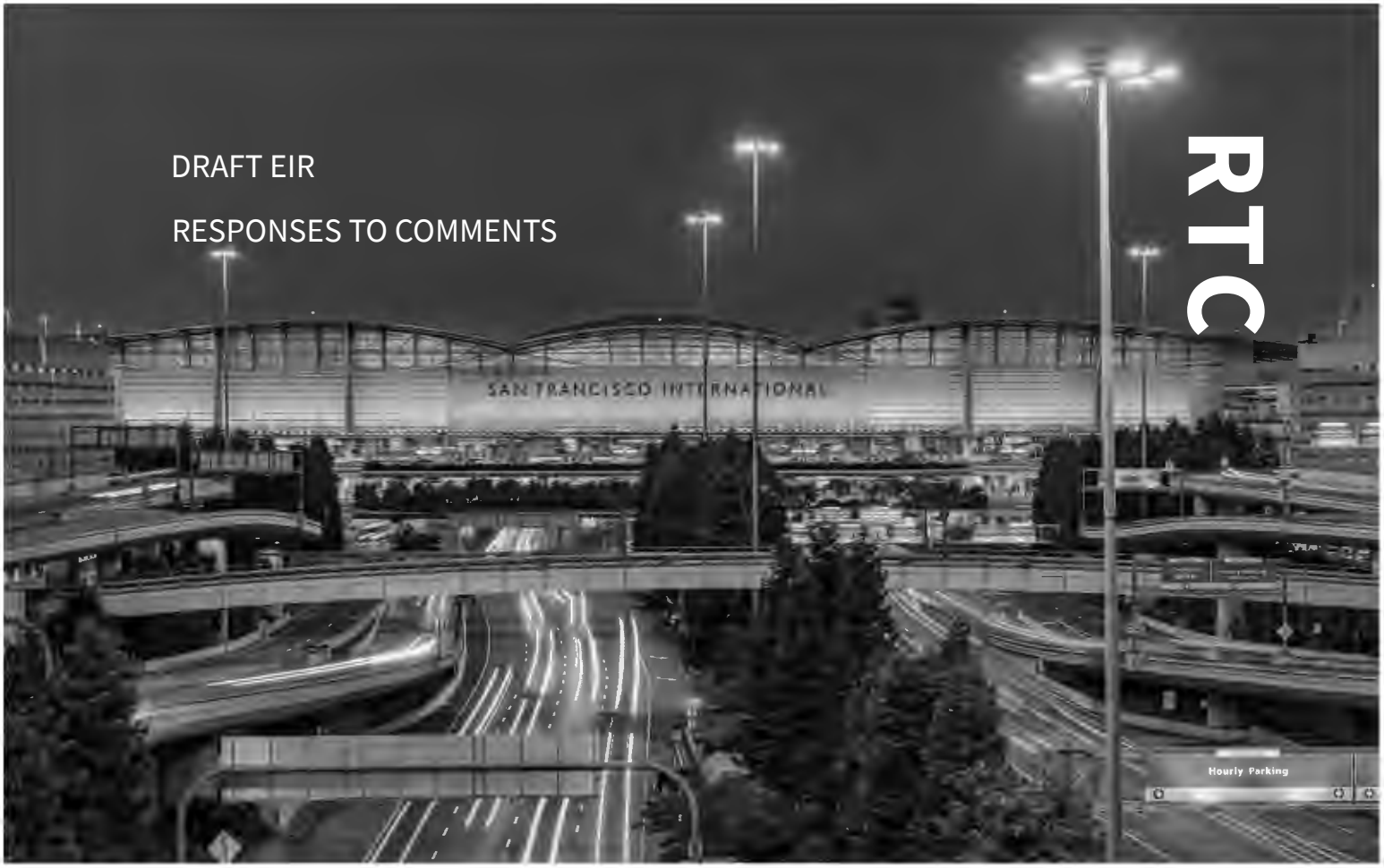
Date:	November 20, 2025
Case No.:	**2017-007468ENV**
Project Title:	**San Francisco International Airport Recommended Airport Development Plan**
To:	Members of the Planning Commission and Interested Parties
From:	Lisa Gibson, Environmental Review Officer
Re:	Attached Responses to Comments on Draft Environmental Impact Report for the SFO RADP Project (Planning Department File No. 2017-007468ENV)

Attached for your review please find a copy of the responses to comments document for the draft environmental impact report (EIR) for the above-referenced project. This document, along with the Draft EIR, will be before the planning commission for Final EIR certification on November 20, 2025. The planning commission will receive public testimony on the Final EIR certification at the November 20, 2025, hearing. Please note that the public review period for the Draft EIR ended on June 2, 2025. Comments received after the close of the public review period or at the Final EIR certification hearing will not be responded to in writing. The agenda for the November 20, 2025, planning commission hearing showing the start time and order of items at the hearing will become available at https://sfplanning.org/hearings-cpc-grid, by close of business Friday, November 21, 2025.

The planning commission does not conduct a hearing to receive comments on the responses to comments document, and no such hearing is required by the California Environmental Quality Act. Interested parties, however, may always write to commission members or to the president of the commission at commissions.secretary@sfgov.org (preferred) or 49 South Van Ness Avenue, Suite 1400, and express an opinion on the responses to comments document, or the commission's decision to certify the Final EIR for this project.

This document, along with the Draft EIR, constitutes the Final EIR. The Draft EIR may be downloaded from https://sfplanning.org/environmental-review-documents. If you have any questions concerning the responses to comments document or the environmental review process, please contact Kei Zushi, EIR coordinator, at cpc.sforadp@sfgov.org or 628.652.7495.

Thank you for your interest in this project and your consideration of this matter.



DRAFT EIR

RESPONSES TO COMMENTS

RTC

SFO RECOMMENDED AIRPORT DEVELOPMENT PLAN

San Francisco Planning
Case No. **2017-007468ENV**

State Clearinghouse No. 2019050013

Draft EIR Publication Date:	April 16, 2025
Draft EIR Public Hearing Date:	May 22, 2025
Draft EIR Public Comment Period:	April 16, 2025–June 2, 2025
Final EIR Certification Hearing Date:	November 20, 2025, 2025

San Francisco Planning

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CHAPTER 1
INTRODUCTION

1.A Purpose of the Responses to Comments Document

The purpose of this responses to comments (RTC) document is to present comments received on the Draft Environmental Impact Report (Draft EIR) for the San Francisco International Airport (SFO or the Airport) Recommended Airport Development Plan (RADP), to respond in writing to comments on environmental issues, and to revise the Draft EIR as necessary to provide additional clarity. Pursuant to California Environmental Quality Act (CEQA) section 21091(d)(2)(A) and (B), the San Francisco Planning Department (planning department) has considered the comments received on the Draft EIR, evaluated the issues raised, and is providing written responses that address each substantive environmental issue that was raised by commenters. In accordance with CEQA, the responses to comments focus on addressing physical environmental effects that could result with implementation of the RADP. Such effects include physical impacts or changes attributable to implementation of the RADP.

None of the comments received provides new information that warrants recirculation of the Draft EIR. The comments do not identify new significant impacts or a substantial increase in the severity of previously identified impacts. Furthermore, beyond minor clarifications or corrections, the comments do not identify or result in feasible project alternatives or mitigation measures that are considerably different from those analyzed in the Draft EIR and/or that the project sponsor did not agree to implement.

The Draft EIR together with this RTC document constitutes the Final EIR for the RADP in fulfillment of CEQA requirements and consistent with CEQA Guidelines section 15132. The Final EIR was prepared in compliance with CEQA, including the CEQA Guidelines and San Francisco Administrative Code chapter 31. The Final EIR is an informational document for use by governmental agencies (such as the City and County of San Francisco) and the public to aid in the planning and decision-making process by disclosing the physical environmental effects that could result with implementation of the RADP and identifying possible ways of reducing or avoiding the potentially significant impacts. If the planning commission and other City entities approve the RADP, they would be required to adopt CEQA findings and a mitigation monitoring and reporting program (MMRP) to ensure that mitigation measures identified in the Final EIR are implemented.

1.B Environmental Review Process

1.B.1 Notice of Preparation

In accordance with CEQA Guidelines section 15082, the planning department, as lead agency, published and distributed a Notice of Preparation (NOP) to governmental agencies, organizations, and persons who may have an interest in the RADP on May 22, 2019 (included as Appendix A in the Draft EIR).[1] Publication of the NOP initiated a 30-day public review and comment period that began on May 22, 2019, and ended on June 21, 2019. The NOP requested that agencies and interested parties comment on environmental issues that should

[1] Due to the COVID-19 pandemic, long-range planning was suspended and SFO continued to refine the RADP.

be addressed in the Draft EIR. Scoping meetings were held on May 30, 2019, in San Francisco and on June 4, 2019, in Millbrae to explain the environmental review process for the RADP and to provide opportunity to take public comment and concerns related to the RADP's environmental issues.

1.B.2 Draft EIR

The planning department prepared the Draft EIR for the RADP in accordance with CEQA, the CEQA Guidelines, and San Francisco Administrative Code chapter 31. The Draft EIR was published on April 16, 2025. An initial study was attached to the Draft EIR (Appendix B). The Draft EIR was circulated for a 48-day public review and comment period, which began on April 16, 2025, and ended on June 2, 2025.

The planning department distributed paper copies of the notice of public hearing and availability of the Draft EIR to relevant state and regional agencies, organizations, and persons interested in the RADP, including those listed on the planning department's and SFO's standard distribution lists standard distribution lists. The planning department also distributed the notice electronically, using email, to recipients who had provided email addresses; published notification of its availability in a newspaper of general circulation in San Francisco; and posted the Notice of Public Hearing and Availability of the EIR at the County Clerk's office and in the lobby of Building 674 in the West Field area of the Airport. Paper copies of the Draft EIR were provided for public review at the San Francisco Permit Center, 49 South Van Ness Avenue, 2nd Floor, San Francisco, CA 94103, and to members of the public that requested hard copies. Electronic copies of the Draft EIR were made available for review or download on the planning department's "Environmental Review Documents" webpage:

https://sfplanning.org/environmental-review-documents

During the Draft EIR public review period, the planning department received written comments from five agencies, 18 individuals, and five organizations.

During the public review period, the planning commission conducted a public hearing to receive oral comments on the adequacy, accuracy, and scope of the Draft EIR on May 22, 2025. A court reporter attended the public hearing remotely to transcribe the oral comments verbatim and provide a written transcript (Attachment A).

Attachment B of this RTC document includes copies of the comment letters and emails submitted to the planning department on the Draft EIR and at the public hearing.

1.B.3 Responses to Comments Document and Final EIR

The comments received during the public review period are the subject of this RTC document, which addresses all substantive written and oral comments on the Draft EIR. Under CEQA Guidelines section 15201, members of the public may comment on any aspect of the project. Furthermore, CEQA Guidelines section 15204(a) states that the focus of public review should be on "the sufficiency of the [Draft EIR] in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated." In addition, "when responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR." CEQA Guidelines section 15088 specifies that the lead agency is required to respond to comments that raise significant environmental issues during the public review period. Therefore, this RTC document is focused on the

sufficiency and adequacy of the Draft EIR with respect to disclosing the significance of the physical environmental impacts that could result with implementation of the RADP that are evaluated in the Draft EIR.

The planning department distributed this RTC document for review to the planning commission, as well as to persons who commented on the Draft EIR. The planning commission will consider the adequacy of the Final EIR, consisting of the Draft EIR and the RTC document, with respect to complying with the requirements of CEQA, the CEQA Guidelines, and San Francisco Administrative Code chapter 31. If the San Francisco Planning Commission finds that the Final EIR is adequate, accurate, complete, and in compliance with CEQA requirements, it will certify the Final EIR. The Airport Commission will then consider the associated MMRP as well as the requested approvals for the RADP.

Consistent with CEQA Guidelines section 15097, the MMRP is designed to ensure implementation of the mitigation measures identified in the Final EIR and adopted by decision-makers to mitigate or avoid the significant environmental effects that could result with implementation of the RADP. CEQA also requires the adoption of findings prior to approval of a project for which an EIR was certified. Because the Draft EIR identified significant adverse impacts that cannot be mitigated to a less-than-significant level, the San Francisco Airport Commission must adopt findings that include a statement of overriding considerations for those significant and unavoidable impacts, should they approve the RADP (CEQA Guidelines section 15093(b)). The project sponsor is required to implement the MMRP as a condition of project approval.

1.C Document Organization

This RTC document consists of the following sections and attachments, as described below:

- **Chapter 1, Introduction**, discusses the purpose of the RTC document, the environmental review process for the EIR, and the organization of the RTC document.
- **Chapter 2, List of Persons Commenting**, presents the names of persons who provided comments on the Draft EIR during the public comment period. The list is organized into the following groups: public agencies and commissions, organizations, and individuals.
- **Chapter 3, Comments and Responses**, presents substantive comments, excerpted verbatim from a transcript of the planning commission public hearing and written correspondence. The complete transcripts as well as the letters and emails with the comments are provided in Attachments A and B of this RTC document. The comments and responses in this section are organized by topic and, where appropriate, by subtopic, including the same environmental topics addressed in Chapter 3 of the Draft EIR and Section E of the initial study. Following each comment or group of comments on a topic are the planning department's responses. The responses generally clarify the text in the Draft EIR. In some instances, the responses may result in revisions or additions to the Draft EIR. Text changes are shown as indented text, with deleted material shown as ~~strikethrough~~ text and new text double underlined.
- **Chapter 4, Draft EIR Revisions**, presents staff-initiated text changes to the Draft EIR that were made by the planning department to update, correct, or clarify the text of the Draft EIR. These changes do not result in significant new information with respect to the RADP, including the level of significance of identified impacts or any new significant impacts. Therefore, recirculation of the Draft EIR, pursuant to CEQA Guidelines section 15088.5, is not required.

- **Attachments**
  - Attachment A: Draft EIR Public Hearing Transcripts
  - Attachment B: Draft EIR Comment Letters and Emails

CHAPTER 2
LIST OF PERSONS COMMENTING

2.A Public Agencies and Commissions and Individuals Commenting on the Draft EIR

This RTC document includes responses to all comments received on the Draft EIR, including written comments submitted by letter or email, as well as oral comments presented at the public hearing that was held on May 22, 2025. This section lists all public agencies and commissions and individuals who submitted comments on the Draft EIR. **RTC Table 2-1** lists the commenters' names, along with the corresponding commenter codes used in Chapter 3, Comments and Responses, to denote each set of comments received by category and date received by the planning department. Oral comments given at the planning commission hearing are included in Attachment A, Draft EIR Hearing Transcripts. All written and oral comments submitted on the Draft EIR are included in Attachment B, Draft EIR Comment Letters and Emails.

- Comments from public agencies and commissions are designated by "A-" and the agency's name or acronym.
- Comments from individuals are designated by "I-" and the commenter's last name.
- Comments from organization are designated by "O-" and the organization's name or acronym.

RTC Table 2-1 Persons Commenting on the Draft EIR

Comment Letter Code	Name and Title of Commenter	Agency/Organization	Comment Format	Comment Date
Public Agencies and Commissions				
A-BART	Tim Chan, Station Area Planning Group Manager	San Francisco Bay Area Rapid Transit District	Letter	May 30, 2025
A-Caltrans	Yunsheng Luo, Branch Chief, Local Development Review, Office of Regional and Community Planning	California Department of Transportation	Letter	June 2, 2025
A-CPC-Braun	Commissioner Braun	San Francisco Planning Commission	Transcript	May 22, 2025
A-CPC-Imperial	Commissioner Imperial	San Francisco Planning Commission	Transcript	May 22, 2025
A-CPC-Moore	Commissioner Moore	San Francisco Planning Commission	Transcript	May 22, 2025
A-Millbrae	Andrew Mogensen, Community Development Director	City of Millbrae	Letter	May 22, 2025
A-PaloAlto	Ed Shikada, City Manager	City of Palo Alto	Letter	May 30, 2025
A-USEPA	Francisco Dóñez, Manager	U.S. Environmental Protection Agency	Letter	March 30, 2025

Comment Letter Code	Name and Title of Commenter	Agency/Organization	Comment Format	Comment Date
Individuals				
I-Alton	Larry Alton	—	Email	June 1, 2025
I-Bailey	Teresa Bailey and Ron Ullmann	—	Email	June 1, 2025
I-Ben-Efraim	Nadav Ben-Efraim	—	Email	June 1, 2025
I-Chueh	Justin Chueh	—	Email	June 2, 2025
I-Delong	Lisa Delong	—	Email	June 2, 2025
I-Duisenberg	Jeannie Duisenberg	—	Email	June 1, 2025
I-Fischer	Michael Fischer	—	Email	June 1, 2025
I-Hanasoge	Srinivas Hanasoge	—	Email	May 21, 2025
I-Jenson	Maria Jenson	—	Email	June 1, 2025
I-Jimenez[2]	Stacy Jimenez	—	Email	June 2, 2025
I-Kiernan	Bette Kiernan	—	Email	June 1, 2025
I-Landesmann2	Jennifer Landesmann	—	Email	June 2, 2025
I-Lopez	Liz Lopez	—	Transcript	May 22, 2025
I-Lyman	Susan Lyman	—	Email	June 2, 2025
I-Niederhofer[3]	Suzy Niederhofer	—	Email	May 25, 2025
I-North	Lindsey North	—	Email	June 2, 2025
I-Rindfleisch	Thomas Rindfleisch	—	Email	June 2, 2025
I-Samson	Mark Samson	—	Email	June 1, 2025
I-Schneider	Ann Schneider	—	Letter	June 2, 2025
Organization				
O-CCAG	Sean Charpentier, Executive Director	City/County Association of Governments	Letter	June 2, 2025
O-CRPA	Darlene Yaplee and Marie-Jo Fremont, Co-founders	Concerned Residents of Palo Alto	Letter	May 18, 2025
O-CSFN1	Eileen Boken	Coalition for San Francisco Neighborhoods	Email	May 19, 2025
O-CSFN2	Eileen Boken	Coalition for San Francisco Neighborhoods	Email	May 30, 2025
O-CSFN3	Eileen Boken	Coalition for San Francisco Neighborhoods	Email	June 2, 2025

[2] Although this comment was submitted by the Mayor of Foster City, it is categorized as an individual comment because it does not explicitly state that it was submitted on behalf of the City. This categorization does not affect the response provided in Chapter 3.
[3] Although this comment was submitted by a councilmember of Foster City, it is categorized as an individual comment because it states, “These are my comments as a Councilmember, not speaking for the City.” This categorization does not affect the response provided in Chapter 3.

Comment Letter Code	Name and Title of Commenter	Agency/Organization	Comment Format	Comment Date
O-MFCBHP	Leaotis Martin, President	Mothers and Fathers Committee of Bayview-Hunters Point	Transcript	May 22, 2025
O-SCREAAM	Matthew Stevens, Founder	SCREAAM.org	Letter	June 2, 2025
O-SPPA	—	Sky Posse Palo Alto	Email	June 2, 2025

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CHAPTER 3
COMMENTS AND RESPONSES

3.A Introduction to Comments and Responses

This chapter presents the substantive comments received on the Draft EIR and initial study and responses to those comments. The comments and responses are organized by subject and are generally in the same order as presented in the Draft EIR and initial study. General comments pertinent to CEQA and the Draft EIR and general comments not pertinent to CEQA and the Draft EIR are grouped accordingly at the end of this chapter. The order of the comments and responses in this chapter is shown in **RTC Table 3-1**, along with the corresponding section number, prefix to the topic code, and page of this chapter on which the comments and responses start.

RTC Table 3-1 Comment Organization

Section	Topic	Topic Code	Page No.
3.B	Introduction	IN	3-2
3.C	Project Description	PD	3-5
3.D	Analysis Assumptions	AA	3-8
3.E	Transportation and Circulation	TR	3-16
3.F	Noise and Vibration	NO	3-25
3.G	Air Quality	AQ	3-41
3.H	Cumulative Analysis	CU	3-61
3.I	Alternatives	AL	3-64
3.J	Biological Resources	BI	3-67
3.K	Cultural Resources	CR	3-68
3.L	Hydrology and Water Quality	HY	3-70
3.M	Public Services	PS	3-72
3.N	Recreation	RE	3-73
3.O	Utilities and Service Systems	UT	3-74
3.P	General Comments (CEQA)	GC-CEQA	3-74
3.Q	General Comments (Non-CEQA)	GC-Non-CEQA	3-81

Within each topic, similar comments are grouped together under subsections, designated by a topic code and sequential number. For example, the comments on Chapter 5, Alternatives, coded as “AL,” are organized under Section 3.I.1, Comment AL-1: Alternatives Analysis.

Under each subheading, the applicable comments are listed by comment code, as described in Chapter 2, List of Persons Commenting. Each comment is then presented verbatim and concludes with the commenter's name and, if applicable, title and affiliation; the comment source (i.e., public hearing transcript, letter, or email); and the comment date. Following each comment or group of comments, a comprehensive response is provided to address environmental issues raised in the comments and clarify or augment information in the Draft EIR, as appropriate. Response numbers correspond to the topic code; for example, the response to Comment PD-1 is presented under Response PD-1. The responses may clarify the Draft EIR text or revise or add text to the Final EIR. New or revised text, including text changes initiated by planning department staff, is double underlined; deleted material is shown in ~~strikethrough~~ (also see Chapter 4, Draft EIR Revisions).

3.B Introduction [IN]

The comments and corresponding responses in this section cover the subjects included in Draft EIR Chapter 1, Introduction. The comment topic relates to:

- IN-1: Scoping Comments
- IN-2: Environmental Review of Subsequent Projects

3.B.1 Comment IN-1: Scoping Comments

This response addresses the following comments, which are quoted below:

A-PaloAlto-1

O-CRPA-13

"**Continued Omission of Key Issues Raised in Scoping**

The City's scoping comments, submitted in 2019 and included in Appendix A of the DEIR, identified specific concerns regarding aircraft noise and air quality impacts on communities such as Palo Alto that lie directly under major departure corridors. We requested that the EIR consider impacts beyond the immediate airport vicinity, evaluate cumulative air traffic from regional airports, and utilize updated, health-protective metrics. The current DEIR does not respond to these concerns in a meaningful way. The analysis remains geographically limited and continues to rely on outdated standards that fail to reflect the actual experience of overflown communities." *(Ed Shikada, City Manager, City of Palo Alto, Letter, May 30, 2025 [A-PaloAlto-1, IN-1])*

"To better align the project with applicable planning and environmental policies—including the San Francisco General Plan Objective 5 and Policy 5.1—which calls for balancing airport expansion with the protection of quality of life in surrounding communities—the following actions are recommended to promote a more transparent and community-responsive approach:

Address comments made in 2019 by various cities and individuals (see pages 46-72 of the RADP DEIR pdf and Appendix A, pages 46-72)." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-13, IN-1])*

Response IN-1[4]

The City of Palo Alto and Concerned Residents of Palo Alto express concerns that key issues raised during the scoping process—particularly related to aircraft noise, air quality impacts on overflown communities, cumulative regional air traffic, and the use of updated health-protective metrics—were not meaningfully addressed in the Draft EIR. The City appreciates the time and effort that commenters have taken to engage in the environmental review process and recognizes the importance of the issues raised. The concerns regarding aircraft noise and air quality impacts on communities such as Palo Alto reflect broader regional challenges associated with air traffic and airport operations, and the City acknowledges the lived experiences of residents in these areas.

Specifically, Comment A-PaloAlto-1 asserts that specific concerns submitted during the scoping process for the EIR were not adequately addressed in the Draft EIR, including evaluation of aircraft noise and air quality impacts on communities such as the City of Palo Alto, evaluation of cumulative air traffic from regional airports, and the use of updated health-protective metrics in the EIR analysis. Comment O-CRPA-13 states that the Draft EIR did not adequately address comments submitted during the scoping process for the EIR by various cities and individuals.

The Draft EIR addresses all substantive and environmentally relevant written and oral comments received during the scoping process for the EIR, as discussed in the Draft EIR under Section 1.B.1, Notice of Preparation of an Environmental Impact Report and Public Scoping Meetings, p. 1-5. A summary of the Notice of Preparation (NOP) scoping comments and the locations in the Draft EIR and initial study (included as Draft EIR Appendix B) where they are addressed and analyzed is provided in Draft EIR Table 1-1, pp. 1-6 through 1-14.

Moreover, as discussed in Draft EIR Chapter 2, Project Description, the purpose of the Recommended Airport Development Plan (RADP) is to accommodate forecast demand at SFO. Implementation of the RADP would facilitate the development of terminal and non-movement areas of the airfield, as well as landside facilities to accommodate long-term aircraft operations and passenger activity levels at the Airport. Implementation of the RADP would not induce passenger demand, nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport, or change the volume of annual passengers that choose to fly into and out of SFO. Rather, development of the terminal and non-movement areas of the airfield and landside facilities identified in the RADP would ensure that SFO is able to maintain an acceptable level of service for passengers and accommodate aircraft operations without causing severe or unrecoverable flight delays. Draft EIR Appendix C, Airport Facilities to Accommodate Aviation Demand, provides further discussion of how and why implementation of the RADP would not induce passenger demand, increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations at the Airport, or change the volume of annual passengers that choose to fly into and out of SFO.

[4] Brad Eggleston, Public Works Director for the City of Palo Alto, submitted a comment letter after the close of the comment period on October 28, 2025. The comment letter noted a correction to the comment letter submitted by Ed Shikada, City Manager of the City of Palo Alto (A-PaloAlto), submitted on May 30, 2025. The October 28 letter notes that in the section titled "Continued Omission of Key Issues Raised in Scoping," the letter incorrectly stated that Palo Alto lies directly under major departure corridors, as Palo Alto is actually located beneath the arrival flow associated with approaches into SFO. The commenter goes on to state that this correction does not alter the substance of the City's concerns outlined in the May 30 letter. As such, this response addresses the corrected letter submitted on October 28.

As discussed in Draft EIR Section 3.B, Noise and Vibration, and Draft EIR Section 3.C, Air Quality, because implementation of the RADP would not result in changes related to aircraft operations or the configuration of the existing runways, aircraft noise and aircraft emissions would remain unchanged with or without implementation of the RADP. Accordingly, the evaluation of aircraft noise and aircraft emissions requested by the comments is beyond the scope of the Draft EIR and is not required under CEQA.

The environmental impacts of implementation of the RADP, including impacts on surrounding communities, are identified and evaluated in the Draft EIR and initial study in accordance with the requirements of CEQA. The comments do not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of the RADP, and no further response is required.

See Response GC-Non-CEQA-8 for further discussion regarding comments pertaining to aircraft noise and aircraft air pollution.

3.B.2 Comment IN-2: Environmental Review of Subsequent Projects

This response addresses the following comment, which is quoted below:

A-BART-3

"The DEIR covers the RADP at the programmatic level, and the RADP projects will be implemented over the next 20 years, as such, it does not provide detailed footprints of project elements or construction scenarios for those elements. Does SFO intend to do more in depth environmental analysis of discrete project elements in the future? If so, when would that analysis be provided? BART would be interested in reviewing any further in-depth environmental analysis of discrete project elements, particularly as pertaining to effects on BART operations and rider experience." *(Tim Chan, Station Area Planning Group Manager, San Francisco Bay Area Rapid Transit District, Letter, May 30, 2025 [A-BART-3, IN-2])*

Response IN-2

The comment accurately states that the Draft EIR analyzes implementation of the RADP at a programmatic level. The comment states that the Draft EIR does not provide detailed footprints of subsequent RADP projects or construction scenarios for those elements and asks whether and when more in-depth environmental analysis of discrete projects would occur and be made available for BART review.

As discussed in Draft EIR Section 1.A.1, Programmatic Review of Potential Impacts, p. 1-3, the Draft EIR analyzes the RADP at a programmatic level, in accordance with CEQA Guidelines section 15168. As noted in the discussion, a programmatic analysis is appropriate for a project that will involve a series of actions that are (1) related geographically, (2) logical parts in a chain of contemplated actions, (3) connected as part of a continuing program, and (4) carried out under the same authorizing statute or regulatory authority and that have similar environmental impacts that can be mitigated in similar ways. As discussed in Draft EIR Section 1.C.1, Environmental Review of Subsequent Projects, p. 1-18, CEQA Guidelines section 15168(c) states that later activities in the program must be examined in light of the program EIR to determine whether an additional environmental document must be prepared. Therefore, the Draft EIR assumes that all subsequent projects in the RADP would be subject to environmental review at such time that those projects

are proposed to determine whether they would result in physical environmental effects that were not examined in the program EIR. The analysis of subsequent projects would be based on existing conditions at the site and vicinity, at the time a project is proposed, and would account for any updated information relevant to the environmental analysis of the subsequent project (e.g., changes to the environmental setting). Any required subsequent review of RADP projects would be conducted in accordance with CEQA requirements, including requirements for noticing, scoping, and public review.

3.C Project Description [PD]

The comments and corresponding responses in this section cover the subjects included in Draft EIR Chapter 2, Project Description. The comment topic relates to:

- PD-1: Purpose of the RADP
- PD-2: Project Description Questions

3.C.1 Comment PD-1: Purpose of the RADP

This response addresses the following comments, which are quoted below:

O-CRPA-4

O-CRPA-20

O-CSFN3-2

"**The DEIR claims the project is not necessary to accommodate demand, yet proposes capacity-expanding projects** (additional gates, apron, and maintenance hangar) without disclosing how this will increase the number of aircraft operations over already-impacted communities.

- The purpose of the project is not to accommodate forecast demand –which existing facilities can handle– but rather to meet the goals and objectives of the Airport Development Plan. As stated on page 146 of the RADP DEIR pdf, '*While the existing facilities could accommodate the forecast demand without implementing the RADP, the goals & objectives of the Draft Final ADP would not be met'*. We listed the project objectives at the end of our comments as a reference (see pages 129-130 of RADP DEIR pdf)." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-4, PD-1])*

"**Do not expand operational capacity.** Limit development to maintaining, updating, or replacing existing facilities—not building new infrastructure (e.g., gates, apron, hangar) that enables increased aircraft operations." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-20, PD-1])*

"The overall goal of most of the projects in the DEIR is to increase passenger capacity by focusing on terminal and pickup/dropoff reconfiguration.

Much of the terminal sprawl is from carrier-dedicated check-in counters, carrier-dedicated gates and the separation of domestic and international facilities.

The proposed project addresses many of these issues with an innovative approach to reconfiguring Terminal H.

With the overall increase in the number of passengers there would likely need to be an increase in the overall number of flights.

Based on the fleet mix of current carriers, how could this be accomplished without runway expansion?"
(Eileen Boken, Coalition for San Francisco Neighborhoods, Email, June 2, 2025 [O-CSFN3-2, PD-1])

Response PD-1

The comments assert that implementation of the RADP would increase passenger demand and increase aircraft operations at SFO, and request that the Airport not increase operational capacity and limit development to maintaining, updating, or replacing existing facilities. One comment questions how the RADP could be implemented without a runway expansion.

In response to these comments, as discussed in Draft EIR Chapter 2, Project Description, the purpose of the RADP is to accommodate long-range forecast demand at SFO. Implementation of the RADP would facilitate the development of terminal and non-movement areas of the airfield, as well as landside facilities to accommodate long-term aircraft operations and passenger activity levels at the Airport. The growth in air travel demand to travel to and from the bay area is forecast to occur regardless of whether the RADP is implemented because such demand is primarily a product of airfield capacity, as discussed further below.

Implementation of the RADP (e.g., new contact gates with passenger boarding bridges) would not induce passenger demand, nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport, or change the volume of annual passengers that choose to fly into and out of SFO. The projects proposed under the RADP would ensure that the Airport's level of service for passengers is maintained as the number of annual passengers is expected to increase based on regional growth projections, up to the practical capacity[5] of the airfield, which would occur independent of implementation of the RADP.

Regarding the commenter's assertion that terminal sprawl is created by dedicated ticket-counter and contact gates and physical separation of domestic and international facilities, each U.S. airport has different airline agreements on lease and use of terminal space and associated facilities. Currently, United Airlines is the only air carrier with "carrier-dedicated check-in counters," soon to be replaced with common use capabilities with the ongoing Terminal 3 renovations. Air carrier branding at each contact gate may appear to be exclusive use contact gates, but since 2011, SFO has reallocated domestic flight contact gates annually to each airline, with the SFO Airport Director able to hold up to 10 percent of contact gates dedicated for common use. Continued terminal modernization under the RADP includes installation of the Individual Carrier System (ICS) baggage handling system where passenger bags checked in one terminal can be tracked and transferred to another

[5] Practical airfield capacity is defined as the number of flights and operations the existing airfield can accept without incurring severe and unrecoverable delays with regard to scheduled flights. Several factors contribute to practical airfield capacity at an airport, including runway configuration and geometry, weather conditions (for wind and visibility), and type of aircraft.

terminal (Chapter 2, Project Description, p. 2-28), enabling common use gates and ticket counter capabilities airport wide. Lastly, domestic/international "swing" gates remain common use to all domestic and international air carriers, provided the gates have required sterile passenger connections to U.S. Customs and Border Protection facilities.

As discussed in Draft EIR Section 2.G.3, Purpose of the RADP, pp. 2-17 through 2-18, the RADP includes projects that would accommodate long-term passenger activity levels at the Airport, forecast to reach approximately 506,000 annual aircraft operations, which is the estimated annual practical capacity of the existing runways regardless of whether the RADP is implemented. Passenger aircraft operations represent the largest portion of the 506,000 annual aircraft operations, which are forecast to accommodate approximately 71.1 million annual passengers.[6] Although the existing facilities could accommodate the forecast demand without implementation of the RADP, this would result in an unacceptable level of service for passengers and likely severe and unrecoverable delays with regard to scheduled flights. Furthermore, the goals and objectives of the Draft Final ADP and the project sponsor's objectives would not be met. The goals and objectives of the RADP are to increase the efficiency of Airport operations by providing passenger connectivity between boarding areas and flexibility to accommodate domestic or international aircraft, and to enhance the overall passenger experience. The project sponsor's objectives include but are not limited to providing a long-range development plan that elevates the passenger experience at the Airport and accommodates forecast passenger demand and aviation activity in a safe, cost-effective, operationally efficient, environmentally conscious, and flexible manner.

The comments are noted but do not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of implementation of the RADP's physical environmental impacts and thus do not require further response. The comments will be provided to decision makers for consideration in their deliberations on approval of the RADP.

3.C.2 Comment PD-2: Project Description Questions

This response addresses the following comment, which is quoted below:

O-CSFN2-1

"Based on those presentations, I have the following questions:

- Since the public comment at the Planning Commission hearing focused mainly on air pollution, what is SFO doing to transition from Jet A Kerosene to Biofuels?
- To avoid unnecessary expansion of infrastructure, does SFO intend to continue to transition from dedicated carrier check-in counters and gates to multiple carrier use of check-in counters and gates?
- Does SFO intend to implement gauge controls to restrict regional aircraft aka puddle jumpers to make more efficient use of air space and avoid wake vortex?" *(Eileen Boken, Coalition for San Francisco Neighborhoods, Email, May 30, 2025 [O-CSFN2-1, PD-2])*

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[6] See Draft EIR Appendix C, Airport Facilities to Accommodate Aviation Demand, for a more detailed description of how forecasts are developed in general and the how SFO's forecast was developed.

Response PD-2

The comment includes questions related to aircraft fuel, dedicated carrier check-in counters and gates, and specific aircraft operations at SFO. Regarding sustainable aviation fuel (SAF)[7]—or biofuels—SFO shares knowledge and best practices on key lessons learned in infrastructure and financing studies, gateway projects and on-airport procedures, and policy and funding advocacy related to SAF with airport and industry peers. SFO is encouraging and supporting the industry to advance efforts that will lead to more SAF-fueled flights in the future.[8] However, it should be noted that U.S. airports can incentivize but cannot require specific fuel types such as biofuels, as fuel standards are regulated at the federal level by the Federal Aviation Administration (FAA) and in some cases by the U.S. Environmental Protection Agency (EPA). Regarding carrier check-in counters and gates, see Draft EIR Chapter 2, Project Description, for a description of the projects that would be implemented under the RADP. Regarding gauge controls, it is unclear exactly what the commenter is referring to. With regard to regional aircraft, federally obligated airports (such as SFO) cannot discriminate against certain operators or aircraft, and regional aircraft are permissible to operate within the U.S. under the regulation of the FAA. Regional air carriers operate under Federal Aviation Regulations (FAR) Part 121, which are the same rules that govern major airlines.[9] As inferred in the comment, regional aircraft require greater airspace separation from full-sized jet aircraft and can decrease airspace capacity if included in the aviation activity forecast. Regardless, the long-range forecast used to develop the RADP includes regional aircraft, as SFO cannot restrict nor assume regional aircraft would be restricted from operating at public use airports such as SFO. The comments do not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of implementation of the RADP's physical environmental impacts and thus do not require further response.

3.D Analysis Assumptions [AA]

The comments and corresponding responses in this section cover environmental analysis assumptions. The comment topics relate to:

- AA-1: Analysis Approach

3.D.1 Comment AA-1: Analysis Approach

This response addresses the following comments, which are quoted below:

A-PaloAlto-4

I-Hanasoge-1

I-Jimenez-2

I-Jimenez-3

I-Jimenez-4

I-Lopez-1

[7] Sustainable Aviation Fuel (SAF) is jet fuel made from renewable materials, such as waste biomass and food scraps. The lifecycle greenhouse gas emissions of SAF are estimated to be 80 percent lower than conventional aviation fuel (San Francisco Airport, Sustainable Aviation Fuel, https://sustainability.flysfo.com/sustainable-aviation-fuel-saf/, accessed July 8, 2025).
[8] San Francisco Airport, Sustainable Aviation Fuel, https://sustainability.flysfo.com/sustainable-aviation-fuel-saf/, accessed July 8, 2025.
[9] Federal Aviation Administration, Aircraft, https://www.faa.gov/aircraft, accessed September 2, 2025.

I-Niederhofer-1

I-Schneider-2

I-Schneider-37

O-CRPA-7

O-CRPA-11

O-SCREAAM-4

"**Unsubstantiated Claim Regarding Capacity**

The DEIR states repeatedly that implementation of the RADP will not result in increased capacity at SFO. This conclusion is difficult to accept given the nature and scale of the proposed improvements. The plan includes:

- A new terminal (Boarding Area H) with up to 14 additional gates;
- A new 243,000-square-foot aircraft apron to accommodate additional parking and remote operations; and
- A new maintenance hangar sized for two widebody aircraft.

Each of these elements directly enables the airport to handle more aircraft, improve turnaround times, and support expanded schedules. The assertion that these infrastructure investments will not affect overall operations is, frankly, incomprehensible. Under CEQA, agencies must evaluate not only direct impacts but also reasonably foreseeable indirect effects (Guidelines §15064(d)). By denying the clear relationship between these projects and future activity levels, the DEIR avoids a substantive analysis of environmental consequences tied to increased throughput." *(Ed Shikada, City Manager, City of Palo Alto, Letter, May 30, 2025 [A-PaloAlto-4, AA-1])*

"I am writing to express my deep concern as a resident of Foster City regarding the proposed airport development plan and the corresponding Environmental Impact Report (EIR). Our community is significantly affected by aircraft noise, with over 400 flights per day, and we strongly oppose the plans to expand capacity by 30% as it will exacerbate the already alarming number of flights over our homes." *(Srinivas Hanasoge, Email, May 21, 2025 [I-Hanasoge-1, AA-1])*

"Specifically, under Noise and Vibration, it states the implementation of the RADP would not induce passenger demand or change the volume of annual passengers that choose to fly into and out of SFO. Therefore, given the implementation of the RADP would not result in changes related to aircraft or the configuration of the existing runways, aircraft noise is not analyzed.

However, on page 195 of the pdf (3.A-13 of the document), it states the implementation of the RADP would facilitate the development of terminal and non-movement areas of the airfield, as well as landside facilities to accommodate long-term passenger activity levels at the Airport forecast to reach approximately 506,000 annual aircraft operations, which is the estimated annual practical capacity of the existing runways regardless of whether the RADP is implemented." *(Stacy Jimenez, Mayor of Foster City, Email, June 2, 2025 [I-Jimenez-2, AA-1])*

"This DEIR also speaks to increasing employment, increasing traffic, etc. due to the RADP." *(Stacy Jimenez, Mayor of Foster City, Email, June 2, 2025 [I-Jimenez-3, AA-1])*

"Whether the capacity of the airport isn't changing, the RADP will be facilitating an increase to the current number of people SFO serves (58M currently served vs the capacity of 71M people). This will undoubtedly increase the number of current flights, thus will be impacting surrounding communities, specifically Foster City due to flight paths, with more aircraft noise.

I believe this needs to be addressed in the DEIR and how increased aircraft noise will be mitigated. Please consider these concerns to ensure there is no further noise impact on surrounding communities." *(Stacy Jimenez, Mayor of Foster City, Email, June 2, 2025 [I-Jimenez-4, AA-1])*

"Hi. Good afternoon. My name is Liz Lopez. I live in San Francisco.

So the airport says that implementing the airport development plan, which is inevitably an expansion project, will not induce passenger demand, but I'd like to know who is guaranteeing that, who is guaranteeing that there won't be any demand.

So, San Francisco's population overall has only grown .4% in the last decade, and SFO ridership has barely been able to hit pre-Pandemic levels. This expansion is more likely part of a much larger marketing strategy to entice more customers to use SFO, which will inevitably increase the amount of flight traffic, noise pollution and chemical pollution over residents' homes, as well as increase greenhouse gases, which will trump the output of CO2 from cars in the city.

United, the largest SFO airline, currently has 2.6 billion-dollar construction project underway and has added over a dozen new destinations to the roster, and they say that modernization paves the way for continued growth. Residents would like to know how many different projects make up the overall expansion in growth development plans that SFO and airlines have in their pipeline -- because it's more than just this project being discussed. When the NextGen Air Space Modernization Project began, Bay Area residents were blindsided with nontransparent data saying that the impact of the project would not be significant. San Francisco officials sat idly by as SFO and the FAA concentrated airplane noise over unsuspecting residents, decreasing their quality of life and impacting their health.

This development project is a public health issue, and I'd like San Francisco officials and SFO to be honest and state the real impacts that the impending operational growth will have on residents further away from the airport, such as San Francisco, Palo Alto and Santa Cruz, instead of just trying to blindside us yet again, telling us that there will be no significant impact.

Please do not accept the environmental review as it is. It needs to include the real impact that increased aviation operations will have. Make no mistake, this is an airport expansion project, which will induce passenger demand and negatively impact residents. Thank you." *(Liz Lopez, Transcript, May 22, 2025 [I-Lopez-1, AA-1])*

"On page 241 of the pdf (3.B-1 of the document) under Noise and Vibration, it states the implementation of the RADP would not induce passenger demand or change the volume of annual passengers that choose to fly into and out of SFO. Therefore, given the implementation of the RADP would not result in changes related to aircraft or the configuration of the existing runways, aircraft noise is not analyzed.

However, on page 195 of the pdf (3.A-13 of the document), it states the implementation of the RADP would facilitate the development of terminal and non-movement areas of the airfield, as well as landside facilities to accommodate long-term passenger activity levels at the Airport forecast to reach approximately 506,000 annual aircraft operations, which is the estimated annual practical capacity of the existing runways regardless of whether the RADP is implemented.

This DEIR also speaks to increasing employment, increasing traffic, etc. due to the RADP.

Whether the capacity of the airport isn't changing, the RADP will be facilitating an increase to the current number of people SFO serves (58M currently served vs the capacity of 71M people). This will undoubtedly increase the number of current flights, thus will be impacting surrounding communities, specifically Foster City due to flight paths, with more aircraft noise.

I believe this needs to be addressed in the DEIR and how increased aircraft noise will be mitigated. Please consider these concerns to ensure there is no further noise impact on surrounding communities." *(Suzy Niederhofer, Councilmember, City of Foster City, Email, May 25, 2025 [I-Niederhofer-1, AA-1])*

"The worst problem is this DEIR is about construction projects and to a very tiny degree using data from ongoing operations. BUT this work is to allow SFO to expand from 52 million passengers per year to 71 million passengers. It also ignores the addition of cargo flights, private jet aviation, and the very near future of heli-taxis. All of which will greatly impact the people in the close in communities of Millbrae and San Bruno. Other close in cities will feel some impact but due to land will also benefit by providing services. The very creation of SFO took away economic opportunity for Millbrae and San Bruno but truly hit Millbrae really hard taking away most of our lowlands, access to the Bay and tearing down our hillsides. It is why we fought to the State Supreme Court to separate from unincorporated San Mateo County and became a city on January 14, 1948. Sadly, more of Millbrae was lost to Burlingame in a 1954 lawsuit allowing Burlingame the industrial land that supports SFO operations like airline catering and car rentals." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-2, AA-1])*

"Nighttime operations forget that 77% of flights depart off runways 1 and runway 28 departures also blast Millbrae. The expansion of cargo flights, often leaving between midnight and 3 am (or till 5 am) are very heavy creating great low frequency noise and vibration incidents. The DEIR might be about new construction projects but, in the end, going from 52 million passengers per year to 71 million by using larger and heavier planes will greatly increase noise impacts to Millbrae." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-37, AA-1])*

"**Fundamentally, the RAPD DEIR is an expansion of SFO's capacity, which in turn allows for more aircraft operations.**

- SFO claims in the RAPD DEIR document that '*implementation of the RADP would not induce passenger demand (i.e., induce the public to choose to fly if and/or where they otherwise would not), nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport (including cargo, private jets, and helicopters), or change the volume of annual passengers that choose to fly into and out of SFO*' (for examples on page 19 of the RADP DEIR pdf and page 4 of the RADP DEIR Appendix A). As stated by the City of Pacifica in their June 21, 2019 comments, '*though SFO claims that the expansion will not "change aircraft operations"," it is difficult to see how such a large expansion in the Airport's ground-based facilities would not result in a corresponding increase in air traffic arriving at and departing from SFO on a 24-hour basis, seven days per week*' (see page 54 of RADP DEIR Appendix A).
- **However, SFO is proposing to build additional gates (Boarding area H – project 1), a new 243,000-square-foot feet apron** (called the Race Track under Taxiways A and B shift and Race Track - project 10), **and a new aircraft maintenance hangar** (Aircraft Maintenance Hangar- project 26) **that will directly enable more operations because**:
  - **The new Boarding area H will increase the number of gates to accommodate up to 8 widebody or 14 narrowbody aircraft** (or a combination of both) though boarding area H will require eliminating one gate at boarding area G (see page 7 of the RADP DEIR Appendix A pdf). **More gates mean more operations** because gate availability is a critical constraint in scheduling operations.
  - **Building a new 243,000-square-foot apron** to hold aircraft waiting for gates as well as park aircraft remotely **will enable more operations** because larger aprons increase the capacity for parking aircraft and loading/unloading aircraft (see page 11 of the RADP DEIR Appendix A pdf).
  - **Building a new 181,000-square-foot maintenance hangar** to accommodate maintenance of two additional widebody aircraft and other maintenance activities **will enable more operations** because the number of hangars directly impacts the capacity of an airport. See page 17 of the RADP DEIR Appendix A pdf.
- The statement '*As to the question of the implementation of the RADP projects inducing growth, it is demonstrated that growth is a function a factor [sic] of demographic and economic conditions and is not influenced by facilities*' (page 4 of the RAPD DEIR Appendix C pdf) appears overly simplistic because:
  - **Facilities directly influence an airport's capacity and growth.** For example, more gates attract new airlines or routes, encourages existing airlines to schedule more flights because of more gates and faster turnarounds, and supports higher passenger throughput which drives up operations
  - The statement on page 7 of Appendix A that '*Currently, the airport is deficient in gates and is accommodating scheduled flights through remote hard stands*[15] *and bussing passengers to and from the gates*' is puzzling given that SFO traffic peaked in 2018 with 470,164 operations and had only 386,507 operations in 2024. Unfortunately, SFO did not provide any data about the percentage of hard stands vs gates used in 2024.
  - SFO refers to a Ninth Circuit court case where the court sided with the Burbank airport regarding a new terminal: '*The Ninth Circuit disagreed and rejected that argument, noting that the data showed that enplanements would grow regardless of whether or not the new terminal was built*' (see page 15 of the RAPD DEIR Appendix C). However, SFO omitted a very important detail. **The Burbank airport**

did not increase gate capacity when rebuilding its terminal –the number of gates remained the same. On the other hand, increasing gate capacity at an existing terminal or building a new terminal with new gates like the new SFO boarding area H will enable operations growth. It's like adding more tables at a restaurant to enable more customers to be seated simultaneously." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-7, AA-1])*

"While the DEIR does not explicitly disclose sufficient analysis of potential operational changes over affected communities, capacity-expanding elements—such as new gates, apron space, and maintenance facilities—will increase the number of future operations. These elements warrant a much more thorough evaluation of their environmental implications." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-11, AA-1])*

"Pushing to increase SFO's capacity by 30% when San Francisco's population has only grown .4% in the last 10 years and with SFO enplanements yet to even reach and maintain pre-2019 levels even though we are already in 2025, doesn't fit the narrative of need.

The claim that this plan will not induce demand is unsubstantiated. We request that the committee look deeper into this statement. Even United notes in one of their newsroom announcements that, 'A five-year $2.6 billion airport construction project set to be completed in 2029, which includes **modernization and expansion of Terminal 3 at SFO, will pave the way for the airline's continued growth** and elevate the customer experience.'

Residents want assurances that as SFO expands, that they do so responsibly and act in good faith and that is why we as concerned citizens are writing this letter." *(Matthew Stevens, Founder, SCREAAM.org, Letter, June 2, 2025 [O-SCREAAM-4, AA-1])*

Response AA-1

Comments Asserting Implementation of the RADP Would Increase Aircraft Operations

Several comments assert that implementation of the RADP is essentially an airport expansion project that would facilitate and directly induce increased passenger demand and increased aircraft operations at SFO. Comments assert that RADP projects, such as new gates, apron space, and maintenance facilities, would increase airport capacity and operational efficiency and would therefore inevitably result in increased passenger demand and increased aircraft operations. The comments assert that the Draft EIR does not appropriately disclose or adequately address the direct and indirect environmental effects of this operational growth that purportedly would result from RADP implementation, including effects related to aircraft-induced noise and vibration, air quality, greenhouse gas emissions, and chemical hazards.

Referring to specific RADP projects, comments A-PaloAlto-4 and O-CRPA-7 assert that new gates proposed as part of Boarding Area H (RADP Project #1), the 243,000-square-foot Remain Over Night (RON)/Race Track proposed as part of Boarding Area F Modernization (RADP Project #2) that would provide a holding area for

aircraft waiting for a gate and accommodate RON aircraft parking, and the Aircraft Maintenance Hangar (RADP Project #18) are RADP projects that would enable and inevitably induce operational growth at SFO.

With regard to new gates proposed as part of Boarding Area H, commenter O-CRPA-7 states that the discussion of *City of Los Angeles v. FAA* in Draft EIR Appendix C, Airport Facilities to Accommodate Aviation Demand, failed to note that the Burbank replacement terminal project did not include an increase in gate capacity, and increased gates proposed under the RADP would enable operational growth.

Contrary to these comments, as discussed in Draft EIR Chapter 2, Project Description, and as substantiated in the Draft EIR, implementation of the RADP would not induce passenger demand, nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport (including cargo, private jets, and helicopters), or change the volume of annual passengers that choose to fly into and out of SFO. Rather, development of the terminal and non-movement areas of the airfield and landside facilities identified in the RADP are proposed to ensure that SFO is able to maintain an acceptable level of service for passengers and accommodate aircraft operations without causing severe or unrecoverable delays with regard to scheduled flights.

With regard to assertions by commenters that implementation of the RADP would enable and induce increased passenger demand and aircraft operations at SFO, as discussed in Draft EIR Appendix C, Airport Facilities to Accommodate Aviation Demand, p. 13, the drivers of airport aviation activity include macroeconomic and demographic factors, airline market factors, air transport production costs and technology, regulatory factors, infrastructure constraints and improvements, and substitutes for air travel, but they do not include airport development projects (such as those under the RADP), which do not increase airfield and airspace capacity. As discussed further in Draft EIR Appendix C, the federal courts have consistently upheld this logic and have long recognized that because aviation demand is driven primarily by variables other than the efficiency of airport facilities, it is not necessarily true that "if you build it, they will come."[10] Citing *City of Los Angeles v. FAA*, Draft EIR Appendix C notes that opponents of the Burbank-Glendale-Pasadena Airport replacement terminal project argued that the FAA inaccurately concluded that a more convenient terminal would not attract more passengers. The United States Court of Appeals for the Ninth Circuit disagreed and rejected that argument, noting that the data showed that enplanements would grow regardless of whether or not the new terminal was built, and that any effect of the modernization project on airport usage would be modest, at most.[11]

As discussed in Draft EIR Appendix C, implementation of the RADP would not change runway configurations or flight paths, expand Airport property, or increase runway capacity. The purpose of the RADP is to align the capacity of SFO's facilities, including passenger terminals, ground transportation and parking garages, and support facilities with the practical capacity of the existing runway system, allowing those facilities to accommodate aircraft operations and passengers corresponding to the runway system capacity at the desired passenger levels of service. As stated and supported by substantial evidence in Draft EIR Appendix C, it is well established that these types of airport development projects (e.g., parking garages or providing contact gates) do not increase airfield/airspace capacity or induce people to purchase airline tickets to fly to that airport. Comment O-CRPA-7, in stating that the increased gates proposed under the RADP would enable

[10] *National Parks & Conservation Association v. U.S. Department of Transportation*, 222 F.3d 677, 680 (9th Cir. 2000).
[11] *City of Los Angeles v. Federal Aviation Administration*, 138 F.3d 806, 808 (9th Cir. 1998).

or lead to operations growth at SFO, provides no substantial evidence to support this assertion, and the claim is not supported in relevant case law and airport operations in the United States.

The environmental impacts of the RADP are identified and comprehensively evaluated in the Draft EIR in accordance with CEQA requirements. The comments do not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of implementation of the RADP, and no further response is required.

Comment Regarding Aircraft Operations and Gate Deficiencies

Commenter O-CRPA-7 references the statement on p. 5 of the EIR NOP (included as Draft EIR Appendix A) that SFO is currently deficient in gates and is accommodating scheduled flights through remote hard stands[12] and busing passengers to and from the gates. Comment O-CRPA-7 asserts that this statement is puzzling given that SFO traffic peaked in 2018 with 470,164 operations and had only 386,507 operations in 2024. Comment O-CRPA-7 additionally states that it is unfortunate that SFO did not provide any data about the percentage of hard stands versus gates used in 2024.

The confusion expressed in comment O-CRPA-7 regarding historical operations and passenger enplanements at SFO and the concern that SFO did not provide any data about the percentage of hard stands versus gates used in 2024 are noted, but these comments do not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of implementation of the RADP's physical environmental impacts. Draft EIR Appendix C describes and documents historical, existing, and forecast passenger operations and decreases in passenger level of service at SFO that implementation of the RADP is intended to address. Appendix C also discusses how the practical capacity of the airfield was determined, noting that "because delays are expected in peak periods during [instrument flight rules] operating conditions (fog or low visibility), peak hour delays must dissipate in the following few hours to avoid excessive cancellations and missed connections. Activity levels that result in high delays cascading throughout the day during predominant operating conditions without dissipating were determined to be unacceptable by the City.[13] Thus, average daily delays, delays in each hour of the day, and the percentage of flights delayed were all considered in defining the practical capacity of the SFO airfield."[14] With regard to the comment lamenting not providing 2024 data related to hard stands versus gates, as indicated on Draft EIR p. 1-4, such 2024 data are not (and are not required to be) included in the Draft EIR because, consistent with CEQA, the Draft EIR uses the physical conditions in the area of the RADP projects at the time of NOP publication (May 22, 2019) as the primary baseline condition for environmental analysis.

Comments Asserting a Range of Draft EIR Deficiencies and Other Concerns

Comment I-Schneider-2 includes a range of topics, including statements regarding the content of the Draft EIR; an unspecified statement regarding the use of data from ongoing operations; a claim that (unspecified) work is to allow SFO to expand from 52 million passengers per year to 71 million passengers; and a claim that the Draft EIR ignores the addition of cargo flights, private jet aviation, and heli-taxis, all of which the commenter asserts would result in a substantial but unspecified impact on people in the City of Millbrae, the

[12] A hard stand at an airport is a parking area on the apron or tarmac where aircraft park away from the terminal building. Instead of using a jet bridge to board, passengers are transported to and from the aircraft by a shuttle bus.
[13] San Francisco International Airport, *Draft Final Airport Development Plan*, Appendix B, Ultimate Capacity, https://www.flysfo.com/about-sfo/sfo-tomorrow/draft-final-airport-development-plan, accessed October 2, 2025.
[14] Ricondo, "Airport Facilities to Accommodate Aviation Demand," Draft EIR Appendix C, p. 6.

City of San Bruno, and other cities. The comment concludes with a collection of the commenter's interpretations and grievances regarding the historical trajectory of SFO, Millbrae, and San Bruno.

Assertions in comment I-Schneider-2 that the Draft EIR ignores the addition of cargo flights, private jet aviation, and heli-taxis and their purported effects on people in the City of Millbrae, the City of San Bruno, and other cities are unsupported. As noted in Chapter 2, Project Description, the only RADP projects related to changes to the airfield include relocation of the existing Remain Over Night (RON)/Race Track and realignment of Taxiways A and B around Boarding Area F as part of RADP Project #2 (Boarding Area F Modernization). As further noted in Draft EIR Chapter 1, Introduction, Chapter 2, Project Description, and Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, implementation of the RADP, including the aforementioned projects, would not induce passenger demand, nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport (including cargo, private jets, and helicopters), or change the volume of annual passengers that choose to fly into and out of SFO. The commenter's interpretations and grievances regarding the historical trajectory of SFO, Millbrae, and San Bruno are noted but do not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts. These comments will be provided to decision makers for consideration in their deliberations on approval of the RADP.

Comments Related to Implementation of the RADP Increasing Employment, Traffic, and Other Effects

Statements in comments I-Niederhofer-1 and I-Jimenez-3 that the Draft EIR speaks to increasing employment, increasing traffic, and other unspecified effects related to the RADP do not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts. As discussed in Draft EIR Section 1.A.1, Analysis Assumptions, pp. 1-3 through 1-4, the Draft EIR analyzes projected employment growth pertaining to the development of terminal and non-movement areas of the airfield and landside facilities that could occur with implementation of the RADP. Effects of the RADP related to transportation are fully identified and addressed in accordance with CEQA requirements in Draft EIR Section 3.A, Transportation and Circulation.

3.E Transportation and Circulation [TR]

The comments and corresponding responses in this section cover the subjects included in Draft EIR Section 3.A, Transportation and Circulation. The comment topics relate to:

- TR-1: VMT and Travel Demand Memorandum
- TR-2: Transportation Construction Analysis and Permits
- TR-3: Transportation Cumulative Analysis
- TR-4: Transportation Network Companies
- TR-5: Millbrae Traffic and Roads

3.E.1 Comment TR-1: VMT and Travel Demand Memorandum

This response addresses the following comment, which is quoted below:

A-Caltrans-1

"**Travel Demand Analysis**
With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide (link). While VMT per employee is not expected to increase with the implementation of the RAPD, since the plan would result in 2,700 new employees that would not have existed in the baseline scenario, total VMT is expected to increase as a result of the RADP. We encourage the project applicant to develop and implement an effective Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. TDM programs should be documented with annual monitoring reports by a TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take to achieve those targets.

Please consider the mitigation measures listed below; these are quantified by California Air Pollution Control Officers Association (CAPCOA) and are shown to efficiently reduce regional VMT:

- Implement Commute Trip Reduction Program
- Provide Ridesharing Program
- Implement Subsidized or Discounted Transit Program
- Provide End-of-Trip Bicycle Facilities
- Provide Employer-Sponsored Vanpool
- Implement Shared Vehicle Program (car/bike/E-bike/scooter)

Additionally, in Appendix E: Transportation Technical Appendix, E.2 Travel Demand Memorandum, several pages appear upside down: pages 31, 33, 35, and 37 (.pdf pages 531, 533, 535, 537)." *(Yunsheng Luo, Branch Chief, Local Development Review, Office of Regional and Community Planning, California Department of Transportation, Letter, June 2, 2025 [A-Caltrans-1, TR-1])*

Response TR-1

The comment refers to Caltrans' assessment of VMT for land use projects, and states that the 2,700 new employees associated with implementation of the RADP would increase total VMT. It encourages SFO to develop and implement a Travel Demand Management program and provides a list of TDM measures that could be implemented to reduce regional VMT. The comment also notes that some pages in the Transportation Technical Appendix E.2 are upside down.

Draft EIR pp. 3.A-34 through 3.A-36 describe the methodology used to assess the potential VMT impacts associated with implementation of the RADP, while Impact TR-5 on Draft EIR pp. 3.A-48 through 3.A-52 presents the results of the VMT impact analysis. As stated on Draft EIR p. 3.A-35, the San Francisco Transportation Impact Analysis Guidelines (SF transportation guidelines)[15] focus on traditional residential, office, and retail land uses, and do not specifically address unique land use uses such as an airport. Given the limitations of available travel demand models, the VMT impact analysis for the RADP was evaluated qualitatively to determine whether implementation of the RADP would substantially increase average VMT per capita (i.e., average VMT per passenger and average VMT per employee). This methodology is consistent with CEQA Guidelines sections 15064.3(b)(3) and 15064.3(b)(4) and the SF transportation guidelines. As referenced by the commenter and analyzed in the Draft EIR, the additional 2,700 employees associated with implementation of the RADP would increase total regional VMT (as would any project that generates net new vehicle trips). However, as described under Impact TR-5 on Draft EIR p. 3.A-50, implementation of the RADP would not change the number of trips per employee, the ways that employees travel, nor the trip lengths for people driving, and therefore would not increase average VMT per employee. Thus, implementation of the RADP would not induce substantial additional VMT, as it is analyzed on a "per employee" and "per passenger" level rather than "total" VMT. The VMT impacts of implementation of the RADP were determined to be less than significant and no mitigation is required.

The commenter identifies measures shown to reduce regional VMT; as previously stated VMT impacts are less than significant and no mitigation is required (and therefore, none are proposed). However, as described on Draft EIR p. 3.A-21, the SFO Lower Emissions Via Sustainable Solutions Transportation Policy (SFO LESS Policy), establishes parameters that support and promote transit to, from, and within the Airport by employees and passengers, while considering the unique Airport context. The SFO LESS Policy also includes consideration of ground transportation and curbside operating policies, electrification of Airport-owned and operated vehicles, and accessibility of transit for passengers and employees traveling to and from the Airport. Through the SFO LESS Policy, SFO implements TDM measures that support and incentivize public transit (i.e., use of BART, SamTrans), the SFO AirTrain people mover, and ridesharing to and from the Airport by employees. For example, SFO provides a Clipper BayPass for Airport Commission/city employees, where for a flat fee of $5 per month, employees can take transit for free on all Bay Area transit services and provides an Employment Commute Option (ECO) for Airport Commission/city employees who chose to relinquish their free daily SFO parking privilege and commute to work by public transit. In addition, SFO also provides four shuttle services for SFO badged workers, which includes Airport Commission/city employees and all airlines/tenants (i.e., two shuttle services described on Draft EIR p. 3.A-11 and two additional shuttles that have been introduced since publication of the Draft EIR).

The pages that were upside down in Appendix E.2, Travel Demand Memorandum, have been corrected and are available on the planning department's Environmental Review Documents webpage (https://sfplanning.org/environmental-review-documents).

[15] San Francisco Planning Department, *Transportation Impact Analysis Guidelines*, October 2019, https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines.

3.E.2 Comment TR-2: Transportation Construction Analysis and Permits

This response addresses the following comments, which are quoted below:

A-Caltrans-4

A-Caltrans-8

"**Construction-Related Impacts**
As noted in Section 3.A.4, project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits (link). Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN). In addition, please note the following upcoming Caltrans projects are within the vicinity of the proposed project and may pose a construction conflict and require coordination between Caltrans and the Planning Department:

- San Mateo 101 Multi-Asset Paving Project: Paving rehabilitation and roadway facility upgrades along U.S. 101 throughout San Mateo County (Post Mile 0.0 to 21.8). San Mateo 101 San Bruno Ave Interchange Project: Interchange reconfiguration on U.S. 101 at San Bruno overcrossing to change existing partial cloverleaf design to a compact diamond layout (Post Mile 20.38).
- San Mateo 101 Upgrade Bridge Rails at Seven Structures: Replacing existing bridge rails with concrete barriers or sidewalks at seven locations along U.S. 101 (Post Mile 0.9 to 23.4)." *(Yunsheng Luo, Branch Chief, Local Development Review, Office of Regional and Community Planning, California Department of Transportation, Letter, June 2, 2025 [A-Caltrans-4, TR-2])*

"**Encroachment Permit**
As noted in Section 3.A.4, please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway ROW requires a Caltrans-issued encroachment permit.

The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist (link)
- Caltrans Encroachment Projects Processes – Informational Video (link)
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual (link)

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects requiring exceptions to design standards, exceptions to encroachment policies, or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits (link)." *(Yunsheng Luo, Branch Chief, Local Development Review, Office of Regional and Community Planning, California Department of Transportation, Letter, June 2, 2025 [A-Caltrans-8, TR-2])*

Response TR-2

The comments note that several approvals may be required from Caltrans during construction, including a transportation permit for movement of oversized or excessive-load vehicles on state roadways and for an encroachment permit for temporary and permanent work within the state right-of-way. Information is provided about requirements and where to obtain additional information for the permits. In addition, the comments identify two Caltrans upgrade projects along U.S. 101 in the vicinity of the Airport that could potentially overlap with construction of RADP projects.

The requirements noted by the commenter are Caltrans requirements that would be complied with, as applicable. As described under Impact TR-1 on Draft EIR pp. 3.A-37 through 3.A-42 and Impact C-TR-1 on Draft EIR pp. 3.A-55 and 3.A-56, construction of subsequent RADP projects would also comply with the Airport's Standard Construction Measures (ASCMs). Preparation of a traffic control plan for subsequent RADP projects would consider any Caltrans projects that could potentially affect access to the Airport and subsequent RADP project sites, such as the San Mateo 101 Multi-Asset Paving Project and the San Mateo 101 Upgrade Bridge Rails at Seven Structures projects noted in the comment. As such, SFO would coordinate with Caltrans, as necessary. No revisions to the analysis or Draft EIR are necessary.

3.E.3 Comment TR-3: Transportation Cumulative Analysis

This response addresses the following comment, which is quoted below:

A-Caltrans-5

"**System Planning**
Caltrans System Planning has recently completed the 101 South Comprehensive Multimodal Corridor Plan (link) that has identified U.S. 101 as the primary access route to and from SFO. Please note that there are several upcoming and long-term transportation projects planned around SFO to which the RADP may potentially contribute additional vehicular traffic by Cumulative Year 2045:

- *San Mateo 101 Peninsula Crossing:* Paving and intersection improvements at the U.S. 101 Northbound on/off ramp and old Bayshore Highway (Post Mile 16.74).
- *San Mateo 101/ San Bruno Ave Interchange Project:* Interchange reconfiguration on U.S. 101 at San Bruno overcrossing to change existing partial cloverleaf design to a compact diamond layout (Post Mile 20.38).
- *San Mateo 101 Managed Lanes Project North of 1-380:* Implementation of a managed lane in each direction of U.S. 101 between the U.S. 101/1-380 Interchange in South San Francisco and the San Mateo/San Francisco County Line (Post Mile R20.63 to 26.11). This project is listed under MTC's Express Lanes – Regional Category.
- *I-380 Corridor and Interchange Improvements:* Interchange improvements at U.S. 101 and El Camino Real (State Route 82), and a new Eastbound freeway lane between I-280 and El Camino Real, with an open

period of Year 2021–2035." *(Yunsheng Luo, Branch Chief, Local Development Review, Office of Regional and Community Planning, California Department of Transportation, Letter, June 2, 2025 [A-Caltrans-5, TR-3])*

Response TR-3

The comment provides information on upcoming Caltrans projects on U.S. 101 and I-380 around SFO, and notes that vehicles generated by implementation of the RADP may travel on these roadways.

The San Mateo 101 Managed Lanes Project North of I-380 is described on Draft EIR p. 3.A-14 and is included as a transportation project that would be completed between the 2019 existing conditions and the 2045 future baseline without RADP conditions. The San Mateo 101 Peninsula Crossing, San Mateo 101/San Bruno Interchange, and I-380 Corridor and Interchange Improvements projects are localized upgrades to existing Caltrans facilities and would not add travel lanes to the freeways, apart from the I-380 Corridor and Interchange Improvements project, which would add an eastbound travel lane on I-380 between I-280 and El Camino Real. These projects would not affect travel routes to or from the Airport or substantially change traffic operations on U.S. 101 or I-380. Inclusion of these and other maintenance/upgrade projects would not change the cumulative impact analysis presented under Impacts C-TR-1 and C-TR-2, and the cumulative transportation impacts of implementation of the RADP would remain less than significant. No revisions to the analysis or Draft EIR are necessary.

The commenter states that Caltrans' 101 South Comprehensive Multimodal Corridor Plan has identified U.S. 101 as the primary access route to and from SFO. The additional employees associated with subsequent RADP projects would travel on U.S. 101 and I-380 to access the Airport. Increases on U.S. 101 in the vicinity of the Airport are presented on Table 3.A-11 on Draft EIR page 3.A-32.

3.E.4 Comment TR-4: Transportation Network Companies

This response addresses the following comment, which is quoted below:

A-Millbrae-4

"**Traffic Impacts**

SFO has long been a major generator of uncompensated traffic impacts on the City of Millbrae's transportation infrastructure and, through the planned projects and growth identified in the RADP, the Airport will continue to do so. The DEIR identifies that auto trips will constitute a 36 percent increase over the number of auto trips under the 2019 existing conditions. One factor that has been especially concerning for the City of Millbrae comes from the growing impact of rideshare and livery vehicles serving SFO passengers, referred to as transportation network companies (TNCs) and charter-party carriers (TCPs). A major portion of this increase identified will come from these transportation providers.

The City of Millbrae currently experiences a surge of TNC and TCP vehicles on City streets during highly sensitive non-peak hour late-night hours due to the number and volume of passengers arriving and departing on flights scheduled around midnight hours, often to Pacific rim and east coast destinations. The impact from these service providers has not been clearly measured because the data is limited to an evaluation of peak-hour conditions that do not take into account the noise and traffic generated by these

service providers in the middle of the night. As their business model requires them to wait until called or hired for their services, and because the current TNC lots along McDonnel [*sic*] Road are inadequately sized to serve the number and frequency of returning vehicles providing this service, these transportation providers tend to loiter on local Millbrae streets and parking lots until capacity becomes available in the TNC lots. This affects the City of Millbrae because we are experiencing very high volumes of TNC and TCP traffic along Millbrae Avenue and Rollins Road in the middle of the night, leading to traffic noise and decreased air quality from idling vehicles. This also affects our police response services during overnight hours because of the increase in the number of TNC drivers, their patrons, and related business activity during hours of the night that would not otherwise experience as much traffic or business activity. Despite their effect on local streets and public services, TNC providers are not required to obtain a business license or operational permit, limiting the City's ability to obtain compensation for their impacts.

As the Airport grows to accommodate more passengers through the accommodation of larger aircraft, the number of TNCs and TCPs will continue to increase and therefore impact the City of Millbrae through noise, air pollution, and wear and tear on the City's transportation infrastructure. It is imperative that the Airport further analyze the unique impact from TNCs and TCPs during late- and mid-night hours and relocate all TNC and TCP staging lots away from their current location near Millbrae Avenue along McDonnell Road. We encourage SFO to work with the City of Millbrae on addressing this issue in the future." *(Andrew Mogensen, Community Development Director, City of Millbrae, Letter, May 22, 2025 [A-Millbrae-4, TR-4])*

Response TR-4

The comment describes existing conditions in the City of Millbrae (i.e., prior to implementation of the RADP) and raises concerns regarding increases in the number of transportation network companies (TNC) and charter party carriers (TCP) vehicles serving SFO passengers within the City of Millbrae resulting in noise, air pollution, and police response service impacts and wear and tear on the city's transportation network. Specifically, the comment raises concerns regarding TNC and TCP vehicles during late-night hours.

As described in Draft EIR Section 3.A.3, 2045 Future Baseline without RADP Conditions (Draft EIR p. 3.A-15), the number of passenger enplanements and aircraft operations are forecast to grow due to increased demand for air travel, regardless of implementation of the RADP. As described in more detail in Chapter 2, Project Description, and in Appendix C, Airport Facilities to Accommodate Aviation Demand, of this Draft EIR, implementation of the RADP would not induce passenger demand, nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport, or change the volume of annual passengers that choose to fly into and out of SFO. Rather, development of the terminal and non-movement areas of the airfield and landside facilities identified in the RADP would allow SFO to maintain an acceptable level of service for passengers and accommodate aircraft operations without causing severe or unrecoverable delays with regard to scheduled flights. See Response AA-1 for further information on the analysis approach.

The operational impact analysis of implementation of the RADP is based on comparing the 2045 future baseline without RADP conditions to the 2045 future baseline with RADP conditions to present those impacts attributable only to subsequent RADP projects. As described on Draft EIR p. 3.A-23, the weekday a.m. and p.m. peak hours were selected for the transportation analysis because these periods represent the periods when most travel occurs on roadways near the Airport. Traffic volumes on transportation study area

roadways outside the peak hours are substantially lower than during the a.m. and p.m. peak hours, and transportation impacts would typically be less.

The methodology and results of the travel demand analysis to develop 2045 future baseline without RADP conditions (i.e., increases in SFO passengers and employees) and 2045 future baseline with RADP conditions (i.e., increases in SFO employees) is presented on Draft EIR pp. 3.A-23 through 3.A-31, with additional detail provided in Draft EIR Appendix E.2. The travel demand includes travel by TNC/TCP vehicles. As shown on Table 3.A-5, Draft EIR p. 3.A-16, between 2019 and 2045 future baseline *without* RADP conditions, the number of vehicle trips associated with the background passenger and employee growth is projected to increase by 34 percent on a daily basis (i.e., not 36 percent as stated in the comment), and between 30 and 32 percent during the weekday a.m. and p.m. peak hours. The vehicle trips include auto, taxi/TNC as well as vehicle trips by visitors, commercial delivery and cargo vehicles, and taxi/ride hail vehicles without occupants. The distribution of the increase in vehicles between 2019 and 2045 future baseline without RADP conditions on the transportation study area roadways during the weekday a.m. and p.m. peak hours is presented in Table 3.A-6 on Draft EIR p. 3.A-17.

Table 3.A-10 on Draft EIR p. 3.A-30 presents the travel demand associated with implementation of the RADP projects. With implementation of the RADP, the number of SFO employee-related vehicle trips between 2045 future baseline without RADP conditions and 2045 future baseline with RADP conditions is projected to increase by 2 percent on a daily basis, and by 3 percent during the weekday a.m. and p.m. peak hours (about 500 vehicle trips during the a.m. peak hour and 300 vehicle trips during the p.m. peak hour). The distribution of these vehicles on the transportation study area's roadways during the weekday a.m. and p.m. peak hours is presented in Table 3.A-11 on Draft EIR p. 3.A-32. These vehicle trips, which as noted above include TNC/TCP vehicles, were used in the transportation impact assessment consistent with the methodology presented on Draft EIR pp. 3.A-23 through 3.A-37. Transportation impacts of implementation of the RADP under project conditions (Impact TR-1 through Impact TR-7 on Draft EIR pp. 3.A-37 through 3.A-55) and cumulative conditions (Impact C-TR-1 and Impact C-TR-2 on Draft EIR pp. 3.A-55 through 3.A-58) were determined to be less than significant. Therefore, transportation impacts related to vehicle trips (including TNC/TCPs) associated with implementation of the RADP are adequately analyzed in the Draft EIR.

As described on Draft EIR p. 3.A-18, as part of existing standard operating procedures, SFO updates its curbside management program as appropriate to respond to changes in passenger loading/unloading facilities by private vehicles and ground transportation, which include TNC/TCP vehicles, at terminal curbsides and within the Central Parking Garage. As part of this effort, SFO is pursuing various technological and operational options to manage and improve TNC operations at the Airport (e.g., signage, restricting TNC operations to specific curbside locations, and increased enforcement of Airport regulations). Several RADP projects, including the Central Hub and International Terminal Building curbside expansion projects, could provide additional facilities and curb space for commercial ground transportation vehicles at the Airport, including TNC/TCP vehicles.

The existing conditions within the City of Millbrae described by the commenter are noted; however, CEQA's primary focus is on the impacts related to implementation of the RADP. SFO will continue to coordinate with the City of Millbrae regarding TNC/TCP vehicles to the greatest extent possible. TNCs are regulated by the California Public Utilities Commission and SFO does not have authority to regulate TNCs beyond Airport property, nor does SFO have any regulatory authority over streets in cities adjacent to the Airport. For comments related to police response services, see Topic E.14, Public Services, of the initial study (Draft EIR

Appendix B). Draft EIR Section 3.B, Noise and Vibration, pp. 3.B-31 through 3.B-32, presents the operational traffic noise impact analysis methodology, while Draft EIR Section 3.C presents the Air Quality emissions methodology and impact analysis.

See Response GC-Non-CEQA-8 for further discussion regarding comments pertaining to aircraft noise and aircraft air pollution.

3.E.5 Comment TR-5: Millbrae Traffic and Roads

This response addresses the following comment, which is quoted below:

I-Schneider-12

"You can work with Millbrae to stop cut through traffic or use SFO profits to help fix Millbrae's roads (2nd worst in San Mateo County)." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-12, TR-5])*

Response TR-5

The comment requests that SFO work with the City of Millbrae to manage traffic flow within Millbrae or use SFO profits to help fix Millbrae's roads.

The comment is noted but does not pertain to the adequacy or accuracy of the Draft EIR and will be provided to decision makers for consideration in their deliberations on approval of the RADP. No revisions to the analysis or Draft EIR are necessary. As noted in Response TR-4, SFO will continue to coordinate with the City of Millbrae to the greatest extent possible; however, SFO has no control over policies related to how the City of Millbrae maintains its streets. U.S. Code title 49, section 47107(b), mandates that airport revenues are used for airport capital improvements, operating costs and other facilities directly related to air transportation.[16] The use of SFO revenues to fix roads in Millbrae, without evidence for consideration and approval by the FAA, could be considered revenue diversion, which is prohibited by federal law.

3.E.6 Comment TR-6: Existing Conditions Setting for Transportation and Circulation Analysis

This response addresses the following comment, which is quoted below:

A-CPC-Imperial-2

"Also, there are a lot of data in terms of the traffic and biking and walking circulation, although there are parts of it that I read those back in 2019, and I think there are some graph studies back in 2025. I wonder if any of those information, when we're talking about the traffic or pedestrian circulation, if there can be more updated data on that. I saw something that is on 2025. I'm trying to get it into the -- there's very recent. But I hope the data that we could find in terms of this Environmental Impact Report could be in the last -- or in the

[16] https://uscode.house.gov/view.xhtml?path=/prelim@title49/subtitle7/partB/chapter471&edition=prelim.

last year or two years. Thank you." *(Commissioner Imperial, San Francisco Planning Commission, Transcript, May 22, 2025 [A-CPC-Imperial-2, TR-6])*

Response TR-6

The comment notes that information on the transportation setting is from 2019 and requests information on transportation conditions within the last two years.

As indicated on Draft EIR p. 1-4, the Draft EIR uses the physical conditions in the area of the RADP projects at the time of NOP publication (May 22, 2019) as the baseline condition for the setting. This condition reflects conditions before the COVID-19 pandemic caused changes in travel patterns (i.e., before air travel, public transit service, and peak-period travel when all modes declined). In addition, the SF transportation guidelines permit the use of prior traffic volume counts for the transportation analysis if justified, and in consultation with the planning department.[17] As indicated on Draft EIR p. 3.A-3, traffic volumes from counts conducted in 2018/2019 (see Table 3.A-1 on Draft EIR p. 3.A-4) were compared to more recent counts collected by SFO at selected locations within the transportation study area in 2023. The vehicle traffic volumes collected in 2023 were 10 to 15 percent lower than those observed in 2018/2019. Counts of people bicycling and walking within the transportation study area in 2023 or later are not available for comparison to the 2018/2019 counts presented in Tables 3.A-2 and 3.A-3 on Draft EIR pp. 3.A-5 and 3.A-8, respectively. Note that field observations of people driving, walking, and bicycling on transportation study area roadways were conducted in June 2024. No revisions to the analysis or Draft EIR are necessary.

3.F Noise and Vibration [NO]

The comments and corresponding responses in this section cover the subjects included in Draft EIR Section 3.B, Noise and Vibration. The comment topics relate to:

- NO-1: Noise Technical Appendix
- NO-2: Noise Thresholds
- NO-3: Noise Analysis
- NO-4: Construction Noise and Vibration
- NO-5: Noise Mitigation Measures

3.F.1 Comment NO-1: Noise Technical Appendix

This response addresses the following comment, which is quoted below:

A-Caltrans-2

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[17] San Francisco Planning Department, *Transportation Impact Analysis Guidelines*, Appendix F, Travel Demand, October 2019, p. F-13, https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines.

"**Noise**
Appendix F: Noise Technical Appendix. There are some inconsistencies across sections in the Noise Technical Appendix. Please review the sections mentioned below to ensure accuracy and consistency.

- Section 3.1, Existing Ambient Noise levels: "..across the street from the Westin Hotel (LT-3) to the south of the Airport from February 8, 2021 (Monday) to February 10, 2021 (Wednesday)." The underlined date is inconsistent with the date of February 9, 2021 stated in Table 2.
- Section 4.3, Noise Impacts from Construction Activities – Nighttime. The third paragraph states that "given the Grand Hyatt at SFO's location on Airport property with daytime noise levels in the range of 72 dBA. Please specify in which table this is reflected." *(Yunsheng Luo, Branch Chief, Local Development Review, Office of Regional and Community Planning, California Department of Transportation, Letter, June 2, 2025 [A-Caltrans-2, NO-1])*

Response NO-1

Comment A-Caltrans-2 points out two inconsistencies in Draft EIR Appendix F, Noise Technical Appendix. The comment notes a discrepancy in the dates reported for noise measurements conducted near the Westin Hotel at long-term measurement location LT-3. As shown in Attachment A.1, Sound Level Meter Reports, to Draft EIR Appendix F, Noise Technical Appendix, noise measurements were conducted at this location between February 8, 2021, and February 10, 2021. In response to the comment, Table 2 of the Noise Technical Appendix and Table 3.B-2 of Draft EIR Section 3.B, Noise and Vibration, both of which present the same information regarding noise measurements, have been revised to correct this typo. The revised Noise Technical Appendix is available on the planning department's Environmental Review Documents webpage (https://sfplanning.org/environmental-review-documents). The first table row for long-term measurement location LT-3 in Table 2 of Noise Technical Appendix p. 10 and Table 3.B-2, Summary of Long-Term and Short-Term Noise Monitoring in the Airport Vicinity, of Draft EIR Section 3.B, Noise and Vibration, pp. 3.B-8, is revised as follows:

Measurement Location		Time Period	Noise Level[a]	Contributing Noise Sources
Long-Term (LT) Measurements (24 hours or more)				
…				
LT-3	**Millbrae. Old Bayshore Highway, across from Westin Hotel**	Tuesday 2/~~9~~8/21 Daytime Nighttime 24-hour	 65 dBA (L_{eq}) 61 dBA (L_{eq}) 68 dBA (L_{dn})	Aircraft and vehicle traffic on Old Bayshore Highway and U.S. 101
…				

The comment also requests clarification on where in the document the daytime ambient equivalent sound level (L_{eq}) at the Grand Hyatt SFO used in the nighttime construction noise impact discussion is reported. The nighttime construction noise analysis in the Draft EIR incorrectly states 72 dBA L_{eq} as the daytime noise level at the Grand Hyatt SFO (ST-2). Based on the noise meter output for ST-2 included in Attachment A.1, Sound Level Meter Reports, to Draft EIR Appendix F, Noise Technical Appendix, the daytime L_{eq} at the Grand Hyatt SFO would be 66 dBA, as shown in Table 2. In response to the comment, the text on Appendix F p. 23 and on

Draft EIR p. 3.B-39, both of which present the same information regarding daytime noise levels at the Grand Hyatt SFO, have been revised to correct this typo. The revised Appendix F is available on the planning department's Environmental Review Documents webpage (https://sfplanning.org/environmental-review-documents). The text on Draft EIR p. 3.B-39 and on Draft EIR Appendix F, Noise Technical Appendix, p. 23 is revised as follows:

> … However, given the Grand Hyatt at SFO's location on Airport property with daytime noise levels in the range of ~~72~~66 dBA, sound-rated materials used for noise abatement likely provide more than the 25 dBA exterior-to-interior noise reduction to meet Title 24 standard. …

3.F.2 Comment NO-2: Noise Thresholds

This response addresses the following comments, which are quoted below:

A-CPC-Moore-1

A-PaloAlto-2

I-Alton-4

I-Bailey-6

I-Chueh-4

I-Fischer-4

I-Landesmann2-3

I-Landesmann2-8

I-Rindfleisch-5

I-Samson-5

I-Schneider-14

I-Schneider-31

I-Schneider-33

I-Schneider-35

O-CRPA-16

O-CRPA-22

O-SPPA-4

"I'm interested as to whether or not we are looking at international metrics regarding airport noise, airline takeoff noise and airline emission standards. I know that all international airports are grappling with the same issue.

I do know, though, that, particularly in Germany, where I'm -- which I'm very familiar with, there are very strict standards, particularly regarding takeoff noise and air pollution at takeoff, and I'm wondering if any of those considerations are being brought to this project or as to whether or not there are overarching

international standards for performance, because we have a lot of not only national but also international aircraft coming to San Francisco.

I think that would be a discussion which I would like to see addressed somewhere along the line because I do believe that the gentleman who spoke about, particularly the need in nearby affected communities, do have concerns. We have other projects in the area coming up in a few weeks, and I think all of those things are ultimately cumulative." *(Commissioner Moore, San Francisco Planning Commission, Transcript, May 22, 2025 [A-CPC-Moore-1, NO-2])*

"**Use of Outdated Noise Thresholds**

The DEIR relies exclusively on the 65 dB CNEL threshold to determine significance of noise impacts, a metric that no longer reflects current research or federal guidance. The Federal Aviation Administration's 2021 Neighborhood Environmental Survey (NES) found that significant annoyance and health effects occur at much lower levels of exposure. The FAA's own data demonstrate that DNL 65 is no longer an appropriate benchmark for community noise tolerance, and continued reliance on it undermines the adequacy of the DEIR under CEQA.

CEQA requires that significance determinations be based on scientific and factual data (Guidelines §15064(b)) and that agencies use reasonable, commonly accepted methodologies for impact analysis (Guidelines §15147). The DEIR does not incorporate any supplementary noise metrics such as N-Above or N-Above-Ambient—metrics that are already in use by SFO in its own reporting—and it fails to provide contour data in more granular increments. This approach does not meet CEQA's standard for a full and accurate disclosure of potential impacts." *(Ed Shikada, City Manager, City of Palo Alto, Letter, May 30, 2025 [A-PaloAlto-2, NO-2])*

"At the May 22 Hearing, I raised the issue of international standards. Countries belong to International Civil Aviation Organizations (ICAO). ICAO has a four-part framework to address noise https://www.icao.int/environmental-protection/pages/noise.aspx.

ICAO Balanced Approach
1. Reduction of Noise at Source
2. Land-Use Planning and Management
3. Noise Abatement Operational Procedures
4. Operating Restrictions

In a nutshell airports around the world use ICAO's Balanced approach because their countries adhere to it. Whereas, although the US is an ICAO leader, the practice in the US is that the Balanced Approach is ignored or practiced in bits. Airlines comply with ICAO 'reduction of noise at the source' (making jet engines quieter for example); airports focus on 'Land-Use Planning and Management' which is 99% an insulation program. And a KEY opportunity to reduce noise (especially at night) - 'Operational Procedures' - are largely neglected. In ICAO's balanced approach, 'restrictions' are meant for measures of last resort, when nothing else has worked. Beyond these country initiatives however, it is so basic that communities expect OUR regional airport to advocate for better stewardship and to protect treasured open space in the Bay Area as well as the neighbors it counts as customers. I love San Francisco, and I want San Francisco to love the MidPeninsula." *(Jennifer Landesmann, Email, June 2, 2025 [I-Landesmann2-3, NO-2])*

"**INQUIRY ON THE NOISE SIGNIFICANCE THRESHOLD:**

We would like to know the reason why SFO looks at the +1.5dB increase in 65 CNEL criteria when the FAA's Environmental Policies and Procedures Guideline Order 1050.1F looks at a 3 dB increase in DNL 60-65 dB and +5 dB for **45-60 dB** as well.

CEQA allows the flexibility to use significance thresholds below 65 CNEL and more metrics to consider local context, so it is disappointing that only the higher threshold criteria (65) is applied which effectively *lowers the standard* for SFO's environmental review. As SFO is aware, the FAA has scientific studies that provide substantial evidence that 65 DNL or 65 CNEL is no longer supported to identify community concerns. The FAA surveyed 10,000 residents living near 20 representative airports with results showing that aircraft noise causes greater levels of community annoyance compared to other transportation noise and, a need for more sensitive criteria to evaluate aircraft noise. There are also legal considerations about noise threshold criteria to assess areas that qualify for insulation, vs National Environmental Policy Act requirements."
(Larry Alton, Email, June 1, 2025 [I-Alton-4, NO-2])
(Teresa Bailey and Ron Ullmann, Email, June 1, 2025 [I-Bailey-6, NO-2])
(Justin Chueh, Email, June 2, 2025 [I-Chueh-4, NO-2])
(Michael Fischer, Email, June 1, 2025 [I-Fischer-4, NO-2])
(Jennifer Landesmann, Email, June 2, 2025 [I-Landesmann2-8, NO-2])
(Thomas Rindfleisch, Email, June 2, 2025 [I-Rindfleisch-5, NO-2])
(Mark Samson, Email, June 1, 2025 [I-Samson-5, NO-2])
(Sky Posse Palo Alto, Email, June 2, 2025 [O-SPPA-4, NO-2])

"S-4, S-5, S-6 – Nighttime use of Aviador Lot – Noise Plan will include noise impacts to be below 45 dBA in doors. But this is using A weighted not C weighted noise – will not include low frequency noise and vibration - will provide a noise plan but clearly homes are within several hundred feet. SFO plans to use this lot until and at least till 2045, that is decades of noise, not just a couple of years of construction. Mitigation – do not use Aviador Lot for any SFO construction." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-14, NO-2])*

"PP 248 and on: One day noise monitors = all over 68 dBA (A weighted not C weighted, then says no impact, simply not true, not using 21st century noise metrics. Ignoring all discussions conducted at SFORT and at the Ground Based Noise meetings since 2018 and on. Sadly, the CC of SF representatives assigned to SFORT rarely ever attend (Mayor and Board of Supervisors appointments). Another sign is that CC of SF doesn't really care about the impact SFO has on close in or any other community." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-31, NO-2])*

"PP 254 S.B-14 HUD allowance – SFO already exceeds these on Millbrae if C-Weighted noise were considered. Existing Noise Contours are incorrectly set at A-Weighted. Also, annoyance at 65 decibels is now commonly considered to happen at 50 dBA so clearly SFO if FAA updated 1980 criteria is causing real health impacts on the people of Millbrae. And having 3 homes on Nandina in Millbrae within the CNEL contours is again simply not a real reflection of the impacts by SFO." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-33, NO-2])*

"PP 261 3.B-10 This table clearly shows that more of Millbrae is impacted by constant departures and taxing. If this DEIR is trying to get out of doing real mitigation, this section should be expanded to say why SFO is ok even if noise is greater than that listed on this table." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-35, NO-2])*

- "**Use non-DNL metrics that are more representative of the noise experienced by communities.** Document noise impacts using N-Above and N-Above-Ambient metrics (not just CNEL), and present data in 5 dB increments starting at 40 dB." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-16, NO-2])*

"Regardless of CEQA, the DEIR must go beyond the outdated DNL 65 threshold and incorporate more current and representative data such as the FAA's 2021 Neighborhood Environmental Survey (NES), which provides relevant and scientifically supported insights into community response to aircraft noise. While CEQA does not mandate the use of any specific noise metric, it requires that the noise analysis be based on reasonable assumptions, reflect actual community impacts, incorporate credible scientific information, and be supported by substantial evidence. Failure to do so risks rendering the DEIR legally inadequate." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-22, NO-2])*

Response NO-2

Several comments assert that the Draft EIR uses outdated or incorrect noise metrics and thresholds to evaluate community noise impacts. However, as described in more detail below, the Draft EIR's evaluation of potential noise impacts relies on appropriate CEQA thresholds for the specific construction and operational noise sources associated with RADP implementation. The Draft EIR, therefore, did not use outdated or incorrect noise metrics to evaluate potential noise impacts that could occur with implementation of the RADP.

First, the Draft EIR states in several locations (e.g., p. S-1, p. 1-3) that the RADP would not induce passenger demand, increase capacity of the airfield, change the configuration of existing runways, change the number or type of aircraft operating at the airport, or change the volume of annual passengers that fly into and out of SFO. Thus, the scope of the Draft EIR is limited to the evaluation of potential environmental effects associated with the construction and operation of RADP projects that accommodate, but do not alter or increase, existing and long-term aircraft operations and passenger activity levels at SFO, including, terminal, ground access and parking, and airport/airline support facilities and utilities (see Draft EIR Section 2.H.1). Accordingly, the Draft EIR evaluates the types of noise sources and activities that would be associated with RADP projects, including, but not limited to construction-related heavy equipment and traffic noise (Draft EIR Impact NO-1), operations-related stationary source and traffic noise (Draft EIR Impact NO-3), and cumulative noise impacts (Draft EIR Impact C-NO-1). While the Draft EIR does reference SFO's existing and future aircraft-operations noise contours (Draft EIR pp. 3.B-55 and 3.B-57), these references explicitly note that implementation of the RADP would not result in changes to aircraft operations and, by extension, the 65 CNEL contour would not change as a result of implementation of the RADP. The reference to the Airport's 65 CNEL noise contour in the Draft EIR is used to describe that it would not change as a result of implementation of the RADP, but it is not used as a significance threshold.

Second, the Draft EIR discloses and describes the basis for the significance criteria that are used to evaluate potential construction and operational noise impacts from projects that would be implemented under the RADP (see Draft EIR Section 3.B.4, pp. 3.B-25 through 3.B-33). As summarized in Table 3.B-11, the Draft EIR applies a combination of fixed short-term (e.g., 90 dBA hourly L_{eq}), distance dependent (e.g., 90 dBA at 25 feet outside the property plane), and increase-above-ambient (e.g., 10 dBA above ambient noise levels, +3 dBA increase in the 24-hour Community Noise Exposure Level [CNEL]) criteria to evaluate project noise impacts. Thus, the Draft EIR's metrics and thresholds accurately describe the noise setting in which implementation of the RADP would occur and adequately evaluate the potential noise impacts that would result from implementation of the RADP.

Finally, with regard to specific suggestions and remarks pertaining to the use of different noise thresholds:

- Two comments (A-CPC-Moore-1 and I-Landesmann2-3) provided general information on international airport noise metrics and standards, including the International Civil Aviation Organizations policy on aircraft noise, and infer the Draft EIR should have considered or used these standards to evaluate the implementation of the RADP's potential noise impacts. As discussed above, the Draft EIR is limited to the evaluation of potential environmental effects associated with the construction and operation of RADP projects that accommodate, but do not alter or increase, existing and long-term aircraft operations and passenger activity levels. Thus, implementation of the RADP would not affect aircraft operations nor aircraft noise emissions, and the use of international aircraft noise metrics or standards in the Draft EIR's noise impact analyses is not applicable because it is outside the scope of CEQA review for the RADP.
- Several comments (A-PaloAlto-2, I-Alton-4, I-Bailey-6, I-Chueh-4, I-Fisher-4, I-Landesmann2-8, I-Rindleisch-5, I-Samson-5, O-SPPA-4, I-Schneider-33, and O-CRPA-22) assert that the Draft EIR relies "exclusively" on a 65 dBA CNEL threshold to determine the significance of noise impacts, that the use of a 65 dBA CNEL threshold is "outdated" given the findings of the FAA's 2021 Analysis of the Neighborhood Environmental Survey, and that CEQA requires significance determinations to be based on scientific and factual data and commonly accepted methodologies for impact analyses. As a point of clarification, the Draft EIR only relies on a 65 dBA threshold to analyze operational traffic noise impacts as this noise threshold is used by the local jurisdiction for noise and land use compatibility purposes (e.g., South San Francisco, see DEIR p. 3.B-22). The FAA's 2021 analysis does show a substantial increase in the percentage of people that are highly annoyed by aircraft noise; however, the FAA has not yet proposed any policy changes as a result of this survey.[18] Moreover, as explained above, implementation of the RADP would not result in changes to aircraft operations nor aircraft emissions standards, and the consideration of analytical methods standards related to these activities in the Draft EIR's noise impact analyses is unnecessary because it is outside the scope of CEQA review for the RADP. The FAA's 2021 analysis does not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis.
- Several comments (A-PaloAlto-2, I-Alton-4, I-Bailey-6, I-Chueh-4, I-Fisher-4, I-Landesmann2-8, I-Rindleisch-5, I-Samson-5, O-SPPA-4, and O-CRPA-16) assert that the Draft EIR should have relied on supplementary or different noise metrics to evaluate the implementation of the RADP's potential aircraft noise impacts, such as N-Above or N-Above Ambient standards similar to that contained in the FAA's Environmental Policies and Procedures Guidelines Order 1050.1F.[19] As previously noted, implementation

[18] FAA, Neighborhood Environmental Survey Frequently Asked Questions, https://www.faa.gov/regulations_policies/policy_guidance/noise/survey_faqs, accessed September 3, 2025. Note that this analysis does not analyze noise impacts related to implementation of the RADP.
[19] FAA, order 1050.1F: https://www.faa.gov/documentlibrary/media/order/faa_order_1050_1f.pdf. On June 30, 2025, Order 1050.1F was replaced with Order 1050.1G: https://www.faa.gov/documentLibrary/media/Order/FAA_Order_1050.1G.pdf. Order 1050.1G retains the same noise standards as Order 1050.1F.

of the RADP would not result in changes to aircraft operations, and aircraft noise is therefore not evaluated in the Draft EIR.

- Several comments (I-Schneider-14, I-Schneider-31) assert that the Draft EIR should have relied on the use of the C-weighted scale, and not the A-weighted scale, to document existing ambient noise levels and potential noise impacts, including impacts from nighttime use of the Aviador Lot. As explained in the Draft EIR on p. 3.B-1, because the human ear is not equally sensitive to all sound frequencies, human response is factored into sound descriptions in a process called *A-weighting*, expressed as *dBA*. This scale is the most common scaling applied to the measurement and analysis of environmental noise levels, including transportation noise. The Department of Housing and Urban Development (Draft EIR p. 3.B-14), the Federal Transit Administration (Draft EIR p. 3.B-14), the FAA's airport noise compatibility standards (Draft EIR p. 3.B-15), the City and County of San Francisco (Draft EIR pp. 3.B-19 through 3.B-20), and other agencies identified in the Draft EIR specify environmental noise analysis thresholds using only the A-weighted scale. The C-weighted scale, in general, does not discount low- and high-frequencies as much as the A-weighted scale and is considered most appropriate to characterize impulsive or loud noise events (over 100 dBA). For example, the FAA Part 150 noise compatibility guidance recommends use of the C-weighted scale as supplemental noise metric to evaluate sonic booms. As described in the Draft EIR (Table 3.B-2), ambient noise levels measured for the RADP were within the typical ranges for urban and airport environs (between approximately 55 dBA L_{eq} and 70 dBA L_{eq}), and potential subsequent RADP project construction and operational noise levels were determined not to result in average or maximum noise levels in excess of 100 dBA at any sensitive receptor location. Thus, it was appropriate to describe the existing noise environment and evaluate the potential noise impacts that could occur with implementation of the RADP using the A-weighted scale. Furthermore, as previously discussed, implementation of the RADP would not induce passenger demand, nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport (including cargo, private jets, and helicopters), or change the volume of annual passengers that choose to fly into and out of SFO. For these reasons, analyzing aircraft noise is outside the scope of the Draft EIR.

  With regard to the Aviador Lot, the commenter is correct in noting that the Aviador Lot continues to be used as a staging area for construction projects at the Airport and would continue to be used as a staging area to support construction of RADP projects. As discussed on Draft EIR p. 3.A-38, construction staging areas would be used primarily for the storage of construction-related materials such as equipment, vehicles, stockpiles, and concrete batching prior to transport to RADP project sites. No construction activities would take place at the staging areas. Therefore, construction staging activities at the Aviador Lot related to implementation of subsequent RADP projects would not include any equipment or activities that would be considered a source of low-frequency noise and would not include any activities that would be considered as impulsive or loud (over 100 dBA) that would require analysis using the C-weighted scale. It is noted that the Draft EIR's analysis of the continued use of the Aviador Lot for construction staging purposes (Draft EIR p. 3.B-39) determined staging activities could exceed interior dBA noise standards at residences on Roblar Avenue, and identified Mitigation Measure M-NO-1, Nighttime Construction Noise Control, to reduce this impact to a less-than-significant level. Thus, no other mitigation measures are required under CEQA to reduce noise impacts resulting from construction staging activities at the Aviador Lot that would occur as part of RADP implementation.

- One comment (A-CPC-Moore-1) expresses general concern over potential cumulative impacts. The Draft EIR provides an analysis of cumulative noise impacts on Draft EIR pp. 3.B-58 through 3.B-60. The

cumulative noise analysis includes consideration of the development and infrastructure projects listed in Draft EIR Table 3-2, p. 3-8, and mapped on Draft EIR Figure 3-1, p. 3-11.

- Several comments (I-Schneider-31, I-Schneider-33, and I-Schneider-35) expressed general opinions on the Airport's management, noise contours, and existing effects on the City of Millbrae. These comments are noted. Comments that that City and County of San Francisco representatives assigned to the SFO Community Roundtable often do not participate in meetings do not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of implementation of the RADP's physical environmental impacts and thus do not require further response. Similarly, comments on the adequacy of the Airport's existing noise contours and the amount of residences within existing noise contours are also not applicable to the adequacy of the Draft EIR's noise analysis because implementation of the RADP would not affect aircraft operations nor alter existing residential land uses in the Airport vicinity.

For the reasons described above, the Draft EIR's evaluation of potential noise impacts is based on the use of appropriate, commonly accepted environmental noise metrics and thresholds that are relevant to the specific construction and operational noise sources associated with implementation of the RADP. In addition, the Draft EIR clearly discloses and describes the basis for the significance thresholds used to evaluate potential construction and operational noise impacts that could result from implementation of the RADP, applies different metrics and thresholds depending on the activity evaluated (e.g., construction or operation), the type of source evaluated (e.g., mobile or stationary), and the jurisdiction where the activity takes place. The Draft EIR's noise metrics and thresholds, therefore, are appropriate and adequately analyze the potential noise impacts that could result from implementation of the RADP.

3.F.3 Comment NO-3: Noise Analysis

This response addresses the following comments, which are quoted below:

I-Hanasoge-2

I-Hanasoge-5

I-Lyman-2

I-Schneider-17

I-Schneider-32

I-Schneider-38

I-Schneider-39

O-CRPA-2

O-CRPA-8

O-CRPA-17

O-CSFN3-4

"1. Lack of Noise Impact Information in the EIR: The current EIR does not provide sufficient information on the noise impacts of the proposed expansion. We urge you to specifically address community noise

impacts in the EIR, including capturing specific noise impacts to Foster City. Currently there is no mention of this issue." *(Srinivas Hanasoge, Email, May 21, 2025 [I-Hanasoge-2, NO-3])*

"We respectfully request that SFO:

- Conduct a thorough noise impact assessment and include the results in the EIR
- Provide transparent and accurate information about the potential noise impacts of the expansion
- Prioritize noise reduction measures to mitigate the effects of increased air traffic on surrounding communities" *(Srinivas Hanasoge, Email, May 21, 2025 [I-Hanasoge-5, NO-3])*

"As a long-standing citizen of South SF who pays taxes, votes in every election, and is negatively impacted by airport noise, I demand that the commision *[sic]* take seriously their responsibility to the communities affected by such noise - and to use REALISTIC noise pollution criteria (including the 45-60dB range) - not a lame average." *(Susan Lyman, Email, June 2, 2025 [I-Lyman-2, NO-3])*

"Impact NO-3 – actions would not impact living or working in area – Heavy trucks and concrete crushing operations are not going to impact Bayside Manor and Gateway neighborhoods. This isn't true now nor in the future. SFO even acted against City and Gateway to remove trees so big construction vehicles using Aviador lot could make turns from Rollins Road. Trees that would have absorbed some of the existing air pollution and in a very tiny way some of the noise." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-17, NO-3])*

"PP 252 S.B-12 Lomita Park School is in Millbrae not San Bruno as stated. This is full on snarky but if SF Planning Staff or the DEIR consultants talked to me, as a former Mayor of Millbrae and long-time SFORT member, I could have saved you this significant and obnoxious error." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-32, NO-3])*

"PP 2713.B-31 San Bruno has a 10dBA ambient operational noise rule. SFO should treat all close in communities to the same level of care. The fact that SF has no vibration codes, but SSF does mean all communities should get these same vibration standards, but SFO now should be treated the same." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-38, NO-3])*

"PP 276 Charts show all above 65 dBA but then doesn't include buildings in the insulation programs." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-39, NO-3])*

"**It is unfortunate that the RADP did not address many of the comments that were previously raised** by cities and individuals, including the request by Dave Pine, San Mateo County Supervisor, District 1 in his July 10, 2019 comment to provide a comprehensive review of all potential impacts on communities. All comments submitted in 2019 are available on pages 46-72 of the RADP DEIR Appendix A. For example, as described on pages 120 of the RADP DEIR pdf and 55 of the RADP DEIR Appendix A pdf, the Environmental

Impact Report should consider the impacts on the communities overflown by additional SFO traffic. The scope should not be limited to communities adjacent to the airport or using only DNL 65 to determine significant impacts. Specifically, the EIR should:

- Document the changes in noise impacts on communities heavily impacted by SFO, such as Palo Alto, using the N-Above and N-Above-Ambient metrics, not just CNEL, and display the results in 5 dB increments (starting at 40 dB for CNEL). The DEIR should no longer rely on the outdated DNL 65 noise threshold because it ignores FAA findings from the Neighborhood Environmental Survey that showed that harm occurs at much lower levels than DNL 65. SFO has already calculated ambient noise levels at all locations where permanent or temporary noise monitors have been deployed. Additionally, SFO regularly reports N-Above metrics in its monthly Airport Director's Reports, demonstrating both familiarity with and capability to apply these metrics.
- Consider the total impact of noise caused by all private or commercial air traffic operations (arrivals and departures, passenger and cargo planes, helicopters) at multiple Bay Area airports (SFO, Oakland, San Jose, San Carlos, and Palo Alto)." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-2, NO-3])*

"**Building more gates in the boarding area H, an additional apron area, and a new maintenance hangar will increase the negative impacts on residential areas because it will enable more operations.**

- Residential areas nearest to Boarding area H like San Bruno and Millbrae will be impacted because Boarding area H will be closer by 600 ft to the nearest residential area (currently boarding area G is about 2500 ft from the nearest residential area, and boarding area H will be about 1900 ft from the nearest residential area). SFO states that '*this would not constitute a considerable change from existing conditions with respect to noise levels from aircraft as aircraft currently parked in the same location where Boarding Area H would be constructed. Therefore, there would be no considerable change in associated noise levels from aircraft gating at the new Boarding Area H*' (see page 295 of the RADP DEIR pdf). However, parking an aircraft versus emplaning and deplaning cargo and passengers are very different activities with very different noise footprints. SFO claims that the change will not be considerable without providing any supporting noise data to distinguish between the impacts of parked aircraft and those actively loading or unloading passengers and cargo." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-8, NO-3])*

- "**Analyze total regional aircraft noise impacts.** Evaluate combined noise exposure from all private and commercial aircraft from/to SFO, Oakland, San Jose, San Carlos, and Palo Alto." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-17, NO-3])*

"Increased flights result in increased air pollution and increased noise pollution." *(Eileen Boken, Coalition for San Francisco Neighborhoods, Email, June 2, 2025 [O-CSFN3-4, NO-3])*

Response NO-3

Comments I-Hanasoge-2, I-Hanasoge-5, I-Lyman-2, and O-CRPA-2 express concern that the Draft EIR does not adequately analyze noise impacts related to implementation of the RADP on communities including Foster City, South San Francisco, and Palo Alto. Comment O-CRPA-2 asserts that the Draft EIR should consider the impacts on communities overflown by aircraft landing at and taking off from SFO and should not be limited to communities adjacent to the Airport. Other comments including I-Lyman-2 and O-CRPA-2 state that analysis in the Draft EIR should be based on alternative noise metrics such as "N-Above and N-Above-Ambient" metrics and lower standards in the 45 to 60 dBA range for aircraft noise instead of the 65 dBA CNEL. Comment O-CRPA-8 expresses concern that building more gates for Boarding Area H, an additional apron area, and a new maintenance hangar will increase aircraft operations and affect nearby residential areas. Comments O-CRPA-2, O-CPA-17, and O-CSFN3-4 state that the Draft EIR should consider and analyze the total impact of noise caused by all private and commercial air traffic operations and the impact of increased flights on noise pollution.

The Draft EIR analyzes construction and operational noise and vibration impacts that could result from implementation of the RADP in accordance with CEQA requirements. The analysis in the Draft EIR focuses on noise sources associated with construction and operation of RADP projects, including construction equipment and traffic, operational traffic, and stationary sources. These sources could generate impacts typically within 900 feet assuming a direct line-of-sight between the noise source and a sensitive receptor (i.e., a piece of construction equipment generating 85 dBA at a reference distance of 50 feet would attenuate to 60 dBA over a distance of 900 feet and 60 dBA is on average the ambient noise conditions). For these reasons, the impact evaluation is focused on communities in the vicinity of proposed RADP projects, including the cities of South San Francisco, San Bruno, and Millbrae where RADP noise sources could result in impacts. Communities such as Palo Alto and Foster City are located farther away. Due to the more than 5-mile distance separating these communities from noise sources associated with subsequent projects construction and operational noise that could occur with implementation of the RADP, they would not substantially be affected by construction and operational noise from RADP projects. In addition, the Draft EIR's evaluation of potential construction traffic noise impacts from multiple RADP projects concluded that construction traffic would, at worst-case, increase existing noise levels at noise sensitive receptors by no more than 1.9 dBA in these adjacent communities resulting in a less-than-significant noise impact. In total, the Draft EIR estimates that up to 326 daily truck trips could occur on U.S. 101 south of the airport. This change in traffic volumes on U.S. 101, which carries tens of thousands of vehicles a day, would not generate perceptible traffic noise changes in Palo Alto, Foster City, or other communities along U.S. 101 or other regional travel routes.

These comments allude to noise impacts from increased aircraft operations based on an assumption that implementation of the RADP constitutes an airport expansion project that would facilitate and directly induce increased passenger demand and increased aircraft operations at SFO. As discussed in Draft EIR Chapter 2, Project Description, and detailed in Draft EIR Appendix C, implementation of the RADP would not induce passenger demand, nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport (including cargo, private jets, and helicopters), or change the volume of annual passengers that choose to fly into and out of SFO. Rather, development of the terminal and non-movement areas of the airfield and landside facilities identified in the RADP are proposed to ensure that SFO is able to maintain an acceptable level of service for passengers and accommodate aircraft operations without causing severe or

unrecoverable delays with regard to scheduled flights. Therefore, as discussed on Draft EIR pp. 3.B-30 and 3.B-31, aircraft noise levels at SFO would not change as a result of implementation of the RADP. Consequently, the Draft EIR is not required to analyze aircraft noise impacts on communities under CEQA. See Response NO-2 for further discussion regarding comments pertaining to aircraft noise.

Comment O-CRPA-8 expresses concern that residential areas in San Bruno and Millbrae nearest to Boarding Area H will be affected by additional noise generated by emplaning and deplaning cargo and passengers at the gates that would be located 600 feet closer to the nearest residential area. Draft EIR Impact NO-3 addresses operational noise impacts from the change in location of gated aircraft due to the construction of Boarding Area H. As explained in the Draft EIR, the nearest sensitive receptors are located along San Antonio Avenue in the City of San Bruno and would still be located approximately 1,900 feet away from the gates at Boarding Area H; therefore, aircraft activity in this area would not substantially change because, as stated on Draft EIR p. 3.B-55, aircraft are currently parked in the same location where Boarding Area H would be constructed. Therefore, there would be no considerable change in associated noise levels from aircraft gating at the new Boarding Area H. The analysis further notes that aircraft turn off their primary engines as they exit the runway and taxi toward the gates, and they operate only auxiliary engines for lighting and ventilation. Once aircraft reach the gate, the auxiliary engines are shut down, as aircraft run on auxiliary power units or ground-based power, which are much quieter than primary aircraft engines. For departures, a tow tractor pushes the aircraft off the gate and into the taxiway, at which point one engine is used to taxi the aircraft to the runway. Although these procedures are followed to save fuel, they also result in noise reduction. Regardless, given that aircraft currently apply the same procedures to park in the location where gated aircraft would park for the Boarding Area H project, there would not be a discernable increase in noise levels at noise-sensitive receptors located on San Antonio Avenue located in the City of San Bruno. For these reasons, noise impacts related to aircraft parking at Boarding Area H are identified as less than significant.

Comment I-Schneider-32 notes that Lomita Park School is in Millbrae, not San Bruno as stated in the Draft EIR. The commenter is correct, but this does not affect the analysis and conclusions presented in the Draft EIR. Because the school is located more than 1,000 feet from construction areas associated with implementation of the RADP, there would be no noise or vibration impacts on receptors at the school or the school buildings. However, in response to the comment, the text on Draft EIR p. 3.B-12 is revised to correct the location of the school:

> … The Belle Air Elementary School in San Bruno and the Lomita Park Elementary School~~, both~~ in ~~San Bruno~~ Millbrae, are located approximately 1,100 feet and 1,400 feet from the RADP project site boundary, respectively. …

Comment I-Schneider-17 expresses concern that noise from heavy trucks and concrete crushing operations at the Aviador Lot construction staging area would affect Bayside Manor and Gateway neighborhoods. As detailed in the Draft EIR, construction staging activities anticipated at the Aviador Lot include construction equipment, vehicle and material storage, and concrete batching prior to transport to subsequent RADP sites. Impact NO-1 adequately addresses noise from construction trucks in the vicinity of the Aviador Lot based on transportation data provided in the SFO Recommended Airport Development Plan CEQA Analysis – Representative Project Construction Vehicle Trip Assignment (Draft EIR Appendix E.3) and identifies a less-than-significant impact with implementation of Mitigation Measure M-NO-1, Nighttime Construction Noise Control. It should be noted that the Aviador Lot is currently used as a construction staging area for other SFO projects; hence, its existing use as a construction staging area is part of the existing environmental setting detailed in the Draft EIR.

Comment I-Schneider-38 asserts that all communities affected by implementation of the RADP should be subject to the same operational noise and vibration standards, irrespective of the jurisdiction in which they are located. There is no CEQA requirement that the same standards be applied across jurisdictions in a multi-jurisdictional analysis. Consistent with the CEQA Guidelines Appendix G checklist, the impact analysis uses standards established in the local general plans or noise ordinances of jurisdictions within which affected noise sensitive receptors are located. Where local jurisdictions do not provide standards, applicable standards of other agencies such as the Federal Transit Administration are used. Table 1 of the scope of work included as Appendix B of Appendix F, Noise Technical Appendix, to the Draft EIR includes a detailed description of the noise and vibration standards from all affected jurisdictions. Although SFO is not subject to the general plans of adjacent jurisdictions,[20] Table 1 includes all noise standards for construction and operation for San Francisco and the jurisdictions adjacent to SFO.

3.F.4 Comment NO-4: Construction Noise and Vibration

This response addresses the following comment, which is quoted below:

A-BART-1

"As described on page 2-19 of the DEIR, this project would include construction of a new Boarding Area H with multiple domestic/international-capable swing gates able to accommodate up to 8 widebody or 14 narrowbody aircraft, or some combination thereof, for domestic or international departures. Boarding Area H would extend west from the base of the International Terminal Building along North Link Road, then shift north and follow North McDonnell Road. According to Table 2-5, (page 2-39) Construction of the new Boarding Area H is anticipated to begin October 2027 continuing to May 2033.

As the project's proposed Boarding Area H would be adjacent to the aerial viaduct that supports BART's trackways, BART is very concerned with any potential construction-related disruption to BART operations, specifically from impacts related to noise, vibration, and air quality. Section 3.B of the DEIR, Noise and Vibration, states in several places (e.g., page 3.B-12 and 3.B-32) that Airport buildings would be the closest structures to construction areas. Although not mentioned in the analysis, the SFO BART station and aerial guideway are well integrated with the Airport terminals and could be affected by construction work as well, particularly from Boarding Area H. Construction noise is a concern, for both BART employees and riders, as is construction vibration due to the proximity of construction to BART's sensitive electronic and communications systems. Construction vibration should also be monitored to ensure there are no adverse effect to BART structures." *(Tim Chan, Station Area Planning Group Manager, San Francisco Bay Area Rapid Transit District, Letter, May 30, 2025 [A-BART-1, NO-4])*

Response NO-4

Comment A-BART-1 asserts that construction activities associated with Boarding Area H, proposed adjacent to the aerial viaduct that supports BART's tracks, would result in disruption to BART operations, and in noise

[20] As provided in footnote 13 on p. 1-1 of the Draft EIR, SFO, owned by the City and County of San Francisco, is not subject to the land use requirements of other jurisdictions, even if the land use occurs within the geographical boundaries of another jurisdiction. California Government Code sections 53090 and 53091 grant a city or county intergovernmental immunity from complying with another governmental body's zoning and building permit laws.

and vibration impacts on BART employees and riders. The comment also cites construction vibration as a concern to BART's sensitive electronic and communications systems.

The Draft EIR analyzes noise impacts related to implementation of the RADP, focusing on a worst-case analysis of representative RADP projects based on their size, duration/intensity of construction, and proximity to sensitive receptors, including worker receptors at the Airport. As detailed under Impact NO-1, Draft EIR pp. 3.B-33 through 3.B-45, even the noisiest construction activities at the Central Hub (one of the largest RADP projects proposed) would expose nearby worker receptors, such as skycaps at the departure terminals and parking enforcement patrols at the arrival terminals, to construction noise below the Federal Transit Administration criterion of 100 dBA for workers. These worker receptors would be located outdoors as close as 200 feet from pile driving activities at the Central Hub. In comparison, construction noise for Boarding Area H would affect BART employees at the station to a lesser extent because they would be located within the station, which provides additional noise attenuation. BART riders are considered transient receptors who would be exposed to construction noise for a few minutes at most. For these reasons, impacts on workers and transit riders related to construction are identified as less than significant.

Draft EIR Impact NO-2 acknowledges that construction of subsequent RADP projects could take place near existing structures at the Airport, including BART facilities, and result in structural damage from construction vibration. Therefore, the analysis identifies Mitigation Measure M-NO-2, which would become applicable if a screening-level analysis comparing vibration levels for various pieces of equipment with the distance to adjacent buildings or structures for a subsequent RADP project determines that the potential exists for building damage to occur. Construction activities at Boarding Area H would be screened for potential vibration impacts based on proposed construction activities and distances to all adjacent structures, including the BART station and other BART facilities. If the vibration thresholds are exceeded, Mitigation Measure M-NO-2 would be implemented, which would reduce vibration-related impacts on the BART station from construction of Boarding Area H to a less-than-significant level.

It should be noted that the Draft EIR analyzes the RADP at a program level. As discussed in Draft EIR Section 1.C.1, Environmental Review of Subsequent Projects, p. 1-18, CEQA Guidelines section 15168(c) states that later activities in the program must be examined in light of the program EIR to determine whether an additional environmental document must be prepared. Therefore, the Draft EIR assumes that all subsequent projects in the RADP would be subject to environmental review at such time that those projects are proposed to determine whether they would result in physical environmental effects that were not examined in the program EIR.

See Responses AQ-2, AQ-3, and AQ-4 for further discussion regarding comments pertaining to air quality.

3.F.5 Comment NO-5: Noise Mitigation Measures

This response addresses the following comments, which are quoted below:

I-Hanasoge-4

I-Schneider-16

"3. Need for Noise Reduction Mitigation: Instead of increasing noise impacts, SFO should focus on reducing them. Currently, we see no mitigation path for the alarming noise levels in the Foster City area. We

request that SFO prioritize noise reduction measures to minimize the impact on surrounding communities." *(Srinivas Hanasoge, Email, May 21, 2025 [I-Hanasoge-4, NO-5])*

"Elaborate on sound curtains for operations on Aviador lot and if they work, why aren't they being used at airport taxiways and runways." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-16, NO-5])*

Response NO-5

The comments state that SFO should reduce and mitigate aircraft noise in Foster City and ask why sound curtains are not being used at the Aviador Lot and around Airport taxiways and runways.

With regard to Comment I-Hanasoge-4, as discussed in Draft EIR Chapter 2, Project Description, implementation of the RADP would facilitate the development of terminal and non-movement areas of the airfield, as well as landside facilities to accommodate long-term aircraft operations and passenger activity levels at the Airport, which are anticipated to occur regardless of whether the RADP is implemented. Implementation of the RADP would not induce passenger demand, nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport, or change the volume of annual passengers that choose to fly into and out of SFO. Therefore, the implementation of RADP projects would not change aircraft noise levels or the area influenced by the Airport's aircraft activity. As required under CEQA, the scope of the Draft EIR is to address noise impacts from the construction and operation of RADP projects, which includes noise sources such as construction equipment, short-term and long-term traffic increases along roadways providing access to the Airport and its facilities, and stationary sources such as emergency generators. These noise sources have the potential to influence ambient noise levels in areas within at most 1,000 feet of the sources. Therefore, the Draft EIR evaluates the noise impacts on communities adjacent to the Airport, including portions of the cities of San Bruno, South San Francisco, and Millbrae. Communities located farther away, such as Foster City, would not substantially be affected by noise from construction or operation of RADP projects. Moreover, CEQA requires mitigation only when a project is found to result in a significant impact and does not require mitigation of existing (non-project generated) noise. See Response NO-2 for further discussion regarding comments pertaining to aircraft noise and Response NO-3 for further discussion regarding noise impacts associated with implementation of the RADP on communities located further away from SFO.

Regarding Comment I-Schneider-16, Impact NO-1, Draft EIR pp. 3.B-33 through 3.B-45, identifies a significant nighttime construction impact on the nearest residential receptors from construction staging activities occurring at the Aviador Lot. Mitigation Measure M-NO-1, Nighttime Construction Noise Control, is identified to address this impact. The mitigation measure provides a menu of options to reduce noise including the use of temporary noise barriers, barrier-backed sound curtains, and/or acoustical panels around working powered impact equipment and, if necessary, around the project site perimeter. These barriers and curtains have been proven to be effective especially when placed around larger, stationary machines such as generators, concrete mixers, or crushers. The barriers are made from high-performance acoustic materials that absorb sound and reduce its transmission. Enclosing construction equipment with sound barriers is one of the most effective ways to minimize a project's noise impacts by ensuring that sound waves are effectively absorbed and contained. However, an evaluation of the use of sound blankets for mitigating noise from Airport taxiways and

runways is beyond the scope of the Draft EIR and is not required under CEQA, as implementation of the RADP would not affect aircraft activity and associated aircraft noise levels. (See Response NO-3 regarding further discussion related to the change in location of gated aircraft due to the construction of Boarding Area H.) As detailed in Draft EIR Appendix C, implementation of the RADP would align the capacity of the Airport's passenger terminals, ground transportation, and support facilities with the fixed capacity of the existing runway system, allowing those facilities to accommodate aircraft operations and passengers corresponding to the runway system capacity. The RADP does not contemplate or result in any change to existing runway configurations or flight paths, expand Airport property, or increase runway capacity.

3.G Air Quality [AQ]

The comments and corresponding responses in this section cover the subjects included in Draft EIR Section 3.C, Air Quality. The comment topic relates to:

- AQ-1: Air Quality Technical Appendix
- AQ-2: Air Quality Analysis
- AQ-3: Air Quality Mitigation Measures
- AQ-4: Construction Emissions
- AQ-5: Air Quality Monitoring
- AQ-6: Odor Impacts

3.G.1 Comment AQ-1: Air Quality Technical Appendix

This response addresses the following comment, which is quoted below:

A-Caltrans-3

"**Air Quality**
Appendix G: Air Quality Technical Appendix. There are some inconsistencies across sections in the Noise Technical Appendix. Please review the sections mentioned below to ensure accuracy and consistency.

- In the introduction the report notes that the air quality analysis considers a comparison between the 2045 Future Baseline without RADP and the 2045 Future Baseline with RADP. Please specify where the calculation of the 2045 Future Base Line without RADP is located.
- Table 8, RADP Terminal Projects Summary of Net New Operational Area: please explain why the Net New Construction would be 1,413,300 square feet (s.f.) if New Construction is 1,618,900 s.f. and Building Area Demolition is N/A.
- In the Delivery Trucks section, the report notes using modeling output from "OFFROAD2021-ORION." (.pdf page 745). Previously, the report noted that "OFFROAD2017-ORION" would be used for consistency (.pdf page 740). Please clarify which version of the Off-Road Equipment Model was used in the Delivery Trucks section.
- In the Air Quality section of the DEIR (3.C.) and in Appendix G (Air Quality Technical Appendix) the radius used for measuring health impacts in exposure of sensitive receptors is inconsistent between

1,000 meters and 1,000 feet. Please clarify which measurement was used." *(Yunsheng Luo, Branch Chief, Local Development Review, Office of Regional and Community Planning, California Department of Transportation, Letter, June 2, 2025 [A-Caltrans-3, AQ-1])*

Response AQ-1

Comment A-Caltrans-3 requests clarification on where to find the calculation for the 2045 future baseline without RADP, seeks an explanation for discrepancies in the figures regarding new construction and demolition in Table 8, notes an inconsistency in the modeling versions used for delivery truck emissions, and calls for clarity on the radius measurement used for health impact assessments of sensitive receptors.

Location of Calculation for 2045 Future Baseline without RADP

Regarding the location of the calculation of the 2045 future baseline without RADP, it is presented or used in several sections of the Draft EIR, including Draft EIR p. 3.C-29 as well as in Draft EIR Appendix G, Air Quality Technical Appendix. The 2045 future baseline without RADP scenario serves as the environmental baseline for the analysis of RADP-related air quality impacts, in accordance with CEQA Guidelines section 15125, as discussed below.

For analyzing Impact AQ-2 (Plan-Level Analysis), related to whether the RADP would result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard, employment and vehicle trip data are presented in Table 3.C-9, Recommended Airport Development Plan Net New Vehicle Trips versus Net New Employment (Draft EIR pp. 3.C-54). The VMT data are from Table 16 of Fehr & Peers & LCW Consulting, 2024, *SFO Recommended Airport Development Plan CEQA Analysis – Travel Demand Memorandum*, March 2025 (see Draft EIR Appendix E.2).

The introduction of Appendix G states that the 2045 future baseline without RADP and the 2045 future baseline with RADP were used for the operational and cumulative operational analyses (Appendix G, p. 2). For analyzing Impact AQ-4 (Representative Analysis of Subsequent RADP Projects), related to whether operation of subsequent RADP projects would cause a cumulatively considerable net increase of a criteria air pollutant for which the region is in nonattainment under an applicable federal or state ambient air quality standard, the Draft EIR calculates operational emissions for the 2045 future baseline with RADP scenario based on net new square footage of buildings and facilities for representative projects (Draft EIR pp. 3.C-65 to 3.C-74). These emissions are used to determine impacts. Because the 2045 future baseline without RADP scenario would not include operation of these buildings, emissions for these buildings from the 2045 future baseline without RADP scenario are effectively zero. This assumption produces a conservative analysis of the RADP's operational criteria pollutant impact; under the 2045 future baseline without RADP scenario, activities associated with existing buildings would increase to accommodate future passenger demand at SFO, producing additional criteria pollutant emissions. This increase in criteria pollutant emissions was not modeled in the Draft EIR and subtracted from the 2045 future baseline with RADP scenario to determine the incremental increase in criteria pollutant emissions associated with the RADP, thereby producing a higher emissions (and more conservative) total attributable to implementation of the RADP. The Draft EIR does not separately calculate emissions for the 2045 future baseline without RADP scenario.

The calculation of the 2045 future baseline with RADP minus 2045 future baseline without RADP is provided in Appendix G, Tables G-1 through G-3 (see also Draft EIR Section 3.C.3), which present baseline activity levels, emissions factors, and associated emissions estimates. The tables and corresponding narrative describe the assumptions, modeling inputs, and methodologies used to quantify baseline emissions. The baseline scenario modeling is also referenced in the main text of Section 3.C under "Environmental Setting" and "Methodology."

Net New Construction and Building Area Demolition

The comment seeks clarification regarding the square footage values of new construction area, net new construction area, and demolition area in Draft EIR Appendix G, Air Quality Technical Appendix, Table 8, RADP Terminal Projects Summary of Net New Operational Area. Table 8 summarizes new terminal area developed under subsequent RADP projects and shows zero square feet of demolition (shown as "N/A" in the table), 1,618,900 square feet of new construction, and 1,413,300 square feet of net new construction area for Boarding Area H (RADP Project #1).

Draft EIR Table 2, p. 2-24, presents square footage data for Boarding Area H (RADP Project #1), which includes Building 575, Building 575A, Building 575B, Building 585, and Boarding Area H. Building 575, Building 575A, Building 575B, and Building 585 involve 205,600 square feet of demolition. Subtracting 205,600 square feet of demolition from 1,618,900 square feet of new construction yields 1,413,300 square feet of net new construction for Boarding Area H (RADP Project #1).

Consequently, the "N/A" for demolition in Draft EIR Appendix G, Air Quality Technical Appendix, Table 8, p. 17, is a typo and has been revised to 205,600 square feet of demolition. This revision does not alter the results or conclusions of the analysis, which was based on Table 2-2 of the Draft EIR. In response to this comment, Appendix G, Air Quality Technical Appendix, Table 8, RADP Terminal Projects Summary of Net New Operational Area, is revised as shown below. The revised Air Quality Technical Appendix is available on the planning department's Environmental Review Documents webpage (https://sfplanning.org/environmental-review-documents).

Table 8 RADP Terminal Projects Summary of Net New Operational Area

Building	Building Area Demolition (sf)	New Construction (sf)	Net New Construction (sf)	New Paving (sf)	CalEEMod Land Use	CalEEMod Area (sf)
			Boarding Area H (1)			
Boarding Area H	~~N/A~~205,600	1,618,900	1,413,300		Industrial Park	1,413,300
…						

Air Quality Model Version Consistency: OFFROAD2017-ORION vs. OFFROAD2021-ORION

As detailed in Appendix G, Air Quality Technical Appendix, and summarized in Draft EIR Section 3.C.4, OFFROAD2017-ORION was used to model construction-related off-road equipment emissions to maintain consistency with the California Emissions Estimator Model (CalEEMod), which relies on the same version of the model. For operational emissions, specifically those associated with delivery trucks, the most recent version, OFFROAD2021-ORION, was used to align with the latest California Air Resources Board (CARB) recommendations and data (see Draft EIR Appendix G, p. 19). Because CalEEMod does not calculate

emissions from transport refrigeration units (TRUs), the use of OFFROAD2021-ORION for TRU emissions is appropriate and does not present methodological inconsistencies between modeling tools.

Radius Used for Measuring Health Impacts to Sensitive Receptors

The health risk assessment (HRA) conducted for the RADP, as detailed in Draft EIR Section 3.C and Appendix G, evaluated potential health impacts on sensitive receptors within a 1,000-meter radius of the Airport, a distance selected to account for the size and complexity of the project. The analysis regarding implementation of the RADP, including all dispersion modeling for cancer risk and $PM_{2.5}$, was based on the 1,000-meter buffer from the Airport. Any reference to a 1,000-foot radius in either the main Air Quality section or Appendix G is in reference to existing sources of health risk or cumulative projects and their proximity to the maximum exposed individual sensitive receptor (MEISR) and the maximum exposed individual worker (MEIW), consistent with the Bay Area Air District's (air district) Air Quality Guidelines Appendix E, Recommended Methods for Screening and Modeling Local Risks and Hazards.[21] In response to this comment, Draft EIR p. 3.C-41 is revised as follows:

> ~~Consistent with the 2024 San Francisco Planning Department's *Air Quality and Greenhouse Gas Analysis Guidelines*,~~ To account for the size and complexity of the project, health risks from DPM, gasoline TOG, and annual-average $PM_{2.5}$ concentrations were estimated at all sensitive receptors located within 3,280 feet (1,000 meters) of the Airport boundary to identify the maximum exposed individual sensitive receptor (MEISR) and the maximum exposed individual worker (MEIW). In addition, health risks at the MEISR and MEIW from existing sources are provided in this analysis for informational purposes, because the health risk thresholds presented below only apply to the RADP's incremental contribution to health risks and do not address existing health risks. The MEISR is the sensitive receptor with the highest modeled health risk. See Appendix G, Air Quality Technical Appendix, for a detailed description of all assumptions and methods used for the HRA.

This response provides clarification and confirms that the Air Quality Technical Appendix and Draft EIR Section 3.C address all substantive comments raised regarding the methodology, assumptions, and technical accuracy of the air quality analysis in accordance with CEQA and air district guidelines. The comments do not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of implementation of the RADP, and no further response is required.

[21] Bay Area Air Quality Management District, *Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards*, August 2023, https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf, accessed July 1, 2025.

3.G.2 Comment AQ-2: Air Quality Analysis

This response addresses the following comments, which are quoted below:

A-CPC-Braun-1

A-CPC-Moore-2

A-PaloAlto-3

A-USEPA-1

I-Schneider-18

I-Schneider-40

I-Schneider-42

O-CRPA-3

O-CRPA-18

"I appreciate acknowledgment of the project's significant and unavoidable impacts of 25 mitigation that affect air pollution, and I look forward to reviewing additional comments and responses to those comments." *(Commissioner Braun, San Francisco Planning Commission, Transcript, May 22, 2025 [A-CPC-Braun-1, AQ-2])*

"We already have data about where the concentrations of air quality conce -- air quality concentrations are, and I do think that we need to look at it in a kind of layered, comprehensive way." *(Commissioner Moore, San Francisco Planning Commission, Transcript, May 22, 2025 [A-CPC-Moore-2, AQ-2])*

"**Incomplete Air Quality Analysis**

The air quality analysis in the DEIR omits any discussion of ultrafine particulate matter (UFPs), which are increasingly recognized as a significant public health concern, particularly for communities situated under flight paths at lower altitudes. These emissions are associated with jet engine exhaust during climb-out and other low-elevation operations. The omission of this impact category is a significant gap in the analysis and fails to meet CEQA's requirement to consider the full range of potentially significant health-related environmental effects." *(Ed Shikada, City Manager, City of Palo Alto, Letter, May 30, 2025 [A-PaloAlto-3, AQ-2])*

"**Air Quality Mitigation**

In section 3.C.4, the Draft EIR indicates that scaling factors that incorporate the Federal Clean Trucks Plan, among others, were applied to the air modeling construction and demolition emission rates. The EPA appreciates that the City included these emission rates into the modeling. However, the EPA notes that the future status of the Federal Clean Trucks Plan is unclear and the construction emissions modeling results may differ as a result. We recommend the City, in the Final EIR, disclose that the status of the plan is tenuous

and that actual trucking emissions may be different than modeled." *(Francisco Dóñez, Manager, U.S. Environmental Protection Agency, Letter, March 30, 2025 [A-USEPA-1, AQ-2])*

"Impact AQ-3 try not to use portable generators especially those diesel powered. The entire east side of Millbrae is considered at high risk to PM2.5, Diesel PM 2.5, heat impacts, traffic, flooding. All related to SFO and yes, HWY 101. As reported in President Biden's Justice 40 report. None of this data is included in any part of this DEIR. Best mitigation – do not use Aviador lot. Too close to homes, already heavily impacted by taxiways and Departures on Runways 1L/R. And greatly impacted by all reverse flow ongoing operations." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-18, AQ-2])*

"PP 305/6 – Air Quality discussions PM – fine particulate matter PP 312 – 3.C-12 The FAA completed a study in 2019, bringing the results to SFORT in October 2019 showing much greater creation of PM2.5 and smaller generated by jet engines. None of this latest information is included in this DEIR. Be honest, look at the dangers of PM2.5 and PM2.5 diesel on close in communities." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-40, AQ-2])*

"PP349 Fugitive Dust – perfect, this is what has been, is and will be happening on Aviador Lot. Mitigation does not conduct operations of any kind on Aviador Lot." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-42, AQ-2])*

- "Measure emissions on the ground, specifically the level of ultra-fine particles, at locations overflown by aircraft flying at or below 5,000 feet. Note that there is no mention of ultrafine particles in the Air Quality section 3.C, which starts on page 301 of the RADP DEIR pdf, even though ultrafine particles are dangerous for humans." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-3, AQ-2])*

- "**Measure ultra-fine particle emissions.** Include ground-level measurements of ultrafine particles under flight paths below 5,000 feet, which are currently missing from the air quality analysis." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-18, AQ-2])*

Response AQ-2

These comments include multiple points related to the adequacy of the air quality analysis in the Draft EIR specifically regarding ultrafine particulate matter (UFPs) (comments A-PaloAlto-3, I-Schneider-40, O-CRPA-3, and O-CRPA-18), the use of scaling factors such as the Federal Clean Trucks Plan (comment A-USEPA-1), construction and operational emissions and the use of portable generators (comment I-Schneider-18), the omission of certain datasets and recent studies (comment I-Schneider-40), the treatment of mitigation at the Aviador Lot (comment I-Schneider-18), and the measurement of air pollutants in communities under flight paths (comments I-Schneider-42 and O-CRPA-3). Responses are provided to each substantive point below, referencing the methodology and conclusions presented in Draft EIR Section 3.C.

Ultrafine Particulate Matter and Health Effects

Several comments assert that the Draft EIR omits discussion or analysis of ultrafine particulate matter (UFPs, typically defined as particles with diameters less than 0.1 micron), which are identified as a significant health concern for communities located under flight paths, particularly at altitudes below 5,000 feet. Comments further request that the analysis include ground-level measurements of UFPs, citing both the lack of data and the emerging scientific consensus on UFP health risks.

As outlined in Draft EIR Section 3.C, the air quality analysis evaluates emissions of criteria air pollutants, with a focus on particulate matter (PM_{10} and $PM_{2.5}$), ozone precursors, and toxic air contaminants (TACs), following established regulatory guidance from the air district, the CARB, and the EPA. Currently, there are no federal, state, or regional ambient air quality standards or established significance thresholds for UFPs. The analysis in the Draft EIR is therefore consistent with CEQA requirements and current regulatory practice, which are based on criteria pollutants for which health-based standards exist.

The Draft EIR evaluates the annual average $PM_{2.5}$ concentrations associated with implementation of the RADP. UFPs are less than 0.1 micron in diameter and $PM_{2.5}$ particulates are less than 2.5 microns in diameter. Because $PM_{2.5}$ emissions include UFPs, the toxic air contaminants (TAC) health effects analysis of $PM_{2.5}$ concentrations includes analysis of UFPs (see Draft EIR Impact AQ-5, Tables 3.C-16 through 3.C-18). The air district, which is the expert air quality agency with jurisdiction in the RADP project area, does not have established significance thresholds or methods specifically for analysis of $PM_{2.5}$ concentrations that include UFPs; therefore, the $PM_{2.5}$ concentrations from implementation of the RADP were evaluated using a significance threshold of 0.2 $\mu g/m^3$ that is based on substantial evidence documented by the air district and consistent with the 2025 San Francisco Planning Department *Air Quality and Greenhouse Gas Analysis Guidelines*.[22] The $PM_{2.5}$ concentration threshold of 0.2 $\mu g/m^3$ is based on several different types of health outcomes from exposure, such as mortality and asthma.

Furthermore, comments express concern about UFPs from jet engine exhaust during climb-out and other low-elevation operations. As discussed in Draft EIR Section 3.C, Chapter 2, Project Description, Appendix C, and Response GC-Non-CEQA-8, the purpose of the RADP is to accommodate forecast passenger demand at SFO. Implementation of the RADP would facilitate the development of terminal and non-movement areas of the airfield, as well as landside facilities to accommodate long-term aircraft operations and passenger activity levels at the Airport. Implementation of the RADP would not induce passenger demand, nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport, or change the volume of annual passengers that choose to fly into and out of SFO. Rather, development of the terminal and non-movement areas of the airfield and landside facilities identified in the RADP would ensure that SFO is able to maintain an acceptable level of service for passengers and accommodate aircraft operations without causing severe or unrecoverable delays with regard to scheduled flights. Therefore, implementation of the RADP would not result in changes related to aircraft operations or the configuration of the existing runways. For this reason, CEQA does not require that the Draft include or evaluate aircraft-related sources of criteria air pollutant and TAC emissions.

The Draft EIR acknowledges the potential for aircraft and ground support equipment to generate fine particulates during low-elevation operations. However, given the absence of quantitative regulatory

[22] San Francisco Planning Department, *Air Quality and Greenhouse Gas Analysis Guidelines*, February 2025, https://sfplanning.org/air-quality.

standards or health risk assessment protocols for UFPs, and because implementation of the RADP would not affect aircraft operations, their analysis remains outside the scope of the Draft EIR.

Air Quality Modeling and the Federal Clean Trucks Plan

Comment A-USEPA-1 notes that the modeling of construction and demolition emissions incorporates scaling factors from the Federal Clean Trucks Plan and expresses concern regarding the Federal Clean Trucks Plan's uncertain status, recommending disclosure in the Final EIR that future emissions may differ if regulatory requirements change.

Draft EIR Section 3.C incorporates applicable federal, state, and regional regulations, including anticipated future requirements, in the estimation of operational emissions; however, these factors were not incorporated into the construction and demolition analysis. Draft EIR p. 3.C-37 mistakenly states that the use of scaling factors (Clean Mile Standard, Advanced Clean Cars II, Clean Truck Check [Heavy-Duty Inspection and Maintenance], and Federal Clean Trucks Plan) were applied to the EMFAC2021 emission rates for construction on-road mobile sources. In response to the comment, the following text change is made to the second full paragraph of Draft EIR p. 3.C-37:

> On-road emissions were calculated using the air board's EMission FACtor (EMFAC2021) emission rate program.[258] ~~Additionally, scaling factors provided by the air board that incorporate the Clean Mile Standard, Advanced Clean Cars II, Clean Truck Check (Heavy-Duty Inspection and Maintenance), and Federal Clean Trucks Plan were applied to the EMFAC2021 emission rates because the model does not yet include these regulations.~~ The on-road criteria air pollutant emissions for each construction phase were totaled for each year of construction and, consistent with the air district's guidance, were averaged over the number of workdays in the construction phase for each construction year to determine average daily emissions on an annual basis.

For operational trucking activities, the use of scaling factors (including those related to the Federal Clean Trucks Plan) is consistent with standard modeling practices and reflects the best available information at the time of the analysis. These scaling factors were provided by CARB based on its most recent modeling efforts to capture the effects of current regulation. The Draft EIR appropriately discloses the regulatory assumptions underlying the emissions modeling, including the adoption of the Clean Trucks Plan.

The status of the Federal Clean Trucks Plan may evolve. Therefore, the EIR has been revised to clarify that, should the RADP not be implemented as currently anticipated, actual operational trucking emissions could differ from modeled projections. On Draft EIR p. 3.C-38, the following footnote has been added at the end of the second sentence in the first paragraph of the "Employee Vehicle Trips" section and at the end of the fourth sentence in the first paragraph of the "Delivery Trucks" section, respectively:

> ### If the Federal Clean Trucks Plan is not implemented or upheld as currently anticipated, actual operational trucking emissions could be higher than the modeled projections for implementation of the RADP.

Diesel $PM_{2.5}$, Environmental Justice, and Cumulative Exposure in Impacted Communities

Comment I-Schneider-18 cites the high cumulative exposure of Millbrae and other communities to $PM_{2.5}$, diesel exhaust, and other pollutants (referencing the Biden administration's Justice 40 report and the

[258] California Air Resources Board, "Welcome to EMFAC," n.d., https://arb.ca.gov/emfac/, accessed July 22, 2024.

historical context of SFO's impacts), and expresses concern over the adequacy of data and mitigation, particularly for neighborhoods adjacent to the Airport and the Aviador Lot.

The Draft EIR evaluates both project-level and cumulative air quality impacts, including $PM_{2.5}$ and diesel particulate matter, in accordance with air district guidelines (see Section 3.C). The analysis identifies sensitive receptors and assesses potential exposure to criteria and toxic pollutants during construction and operation. Mitigation measures include implementation of best management practices for dust control, use of Tier 4 Final or equivalent equipment, idling restrictions, and, where feasible, zero-emission or near-zero-emission vehicles and equipment.

The Draft EIR discusses existing sources of health risk–producing TAC emissions within 1,000 feet of the MEISR and the MEIW. The analysis evaluates community risk impacts from other existing sources near the MEISRs and MEIWs in addition to risk impacts from implementation of the RADP (Draft EIR pp. 3.C-42 and 3.C-75 through 3.C-81). Existing sources include roadways with average daily traffic volumes exceeding 10,000, permitted stationary sources, and rail (diesel locomotives). To determine the health risk impact of these sources at the MEISR and MEISW, an equation based on distance that was acquired from the air district, was used to extrapolate the risk.[23] See Appendix G, Air Quality Technical Appendix, for a detailed description of the modeling methods for existing sources of TAC emissions and associated health risks.

Existing plus RADP and cumulative impacts are addressed by combining emissions associated with implementation of the RADP with regional baseline conditions and emissions from other reasonably foreseeable projects; these impacts are evaluated under Impact AQ-5 (Draft EIR p. 3.C-74) and Impact C-AQ-1 (Draft EIR p. 3.C-82). The Draft EIR concludes that, with mitigation, cumulative particulate and toxic air contaminant levels are expected to remain below significance thresholds.

The Draft EIR acknowledges the existing environmental burden in communities adjacent to SFO and prioritizes mitigation to reduce exposure for sensitive populations. The analysis and mitigation measures are consistent with CEQA and air district requirements, recognizing the importance of environmental justice considerations.

Use of Recent Studies and Data (FAA 2019 $PM_{2.5}$ Study)

Comment I-Schneider-40 references a 2019 FAA study presented from October 2019, indicating increased $PM_{2.5}$ and smaller particle emissions from jet engines, and contends that these findings are not reflected in the Draft EIR.

The air quality analysis in Draft EIR Section 3.C is based on the most recent regulatory standards, ambient air quality data, and emissions factors available from the air district, CARB, and EPA at the time of preparation. While the Draft EIR does not specifically reference the 2019 FAA study, it incorporates current scientific understanding of particulate emissions from aviation sources through the use of updated emissions factors and modeling protocols.

In addition, as discussed above, implementation of the RADP would not result in changes related to aircraft operations or the configuration of the existing runways. Accordingly, aircraft emissions would remain

[23] Bay Area Air Quality Management District, Health Risk Calculator (Beta 4.0), 2020, https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/tools/baaqmd-health-risk-calculator-beta-4-0-xlsx.xlsx?la=en.

unchanged with or without implementation of the RADP. For this reason, aircraft-related sources of criteria air pollutant and TAC emissions have not been included or evaluated in this Draft EIR.

The Draft EIR's methods are consistent with applicable regulatory guidance and CEQA requirements.

Mitigation at the Aviador Lot

Comment I-Schneider-42 claims that no air quality mitigation measures would occur on the Aviador Lot and expresses concern because of the Aviador Lot's proximity to homes and the potential to emit fugitive dust at this location with implementation of the RADP.

The Draft EIR evaluates operational and construction-related emissions at all relevant sites, including the Aviador Lot, in accordance with the 2025 San Francisco Planning Department Air Quality and Greenhouse Gas Analysis Guidelines, air district criteria, and CEQA (see Impact AQ-3, p. 3.C-55).[24] The Draft EIR acknowledges that construction of subsequent RADP projects has the potential to create temporary air quality impacts through emissions of fugitive dust from site disturbance including demolition, excavation, pile driving, grading, trenching, and berm/soil removal. RADP construction activities may cause windblown dust, which would contribute particulate matter to the local atmosphere. SFO is required to implement ASCMs specific to dust control at all locations generating fugitive dust, including the Aviador Lot. The ASCMs include the air district's Basic Construction Mitigation Measures (Table 5-2 of the 2022 CEQA Air Quality Guidelines) that are required to reduce the fugitive dust impact to a less-than-significant level, and include regular watering, speed restrictions, and covering of materials. These ASCMs would avoid or minimize impacts of construction-generated fugitive dust. See Draft EIR pp. 3.C-27 to 3.C-28 and 3.C-55.

Ground-Based Measurement and Monitoring of Ultrafine Particles

Comments O-CRPA-3 and O-CRPA-18 request monitoring of ground-level UFPs at locations under low-altitude flight paths and note the absence of such data in the Draft EIR.

As detailed above, the Draft EIR evaluates particulate emissions for those pollutants for which regulatory standards and significance thresholds exist. There are currently no regulatory requirements, thresholds, or standardized methodologies for routine monitoring and assessment of UFPs in environmental analysis under CEQA. Furthermore, implementation of the RADP would not result in changes related to aircraft operations or the configuration of the existing runways, and therefore, aircraft-related emissions sources (including UFPs) have not been included or evaluated in this Draft EIR. Therefore, the air quality analysis in the Draft EIR is consistent with current practice and requirements.

The Draft EIR's air quality analysis, as presented in Section 3.C, complies with CEQA and regulatory agency guidance, thoroughly addressing construction and operational emissions, cumulative impacts, and mitigation for criteria pollutants and toxic air contaminants. Although the analysis does not quantify UFPs due to the absence of regulatory standards and CEQA significance thresholds, and because the RADP would not change aircraft operations or UFP emissions associated with jet engine operations, the Draft EIR applies robust mitigation to minimize emissions and protect sensitive receptors from TAC emissions and $PM_{2.5}$.

[24] San Francisco Planning Department, *Air Quality and Greenhouse Gas Analysis Guidelines*, February 2025, https://sfplanning.org/air-quality.

The comments do not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of the RADP, and no further response is required.

3.G.3 Comment AQ-3: Air Quality Mitigation Measures

This response addresses the following comments, which are quoted below:

A-USEPA-2

I-Schneider-19

I-Schneider-43

"In section S.3, Table S-1, the Draft EIR describes the impacts and mitigation from the RADP and subsequent projects. Mitigation measure M-AQ-3a: Clean Off Road Construction Equipment describes the requirements that project sponsors must comply with should a project-specific analysis determine that an RADP project would result in a significant criteria air pollutant impact. The EPA appreciates the listed mitigation and recommends the City, in the Final EIR, commit to usage of lower emitting and/or zero-emission equipment by including equipment eligibility requirements and/or weighted selection criteria in construction requests for proposals.

Similarly, we note that Mitigation Measure M-AQ-4e specifies requirements for electric landscaping equipment, and we recommend that the City commit to lower emitting and/or zero-emission landscaping equipment in projects under this plan.

Furthermore, as the Draft EIR states in the Noise Abatement Procedures, "[San Francisco International Airport] encourages airlines to limit the time auxiliary power units are used by using ground power and pre-conditioned air" (pg. 3.B-24). The EPA appreciates that SFO encourages these measures; we recommend that the City commit to operational emissions mitigation by creating and enforcing auxiliary power unit usage, implementing policies that encourage visits of cleaner aircrafts, and utilizing lower or zero emission taxi equipment where applicable. We also recommend the City disclose SFO's adoption targets for electric ground support equipment." *(Francisco Dóñez, Manager, U.S. Environmental Protection Agency, Letter, March 30, 2025 [A-USEPA-2, AQ-3])*

"Page 39 S-22 Mitigation: Order of mitigation activities – puts SFO first, then 'offsite within neighborhoods surrounding the airport, then within the cities of SSF, SB and Millbrae. But there is no neighborhood more impacted within the surrounding neighborhoods than Millbrae. See Insulation program and how it ignores Millbrae using 1980 sound criteria and avoidance of low frequency noise issues greatest at departures." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-19, AQ-3])*

"PP 370 – Mitigation, there are over 100 years of damage done to Millbrae by Mills Field and SFO. The County of San Mateo has at least 6 direct revenue streams from SFO and its operations. Millbrae has none even while providing the roads to get to Aviador Lot. ALL mitigation in lieu of fees should be spent in Millbrae firsts then San Bruno or combined as we are the communities most hurt by SFO current, future, and historical operations.

At least homes in San Bruno fall within the 65 CNEL contour and can get some mitigation. Millbrae basically gets NONE. Mitigation funds should go to Millbrae." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-43, AQ-3])*

Response AQ-3

The comments raise concerns regarding the adequacy and enforceability of air quality mitigation measures for both construction and operational emissions, the need for commitment to lower emitting or zero-emission equipment for construction and landscaping, the prioritization of mitigation activities in communities most affected by SFO operations (particularly the City of Millbrae), and the transparency of mitigation measure implementation and the allocation of mitigation funds.

Construction Emissions Mitigation Measures

Comment A-USEPA-2 requests that the City and County of San Francisco commit to the use of lower emitting and/or zero-emission construction equipment by including eligibility requirements and/or weighted selection criteria in construction requests for proposals. This comment also raises comments regarding the effectiveness and sufficiency of construction mitigation measures.

As discussed in Draft EIR Section 3.C under Impact AQ-3, construction emissions associated with the RADP were evaluated for low-, medium-, and high-overlap scenarios. Small projects were found to result in less-than-significant impacts without mitigation, while medium and large projects under high-overlap scenarios could exceed thresholds for criteria air pollutants, specifically reactive organic gases (ROG) and nitrogen oxides (NOx).

To address these potential construction-related impacts, the Draft EIR identifies the following mitigation measures:

- Mitigation Measure M-AQ-3a: Requires use of Tier 4 Final construction equipment, which represents the best currently available emissions control technology, limits idling to no more than two minutes for all diesel-powered equipment, and prohibits portable diesel engines (less than 25 horsepower) where access to grid power is available.
- Mitigation Measure M-AQ-3b: Mandates use of super-compliant low-VOC architectural coatings during the construction phase.

These mitigation measures ensure that construction-related emissions would be minimized to the greatest extent feasible and brought below applicable significance thresholds, in accordance with the air district's CEQA guidelines. All mitigation measures would be enforceable as conditions of project approval and include detailed monitoring and implementation requirements (see Draft EIR Section 3.C).

In response to EPA's recommendation to further prioritize lower-emitting and/or zero-emission construction equipment, Mitigation Measure M-AQ-3a item 1e provides for the use of any future best available technology to reduce ROG and NO_X emissions, provided documentation demonstrates that such technology would reduce ROG and NO_X emissions without increasing other pollutant emissions or creating additional impacts such as noise. Such technologies may include new alternative fuels and electric or hydrogen fuel cell equipment. Although M-AQ-3a item 1e does not require the use of lower emitting and/or zero-emission

equipment and does not include equipment eligibility requirements or selection criteria, it encourages such equipment to reduce the RADP's potentially significant impact associated with ROG and NO_X emissions.

Operational Emissions Mitigation Measures

Comment A-USEPA-2 also notes the requirements for electric landscaping equipment under Mitigation Measure M-AQ-4e and recommends the City further commit to lower-emitting and/or zero-emission landscaping equipment. The comment also requests additional mitigation commitments for operational sources at SFO, including ground support equipment and aircraft operations.

As described in Draft EIR Section 3.C, operational ROG emissions at full RADP buildout are expected to exceed air district thresholds, primarily due to consumer products, architectural coatings, and landscaping activities. The EIR incorporates a comprehensive suite of mitigation measures, including:

- Mitigation Measure M-AQ-4a: Best available emissions controls for stationary generators
- Mitigation Measure M-AQ-4b: Restrictions on truck idling and transportation refrigeration unit (TRU) operations
- Mitigation Measure M-AQ-4c: Promotion of low-volatile organic compound (VOC) consumer products
- Mitigation Measure M-AQ4-d: Mandatory use of super-compliant VOC architectural coatings
- Mitigation Measure M-AQ-4e: Requirement for electric landscaping equipment in place of gas-powered equipment

Despite these measures, residual ROG emissions are anticipated to remain above significance thresholds, primarily due to consumer products. The Draft EIR therefore requires Mitigation Measure M-AQ-4f: Offset of Remaining ROG Emissions. However, as the precise offset mechanisms are not finalized at this stage, the impact is conservatively characterized as significant and unavoidable. The Draft EIR provides full disclosure of this residual impact, consistent with CEQA requirements.

With respect to operational mitigation for SFO activities, the Draft EIR notes that SFO encourages airlines to limit the use of auxiliary power units (APUs) by utilizing ground power and pre-conditioned air (Draft EIR p. 3.B-24). The City will also disclose SFO's adoption targets for electric ground support equipment in the Final EIR, where available. As discussed in Response GC-Non-CEQA-8, implementation of the RADP would not result in changes related to aircraft operations or the configuration of the existing runways. For this reason, aircraft-related sources of criteria air pollutant and TAC emissions (including APU usage, aircraft engine operations, and ground support equipment activity) have not been included or evaluated in this Draft EIR.

Allocation and Prioritization of Mitigation Activities

Comments I-Schneider-19 and I-Schneider-43 express concern that mitigation activities and funding prioritize SFO and do not adequately address the disproportionate impacts on the City of Millbrae compared to surrounding communities. The commenter requests that mitigation funds, especially those in lieu of fees, be allocated first to the City of Millbrae, which is asserted to have borne the greatest adverse impacts from SFO operations, both historically and presently.

As set forth in the Draft EIR, and as required by CEQA, the prioritization of mitigation activities is based on proximity to and the magnitude of impacts from RADP implementation. The order of mitigation—SFO, then

offsite within neighborhoods surrounding the Airport, then within the cities of South San Francisco, San Bruno, and Millbrae—is established to maximize the effectiveness of air quality improvements where impacts are greatest (Draft EIR, Table S-1, pp. S-13 through S-25). CEQA Guidelines section 15126.4(c)(4) allows for the use of off-site measures, including offsets that are not otherwise required, to mitigate a project's GHG emissions. The Air District's CEQA Air Quality Guidelines allow for the use of off-site mitigation measures for air quality impacts and recommend prioritizing local measures:

> *Finally, if emissions cannot be avoided or mitigated on-site to a less-than-significant level, off-site mitigation measures can be a feasible alternative (see State CEQA Guidelines Section 15126.4[c][4]). In implementing off-site mitigation measures, the lead agency must ensure that emission reductions from identified projects are real, permanent, quantifiable, verifiable, enforceable, and additional to any reductions already required or likely to occur for other reasons. In addition, if off-site mitigation measures are used, it is preferable to select measures that benefit the local community, the city, county, or the Bay Area region—in that order.*[25]

Because the impacts of ROG and NO_X are regional and manifest within the Bay Area Air Basin, mitigation measures which reduce ROG and NO_X emissions within the Bay Area Air Basin effectively mitigate the RADP's criteria air pollutant impact.

As such, the Draft EIR's proximity-based ranking of mitigation activities is appropriate and effective.

Mitigation Effectiveness and Enforceability

These comments also express concerns about the sufficiency and enforceability of all mitigation measures. As described in the Draft EIR, all air quality mitigation measures are enforceable as conditions of project approval, with detailed monitoring and implementation requirements throughout construction and operational phases. The use of Tier 4 Final equipment, low-VOC coatings, and electric landscaping equipment are feasible and widely recognized best practices for emissions reductions.

While offset mechanisms (Mitigation Measure M-AQ-4f) provide a pathway for further emissions reduction, the Draft EIR acknowledges implementation uncertainty and discloses the significant and unavoidable nature of residual operational ROG emissions. The City will continue to coordinate with the air district and other regulatory agencies to refine mitigation strategies as new technologies and programmatic opportunities become available.

The Draft EIR comprehensively identifies and addresses construction-related, operational, and cumulative air quality impacts. Enforceable mitigation measures are provided to reduce most impacts to less-than-significant levels. The Draft EIR transparently discloses significant and unavoidable operational ROG emissions due to uncertainties associated with offset mechanisms pursuant to Mitigation Measure M-AQ-4f. Because no specific off-site emission reduction projects have yet been identified, and such projects would ultimately be implemented by the air district or other agencies outside the City's jurisdiction, the precise level of ROG reductions cannot be assured. Accordingly, even with implementation of all feasible mitigation

[25] Bay Area Air Quality Management District, *CEQA Guidelines-Chapter 8: Mitigating Air Quality and Climate Impacts*, 2022, https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-8-mitigation_final-pdf.pdf?la=en.

measures, the residual impact remains significant and unavoidable. Consistent with CEQA, the Draft EIR discloses this outcome while ensuring that all feasible measures have been identified and adopted.

The comments do not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of the RADP, and no further response is required.

3.G.4 Comment AQ-4: Construction Emissions

This response addresses the following comment, which is quoted below:

A-BART-2

"Air quality issues related to construction emissions and particulate matter from demolition, excavation, earth moving, and general construction activity could also be an issue for BART employees and passengers." *(Tim Chan, Station Area Planning Group Manager, San Francisco Bay Area Rapid Transit District, Letter, May 30, 2025 [A-BART-2, AQ-4])*

Response AQ-4

Comment A-BART-2 expresses concern regarding emissions resulting from demolition, excavation, earthmoving, and general construction activities, particularly with respect to potential impacts on BART employees and passengers.

Quantification of Construction Emissions

As discussed in Draft EIR Section 3.C, construction emissions associated with subsequent RADP projects were comprehensively quantified using CalEEMod and representative project-specific information (Draft EIR p. 3.C-22). The quantification addressed criteria air pollutants, including reactive organic gases (ROG), nitrogen oxides (NOx), and particulate matter less than 10 and 2.5 microns in diameter (PM_{10} and $PM_{2.5}$). Emissions for each year of construction were calculated and compared to the relevant Bay Area air district CEQA significance thresholds (Draft EIR Table 3.C-10, p. 3.C-57; Table 3.C-11, p. 3.C-59).

The analysis determined that, absent mitigation, emissions from individual large-scale subsequent RADP projects—or scenarios involving overlapping construction activities for medium and large subsequent RADP projects—could exceed air district thresholds for ROG and NOx.

Mitigation Measures for Construction Emissions

The Draft EIR identifies and requires implementation of a suite of robust mitigation measures to reduce construction-related emissions (Draft EIR pp. 3.C-42 through 3.C-45):

- Mitigation Measure AQ-1: Requires exclusive use of Tier 4 Final off-road construction equipment, which achieves substantial reductions in NOx and PM emissions compared to less advanced equipment. This requirement directly addresses air quality concerns related to heavy equipment operation near sensitive receptors such as BART stations.

- Mitigation Measure AQ-2: Limits idling of all construction equipment to a maximum of two minutes, and requires regular equipment maintenance and tuning to further reduce pollutant emissions.
- Mitigation Measure AQ-3: Mandates the use of super-compliant volatile organic compound (VOC) coatings to minimize ROG emissions associated with architectural coating and surface finishing tasks.
- Mitigation Measure AQ-4: Enforces compliance with the air district's Basic Construction Mitigation Measures, including dust control best practices such as wetting disturbed soils, covering haul trucks, and minimizing on-site vehicle speeds.

Collectively, these mitigation measures ensure that construction emissions remain below significance thresholds, even where multiple RADP projects may be constructed concurrently (Draft EIR Table 3.C-12, p. 3.C-62; Table 3.C-13, p. 3.C-64).

Fugitive Dust and Particulate Matter (PM) Emissions

The comment expresses concern regarding particulate matter generated from demolition and excavation. The Draft EIR (pp. 3.C-24 through 3.C-25) addresses fugitive dust (PM_{10} and $PM_{2.5}$) resulting from earthmoving, equipment operation, and material transport. Compliance with the air district's Basic Construction Mitigation Measures and SFO's ASCMs is required, including:

- Regular watering of exposed surfaces and stockpiles;
- Utilization of wind barriers and coverage of soil/material piles;
- Cleaning of haul routes and vehicle tires prior to leaving the site.

With these measures, fugitive dust and PM concentrations would remain below air district significance thresholds and would not adversely affect adjacent sensitive receptors, including BART staff and passengers.

Diesel Particulate Matter (DPM) and Health Risks

Potential health risks associated with diesel particulate matter (DPM), a toxic air contaminant emitted from construction equipment, and exhaust $PM_{2.5}$, are evaluated in the Draft EIR health risk assessment (Draft EIR pp. 3.C-35 through 3.C-38). DPM and exhaust $PM_{2.5}$ emissions are temporary and restricted to the construction period. Consistent with CEQA requirements, the Draft EIR evaluated potential exposure of sensitive receptors—including residential areas, schools, and on-site workers (such as BART employees)—to construction-related air pollutant concentrations (Draft EIR p. 3.C-42). See Appendix G for additional discussion of receptors analyzed in the HRA.

Through implementation of Mitigation Measures M-AQ-1 and M-AQ-2, DPM and $PM_{2.5}$ emissions would be substantially reduced. The HRA demonstrates that lifetime cancer risk and annual-average $PM_{2.5}$ concentrations from construction activities would not exceed significance thresholds at sensitive receptor locations, including residences west of U.S. 101 and public facilities such as BART stations (Draft EIR pp. 3.C-76 through 3.C-79). In addition, occupational exposures for employees are further regulated under federal occupational health and safety standards.

Regulatory Compliance

All construction activities under the RADP would comply with federal, state, and regional air quality regulations, including air district CEQA Guidelines, CARB regulations for on- and off-road equipment, and SFO's ASCMs. This regulatory framework ensures that construction emissions are effectively managed, monitored, and minimized.

The Draft EIR provides a comprehensive assessment of construction-related air quality impacts from RADP implementation. With the application of the mitigation measures described above, construction emissions—including human exposure to emissions and particulate matter associated with demolition, excavation, and other earthmoving activities—would be reduced to less-than-significant levels. Cumulative impacts are likewise mitigated to below significance thresholds. The concerns raised in Comment A-BART-2 are therefore addressed in detail and resolved through the mitigation measures and regulatory compliance requirements presented in the Draft EIR.

The comments do not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of the RADP, and no further response is required.

3.G.5 Comment AQ-5: Air Quality Monitoring

This response addresses the following comments, which are quoted below:

I-Schneider-9

I-Schneider-21

"Further, SFO should be providing a range of air quality monitors in Millbrae and San Bruno and report on all releases, all overflights and all other situations that can cause harm to the people of Millbrae." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-9, AQ-5])*

"PP 42 S-24 PM25 and odors states no mitigation required. But using air quality data from a monitor in San Francisco. At minimum SFO needs to place air quality monitors in the close in communities – see the map of the study area to be consistent. Also consider the topography of Millbrae with canyons that concentrate both air pollution, odors, and noise." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-21, AQ-5])*

Response AQ-5

Comment I-Schneider-9 discusses air quality monitoring at SFO, specifically related to the placement of air quality monitors in the cities of Millbrae and San Bruno and the adequacy of monitoring data sources and consideration of topographic influences.

Request for Air Quality Monitors in Millbrae and San Bruno

As discussed in Draft EIR Section 3.C, Air Quality, the RADP incorporates a comprehensive air quality mitigation program to reduce significant impacts, consistent with the requirements of the Bay Area air

district and state and federal air quality regulations. SFO's ASCMs require preparation and implementation of a Construction Emissions Minimization Plan (see Draft EIR Table 3.C-7). This plan mandates protocols to monitor, manage, and minimize construction-related emissions, including fugitive dust and DPM.

During subsequent project operations, emissions are evaluated for compliance with air district and CARB standards, and all stationary sources, such as emergency generators, are subject to permitting and ongoing regulatory oversight. The project design and mitigation measures ensure that construction and operation of RADP projects would not result in emissions of fine particulate matter or toxic air contaminants that would result in exposure of sensitive receptors to substantial air pollutant concentrations (Impact AQ-5).

The Draft EIR further includes a detailed HRA, which evaluates exposure risks for nearby sensitive receptors, including residents of the cities of Millbrae and San Bruno (Draft EIR pp. 3.C-40 through 3.C-43). The HRA demonstrates that both construction and operational emissions would remain below the City's significance thresholds for cancer risk and $PM_{2.5}$ concentrations pursuant to the 2025 San Francisco Planning Department Air Quality and Greenhouse Gas Analysis Guidelines.[26]

While the deployment of additional permanent air quality monitors in the cities of Millbrae and San Bruno is not specifically required under CEQA or recommended by the air district, the Draft EIR's analysis is based on conservative modeling assumptions, regulatory compliance, and mitigation measures that ensure protection of public health in all nearby communities. The purpose of CEQA is to disclose and mitigate a project's significant effects on the environment, whether such an impact is a direct effect or a reasonably foreseeable indirect effect (CEQA Guidelines section 21082.2). CEQA does not require that an EIR mitigate existing environmental impacts or adverse effects. For these reasons, the Draft EIR discloses the implementation of the RADP's potentially significant direct and reasonably foreseeable indirect effects on the environment. The Draft EIR concludes that, with implementation of mitigation measures, human health risks associated with exposure to RADP-generated TAC emissions would be less than significant.

Use of Existing Air Quality Data and Consistency with Study Area Topography

As stated in Draft EIR Section 3.C, the baseline ambient air quality data used for the impact assessment are derived from the regulatory air quality monitoring station located closest to SFO, operated and maintained by the air district at 16th and Arkansas streets, approximately 10 miles north of the Airport. This is consistent with established air quality analysis practices as recommended by the air district.[27] The Draft EIR's modeling and risk assessment for criteria pollutants and TACs is based on worst-case conditions, which conservatively represent exposures in adjacent communities, including the cities of Millbrae and San Bruno.

With respect to the specific concern regarding the topography of the City of Millbrae, the air quality modeling conducted for the Draft EIR accounts for regional meteorological conditions and prevailing wind patterns that influence pollutant dispersion. As documented in the HRA (see Appendix G), the modeling domain includes sensitive receptors located throughout the study area, and exposure estimates are based on the highest predicted concentrations at any off-site receptor location. This approach ensures that potential

[26] San Francisco Planning Department, *Air Quality and Greenhouse Gas Analysis Guidelines*, February 2025, https://sfplanning.org/air-quality, accessed August 28, 2025.
[27] Area Air Quality Management District, *California Environmental Quality Act Air Quality Guidelines*, April 2022, https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines, accessed July 22, 2024.

localized effects, including those related to topographic features such as canyons, are considered in the overall impact analysis.

The Draft EIR concludes that both exposure to construction and operational emissions, as well as cumulative air quality impacts, remain below established significance thresholds. Both the City's and the air district's regulatory framework is designed to protect all affected populations, including communities situated in areas with varying topography. The Draft EIR's findings are supported by substantial evidence, and no further mitigation is required.

Reporting on Overflights and Other Emission Sources

The comment requests that SFO "report on all releases, all overflights and all other situations that can cause harm to the people of Millbrae."

The Draft EIR provides a comprehensive assessment of all relevant emission sources associated with RADP implementation, including ground-based construction equipment, stationary sources, and operational activities at SFO (see Draft EIR Sections 3.C.3 and 3.C.4). Emissions from aircraft overflights are regulated at the federal level by the FAA and are not within the jurisdiction of CEQA or the Draft EIR scope for the RADP (see Response GC-Non-CEQA-8 for additional discussion related to aircraft emissions).

Nonetheless, the Draft EIR's cumulative analysis (see Section 3.C.6) evaluates the combined effects of RADP-related emissions with those from ongoing SFO operations and other regional projects to ensure that cumulative health risks and pollutant concentrations are below significance thresholds. All modeling and reporting requirements are consistent with air district and CEQA guidelines.

In summary, the Draft EIR (Section 3.C) provides a robust and comprehensive evaluation of air quality impacts for the RADP, including the implementation of enforceable mitigation measures, a detailed health risk assessment, and compliance with all applicable regulatory standards. The comments do not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of the RADP, and no further response is required.

3.G.6 Comment AQ-6: Odor Impacts

This response addresses the following comment, which is quoted below:

I-Schneider-41

"PP 314 3.C-14 talks about odors but there are no monitors provided by SFO. Many Millbrae neighborhoods commonly experience noxious odors from SFO with Marino Vista getting the worst from planes at gates at the International Terminal and Terminal 1 A Gates. But fumes have traveled as far as the 400 block of Palm Ave (see Fire Department complaints and site visits) and Millbrae Central Park. The DEIR uses a monitor up in San Francisco on Arkansas as the rational for there being no odors. SFO should be required to place odor and air pollution monitors in several neighborhoods in Millbrae and San Bruno. Close in Communities should not have to pay for this. SFO is a huge industrial operation that has for 100 years got away with not monitoring the pollution it causes." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-41, AQ-6])*

Response AQ-6

Comment I-Schneider-41 raises concerns regarding odor impacts associated with both construction and operational activities under the RADP, including: (1) the perceived absence of odor monitors in impacted communities such as the cities of Millbrae and San Bruno; (2) anecdotal reports of noxious odors attributed to Airport operations, particularly near the International Terminal Building and Terminal 1 gates, with impacts extending into residential neighborhoods; (3) the use of a monitor in San Francisco on Arkansas Street as a basis for evaluating odor conditions; and (4) requests that SFO install odor and air pollution monitors in multiple nearby neighborhoods at no cost to those communities.

Odor Monitoring and the Absence of Monitors in Millbrae and San Bruno

As discussed in Draft EIR Section 3.C, Impact AQ-6, the assessment of odor impacts under CEQA relies on the evaluation of potential odor sources, the likely frequency, intensity, and duration of odor emissions, and the regulatory framework governing odor nuisances (pp. 3.C-14, 3.C-43, and 3.C-81 through 3.C-82). The Draft EIR's odor analysis considers the nature of construction and operational activities associated with RADP implementation and evaluates the potential for off-site odor impacts consistent with the air district's CEQA Air Quality Guidelines. While the Draft EIR does not (and is not required by CEQA to) propose the installation of permanent odor monitors in specific neighborhoods, the analysis concludes that construction-related odors (e.g., from diesel equipment or exposed organic materials) would be temporary, localized, and intermittent, and that operational odors (e.g., from waste management or food preparation) are typical for airport operations and not expected to result in significant or offensive conditions beyond SFO property boundaries and prevailing wind conditions.

Air district Regulation 7 establishes enforceable standards for odor emissions and provides a complaint-driven enforcement mechanism to address odor nuisances. Compliance with air district Regulation 7, in addition to implementation of SFO's ASCMs and best management practices, ensures that odor impacts would remain less than significant and that regulatory recourse is available should odor nuisances arise. The comments do not provide evidence to support claims that the Draft EIR's odor analysis is deficient with respect to monitoring or regulatory compliance.

Anecdotal Reports of Odors in Millbrae and Surrounding Neighborhoods

Draft EIR Section 3.C (see Impact AQ-6) evaluates the sources of potential odors associated with both construction (e.g., diesel exhaust, excavation of organic materials) and ongoing operations (e.g., waste management, food preparation, aircraft activity). The analysis finds that construction-related odors would be of limited duration and intensity, and that operational odors would be managed through established procedures and regulatory controls. Because odor emission levels would not exceed air district nuisance thresholds, the Draft EIR concludes that odor impacts would be less than significant. The comment does not provide substantial evidence that would alter this conclusion.

Use of San Francisco (Arkansas Monitor) Data in Odor Analysis

The Draft EIR references ambient air data from regional monitors, including the Arkansas Street monitor in San Francisco, as part of the baseline conditions assessment for general air quality. However, monitoring data for criteria pollutants are not used as a proxy for localized odor impacts. The odor analysis is instead based on the evaluation of specific emission sources, activities, and site conditions at SFO, in accordance with the air district's guidelines for odor impact assessment. As such, the Draft EIR's reliance on the Arkansas

monitor is appropriate for regional air quality characterization, but not determinative of odor impacts in the cities of Millbrae or San Bruno. The comment is incorrect that the Draft EIR uses odor data from the Arkansas street monitor to determine the RADP's air quality impacts (pp. 3.C-81 and 3.C-82). The analysis of odor impacts reflects local project conditions and applicable regulatory requirements.

Request for SFO to Fund and Install Odor and Air Pollution Monitors in Neighboring Communities

CEQA requires that the EIR evaluate whether implementation of the RADP would result in significant odor impacts and identify feasible mitigation measures only when a significant impact is identified. As discussed in Draft EIR Section 3.C, Impact AQ-6, the analysis concludes that both construction and operational odor impacts would be less than significant based on the temporary and localized nature of odor emissions, effectiveness of standard mitigation measures, and compliance with air district Regulation 7. Because the analysis does not identify a significant impact, neither CEQA nor the air district guidelines require the installation of additional odor monitors in surrounding communities. Furthermore, the regulatory framework provides for complaint-based investigation and enforcement of odor nuisances should issues arise in the future.

In summary, the Draft EIR provides a comprehensive and robust evaluation of odor impacts associated with implementation of the RADP. Construction- and operation-related odors are anticipated to be temporary, localized, and managed through adopted mitigation measures and compliance with air district Regulation 7. The comments do not provide evidence to support claims that the Draft EIR does not adequately address odor impacts or that additional monitoring is required, and no further response is required.

3.H Cumulative Analysis [CU]

- CU-1: Cumulative Projects and Approach to Cumulative Analysis

3.H.1 Comment CU-1: Cumulative Projects and Approach to Cumulative Analysis

This response addresses the following comments, which are quoted below:

A-Millbrae-2

O-CSFN3-1

O-CSFN3-5

"The Site 7 facility is also located adjacent to a planned route for the future connection of the San Francisco Bay Trail around the Airport, which will likely result in an increased number of recreational users regularly passing by the facility. As Site 7 is an Airport parcel, and the Bay Trail is a future project planned for development along Airport property, the Bay Trail should have been considered and identified in the RADP." *(Andrew Mogensen, Community Development Director, City of Millbrae, Letter, May 22, 2025 [A-Millbrae-2, CU-1])*

"As a veteran of the decade long opposition to runway expansion at SFO, I'm inherently sceptical [sic] of SFO capital plans.

As in many prior EIRs, this Draft EIR is narrowly focused.

It does not examine the cumulative impacts from SFO let alone SFO in combination with the other two major Bay Area airports.

The DEIR seems to work on the premise that "What happens here stays here" and does not acknowledge the impacts on the runways and beyond the boundaries of the airport itself.

This is inconsistent with the nature of industry itself as impacts can occur miles away from the airport."
(Eileen Boken, Coalition for San Francisco Neighborhoods, Email, June 2, 2025 [O-CSFN3-1, CU-1])

"These are the cumulative impacts of airport expansion and the resulting increase in number of flights."
(Eileen Boken, Coalition for San Francisco Neighborhoods, Email, June 2, 2025 [O-CSFN3-5, CU-1])

Response CU-1

Comment A-Millbrae-2 states that the San Francisco Bay Trail (Bay Trail) should have been considered in the analysis of construction activities at the Aviador Lot (which the comment identifies as Site 7). Comments O-CSFN3-1 and O-CSFN3-5 claim the Draft EIR is narrowly focused, does not analyze cumulative impacts, does not address impacts associated with the runways and beyond SFO boundaries, and claims the RADP is an airport expansion project that will increase aircraft operations.

The Aviador Lot and the San Francisco Bay Trail

The Aviador Lot is located on Airport property west of U.S. 101 in the City of Millbrae and is used as construction staging area for SFO projects under existing conditions and would be used as a construction staging area for RADP projects. The Bay Trail is a bicycle and pedestrian trail that, when finished, will allow continuous pedestrian or bicycle travel around the shoreline of San Francisco Bay. The Bay Trail currently runs along the coastline north and south of SFO. Comment A-Millbrae-2 is referencing a separate and independent study undertaken by the MTC to identify "gaps" between existing Bay Trail alignments throughout the bay area. The study identified potential alignments to close the gap between the northern and southern termini of the existing trail and is currently proposed to follow Aviador Avenue adjacent to the Aviador Lot. Comment A-Millbrae-2 states that the Bay Trail is a future project planned for development along Airport property and that it should have been considered and identified in the RADP.

In response to this comment, RADP projects would be located on Airport property, and implementation of the RADP proposes no development on existing or proposed future portions of the Bay Trail. Moreover, the Draft EIR is not required to analyze a potential future extension of the Bay Trail. As discussed below, a future trail extension may be analyzed as part of the environmental review for a subsequent RADP project as required by CEQA.

General Cumulative Impact Analysis

Comments O-CSFN3-1 and O-CSFN3-5 assert the Draft EIR is narrowly focused, does not analyze cumulative impacts, does not address impacts associated with the runways and beyond SFO boundaries, and claims the RADP is an airport expansion project that will increase aircraft operations.

In response to these comments, the RADP serves as a framework for future development at SFO. Implementation of the RADP would facilitate the development of terminal and non-movement areas of the airfield, as well as landside facilities to accommodate long-term aircraft operations and passenger activity levels at the Airport. The Draft EIR analyzes potential environmental effects, including cumulative effects, associated with implementation of the RADP in accordance with CEQA statute and guidelines. As discussed under Cumulative Impacts on Draft EIR pp. 3-6 through 3-11, CEQA Guidelines section 15130(b)(1) outlines two approaches to a cumulative impact analysis: (a) The analysis can be based on a list of past, present, and reasonably foreseeable probable future projects producing closely related impacts that could combine with those of a proposed project, or (b) a summary of projections contained in a general plan or related planning document can be used to determine cumulative impacts. As discussed under Cumulative Impacts, the analysis in the EIR employs both the list-based approach and a projections-based approach, depending on which approach is most appropriate for the resource topic being analyzed. For the resource topics using the list-based approach, Draft EIR Table 3-2, pp. 3-8 through 3-10, presents a comprehensive list of cumulative development and infrastructure projects generally located within 0.25 mile of the project site that are considered in the various cumulative analyses in the Draft EIR. As noted in Draft EIR Table 3-2, cumulative projects are defined as projects for which a CEQA application has been filed. A project for which an application has not been filed is not considered reasonably foreseeable and therefore is not included in the list of cumulative projects considered in the Draft EIR. Accordingly, as no application has been filed for a future proposed extension of the Bay Trail along Airport property referenced in Comment A-Millbrae-2, the trail extension is not considered reasonably foreseeable and therefore was not included in the list of cumulative development and infrastructure projects in the Draft EIR.

Furthermore, as discussed in Draft EIR Section 1.A.1, Programmatic Review of Potential Impacts, p. 1-3, the Draft EIR analyzes the RADP at a programmatic level, in accordance with CEQA Guidelines section 15168. As noted in the discussion, a programmatic analysis is appropriate for a project that will involve a series of actions that are (1) related geographically, (2) logical parts in a chain of contemplated actions, (3) connected as part of a continuing program, and (4) carried out under the same authorizing statute or regulatory authority and have similar environmental impacts that can be mitigated in similar ways. The discussion further notes that, to the extent that subsequent RADP projects could result in significant adverse effects on the physical environment that were not anticipated in the Draft EIR, those projects would require further environmental review. As discussed in Draft EIR Section 1.C.1, Environmental Review of Subsequent Projects, p. 1-18, in accordance with the requirements of CEQA Guidelines section 15168(c), which states that later activities in the program must be examined in light of the program EIR to determine whether an additional environmental document must be prepared, the Draft EIR assumes that all subsequent projects in the RADP would be subject to environmental review at such time that those projects are proposed to determine whether or not they would result in physical environmental effects that were not examined in the program EIR. The analysis of subsequent projects would be based on existing conditions at the site and vicinity, at such time a project is proposed, and would take into account any updated information relevant to the environmental analysis of the subsequent project (e.g., changes to the environmental setting or updated forecasts or models). Any required environmental review of subsequent RADP projects would be conducted

in accordance with CEQA requirements. Therefore, for example, required subsequent environmental review of RADP projects would address impacts to the extension of the Bay Trail along Airport property referenced in Comment A-Millbrae-2 should the extension be considered a cumulative project at that time.

Regarding comments stating that the Draft EIR is narrowly focused because it does not address impacts associated with the runways and that the RADP is an expansion project that will increase aircraft operations, as stated in Draft EIR Chapter 2, Project Description, implementation of the RADP would facilitate the development of terminal and non-movement areas of the airfield, as well as landside facilities to accommodate long-term aircraft operations and passenger activity levels at the Airport. Implementation of the RADP would not induce passenger demand, nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport, or change the volume of annual passengers that choose to fly into and out of SFO. Rather, the subsequent projects under the RADP would ensure that the Airport's level of service for passengers is maintained, as the number of annual passengers is expected to increase based on regional growth projections, and this growth would occur independent of implementation of the RADP. Therefore, implementation of the RADP would not result in changes related to aircraft operations or the configuration of the existing runways. See Response AA-1 for further discussion regarding comments requesting analysis of increased passenger demand and aircraft operations.

Conclusion

In summary, the Draft EIR provides a comprehensive and robust evaluation of impacts associated with implementation of the RADP. The comments do not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of the RADP under CEQA, and no further response is required.

3.I Alternatives [AL]

The comments and corresponding responses in this section cover the subjects included in Draft EIR Chapter 5, Alternatives. The comment topics relate to:

- AL-1: Alternatives Analysis

3.I.1 Comment AL-1: Alternatives Analysis

This response addresses the following comments, which are quoted below:

A-PaloAlto-5

O-CRPA-9

O-CRPA-12

O-CRPA-15

O-CRPA-21

"**Inadequate Alternatives Analysis**

The alternatives analysis in the DEIR is similarly lacking. While the DEIR identifies Alternatives A, B, and C, it does not provide a clear, quantitative comparison of their respective impacts across major environmental categories. CEQA requires that an EIR "describe a range of reasonable alternatives" and evaluate them in sufficient detail to support informed decision-making (Guidelines §15126.6). Simply asserting that one alternative results in "fewer impacts" than another is not adequate without data to support that conclusion. Given that Alternative A is identified as the environmentally superior option and that Alternative C is the next-best alternative, the DEIR should have included a more robust analysis of Alternative C in particular—especially since it would have materially different outcomes for air quality and noise than the proposed project." *(Ed Shikada, City Manager, City of Palo Alto, Letter, May 30, 2025 [A-PaloAlto-5, AL-1])*

"**Alternative B is also expanding SFO's capacity because it will still build a new 243,000-square-foot airport apron**. SFO describes Alternative B as a lesser impact option as described on page 397 and Table 5-2 on page 434 of the RADP DEIR pdf file. Under alternative B,

- Boarding Area H would not be built (project 1 - see page 147 of the RADP DEIR pdf file)
- The Main Hall of the International Terminal Building would not be expanded (project 3 - see page 157 of the RADP DEIR pdf file)
- No new aircraft maintenance hangar would be built (project 18 - see page 165 of the RADP DEIR pdf file)

Alternative B is intended to eliminate the significant adverse air quality impacts such as ROG emissions, which is an ozone precursor. However, **Alternative B still represents an expansion because a new 243,000-square-foot apron will be built thus increasing the airfield capacity and operations efficiency**. Even though the footprint of the airport is not expanding, or the runways are not changing, the proposed Alternative B still expands SFO's capacity to handle more operations." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-9, AL-1])*

"In addition, per CEQA Guidelines, one must identify the environmentally superior alternative and the next option if the 'no project' alternative is the environmentally superior alternative. As stated on page 436 of the RAPD DEIR pdf, **Alternative A (No Project Alternative) is the environmentally superior alternative and Alternative C (Boarding Area H Only Alternative) is the environmentally superior alternative among the other options considered**. However, as stated previously, Boarding Area H will increase gates capacity, thus increasing the number of operations and the noise and emissions impacts on communities. Furthermore, under CEQA, the environmental review must be based on current, representative data and provide a transparent assessment of foreseeable impacts. Continued reliance on the DNL 65 threshold as the sole indicator of noise significance does not reflect the experience of many overflown communities, as demonstrated by the FAA's own 2021 Neighborhood Environmental Survey. Per CEQA, a detailed analysis of Alternative C is absent from the DEIR and must be performed. Without addressing this limitation and incorporating non-DNL noise metrics, the DEIR falls short of CEQA's requirements for a complete and informed analysis." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-12, AL-1])*

- "**Quantify and compare the environmental impacts of all alternatives A, B, and C.** The summary information provided in the RADP DEIR is at a very high level and is not quantitative. Describing the impacts of alternatives A, B, or C as less than the impacts of the RADP is not an appropriate evaluation because you cannot tell the differences in impacts across the alternatives. The summary information provided in the RADP DEIR is at a very high level and is not quantitative. Describing the impacts of alternatives A, B, or C as less than the impacts of the RADP is not an appropriate evaluation because you cannot tell the differences in impacts across the alternatives." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-15, AL-1])*

"**Provide a detailed analysis for informed decision-making on Alternative C (Boarding Area H Only Alternative)** given that Alternative A (No Project Alternative) is the environmentally superior alternative, **and Alternative C is the next best alternative under CEQA guidelines**." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-21, AL-1])*

Response AL-1

Comments A-PaloAlto-5, O-CRPA-15, and O-CRPA-21 assert that the Draft EIR does not provide a sufficiently clear, quantitative, and detailed comparison of the respective RADP alternatives' impacts across major environmental categories to support informed decision-making in accordance with CEQA. The comments assert that the Draft EIR's analysis of Alternative C (Boarding Area H Only Alternative) is not sufficiently robust given that it is identified as the environmentally superior alternative. Comment O-CRPA-9 asserts that Alternative B (Reduced Development Alternative), which would include the 243,000-square-foot RON)/Race Track proposed as part of Boarding Area F Modernization (RADP Project #2) to provide a holding area for aircraft waiting for a gate and accommodate RON aircraft parking, represents an operational expansion of SFO. Comment O-CRPA-12 asserts that Alternative C (Boarding Area H Only Alternative) would increase gate capacity and thus increase the number of SFO air operations and associated aircraft-related noise and emissions impacts on communities. Comment O-CRPA-12 asserts that the Draft EIR does not evaluate increased aircraft noise that would purportedly result with implementation of Alternative C using appropriate thresholds.

Contrary to these comments, Draft EIR Chapter 5, Alternatives, describes and evaluates a reasonable range of alternatives to the RADP and includes sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the RADP in accordance with CEQA requirements. As specified in CEQA Guidelines section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. CEQA does not require a detailed comparison of the relative impacts of the alternatives to each other. The comments do not provide evidence to support claims that the Draft EIR's consideration and discussion of alternatives to the RADP is inadequate under CEQA. Moreover, neither implementation of the RADP nor any RADP alternative described and evaluated in the Draft EIR would induce passenger demand, increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport, or change the volume of annual passengers that choose to fly into and out of SFO. Rather, development of the terminal and non-movement areas of the airfield and landside facilities identified in the RADP and RADP alternatives described and evaluated in the Draft EIR are designed to ensure that SFO is able to accommodate long-term aircraft operations and passenger activity levels at the Airport.

The comments do not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of the RADP under CEQA, and no further response is required.

See Response AA-1 for further discussion regarding comments requesting analysis of increased passenger demand and aircraft operations.

3.J Biological Resources

The comments and corresponding responses in this section cover the subject of biological resources. The comment topics relate to:

- BI-1: Impacts on West of Bayshore

3.J.1 Comment BI-1: Impacts on West of Bayshore

This response addresses the following comment, which is quoted below:

I-Schneider-27

"Page 82 Biological Impacts – 1, 2, 3, 4. Plans to removed trees will help snakes but hurt people in Millbrae. SFO should be required to work with Millbrae to enhance wetlands west of 101 while also helping with storm water retention, ground water recharge (from SFPUC wells in Millbrae) while improving nature's capacity to absorb noise and air pollution." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-27, BI-1])*

Response BI-1

The comment refers to the evaluation of impacts related to biological resources in the initial study included as Draft EIR Appendix B. The comment asserts that (unspecified) plans to remove trees will help snakes but hurt people in Millbrae, and SFO should be required to work with Millbrae to enhance wetlands west of U.S. 101 to help with storm water retention and ground water recharge (from SFPUC wells in Millbrae) to improve nature's capacity to absorb noise and air pollution.

Tree Removal

In response to the comment concerning tree removal, the comment does not specify which tree removal and does not explain how tree removal would hurt people or identify any significant impact on people that may result from the potential tree removal under CEQA. The comment does not pertain to the adequacy, accuracy, or completeness of the Draft EIR and no further response is required.

Enhancing Wetlands in West of Bayshore

The commenter's statement that SFO should be required to work with the City of Millbrae to enhance wetlands west of U.S. 101 (West of Bayshore) to help with storm water retention and ground water recharge to improve nature's capacity to absorb noise and air pollution is noted. The RADP project site as shown on Draft EIR Figure 2-1, p. 2-4, does not include the West of Bayshore area, and no RADP projects are proposed in the West of Bayshore. For these reasons, impacts related to the West of Bayshore are beyond the scope of

the Draft EIR. The comment does not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of implementation of the RADP's physical environmental impacts and thus does not require further response. The comment will be provided to decision makers for consideration in their deliberations on approval of the RADP.

3.K Cultural Resources [CR]

The comments and corresponding responses in this section cover the subject of cultural resources. The comment topics relate to:

- CR-1: Archeological Resources
- CR-2: Historic Resources in Millbrae

3.K.1 Comment CR-1: Archeological Resources

This response addresses the following comments, which are quoted below:

A-Caltrans-7

A-CPC-Imperial-1

"**Cultural Resources**
Should construction activities within Caltrans' Right-of-Way (ROW) take place in relation to this project, these mitigation measures shall be implemented if there is an archaeological discovery. If there is an inadvertent archaeological or burial discovery within Caltrans' ROW, please immediately contact the Caltrans Office of Cultural Resource Studies at (510) 847-1977. A staff archaeologist will evaluate the finds within one business day after contact. Caltrans requires review of any potential data recovery plans within Caltrans' ROW." *(Yunsheng Luo, Branch Chief, Local Development Review, Office of Regional and Community Planning, California Department of Transportation, Letter, June 2, 2025 [A-Caltrans-7, CR-1])*

"I also read in -- the Environmental Impact Report and its outlines on different mitigation measures. And one particular that -- for me, that I find compelling or interesting is the historical resources or the tribal resources and the plans for that in terms of the mitigating and finding those issues." *(Commissioner Imperial, San Francisco Planning Commission, Transcript, May 22, 2025 [A-CPC-Imperial-1, CR-1])*

Response CR-1

Comment A-Caltrans-7 specifies that, should RADP construction activities occur with Caltrans' right-of-way (ROW), and if there is an inadvertent archaeological or burial discovery within Caltrans' ROW, the Caltrans Office of Cultural Resource Studies should be contacted immediately at (510) 847-1977. The comment states that a Caltrans staff archaeologist will evaluate the find within one business day after contact. The comment also states that Caltrans requires review of any potential data recovery plans within Caltrans' ROW.

The planning department acknowledges this information. The Airport is committed to complying with all relevant legal requirements related to work within Caltrans' ROW.

Comment A-CPC-Imperial-1 expresses interest in mitigation measures to address impacts related to historic resources and tribal cultural resources that are identified in Section E.4, Cultural Resources, and Section E.5, Tribal Cultural Resources, of the initial study included as Draft EIR Appendix B. The historic resources mitigation measures (M-CR-1a, Identification and Minimization Measure; M-CR-1b, Documentation; M-CR-1c, Salvage Plan; and M-CR-1d, Interpretation) and archeological resources mitigation measures (M-CR-2a, Accidental Discovery; M-CR-2b, Archeological Testing; M-CR-2c, Treatment of Submerged and Deeply Buried Resources) are outlined in Section E.4, Cultural Resources, in the initial study attached as Appendix B to the Draft EIR. The tribal cultural resources mitigation measures (M-TCR-1a, Tribal Cultural Resources Public Interpretation Program; and M-TCR-1b, Tribal Cultural Resources Sensitivity Training) are outlined in Section E.5, Tribal Cultural Resources, in the initial study attached as Draft EIR Appendix B. The mitigation measures detail the steps that would be required to mitigate impacts related to historic resources, archeological resources, or tribal cultural resources should they occur with implementation of the RADP. The comment is acknowledged and will be provided to decision makers for consideration in their deliberations on approval of the RADP.

The comments do not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts and thus do not require further response.

3.K.2 Comment CR-2: Historic Resources in Millbrae

This response addresses the following comment, which is quoted below:

I-Schneider-15

"Page 26 - Note all Bayside Manor Neighborhood is older that 45 years, all are potentially historic. Millbrae has discussed the process of designation of this and other neighborhoods as historic as they are so SFO will have to mitigate long term existing noise, air pollution and traffic impacts." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-15, CR-2])*

Response CR-2

Comment I-Schneider-15 states that the entire Bayside Manor neighborhood is older than 45 years and that all of the homes are potentially historic. The comment states that the City of Millbrae has considered historic resource designations for the Bayside Manor neighborhood and other (unspecified) neighborhoods, and these designations, the comment asserts, will obligate SFO to mitigate (unspecified) long-term existing noise, air pollution, and traffic impacts.

In response to this comment, potential RADP impacts related to historic resources are fully identified and addressed in accordance with CEQA requirements in Section E.4, Cultural Resources, of the initial study included as Draft EIR Appendix B. Potential impacts regarding implementation of the RADP related to transportation and circulation, noise and vibration, and air quality are fully identified and addressed in accordance with CEQA requirements in Draft EIR Sections 3.A, Transportation and Circulation, 3.B, Noise and

Vibration, and 3.C, Air Quality, respectively. The comment is noted but does not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of implementation of the RADP's physical environmental impacts and, thus, does not require further response. The comment will be passed along to decision makers for consideration in their deliberations on approval of the RADP.

3.L Hydrology and Water Quality [HY]

The comments and corresponding responses in this section cover the subject of hydrology and water quality. The comment topics relate to:

- HY-1: Hydrology and Water Quality Analysis

3.L.1 Comment HY-1: Hydrology and Water Quality Analysis

This response addresses the following comments, which are quoted below:

A-USEPA-3

I-Schneider-4

"**Stormwater and Wastewater Mitigation**

The EPA notes that the programmatic Draft EIR provides a framework of the proposed RADP, without specific project level information. In section E.17 of Appendix B, the Draft EIR briefly discusses the various permits that SFO would comply with to protect water quality and reduce stormwater impacts, but does not describe the specific pollutant control measures that would be implemented to comply with the permits. As such, it is unclear how these future control measures would protect water quality. The EPA recommends that the Final EIR and future NEPA analysis clarify the specific pollutant control measures that would be implemented to comply with the permits listed in the Hydrology and Water Quality Section, and describe how these measures will protect water quality. Furthermore, as part of the suite of pollutants of concern in San Francisco Bay, we note that there is an existing implementation plan for polychlorinated biphenyls (PCBs) under a Total Maximum Daily Load (TMDL) overseen by the San Francisco Bay Regional Water Quality Control Board and the regional stormwater permit.[2] We recommend addressing any project activities that could contribute to mobilization of PCBs from building materials or prior use and describing potential mitigations to comply with the TMDL. Additionally, Regional Board National Pollutant Discharge Elimination System (NPDES) permit No. CA003818 was recently reissued in February 2025, and we recommend amending Footnote 265 to refer to this new permit. *(Francisco Dóñez, Manager, U.S. Environmental Protection Agency, Letter, March 30, 2025 [A-USEPA3, HY1])*

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[2]https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/sfbaypcbstmdl.html#:~:text=The%20Watershed%20Permit%20(R2%E2%80%932012,to%20the%20San%20Francisco%20Bay"

"It completely ignores the fact that SFO's existence blocks storm water drainage. It ignores the fact that Millbrae floods when SFO does not maintain Lomita Canal (formerly a creek that drained Millbrae and San Bruno into SF Bay, forever blocked now by SFO/101. It ignores the history of SFO not maintaining Lomita Canal so storm water can move. It ignores the historic fact that SFO often said no to turning on the water

pumps to move said storm water into Millbrae's Highline Canal." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-4, HY-1])*

Response HY-1

Comment A-USEPA-3 states that the Draft EIR analyzes the RADP at a programmatic level and provides a framework of the RADP without specific project-level information. The comment states that Section E.17, Hydrology and Water Quality, of the initial study (Draft EIR Appendix B) does not describe the specific pollutant control measures that would be implemented to comply with the water quality permits identified in the section. The comment states that it is thus unclear how water quality would be protected and recommends that the Final EIR and future NEPA analysis clarify the specific pollutant control measures that would be implemented to comply with the identified permits and describe how these measures will protect water quality. The comment further notes that as part of the suite of pollutants of concern in San Francisco Bay, there is an existing implementation plan for polychlorinated biphenyls (PCBs) under a Total Maximum Daily Load (TMDL) overseen by the San Francisco Bay Regional Water Quality Control Board and the regional stormwater permit. The comment recommends that the EIR should address any project activities that could contribute to mobilization of PCBs from building materials or prior use and describing potential mitigations to comply with the TMDL. Finally, the comment notes that Regional Board National Pollutant Discharge Elimination System (NPDES) permit No. CA003818 was recently reissued in February 2025 and recommends that footnote 265 on page 158 of the initial study should be revised to reflect this. Comment I-Schneider-4 identifies several purported adverse impacts related to stormwater drainage and flooding resulting from the existence and actions of SFO.

Water Quality Analysis

In response to Comment A-USEPA-3, the comment accurately states that the Draft EIR analyzes the RADP at a programmatic level. See Response IN-2 for further discussion regarding comments related to the Draft EIR's programmatic level of analysis.

With regard to the commenter's assertion that the Draft EIR provides a framework of the RADP without specific project-level information, Draft EIR Section, 2.H.1, RADP Projects, pp. 2-19 through 2-39, provides descriptions of the RADP projects, including project type and function, locations (in text and figures), square footages of demolition and new construction, dimensions (e.g., building heights), and other individual project components in sufficient detail required by CEQA for analysis in the Draft EIR. With regard to the anticipated phasing and timing of construction of RADP projects, this information is provided in Draft EIR Table 2-5, pp. 2-39 through 2-40. Consequently, the Draft EIR properly discloses the physical components, timing, and conditions for any required subsequent review for the RADP projects in accordance with CEQA requirements.

With regard to the commenter's assertion that Section E.17, Hydrology and Water Quality, of the initial study (Draft EIR Appendix B) does not provide sufficient detail regarding specific pollutant control measures that would be implemented to comply with the water quality permits identified in the section, Section E.17 identifies all project construction and operational activities that could affect water quality, identifies all applicable regulations and permit requirements that pertain to water quality (e.g., SFO's NPDES permit, Industrial Stormwater Pollution Prevention Plan, and Construction General Permit) and states that

implementation of RADP projects would be required to comply with these regulations and permits and their associated water quality protection measures and controls. CEQA does not require an exhaustive description of each of the measures required as part of permit compliance. It is sufficient to identify the projects' required compliance with the regulations and permits that set forth the specific measures and controls that would be required for the subsequent projects to obtain the necessary approvals and permits in order to proceed.

In response to the commenter's note regarding the February 2025 reissuance of NPDES permit number CA0038318, footnote 265 on page 158 of the initial study is revised as follows:

> [265] Mel Leong Treatment Plant – Sanitary and Industrial Plants, NPDES Permit Number CA0038318, California Regional Water Quality Control Board Order Number R2-~~2018-0045~~-2025-0002.

This revision does not change the relevant analysis or impact conclusions in the Draft EIR.

Stormwater Drainage and Flooding in Millbrae

Comment I-Schneider-4 states that the Draft EIR ignores that the existence of SFO blocks stormwater drainage, which leads to flooding in the City of Millbrae, and the history of a canal in the West of Bayshore. The RADP project site as shown on Draft EIR Figure 2-1, p. 2-4, does not include the West of Bayshore area, and no RADP projects are proposed in the West of Bayshore. For these reasons, impacts related to the West of Bayshore are beyond the scope of the Draft EIR. Moreover, the comment describes concerns related to existing conditions and not those attributable to the RADP. Impacts regarding implementation of the RADP related to stormwater drainage and flooding are fully identified and addressed in accordance with CEQA requirements in Section E.17, Hydrology and Water Quality, of the initial study (Draft EIR Appendix B). The comment does not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of implementation of the RADP's physical environmental impacts and thus does not require further response. The comment will be provided to decision makers for consideration in their deliberations on approval of the RADP.

3.M Public Services [PS]

The comments and corresponding responses in this section cover issues related to public services. The comment topic relates to:

- PS-1: Impacts on Government Facilities

3.M.1 Comment PS-1: Impacts on Government Facilities

This response addresses the following comment, which is quoted below:

I-Schneider-26

"PS-1 – would not alter existing government facilities. Sadly, SFO already impacts existing Millbrae facilities, the pumping station to drain Lomita Canal into Highline Canal. Stating that this set of operations won't cause damage is not truthful when historical data shows SFO not maintaining operations west of 101." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-26, PS-1])*

Response PS-1

Comment I-Schneider-26 references the discussion of Impact PS-1, pp. 112 through 113, in Section E.14, Public Services, of the initial study (Draft EIR Appendix B). The comment disagrees with the conclusion of the analysis that impacts associated with implementation of the RADP regarding the provision of new or physically altered governmental facilities would be less than significant and states that existing SFO actions and future SFO actions under the RADP would result in damage and adverse impacts, including adverse impacts related to drainage facilities, in Millbrae and elsewhere west of U.S. 101. The comment does not explain the nature or extent of damage or adverse impacts that would purportedly occur. As noted above, the RADP project site as shown on Draft EIR Figure 2-1, p. 2-4, does not include the West of Bayshore area, and no RADP projects are proposed in the West of Bayshore. For these reasons, impacts related to the West of Bayshore are beyond the scope of the Draft EIR. Impacts regarding implementation of the RADP related to hydrology and water quality and public services are fully identified and addressed in accordance with CEQA requirements in Section E.17, Hydrology and Water Quality, and Section E.14, Public Services, of the initial study (Draft EIR Appendix B). The comment does not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of implementation of the RADP under CEQA, and no further response is required.

3.N Recreation [RE]

The comments and corresponding responses in this section cover issues related to recreation. The comment topic relates to:

- RE-1: Impacts on Bay Trail

3.N.1 Comment RE-1: Impacts on Bay Trail

This response addresses the following comment, which is quoted below:

I-Schneider-24

"PP80 S-62 There will be substantial deterioration of degradation of recreational facilities with damage done to the Bay Trail. Damage has already been occurring with heavy truck traffic and loss of vegetation." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-24, RE-1])*

Response RE-1

Comment I-Schneider-24 asserts that there will be substantial deterioration and degradation of recreational facilities with damage done to the San Francisco Bay Trail, and this damage, the comment states, has already been occurring with heavy truck traffic and loss of vegetation. The assertions are provided without context or evidence. Impacts regarding implementation of the RADP related to recreation are fully identified and addressed in accordance with CEQA requirements in Section E.12, Recreation, of the initial study (Draft EIR Appendix B). The comment does not provide evidence to support claims that the Draft EIR does not

adequately address the environmental impacts of implementation of the RADP under CEQA, and no further response is required.

See Response CU-1 for further discussion regarding comments pertaining to the San Francisco Bay Trail.

3.O Utilities and Service Systems [UT]

The comments and corresponding responses in this section cover issues related to utilities and service systems. The comment topic relates to:

- UT-1: Impacts Related to Recycling

3.O.1 Comment UT-1: Impacts Related to Recycling

This response addresses the following comment, which is quoted below:

I-Schneider-25

"S-62 UT-1, 3, 4 – using Millbrae to achieve recycling goals while degrading Millbrae's environmental with C&D activities is moving your problem into a different community. All C&D activity should remain on east side of 101." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-25, UT-1])*

Response UT-1

The comment asserts that Millbrae is being used to achieve recycling goals while being subject to environmental degradation related to construction and demolition activities. The comment asserts that all construction and demolition activities should remain on the east side of U.S. 101. The environmental impacts of the RADP, including impacts related to construction and operation of RADP projects, including use of SFO property on the west side of U.S. 101, are identified and evaluated in the Draft EIR and initial study (Draft EIR Appendix B) in accordance with CEQA requirements. There would be no changes to the historic use of this SFO property, and a construction and operational noise analysis is included in Section 3B, Noise and Vibration, and Appendix F, Noise Technical Report, of the Draft EIR. Effects of the RADP specifically related to construction and operational solid waste and recycling are identified and evaluated in accordance with CEQA requirements in Section E.9, Greenhouse Gas Emissions, and Section E.13, Utilities and Service Systems, of the initial study (Draft EIR Appendix B). The comment does not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of implementation of the RADP under CEQA, and no further response is required.

3.P General Comments (CEQA) [GC-CEQA]

The comments and corresponding responses in this section cover the general issues related to CEQA. The comment topics relate to:

- GC-CEQA-1: CEQA Process

- GC-CEQA-2: General Plan Consistency
- GC-CEQA-3: Climate Change/Sea-Level Rise
- GC-CEQA-4: Existing Conditions Related to Noise and Air Quality
- GC-CEQA-5: Inadequacy of Draft EIR

3.P.1 Comment GC-CEQA-1: CEQA Process

This response addresses the following comments, which are quoted below:

A-PaloAlto-6

I-Schneider-28

O-CRPA-14

O-CSFN1-1

"**Request for Recirculation**

In light of the deficiencies noted above, the City of Palo Alto finds that the DEIR does not comply with CEQA. The analysis is incomplete, fails to respond to previous input, and omits key data required for a full evaluation of environmental impacts. The conclusions presented in the DEIR— particularly regarding capacity and significance thresholds—are not supported by substantial evidence.

We respectfully request that the DEIR be revised and recirculated to include:

- Updated noise metrics and thresholds;
- A meaningful cumulative and regional air quality analysis, including ultrafine particulates;
- A realistic assessment of capacity expansion and related impacts; and
- A more comprehensive, quantitative alternatives analysis.

We appreciate your consideration of these comments and would welcome the opportunity to discuss these concerns further." *(Ed Shikada, City Manager, City of Palo Alto, Letter, May 30, 2025 [A-PaloAlto-6, GC-CEQA-1])*

"PP 113 Stating that you are working with Millbrae by coming to Millbrae on June 4, 2019, is sadly laughable. Truly SFO and City & County of SF treat us like a colony, to be ignored and then patted on the head that you care because you came to the City six years ago? How entitled and privileged are all San Franciscans that you gain all the financial advantages and make Millbrae (and San Bruno) deal with the bulk of the problems. Burlingame and SSF also impacted but they have land to do economic development to help offset the damage SFO operations, not just construction due to their communities." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-28, GC-CEQA-1])*

"**Demonstrate no net increase in community harm**. No project should proceed without a clear showing that it will not increase noise, emissions, or other burdens on already-impacted communities." *(Darlene Yaplee*

and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-14, GC-CEQA-1])

"State and Federal Legislative Liaison

Coalition for San Francisco Neighborhoods*

*For identification purposes only.

RE: Planning Commission Hearing May 22, 2025 Agenda Item #12 SFO Recommended Airport Development Plan (RADP) - Case Number 2017 - 007468ENV

Position: Strongly urging CONTINUANCE

Capital plans are typically heard first at the Capital Planning Committee.

I would strongly urge the Planning Commission to continue this item until after it's heard at the Capital Planning Committee." *(Eileen Boken, Coalition for San Francisco Neighborhoods, Email, May 19, 2025 [O-CSFN1-1, GC-CEQA-1])*

Response GC-CEQA-1

Comment A-PaloAlto-6 asserts that the Draft EIR analysis is incomplete, fails to respond to previous input, and omits key data required for a full evaluation of environmental impacts. The comment states that the conclusions presented in the Draft EIR — particularly regarding capacity and significance thresholds—are not supported by substantial evidence. The comment requests that the Draft EIR should be revised and recirculated to include updated noise metrics and thresholds; a meaningful cumulative and regional air quality analysis, including ultrafine particulates; a realistic assessment of capacity expansion and related impacts; and a more comprehensive, quantitative alternatives analysis.

Comment I-Schneider-28 references the public scoping meeting for the RADP EIR held in Millbrae on June 4, 2019, and laments how the City and County of San Francisco and SFO treat the City of Millbrae. Comment O-CRPA-14 states that no project should proceed without a clear showing that it will not increase noise, emissions, or other burdens on already-impacted communities. Comment O-CSFN1-1 references the public hearing on the Draft EIR for the RADP held by the planning commission on May 22, 2025. The comment urges the planning commission to continue consideration of the Draft EIR until after it is heard by the Capital Planning Committee.

Draft EIR Scoping Process

In response to comments related to the scoping process, the Draft EIR addresses all substantive and environmentally relevant written and oral comments received during the scoping process for the EIR, as discussed in the Draft EIR under Section 1.B.1, Notice of Preparation of an Environmental Impact Report and Public Scoping Meetings, p. 1-5. A summary of the NOP scoping comments and the locations in the Draft EIR and initial study (included as Draft EIR Appendix B) where they are addressed and analyzed is provided in

Draft EIR Table 1-1, pp. 1-6 through 1-14. See Response IN-1 for further discussion regarding comments on the scoping process. See Response NO-2 for further discussion regarding comments requesting the use of alternative noise metrics. See Responses AQ-2, AQ-3, AQ-4, and AQ-5 for further discussion regarding comments requesting a revised air quality analysis approach. See Response AA-1 for further discussion regarding comments requesting assessment of increased passenger demand and aircraft operations. See Response AL-1 for further discussion regarding comments requesting a more comprehensive alternatives analysis.

General CEQA Process

Comments lamenting how the City and County of San Francisco and SFO treat the City of Millbrae, comments stating implementation of the RADP should not result in any noise, air quality, or other impacts, and comments requesting a continuance are noted. The comments do not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of the RADP under CEQA. With regard to comments requesting revision and recirculation of the Draft EIR, as specified in CEQA Guidelines section 15088.5, recirculation of an EIR is only required where significant new information is added, which includes the following situations: (1) a new significant environmental impact from the project or from a new proposed mitigation measure; (2) a substantial increase in the severity of an environmental impact; (3) a feasible project alternative or mitigation measure considerably different from others previously analyzed would lessen the significant environmental impacts of the project but is not adopted; or (4) the Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. The comments do not provide any evidence that these conditions have been met; therefore, recirculation of the Draft EIR is not required.

3.P.2 Comment GC-CEQA-2: General Plan Consistency

This response addresses the following comments, which are quoted below:

O-CRPA-5

O-CRPA-10

- "While SFO's mission emphasizes delivering a world-class airport experience and expanding its role as an international gateway, the San Francisco General Plan provides important context and balance. In particular, Objective 5 and Policy 5.1 (page 202 of RADP DEIR pdf) clearly state that any expansion of SFO must be balanced with protecting the quality of life in surrounding communities: '*Objective 5: Support and enhance the role of San Francisco as a major destination and departure point for travelers making interstate, national, and international trips. Policy 5.1: Support and accommodate the expansion of San Francisco International Airport, while balancing this expansion with the protection of the quality of life in the communities that surround the Airport*.' Expansion that increases operational impacts —without meaningful mitigation or public accountability— undermines this policy directive. A truly exceptional airport experience must also include being a responsible neighbor to the communities affected by its operations. SFO should prioritize maintaining and updating existing facilities, not expanding facilities that will enable more operations and result in more negative impacts on communities especially when existing facilities can accommodate forecast demand." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-5, GC-CEQA-2])*

"In conclusion, the DEIR states that the purpose of the project is not to accommodate forecast demand—demand that, by the document's own analysis, can be met with existing facilities—but rather to achieve broader goals such as enhancing the passenger experience. However, the necessary balance between facility improvements and protection of community quality of life, as outlined in the San Francisco General Plan, has not been clearly demonstrated. The DEIR does not explain how this expansion aligns with that policy directive or how any resulting increase in community impacts would be addressed." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-10, GC-CEQA-2])*

Response GC-CEQA-2

The comments suggest potential and unaddressed RADP conflicts with San Francisco General Plan policies related to Airport expansion. The comments are underlain by an incorrect understanding that implementation of the RADP would result in an increase or expansion of operational activities at SFO. As discussed in Draft EIR Chapter 2, Project Description, and as substantiated in the Draft EIR, implementation of the RADP would not induce passenger demand, nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport (including cargo, private jets, and helicopters), or change the volume of annual passengers that choose to fly into and out of SFO. Rather, the projects proposed under the RADP would ensure that the Airport's level of service for passengers is maintained, as the number of annual passengers is expected to increase based on regional growth projections, and this increase would occur independent of implementation of the RADP.

Comment O-CRPA-10 incorrectly states that the Draft EIR states the purpose of the RADP is not to accommodate forecast demand. No such statement is included in the Draft EIR. On the contrary, the RADP is specifically proposed to maintain an acceptable level of service in alignment with forecast demand. Moreover, as discussed in Draft EIR Chapter 2, Project Description, and as noted in the comments, while existing SFO facilities could accommodate forecast increases in annual passengers that would occur independent of implementation of the RADP, without implementation of the RADP, the goals and objectives of the RADP to maintain an acceptable level of service for passengers and accommodate aircraft operations without causing severe or unrecoverable delays with regard to scheduled flights would not be met. The comments express confusion and infer policy conflicts with this concept and inaccurately identify development of terminal and non-movement areas of the airfield and landside facilities identified in the RADP as an expansion of operational activities at SFO. The underlying premise of the comments that the RADP comprises an operational expansion of SFO is inaccurate and unsupported.

Regarding comments stating that implementation of the RADP would conflict with the San Francisco General Plan, as noted on p.2 of the initial study (Draft EIR Appendix B), policy conflicts do not in and of themselves indicate a significant environmental effect pursuant to the CEQA, in that the intent of CEQA is to determine the physical impacts of a plan or project on the environment. The San Francisco Airport Commission and other decision makers will review the RADP for consistency with the relevant objectives, policies, and principles of applicable policy documents. The approval motions and supporting documents prepared for the decision makers as part of the RADP's approval process will include a comprehensive analysis and findings regarding the consistency of the RADP with the applicable plans, policies, and regulations independent of the environmental review process. These comments do not pertain to the adequacy,

accuracy, or completeness of the Draft EIR's analysis of implementation of the RADP's physical environmental impacts and thus do not require further response.

3.P.3 Comment GC-CEQA-3: Climate Change/Sea-Level Rise

This response addresses the following comments, which are quoted below:

A-Caltrans-6

O-CSFN2-2

"**Climate Change**
In the 2020 Caltrans District 4 Adaptation Priorities Report (link), U.S. 101 adjacent to the project location is identified as a high-priority Caltrans asset vulnerable to sea level rise, storm surge, and climate change impacts, including increased precipitation. Caltrans would like to be included in discussions, to stay informed as Caltrans is interested in engaging in multi-agency collaboration early and often, to find multi-benefit solutions that protect vulnerable shorelines, communities, infrastructure, and the environment. For any questions or concerns, please contact the Caltrans Bay Area Climate Change Planning Coordinators at D4_ClimateResilience@dot.ca.gov." *(Yunsheng Luo, Branch Chief, Local Development Review, Office of Regional and Community Planning, California Department of Transportation, Letter, June 2, 2025 [A-Caltrans-6, GC-CEQA-3])*

- "Does the DEIR address sea level rise issues as SFO is particularly vulnerable?" *(Eileen Boken, Coalition for San Francisco Neighborhoods, Email, May 30, 2025 [O-CSFN2-2, GC-CEQA-3])*

Response GC-CEQA-3

Comment A-Caltrans-6 states that U.S. 101 adjacent to the RADP project site is identified as a high-priority Caltrans asset vulnerable to sea-level rise, storm surge, and climate change impacts, including increased precipitation, in the 2020 Caltrans District 4 Adaptation Priorities Report. The comment states that Caltrans would like to be included in discussions, to stay informed, as Caltrans is interested in engaging in multi-agency collaboration early and often to find multi-benefit solutions that protect vulnerable shorelines, communities, infrastructure, and the environment. The comment states that any questions or concerns should be directed to the Caltrans Bay Area Climate Change Planning Coordinators at D4_ClimateResilience@dot.ca.gov.

The comment is acknowledged and will be provided to decision makers for consideration in their deliberations on approval of the RADP.

Comment O-CSFN2-2 asks if the Draft EIR addresses sea-level rise and notes the commenter's understanding that SFO is particularly vulnerable to effects related to sea-level rise. In response to this comment, effects related to sea-level rise are addressed in Section E.17, Hydrology and Water Quality, of the initial study (Draft EIR Appendix B). As discussed in Section E.17, p. 161, to address existing flood risk at the Airport and implement future flood protection through 2080, including consideration of sea-level rise, the Airport has developed the Shoreline Protection Program, which would install a new seawall that would comply with

current Federal Emergency Management Agency requirements for flood protection and address future flood risk related to sea-level rise. Pending regulatory approvals, the Shoreline Protection Program is anticipated to be completed by 2035. Additional information about the Shoreline Protection Program is available at https://planning.flysfo.com/shoreline-protection-program/.

The comments do not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts and thus do not require further response.

3.P.4 Comment GC-CEQA-4: Existing Conditions Related to Noise and Air Quality

This response addresses the following comment, which is quoted below:

I-Schneider-44

"PP 381 3.C – DEIR states impacts are less than significant due to existing noise/air pollution. But most of that is because of SFO and 101 operations. 101 operations would be less impactful if Old Bayshore was not moved right next to existing Millbrae neighborhoods, Marino Vista and Bayside Manor. This was done for a previous SFO expansion. Millbrae paid the costs." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-44, GC-CEQA-4])*

Response GC-CEQA-4

Comment I-Schneider-44 refers to determinations of less-than-significant noise and air quality impacts in the Draft EIR and draws unspecified connections to the conclusion that most of the existing noise and air pollution is because of SFO and U.S. 101 operations and that U.S. 101 operations would be less impactful if Old Bayshore was not moved right next to existing Millbrae neighborhoods. The comment does not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of implementation of the RADP's physical environmental impacts and thus does not require further response.

3.P.5 Comment GC-CEQA-5: Inadequacy of Draft EIR

This response addresses the following comment, which is quoted below:

I-Landesmann1-1

"Hi. Good afternoon, commissioners.

I wonder if you can recognize that SFO's DEIR has standards from the disco era -- as in polyester suits -- which guarantees that the public nor you will know the true impacts of this plan, and it will not meet the standards that the public expects to see today, in 2025, from a major city's planning office. You will certainly not be able to see the human or environmental impacts as it is right now.

Why would San Francisco, instead, not make the DEIR more relevant to today's audience? Quoting the Secretary of Transportation this week, he asked, "I don't know why, when I travel around the world, I think so

many other countries have safer and cleaner transportation systems." Why have something second best? We should aspire to be the safest, cleanest and most efficient in the world. Many ask that question.

I grew up in Brazil and have lived in Europe, in countries with excellent airlines and airports. The United States aviation system actually is third-rate in contrast to many developed and developing countries. In the European Union, agencies produce highly relevant information on airport impacts. Countries are heavily fined if they do not comply. EU agencies measure everything so that their airports and airlines are much more competitive and effective on tackling the very real impacts on people and the environment; whereas in the Bay Area, airports, just in the last few years, are presenting environmental reviews that hide the real pollution impacts, and this, when big data tools invented here in this region are available to conduct important analytics. A leading aero expert called the amount of data available "an embarrassment of riches."

And are you aware that a year's worth of all of SFO departures and arrivals over flight data can be processed in three days at a cost that is less than what it would cost to print the DEIR?" *(Jennifer Landesmann, Email, May 22, 2025 [I-Landesmann1-1, GC-CEQA-5])*

Response GC-CEQA-5

The comment states that the Draft EIR uses outdated (unspecified) standards for the analysis, asks why the City does not make the Draft EIR more relevant to today's audience, and claims that the U.S. aviation system is third-rate compared to other countries. The comment goes on to state that annual aircraft operations data can be processed for the cost of printing a copy of the Draft EIR. It is unclear to which standards the commenter is referring. See Responses NO-2, AQ-2, AQ-3, and AQ-4 for further discussion regarding comments pertaining to the thresholds used in the noise and air quality analyses to assess impacts related to implementation of the RADP. Comments pertaining to the state of the U.S. aviation system and the cost of processing aircraft operations data are noted. These comments do not raise specific issues pertaining to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts and thus do not require further response.

3.Q General Comments (Non-CEQA) [GC-Non-CEQA]

Several comments are general comments unrelated to CEQA or unrelated to the topics studied in the CEQA Guidelines Appendix G checklist. Some comments suggest adding additional information unrelated to environmental impact analysis. Others are general concerns regarding the RADP or the analysis in the Draft EIR but do not identify any particular deficiencies in the analysis or conclusions in the Draft EIR regarding the physical environmental impacts of the RADP.

The comment topics relate to:

- GC-Non-CEQA-1: Aviador Lot
- GC-Non-CEQA-2: Discrepancy Between ALUCP and RADP Forecasts
- GC-Non-CEQA-3: Aircraft Operations Forecast
- GC-Non-CEQA-4: BART Coordination

- GC-Non-CEQA-5: General Comments on SFO and SFO Operations
- GC-Non-CEQA-6: Next Generation Air Transportation System (NextGen)
- GC-Non-CEQA-7: FAA Role Regarding Flight Paths
- GC-Non-CEQA-8: Aircraft Noise, Aircraft Air Pollution, Aircraft Flight Paths
- GC-Non-CEQA-9: New Forms of Aviation
- GC-Non-CEQA-10: Oakland International Airport Environmental Review
- GC-Non-CEQA-11: Support for Sky Posse Palo Alto Comment Letter
- GC-Non-CEQA-12: 1989 Masterplan
- GC-Non-CEQA-13: General Comments on Millbrae and Growth of City of Millbrae
- GC-Non-CEQA-14: Noise Insulation Program
- GC-Non-CEQA-15: Do Not Support the RADP

3.Q.1 Comment GC-Non-CEQA-1: Aviador Lot

This response addresses the following comments, which are quoted below:

A-Millbrae-1

I-Schneider-5

I-Schneider-8

I-Schneider-11

I-Schneider-22

I-Schneider-23

I-Schneider-30

"**Site 7**

The City of Millbrae has long been concerned about current and future Airport operations and construction activities that utilize the Airport's "Site 7" parcel located on Aviador Avenue (APN: 092030050). This parcel has historically been used to store building and construction materials, soil, debris, heavy equipment, and cargo containers, and will continue to be used for staging and transportation to serve projects elsewhere on Airport property as they occur. The Airport's use of this parcel contributes to uncompensated impacts on the City from heavy truck traffic, dust, and noise. This directly affects the City of Millbrae because the adjacent and surrounding streets leading to Site 7 need more frequent pavement repairs, landscaping maintenance, and street and sidewalk sweeping than other comparable areas of the City. As many of the projects identified in the RADP will rely on Site 7 for staging and construction materials storage, the Airport should work with the City to develop adequate solutions to reduce the effects of dust, noise, and heavy vehicle traffic. Solutions could include working with the City of Millbrae to provide construction traffic control plans, dust control plans/dust remediation strategies, street sweeping assistance, landscaping services, and/or developing some form of assistance or compensation for the City's infrastructure maintenance costs

stemming from the Airport's use of Site 7." *(Andrew Mogensen, Community Development Director, City of Millbrae, Letter, May 22, 2025 [A-Millbrae-1, GC-Non-CEQA-1])*

"It ignores the history of the 'Adrian Lot' that was wetlands. Until very recently, this property had vegetation that helped to mitigate both noise from taxiing and departing planes, but also 101 traffic. That this same vegetation helped trap air pollutants, especially particulate matter. That this property is the first thing people on 101 south see as they pass or enter Millbrae. Now they see piles of dirt and broken concrete. This hardly is welcoming and is a huge slap in the face of Millbrae and its people. While hundreds of millions are spent making SFO attractive, the exact opposite is done to Millbrae by using Adrian Lot as a construction staging area or really a heavy industrial recycling operation for construction and demolition materials (C&D)." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-5, GC-Non-CEQA-1])*

"The use of Aviador Lot for past, current, and future heavy construction and demolition operations is the basic definition of environmental INJUSTICE. The best and only alternative for the use of Aviador Lot for any current or future SFO operations including those in the Shoreline Protect Plan is to NOT USE AVIADOR LOT AT ALL." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-8, GC-Non-CEQA-1])*

"You can change this. You can stop the use of Aviador Lot, put in the monitors, require this DEIR to use updated science and C-Weighted noise reports and serious work on PM2.5 and other air pollutants." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-11, GC-Non-CEQA-1])*

"PP 44 – S-26 – states no adverse effect on land use plans – Aviador Lot clearly has impact on existing Millbrae infrastructure including roads, new bay trail section, vegetation, quality of life and Impact AE=1 scenic vista – Aviador lot reduction of existing vegetation already damaged scenic vista. Big piles of construction and demolition debris also damaging scenic vistas. S-27 SFO past project work and Shoreline Protection Plan work have already changed Aviador Lot negatively. In the later plan work only until 2035 now extending to 2024 and beyond based on delays in previous work by SFO since 1989 Plan." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-22, GC-Non-CEQA-1])*

"C-AE-1 – no cumulative impact on aesthetics – simply not true. Just the fence and fallen gravel on the new bay trail is beyond aesthetics, it is dangerous to users who can experience tires getting damaged or gravel caught in skaters wheels leading to falling. Use of Aviador Lot is a physical danger to all people walking or cycling in this area." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-23, GC-Non-CEQA-1])*

"PP220-245 – Construction Staging operations 2-41 = Aviador Lot – should be moved to SFO footprint east of 101. Stop all traffic, noise, air pollution impacts in a way to mitigate for moving runways 1 L/R 450 feet closer to Millbrae and greatly increasing noise all over Millbrae as low frequency noise concentrates as it moves up the hillsides." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-30, GC-Non-CEQA-1])*

Response GC-Non-CEQA-1

The comments concern the Aviador Lot, which is located on Airport property west of U.S. 101 in the City of Millbrae and is used as construction staging area for SFO projects under existing conditions and would be used as a construction staging area for RADP projects.

Comment A-Millbrae-1 expresses concerns regarding the aforementioned past, ongoing, and future construction staging activities at the Aviador Lot (which the comment identifies as Site 7). The comment asserts that the Airport's use of this parcel contributes to uncompensated impacts on the City of Millbrae from heavy truck traffic, dust, and noise. The comment requests the Airport to work with the City of Millbrae to address these stated concerns. The comment is acknowledged and will be provided to decision makers for consideration in their deliberations on approval of the RADP.

The environmental impacts of the RADP, including impacts related to use of the Aviador Lot as a construction staging area for RADP projects, are fully identified and addressed in the Draft EIR and initial study in accordance with CEQA requirements. Potential impacts related implementation of the RADP regarding transportation and circulation, noise and vibration, and air quality are fully identified and addressed in accordance with CEQA requirements in Draft EIR Section 3.A, Transportation and Circulation, Section 3.B, Noise and Vibration, and Section 3.C, Air Quality, respectively. The comment does not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts and, thus, does not require further response.

Comments I-Schneider-5, I-Schneider-8, I-Schneider-11, I-Schneider-22, I-Schneider-23, and I-Schneider-30 express a range of concerns and objections regarding past, ongoing, and future construction staging activities at the Aviador Lot, including purported impacts related to biological resources (e.g., wetlands), air quality, noise, aesthetics, land use, recycling, environmental justice, and skateboarding accidents. Comments noting the historical development of the Aviador Lot as a construction staging area; comments stating that the use of the Aviador Lot as a construction staging area is an injustice and should not be used for such activities; and comments requesting the Airport to stop using the Aviador Lot for construction staging activities are noted. These comments do not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of implementation of the RADP's physical environmental impacts and thus does not require further response.

Comments stating that use of the Aviador Lot as a construction staging area conflicts with a land use plan and results in an aesthetics impact are without merit. The Aviador Lot is currently a construction staging area and is part of the existing conditions setting; implementation of the RADP would not result in any changes to this condition. The environmental impacts of implementation of the RADP, including impacts related to use of the Aviador Lot as a construction staging area for RADP projects, are fully identified and addressed in the Draft EIR and initial study in accordance with CEQA requirements. The comments do not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of implementation of the RADP, and no further response is required.

3.Q.2 Comment GC-Non-CEQA-2: Discrepancy Between ALUCP and RADP Forecasts

This response addresses the following comment, which is quoted below:

O-CCAG-1

"C/CAG Airport Land Use Committee staff offers the following comments for your consideration:

- DEIR section 3.B.1 states that implementation of the RADP would not induce passenger demand, or change the number of aircraft operations, so the DEIR does not analyze aircraft noise. However, the forecast operations and passenger throughput (71.1 million annual passengers and 506,600 aircraft operations) are significantly higher than those included in other related documents, including the 1992 *SFO Master Plan and the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport*, adopted in November 2012, (SFO ALUCP). The SFO ALUCP includes airport activity forecasts (which project to 2028) based on 2010 data. The SFO ALUCP's 2028 forecasts identified approximately 27 million passengers and 482,520 total operations. Comparatively, the DEIR for the RADP projects a "High Constrained" annual demand level, as noted above, that represents a more that 250% increase in annual passengers and 5% increase in aircraft operations over those forecast in the SFO ALUCP.

  As indicated, there is a large disparity between the projections in these documents which should be analyzed to ensure the impact of the airport's growth forecasts is properly reflected in the ALUCP. If the potential noise impact of this level of forecast flight activity has been analyzed in a previously certified environmental document, it is requested that such analysis be clearly referenced in this DEIR. Alternately, if this has not yet been done, then C/CAG believes the DEIR must be revised to include this analysis.

The ALUCP is a critical tool for identifying and minimizing potential land use incompatibilities, so it is important that the document reflect the most current projections, especially given the significant gap in the operational forecasts between the SFO ALUCP and the RADP. Accordingly, C/CAG requests that the SFO Airports Commission direct its staff to initiate ALUCP update discussions, including a significant funding commitment, as part of this overall planning effort." *(Sean Charpentier, Executive Director, City/County Association of Governments, Letter, June 2, 2025 [O-CCAG-1, GC-Non-CEQA-2])*

Response GC-Non-CEQA-2

Comment O-CCAG-1 states that forecast operations and passenger throughput (71.1 million annual passengers and 506,600 aircraft operations) identified for SFO and included in the Draft EIR are significantly higher than those included the SFO Master Plan adopted in 1992 and the SFO ALUCP adopted in 2012. The comment notes that the 71.1 million annual passengers and 506,600 annual aircraft operations forecast represents a greater than 250 percent increase in annual passengers and a 5 percent increase in aircraft operations over the forecast in the SFO ALUCP. The comment states that this increase should be analyzed to ensure the impact of the Airport's growth forecasts is properly reflected in the ALUCP. The comment states that if the potential noise impact of this level of forecast flight activity has been analyzed in a previously certified environmental document, it is requested that such analysis be clearly referenced in the Draft EIR.

The comment states that if this analysis has not yet been done, then the Draft EIR must be revised to include this analysis.

In response to this comment, as discussed in Draft EIR Section 2.G.2, Aviation Activity Forecast, pp. 2-15 through 2-17, and detailed and documented in Draft EIR Appendix C, in 2014, the FAA approved an updated forecast for SFO, which is referred to as the 2014 forecast. The forecast was developed following standard FAA guidance and industry practice considering a variety of factors such as historical and forecast socioeconomic data, historical air traffic at the Airport (domestic and international), historical shares of originating and destination versus connecting passengers, airline economics data regarding service at the Airport, and other drivers of aviation demand. As shown in Draft EIR Table 2-1, the High Constrained annual demand level comprises approximately 71.1 million annual passengers and 506,600 annual aircraft operations.

As discussed in Draft EIR Chapter 2, Project Description, and as substantiated in the Draft EIR, implementation of the RADP would not induce passenger demand, nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport (including cargo, private jets, and helicopters), or change the volume of annual passengers that choose to fly into and out of SFO. Rather, development of the terminal and non-movement areas of the airfield and landside facilities identified in the RADP are proposed to ensure that SFO is able to maintain an acceptable level of service for passengers and accommodate aircraft operations without causing severe or unrecoverable delays with regard to scheduled flights. Implementation of the RADP would not result in changes related to aircraft operations or the configuration of the existing runways. As discussed in Draft EIR Section 2.G.3, Purpose of the RADP, pp. 2-17 through 2-18, the RADP includes projects that would accommodate long-term passenger activity levels at the Airport, forecast to reach approximately 71.1 million annual passengers and 506,600 annual aircraft operations regardless of whether the RADP is implemented. For this reason, aircraft-related noise or air quality impacts are not evaluated in the Draft EIR.

The comment is acknowledged and will be provided to decision makers for consideration in their deliberations on approval of the RADP. The environmental impacts of the RADP are fully identified and addressed in the Draft EIR and initial study (Draft EIR Appendix B) in accordance with CEQA requirements. The comment does not provide evidence that the Draft EIR does not adequately address the environmental impacts of the RADP or that any revisions to the Draft EIR analysis are required. With regard to differing forecast information included in the ALUCP in comparison to the FAA-approved 2014 forecast, an update to the forecast information in the ALUCP is not required under CEQA because implementation of the RADP would not induce passenger demand, nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport, or change the volume of annual passengers that choose to fly into and out of SFO.

3.Q.3 Comment GC-Non-CEQA-3: Aircraft Operations Forecast

This response addresses the following comments, which are quoted below:

O-CRPA-6

O-CRPA-19

O-SCREAAM-1

"**SFO claims the need to accommodate the forecasted demand of roughly 500,000 operations (498,853 operations** for Base constrained and 506,571 operations for High Constrained, see Table 1 page 10 of RADP DEIR Appendix C pdf) **even though SFO did not reach in 2024 pre-COVID-19 activity levels as indicated in the statement that** '*SFO is projected to recover to pre-COVID-19 activity levels in 2024*' (see page 145 of the RADP DEIR pdf),

- SFO peaked in 2018 with 470,164 operations for the year and decreased by 2.5% in 2019 to 458,164 operations.
- In contrast, actual operations in 2024 were only 386,507, which is 83,657 fewer operations than in 2018 and 71,657 fewer operations than in 2019 (SFO source).
- While the first 3 months of 2025 show an average 8.4% growth over the same period in 2024, ongoing political and economic uncertainties make sustained growth far from guaranteed. Given the gap between forecasted and actual activity, SFO should update and revise its operational forecast using verified data from the first half of 2025 for a more realistic RADP." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-6, GC-Non-CEQA-3])*

- "**Update and revise forecast data.** Reassess project justification using current, verifiable operations data—especially considering SFO's continued post-COVID recovery lag and economic uncertainty." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-19, GC-Non-CEQA-3])*

"We would like to bring your attention to inaccuracies that exist in the draft environmental review documents that are a cause for concern.

On page 5 of DEIR the FAA is quoted as saying that, 'forecasts of future levels of aviation activity are the basis for effective decisions in airport planning. These projections are used to determine the need for new or expanded facilities.'

If effective decisions rely on accurate forecasts **why is the DEIR relying on an outdated forecast document to determine the need for this project?** The *San Francisco International Airport Forecast Update* was completed in 2014 which **uses old 2013 data in order to estimate what travel demand would be like in 2018, 2023**, and beyond. For example, we don't need to forecast what travel demand might be in 2018 and 2023 because we already have that data.

We would also like to understand the impact of using outdated obsolete information to guide forecasting in this report." *(Matthew Stevens, Founder, SCREAAM.org, Letter, June 2, 2025 [O-SCREAAM-1, GC-Non-CEQA-3])*

Response GC-Non-CEQA-3

The comments assert that the 2014 aviation activity forecast for SFO that were used to formulate the terminal, landside, and associated airport support facilities in the RADP to accommodate future aviation activity are outdated and do not reflect more current forecast data that show decreased recent and future

levels of activity at SFO in comparison to the 2014 forecast data. The comments assert that the RADP and Draft EIR should be revised to reflect the more recent data.

In response to the comments, as discussed in Draft EIR Section 2.G.2, Aviation Activity Forecast, pp. 2-15 through 2-17, and in more detail in Draft EIR Appendix C, aviation activity forecasts provide the primary input to identifying the facilities needed to accommodate future levels of activity at an airport. In 2014, the FAA approved an updated forecast for SFO for the maximum number of annual passengers and aircraft operations that the existing runways can accommodate. The forecast was developed following standard FAA guidance and industry practice considering a variety of factors such as historical and forecast socioeconomic data, historical air traffic at the Airport (domestic and international), historical shares of originating and destination versus connecting passengers, airline economics data regarding service at the Airport, and other drivers of aviation demand. As shown in Draft EIR Table 2-1, the High Constrained annual demand level comprises approximately 71.1 million annual passengers and 506,600 annual aircraft operations. As discussed in Draft EIR Appendix C, Airport Facilities to Accommodate Aviation Demand, pp. 6 through 7, the 2014 forecast was used to identify facility needs to accommodate demand consistent with the City's goal of providing the highest level of international and domestic guest service. Given that no additional physical runway capacity is anticipated at SFO nor considered in the RADP, the High Constrained demand level of 1,500 daily aircraft operations was used for planning purposes. As discussed further in Draft EIR Appendix C, the regulation of airspace is reserved entirely to the federal government. The FAA regulates air traffic using the National Airspace System, and meters the number of aircraft arriving and departing an airport based on flight tracks, navigational fixes, weather conditions, and air traffic control procedures, but does not regulate how airlines schedule their flights. Thus, airlines can schedule and will try to operate as many flights as they can based on the demand for the markets they serve. Although SFO has identified the practical capacity of the Airport as approximately 1,500 aircraft operations per day for planning, the airlines may schedule more flights if they deem it in their interest to do so. However, SFO, through the RADP process, has concluded that anything beyond 1,500 daily operations could introduce unacceptable levels of delay and provide a poor experience for passengers and airlines, especially during inclement weather and visibility conditions (e.g., low fog). Thus, the RADP was formulated to identify the terminal, landside, and associated airport support facilities needed to accommodate a foreseeable demand level of 1,500 daily aircraft operations (approximately 71.1 million annual passengers) at the desired level of service based on the existing physical runway capacity of the Airport. The RADP is long-range development plan to accommodate forecast growth up to the capacity of the existing airfield/airspace, which is not being expanded under the RADP. Consequently, the FAA-approved 2014 forecast for SFO, which accounts for the maximum number of annual passengers and aircraft operations that the existing runways can accommodate, is appropriate for the RADP's identification of terminal, landside, and associated airport support facilities needed to accommodate a foreseeable demand, and the use of more recent forecast data is neither appropriate nor required for the RADP or this EIR. The comments do not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of implementation of the RADP's physical environmental impacts and thus do not require further response.

3.Q.4 Comment GC-Non-CEQA-4: BART Coordination

This response addresses the following comment, which is quoted below:

A-BART-4

"We would like to closely coordinate with SFO during project design and construction to ensure that there is minimal disruption to our operations and that access to the BART station is maintained. Construction affecting BART operations and rider experience are subject to BART's approval." *(Tim Chan, Station Area Planning Group Manager, San Francisco Bay Area Rapid Transit District, Letter, May 30, 2025 [ABART4, GCNonCEQA4])*

Response GC-Non-CEQA-4

The comment states that BART would like to closely coordinate with SFO during project design and construction to ensure that there is minimal disruption to BART operations and that access to the BART station is maintained. The comment states that construction affecting BART operations and rider experience are subject to BART's approval.

SFO and City staff acknowledge BART's request for coordination regarding implementation of RADP projects. SFO has the same goal of minimizing disruptions to operations and passenger/rider experience. However, SFO projects are not subject to BART approval. The comment will be provided to decision makers for consideration in their deliberations on approval of the RADP. The comment does not raise specific issues pertaining to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts and thus does not require further response.

3.Q.5 Comment GC-Non-CEQA-5: General Comments on SFO and SFO Operations

This response addresses the following comments, which are quoted below:

I-Lyman-3

I-Schneider-3

I-Schneider-10

I-Schneider-29

O-CSFN3-3

"I want SFO, the SF planning commision, the FAA, and the airlines to be MUCH more transparent and inclusive of the community in standards, plans, and decision making." *(Susan Lyman, Email, June 2, 2025 [I-Lyman-3, GC-Non-CEQA-5])*

"Following is a list of errors and omissions within the 440-page DEIR. I don't list them all and I mainly looked at the impact on the people and community of Millbrae. Sadly, I believe that both the San Francisco Planning Commission and the San Francisco Airport Commission, or staff have little knowledge of the 'close in communities around SFO. Your decisions have grave impacts on over one hundred thousand people. I would like to think that no one has ever told you the history of SFO and the historical damage caused to the City of Millbrae that began when we were unincorporated San Mateo County. In this you are not alone as the County

of San Mateo has also forgotten the damage they did to the people living in then unincorporated Millbrae. People who lived here long before Mills Field (the predecessor of SFO), the relocation of the old Bayshore Highway to assist the expansion of SFO, and the change from a small bi-plane airport to one of the biggest airports in the USA and world today.

This DEIR also takes advantage of the myth of ambient noise and ambient air pollution that SFO operations place on the close in communities including Millbrae. In other words, it assumes cities like Millbrae create ambient noise and air pollution when most of that is from SFO and 101 itself including the traffic to and from SFO. It also ignores that the reason the Millbrae Transit Station exists is to serve SFO (and that is why Calif. High Speed Rail and the enormous impact on Millbrae is planned). It ignores the cut through traffic created by SFO's existence. SFO is responsible for a range of pollutants and traffic in Millbrae already so to call this existing or ambient problems is historically incorrect." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-3, GC-Non-CEQA-5])*

"I would wish that this will happen. But Millbrae has truly no say in anything SFO does. Power is in the hands of you the San Francisco Planning Commission. More power to all of you since the County of San Mateo has abrogated their responsibility to care for all the people in the close in communities as shown by allowing SFO to do whatever it wants on San Mateo County land." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-10, GC-Non-CEQA-5])*

"PP 108 S-89 Completely ignored SFO realigning taxiways and pulling Runway" *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-29, GC-Non-CEQA-5])*

"SFO has been resistant to implementing gauge controls despite one of SFO's stated goals is to 'Become the #1 Long-Haul and International Gateway of Choice'.

Gauge controls would free up slots by eliminating regional aircraft aka puddle jumpers.

Issues with regional jets at SFO were highlighted with a recent near miss between a Bombardier CRJ-200 regional jet headed to Fresno and an Airbus A320 headed to Dallas.

Here is the link to the SF Chronicle article:

https://url.avanan.click/v2/r01/___https://www.sfchronicle.com/bayarea/article/sfo-united-near-miss-20353875.php___.YXAzOnNmZHQyOmE6bzo2ZDYwMWMxZTZmNWYwNWE3ZWU1NTFjOTBjYTU4ODAzMTo3OmNmNDU6ZmE1YWEzMWIxNjRlYjRkOGZjYWUyMWRmYjRmNDVjMmM0MjUxZWZhY2I2NTBkYmMzZDZjZTdjOTkwMjZjN2I1NTp0OkY6Tg

Fresno is not a long-haul destination.

Besides regional jets having wake vortex issues with larger jets, they increase congestion in airspace which is already congested by three major Bay Area airports." *(Eileen Boken, Coalition for San Francisco Neighborhoods, Email, June 2, 2025 [O-CSFN3-3, GC-Non-CEQA-5])*

Response GC-Non-CEQA-5

The comments comprise a range of concerns, assertions, and requests regarding SFO and SFO operations, along with claims of errors and inaccuracies in the Draft EIR.

Comment I-Lyman-3 expresses a wish for SFO, the planning commission, the FAA, and the airlines to be more transparent and inclusive of the local community in standards, plans, and decision making. The comment is acknowledged and will be provided to decision makers for consideration in their deliberations on approval of the RADP. The comment does not raise specific issues pertaining to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts and thus does not require further response in this RTC document.

Comments I-Schneider-3, I-Schneider-10, and I-Schneider-29 assert a range of damages and adverse effects, including effects related to air quality, noise, and transportation, experienced by the residents of Millbrae resulting from past and current SFO development and operations and decisions made by the San Francisco Planning Commission and the San Francisco Airport Commission. The comments assert that the Draft EIR contains errors, omissions, and inaccuracies, which are enumerated in the comment letter and included in the appropriate responses in this Response to Comments document. In response to these comments, the environmental impacts of the RADP are fully identified and addressed in the Draft EIR and initial study (Draft EIR Appendix B) in accordance with CEQA requirements. Potential RADP impacts related to transportation and circulation, noise and vibration, and air quality are fully identified and addressed in accordance with CEQA requirements in Draft EIR Sections 3.A, Transportation and Circulation, 3.B, Noise and Vibration, and 3.C, Air Quality, respectively. The comments do not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of implementation of the RADP under CEQA, and no further response is required.

Comment O-CSFN3-3 asserts that SFO has been resistant to implement gauge controls and asserts that implementation of gauge controls would have beneficial effects. The comment does not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts and thus does not require further response.

3.Q.6 Comment GC-Non-CEQA-6: Next Generation Air Transportation System (NextGen)

This response addresses the following comment, which is quoted below:

O-SCREAAM-2

"The commission may not be familiar with the after effects of NextGen modernization projects and the turmoil it brought to bay area communities back in 2015 – 2017 and have yet to be resolved. Community groups have been formed all over the nation, including San Francisco, as residents strived to inform themselves on a dense subject matter. Flights that used to fly over many different paths now fly over fewer areas, concentrating noise pollution over certain households, negatively impacting home life with constant

loud aviation industry noise – all day and night." *(Matthew Stevens, Founder, SCREAAM.org, Letter, June 2, 2025 [O-SCREAAM-2, GC-Non-CEQA-6])*

Response GC-Non-CEQA-6

The comment expresses concerns regarding purported adverse aircraft noise effects and associated local and national organizing efforts related to the use of the Next Generation Air Transportation System (NextGen) in project planning.

As provided in footnote 22 of Draft EIR Appendix C, p. 6, NextGen refers to the modernization of the national airspace system (NAS) in the United States through the use of satellite-based air traffic control systems rather than ground-based equipment. As also discussed in Draft EIR Appendix C, p. 6, the identification of RADP projects needed to accommodate long-term passenger demand at SFO was informed by NextGen procedures employed by the FAA to determine the practical capacity of the existing SFO runway system. While the selection of RADP projects was informed by NextGen procedures, NextGen is not part of the RADP and therefore it is not required to be analyzed in the EIR. The comment does not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts and thus does not require further response.

3.Q.7 Comment GC-Non-CEQA-7: FAA Role Regarding Flight Paths

This response addresses the following comments, which are quoted below:

I-Alton-2

I-Bailey-4

I-Chueh-2

I-Fischer-2

I-Landesmann2-6

I-Rindfleisch-3

I-Samson-3

O-SPPA-2

"**INACCURACIES:**

#1 SFO is incorrect to say that flight paths are "**the sole purview**" of the FAA. An airport's role is required in flight path oversight.

After serious miscalculations about regional noise effects from the implementation of the FAA's Nextgen program for Northern California in 2014, the FAA expanded the role of airports as regards flight paths. SFO has since been on the FAA's Technical Working Groups for flight path design and **the Government Accountability Office recommended for the FAA to clarify how a flight path change is initiated and**

processed. The FAA's publication "How the FAA engages with Airport and Community Roundtables" now describes the role of an Airport authority;

Step 2 of the FAA's criteria for Flight Path development states,

> 'All requests not made by the airport authority or internal FAA sections responsible for air traffic control (ATC) and flight procedure development (e.g., ATC, flight standards, FPT, etc.) **require airport authority concurrence** prior to submission.'

This is consistent with US Aviation policy which states that aircraft noise is a ***shared responsibility*** *between airport authorities, airlines, state and local government, communities, and the Federal Aviation Administration*. Furthermore, communities expect airport sponsors to **balance** the interests of various stakeholders.

> #2 **It is also inaccurate that flight paths will 'not change'** when petitions for changes are ongoing largely from airlines and the airport itself.

The FAA continuously makes changes to flight paths *in response* to SFO's needs and the needs of the National Airspace System. It is impossible for flight paths to be static given that in addition to the FAA's internal changes (e.g., ATC, flight standards, FPT, etc.) requests are initiated by airlines - including for private use flight paths. SFO also has flight path procedures (navigation rules) for its new landing system 'GBAS' which can INCREASE noise and SFO controls these procedures.

It is evident that the FAA looks to airports to provide local context in efforts to be responsive to the public and to consider the environment and people. SFO's misrepresentation that '*flight paths will not change*' has broken trust before. Unless this is addressed, SFO is misinforming the FAA on current and future projects, and leaving the public in the dark about potential consequences from SFO's operations."
(Larry Alton, Email, June 1, 2025 [I-Alton-2, GC-Non-CEQA-7])
(Teresa Bailey and Ron Ullmann, Email, June 1, 2025 [I-Bailey-4, GC-Non-CEQA-7])
(Justin Chueh, Email, June 2, 2025 [I-Chueh-2, GC-Non-CEQA-7])
(Michael Fischer, Email, June 1, 2025 [I-Fischer-2, GC-Non-CEQA-7])
(Jennifer Landesmann, Email, June 2, 2025 [I-Landesmann2-6, GC-Non-CEQA-7])
(Thomas Rindfleisch, Email, June 2, 2025 [I-Rindfleisch-3, GC-Non-CEQA-7])
(Mark Samson, Email, June 1, 2025 [I-Samson-3, GC-Non-CEQA-7])
(Sky Posse Palo Alto, Email, June 2, 2025 [O-SPPA-2, GC-Non-CEQA-7])

Response GC-Non-CEQA-7

The comments concern aircraft flight paths, agencies with authority related to aircraft flight paths, and purported but unspecified misrepresentations regarding aircraft flight paths. U.S. Code title 49, section 40103, Sovereignty and use of airspace, states "[t]he United States Government has exclusive sovereignty of airspace of the United States." Furthermore, the U.S. Congress charged the FAA to "develop plans and policy for the use of the navigable airspace and assign by regulation or order the use of the airspace necessary to ensure the safety of aircraft and the efficient use of airspace." While the FAA could seek public input on designation of flight paths, they remain the approver, as charged by U.S. Congress. These comments are noted but do not pertain to the adequacy, accuracy, or completeness of the Draft EIR's analysis of implementation of the RADP's physical environmental impacts and thus does not require further

response. The comments will be provided to decision makers for consideration in their deliberations on approval of the RADP.

3.Q.8 Comment GC-Non-CEQA-8: Aircraft Noise, Aircraft Air Pollution, Aircraft Flight Paths

This response addresses the following comments, which are quoted below:

A-Millbrae-3

I-Alton-1

I-Alton-3

I-Alton-5

I-Alton-6

I-Bailey-1

I-Bailey-3

I-Bailey-5

I-Bailey-7

I-Ben-Efraim-1

I-Chueh-1

I-Chueh-3

I-Chueh-5

I-Delong-1

I-Duisenberg-1

I-Fischer-1

I-Fischer-3

I-Fischer-5

I-Hanasoge-3

I-Hanasoge-6

I-Jimenez-1

I-Landesmann1-2

I-Landesmann2-4

I-Landesmann2-5

I-Landesmann2-7

I-Landesmann2-9

I-Lyman-1

I-Rindfleisch-2

I-Rindfleisch-4

I-Rindfleisch-6

I-Samson-2

I-Samson-4

I-Samson-6

I-Schneider-7

O-CRPA-1

O-CSFN2-3

O-CSFN3-6

O-CSFN3-7

O-SCREAAM-3

O-SPPA-1

O-SPPA-3

O-SPPA-5

"**Noise**

The City of Millbrae has long been impacted by noise from Airport operations, construction and traffic. Measuring and disclosing impacts from short and long-term noise is reliant on data collected from established noise monitoring locations. These locations are generally identified along the eastern perimeter of the City of Millbrae, as noted in Figure 3.B-2 of the DEIR, locations which are at the lowest elevations of the City of Millbrae and close to the Airport's perimeter. These noise monitoring locations generally do not have a clear line of sight to aircraft, a major noise generator, and, due to their limited number and location, are limited in their ability to measure noise impacts on the City of Millbrae. Because the City rises in elevation to the west of the Airport, noise monitoring locations at the lowest elevations along the eastern boundary of the City are unable to measure ambient noise impacts from Airport operations on western residential portions of the City which are located at higher elevations. These sensitive residential neighborhoods directly overlook the Airport with a clear line of sight to aircraft take off and landings and have long been affected by unmeasured noise from aircraft operations. Future growth from the Recommended Airport Development Plan will affect all portions of the City and therefore noise levels should continuously be monitored with permanent noise monitoring stations established by SFO in multiple areas of the City, including new monitoring stations that should be placed in western residential neighborhoods that overlook the Airport at higher elevations. This would provide the City and the Airport with more accurate overall noise measurements and help establish a more appropriate baseline for further evaluation and discussion of Airport noise impacts." *(Andrew Mogensen, Community Development Director, City of Millbrae, Letter, May 22, 2025 [A-Millbrae-3, GC-Non-CEQA-8])*

"On behalf of thousands of Midpeninsula residents impacted by noise and air quality impacts from SFO-

bound flight paths, we respectfully submit that SFO's DEIR is inadequate as long as it does not consider flight path impacts. At the May 22 public Hearing SFO's presentation suggested that '*There are no changes or expansions proposed to the existing runway or to aircraft flight paths, which are the sole purview of the FAA*.' As this report and process is meant to protect the environment and people who stand to be negatively affected by SFO's development plan, please consider our feedback as follows:"
(Larry Alton, Email, June 1, 2025 [I-Alton-1, GC-Non-CEQA-8])
(Teresa Bailey and Ron Ullmann, Email, June 1, 2025 [I-Bailey-3, GC-Non-CEQA-8])
(Justin Chueh, Email, June 2, 2025 [I-Chueh-1, GC-Non-CEQA-8])
(Michael Fischer, Email, June 1, 2025 [I-Fischer-1, GC-Non-CEQA-8])
(Jennifer Landesmann, Email, June 2, 2025 [I-Landesmann2-5, GC-Non-CEQA-8])
(Thomas Rindfleisch, Email, June 2, 2025 [I-Rindfleisch-2, GC-Non-CEQA-8])
(Mark Samson, Email, June 1, 2025 [I-Samson-2, GC-Non-CEQA-8])
(Sky Posse Palo Alto, Email, June 2, 2025 [O-SPPA-1, GC-Non-CEQA-8])

"**INCOMPLETE INFORMATION AND MISSING REGIONAL HISTORY:**

SFO's claim that '*no changes or expansions proposed to the existing runway or to aircraft flight paths*' mixes two sets of airport infrastructure that have distinct impacts and mitigation options.

The public needs to be informed that while runways are not changing, SFO's flight paths are not static; flight path procedure (navigation rules) design and the level of usage of flight paths from increasing operations can increase noise and air quality impacts. Not only are flight paths distinct infrastructure from runways, flight paths can be more deleterious in terms of affecting more sensitive areas and people. The menu of potential mitigations for flight paths is also distinct. Quieter aircraft engines for example do not help address flight path noise but thoughtful flight path design and compliance can meaningfully mitigate night time noise. These mitigations however cannot be employed if the airport is denying how directly their project will impact noise. Adding a gate to serve more passengers means more flights, more flight path impacts. Moreover SFO's plan leverages powerful airline programs to induce more operations for more profits. As noted by public comment at the May 22 Hearing, United Airlines has a $2.6 billion construction project to re-establish SFO as the airline's global gateway. This expands United's route networks with **more flights**, including promotional flights that are not at full passenger capacity but add **more noise**.

Airport-airline projects influence noise as happened with Nextgen when airlines requested lower altitudes for SFO's arrivals which greatly increased noise. The failure to recognize community concerns over flight path changes led to an FAA Initiative and official community meetings with FAA and local leaders in three counties; thousands of citizens weighed in over months to come up with consensus recommendations to address flight path noise and night time operations. The DEIR's omission of the impacts of flight path changes undermines recent regional history to address just this issue, and ignores opportunities identified by citizens, local officials and the FAA to mitigate flight path impacts affecting people's health, quality of life, and the environment."
(Larry Alton, Email, June 1, 2025 [I-Alton-3, GC-Non-CEQA-8])
(Teresa Bailey and Ron Ullmann, Email, June 1, 2025 [I-Bailey-5, GC-Non-CEQA-8])
(Justin Chueh, Email, June 2, 2025 [I-Chueh-3, GC-Non-CEQA-8])
(Michael Fischer, Email, June 1, 2025 [I-Fischer-3, GC-Non-CEQA-8])
(Jennifer Landesmann, Email, June 2, 2025 [I-Landesmann2-7, GC-Non-CEQA-8])
(Thomas Rindfleisch, Email, June 2, 2025 [I-Rindfleisch-4, GC-Non-CEQA-8])

(Mark Samson, Email, June 1, 2025 [I-Samson-4, GC-Non-CEQA-8])
(Sky Posse Palo Alto, Email, June 2, 2025 [O-SPPA-3, GC-Non-CEQA-8])

"**RECOMMENDATION:**

We recommend that an additional report is needed on SFO's Arrival flight path noise impacts to inform on regional impacts; at a minimum to consider the top five areas with the highest number of complaints. Particularly an analysis of all night time overflights is necessary; sleep being critical for physical and mental health and productivity. SFO has extensive data to accomplish regional noise assessments, and with various metrics. In addition, provide details such as target altitudes and current navigation rules for SFO arrival flight paths. The report should also describe how SFO makes decisions on flight path requests; how pre- and post-implementation reviews of flight path changes are managed, and who is responsible for keeping communities informed.

Please reject any environmental review for SFO that excludes SFO's regional impacts."
(Larry Alton, Email, June 1, 2025 [I-Alton-5, GC-Non-CEQA-8])
(Teresa Bailey and Ron Ullmann, Email, June 1, 2025 [I-Bailey-7, GC-Non-CEQA-8])
(Justin Chueh, Email, June 2, 2025 [I-Chueh-5, GC-Non-CEQA-8])
(Michael Fischer, Email, June 1, 2025 [I-Fischer-5, GC-Non-CEQA-8])
(Jennifer Landesmann, Email, June 2, 2025 [I-Landesmann2-9, GC-Non-CEQA-8])
(Thomas Rindfleisch, Email, June 2, 2025 [I-Rindfleisch-6, GC-Non-CEQA-8])
(Mark Samson, Email, June 1, 2025 [I-Samson-6, GC-Non-CEQA-8])
(Sky Posse Palo Alto, Email, June 2, 2025 [O-SPPA-5, GC-Non-CEQA-8])

"**There are at least 50 Surf Air extremely noisy low altitude executive jet flights directly over Palo Alto to and from the San Carlos Airport. every day**." *(Larry Alton, Email, June 1, 2025 [I-Alton-6, GC-Non-CEQA-8])*

"I wish to state that my family and I concur with Sky Posse Palo Alto's response (copied below for your reference), and add that as residents of unincorporated Santa Clara County, Los Altos sphere of influence, that we share the same concerns, and that pushing the problem to the next area south of Palo Alto is not a meaningful response to these criticisms.

Residents of all ages and taxpayers have rights to healthy peace and quiet and enjoyment of their homes and properties such that increased numbers of flights and their attendant noise pollution is contrary to the health and well-being of all residents. Slight reductions in dBA measurements are not adequate metrics to address the full spectrum of sound experienced by persons and animals whose health depends on not being regularly bombarded by full spectrum sounds that are not captured by dBA or by the averaging processes of commonly used metrics that effectively remove most of the effects of noise exposure by statistical slights of hand, but do nothing to measure the actual effects, both physiological and psychological of this industrial aviation exposure." *(Teresa Bailey and Ron Ullmann, Email, June 1, 2025 [I-Bailey-1, GC-Non-CEQA-8])*

"I support the submission of comments on SFO's Draft Environmental Impact Report, highlighting the

inclusion of flight path impacts as a critical issue. Your disregard to our quality of life is deplorable. SFO should not be allowed to increase or change traffic load or patterns it solves the noise issues with current flight patterns." *(Nadav Ben-Efraim, Email, June 1, 2025 [I-Ben-Efraim-1, GC-Non-CEQA-8])*

"I live in Crescent Park neighborhood in Palo Alto. We are close to the City of Palo Alto Airport and on the arriving flight path of what feels like most of the airplanes coming into SFO. Both airports have had increased activity and noise for all of us residents in these areas of PA/MP/Mt. View, etc. that are located near the bay.

We ask that you and the boards/committees, etc. keep vigilant on our behalf of keeping the noise level, sight level, pollution level as low as possible so that the quality of our daily and nightly life in our most valuable asset remains pleasant and valued.

Having reports that aren't honest, aren't complete, or inaccurate are undermining our lifestyle here. Please operate in the way you would if you lived here in the flight path zones." *(Lisa Delong, Email, June 2, 2025 [I-Delong-1, GC-Non-CEQA-8])*

"For SFO to omit the inclusion of fight path study in the DEIR is a problem that renders the EIR incomplete at best if not frankly duplicitous.

Flight paths ARE the problem and SFO must exercise its oversight in this study.

I am quite certain the fight path/airplane noise disturbance, particularly in the night is grossly underreported by those of us affected adversely by it. That is because it is very convenient to report an incident from the middle of the night with the details required for veracity unless one writes it down, thus further disturbing sleep.(3 noisy night incidents this past month are still awaiting my reporting). There is a general fatigue about reporting since it has been more than a decade that we have been trying to bring about some relief from flight path disturbance. I think another general call to action for reporting during a finite period of study twould *[sic]* be revelatory.

Not to consider flight path status in the DEIR is inexcusable." *(Jeannie Duisenberg, Email, June 1, 2025 [I-Duisenberg-1, GC-Non-CEQA-8])*

"2. Misleading Statements: While SFO claims that the expansion will not change runway configuration or flight paths, nor expand the airport property footprint or increase runway capacity, these statements do not address the significant noise impact due to increasing airport capacity. We believe these words are misleading and do not accurately reflect the true implications of the expansion." *(Srinivas Hanasoge, Email, May 21, 2025 [I-Hanasoge-3, GC-Non-CEQA-8])*

"We appreciate your attention to this matter and look forward to a more comprehensive and considerate approach to addressing the concerns of Foster City residents." *(Srinivas Hanasoge, Email, May 21, 2025 [I-Hanasoge-6, GC-Non-CEQA-8])*

"In Foster City, the noise impacts resulting from SFO traffic cannot be undermined. I have had resident after resident complain, and while there may be nuances I do not understand not having been a part of this process, I share the following concerns.

While the airport is expected to see increased air traffic and passengers, it does not appear that this study addressed the noise concerns resulting from this traffic on local communities, Foster City being one." *(Stacy Jimenez, Mayor of Foster City, Email, June 2, 2025 [I-Jimenez-1, GC-Non-CEQA-8])*

"One final point: SFO's impacts are severe far south of San Francisco and San Mateo County. It takes just three to four minutes for a freighter to rattle and roar over three counties, many as far as the Santa Cruz Mountains, waking up people of all ages and economic backgrounds. Just in the last few years, SFO has deposited noise where I come -- where I live in Palo Alto, from -- and I should remind you that the DEIR is supposed to look at areas with noise between 45 and 60 DNL as well as reportable noise. A deposit of 5 DNL did happen in my community. That's the equivalent of your cholesterol going from 200 to 300 or you putting on 60 pounds.

So I hope you will think about this, and that would answer the question as to why our system is a third-rate system and is not the cleanest in the world. Thank you." *(Jennifer Landesmann, Email, May 22, 2025 [I-Landesmann1-2, GC-Non-CEQA-8])*

"If SFO is going to be in a league of world class airports, it should please join world class airports by assessing Flight Paths and Operational Procedures instead of denying them in what will arguably be SFO's signature environmental review. I reiterate the message from Sky Posse below which reflects the expectations of communities today and from an agency such as SFO." *(Jennifer Landesmann, Email, June 2, 2025 [I-Landesmann2-4, GC-Non-CEQA-8])*

"As a resident of South San Francisco who has for 18 years (and counting) rented an apartment directly under the 2015-2017 NextGen flight path, I want to make my voice heard about what seems to be a real lack of consideration from the comission about noise pollution.

In the 2 years after NextGen was implemented, from 2015 to 2017 / early 2018, a low-flying and insanely loud plane would fly directly over my apartment at least every 10 minutes; often every 5 minutes. ALL DAY AND INTO THE WEE HOURS OF THE NIGHT.

It was impossible to have a conversation, listen to the radio, or even think - the noise was so invasive. The duplex would physically rattle every time one of these low planes flew over.

After 2 years of submitting as many noise complaints as I could, SFO / FAA finally changed the plan so that the preponderance of flights went over water instead of directly over a long-suffering residential area.

However, there are still plenty of low/loud flights - presumably due to runway repairs or strong winds - in these instances, flights start very early in the morning and can be heard as late as 2AM.

As someone who has been affected by a ridiculous degree of flight noise, I want to STRONGLY STATE that the

SFO Draft Environmental Report (DEIR) should do what is VERY OBVIOUS:

INCLUDE FLIGHT PATH IMPACT and noise pollution - and to do this NOT using the flawed "average" reading, but to take into account peak noise and the frequency of noise.

I would dare any one of the commissioners to live where I live under the NextGen conditions of 2015-2017 and to not go insane. You have NO IDEA what it is like to deal with frequent noise like this until you have lived through days, weeks, months, and years of it.

SFO itself has long been a source of profit for the city of San Francisco, while the residents of South San Francisco bear the brunt of the annoyance and health impacts caused by noisy planes.

And SFO itself has a RESPONSIBILITY to be a good neighbor to the people affected by its operations - and to take our issues seriously and ACT ON THEM, rather than simply bending a knee to SF and to airlines who want to maximize profits, while they sit far away insulated from the noise and pollution from SFO.

SFO has, per the FAA, authority to weigh in on air traffic and flight path planning, and to agree or disagree.

SFO seems to have no issue at all with United's major project to add significantly more capacity to SFO. I propose that everyone high up at SFO, the FAA, and United be forced to live indefinitely under a low, loud NextGen flight path and then see how they would vote…

Airplane noise is a SHARED RESPONSIBILITY between SFO, airlines, state/local government, and the FAA." *(Susan Lyman, Email, June 2, 2025 [I-Lyman-1, GC-Non-CEQA-8])*

"This DEIR might be just about demolishing some buildings and constructing some new ones. But every plane has a negative impact on Millbrae and SFO does ZERO mitigation in Millbrae." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-7, GC-Non-CEQA-8])*

"As documented in the Airport Director's reports, SFO received 813,627 noise complaints in 2024: about 70% –793,375 complaints– were SFO aircraft (other noise complaints are related to other airports).This large number of complaints reflects the ongoing and significant impact of SFO operations on surrounding communities, including those located miles from the airport, much of which stems from FAA NextGen changes.

While SFO does not control flight paths or airline scheduling, it remains a key stakeholder with clear authority over airport development, infrastructure, and capacity planning. **SFO must take responsibility for not exacerbating community harm through decisions that would enable a 30% growth in operations**. SFO wants to accommodate up to 506,571 operations, which is 30% more operations than the 385,507 actual operations in 2024.

SFO has indicated an interest in acting responsibly: SFO stated for instance that it would discontinue Ground-Based Augmentation System (GBAS) procedures if they prove louder than comparable non-GBAS procedures. **That standard should be upheld—and extended to all projects under SFO's control. No development should proceed without a clear demonstration that it will not increase noise, emissions, or**

other burdens on already-impacted communities. The current DEIR does not show that except for the No Project - Alternative A." *(Darlene Yaplee and Marie-Jo Fremont, Co-founders, Concerned Residents of Palo Alto, Letter, May 18, 2025 [O-CRPA-1, GC-Non-CEQA-8])*

- "Does the DEIR address air pollution and noise over the Westside of San Francisco as eastbound aircraft are increasingly taking short cuts over the Inner Sunset and Parkside? These aircraft are also increasingly flying at lower altitudes which is a public safety concern." *(Eileen Boken, Coalition for San Francisco Neighborhoods, Email, May 30, 2025 [O-CSFN2-3, GC-Non-CEQA-8])*

"There is no indication in the DEIR whether SFO is increasing its use of aviation biofuels as a replacement of Jet A Kerosene or blending aviation biofuels with Jet A Kerosene to reduce air pollution." *(Eileen Boken, Coalition for San Francisco Neighborhoods, Email, June 2, 2025 [O-CSFN3-6, GC-Non-CEQA-8])*

"There is no indication in the DEIR on how SFO intends to reduce noise pollution and meet the goals of its SFO Fly Quiet program.

In fact, noise pollution from inbound and outbound SFO flights is already becoming worse.

Eastbound flights out of SFO are increasingly taking shortcuts over the Westside of San Francisco and flying over the Inner Sunset and Parkside.

These eastbound flights are also flying at increasingly lower altitudes.

Inbound flights on final approach to SFO are also flying at increasingly lower altitudes.

If the DEIR had studied these cumulative impacts indirectly created by the RADP projects, then these related issues would have been studied." *(Eileen Boken, Coalition for San Francisco Neighborhoods, Email, June 2, 2025 [O-CSFN3-7, GC-Non-CEQA-8])*

"The EIR should propose that any new flight operations being added to system be spread out onto new flight paths so that burden is not deliberately placed onto people who are currently being affected. We are asking why a certain segment of the population in San Francisco are being disproportionately discriminated against in regard to aviation noise pollution from SFO and **why the EIR is not accurately reporting how increased capacity will affect San Francisco residents nor any residents across the Bay Area who live outside of the 65CNEL boundary?**" *(Matthew Stevens, Founder, SCREAAM.org, Letter, June 2, 2025 [O-SCREAAM-3, GC-Non-CEQA-8])*

Response GC-Non-CEQA-8

The comments describe impacts related to aircraft noise, aircraft air pollution, aircraft flight paths, and other impacts related to past, present, and future SFO actions that the commenters' assert have not been previously adequately addressed and have not been adequately analyzed in the Draft EIR.

Aircraft Noise Monitoring

Comment A-Millbrae-3 states that the City of Millbrae has long been impacted by noise from Airport operations, construction, and traffic. The comment states that locations of noise monitoring conducted to characterize the background noise environment are at the lowest elevations along the eastern boundary of the City of Millbrae and are thus unable to measure ambient noise impacts from Airport operations on western residential portions of the City located at higher elevations. The comment asserts that these noise monitoring locations generally do not have a clear line of sight to aircraft, a major noise generator, and, due to their limited number and location, are limited in their ability to measure Airport-related noise impacts on the City of Millbrae. The comment asserts that future Airport growth that would result from implementation of the RADP would affect all portions of the City of Millbrae, and, therefore, noise levels should continuously be monitored with permanent noise monitoring stations established by SFO in multiple areas of the City of Millbrae, including new monitoring stations that should be placed in western Millbrae residential neighborhoods that overlook the Airport at higher elevations. The comment asserts that this would provide the City and the Airport with more accurate overall noise measurements and help establish a more appropriate baseline for further evaluation and discussion of Airport noise impacts.

As discussed in Draft EIR Section 3.B, Noise and Vibration, and Draft EIR Section 3.C, Air Quality, because implementation of the RADP would not result in changes related to aircraft operations or the configuration of the existing runways, aircraft noise and aircraft emissions would remain unchanged with or without implementation of the RADP. Accordingly, the evaluation of aircraft noise and aircraft emissions is beyond the scope of the Draft EIR and is not required under CEQA. The commenter's requests for additional monitoring of aircraft noise at different locations than existing monitoring locations require no further response, and the noise measurement locations used for the analysis in the Draft EIR are appropriate under CEQA.

Aircraft Noise and Air Pollution

Comments I-Alton-1, I-Bailey-3, I-Chueh-1, I-Fischer-1, I-Landesmann2-5, I-Rindfleisch-2, I-Samson-2, O-SPPA-1, I-Alton-3, I-Bailey-5, I-Chueh-3, I-Fischer-3, I-Landesmann2-7, I-Rindfleisch-4, I-Samson-4, O-SPPA-3, I-Alton-5, I-Bailey-7, I-Chueh-5, I-Fischer-5, I-Landesmann2-9, I-Rindfleisch-6, I-Samson-6, O-SPPA-5, I-Alton-6, I-Bailey-1, I-Ben-Efraim-1, I-Delong-1, I-Duisenberg-1, I-Hanasoge-3, I-Hanasoge-6, I-Jimenez-1, I-Landesmann1-2, I-Landesmann2-4, I-Lyman-1, I-Schneider-7, O-CRPA-1, O-CSFN2-3, O-CSFN3-6, O-CSFN3-7, O-SCREAAM-3 describe a range of impacts related to aircraft noise, aircraft air pollution, aircraft flight paths, and other impacts related to past, present, and future SFO actions that the commenters' assert have not been previously adequately addressed and have not been adequately addressed in the Draft EIR. In response to these comments, as discussed in Draft EIR Chapter 2, Project Description, and as substantiated in the Draft EIR, implementation of the RADP would not induce passenger demand, nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport (including cargo, private jets, and helicopters), or change the volume of annual passengers that choose to fly into and out of SFO. Rather, development of the terminal and non-movement areas of the airfield and landside facilities

identified in the RADP are proposed to ensure that SFO is able to maintain an acceptable level of service for passengers and accommodate aircraft operations without causing severe or unrecoverable delays with regard to scheduled flights.

As discussed further in Draft EIR Appendix C, Airport Facilities to Accommodate Aviation Demand, p. 13, the drivers of airport aviation activity include macroeconomic and demographic factors, airline market factors, air transport production costs and technology, regulatory factors, infrastructure constraints and improvements, and substitutes for air travel, but they do not include airport development projects (such as those under the RADP), which do not increase airfield capacity. Importantly, as discussed in Draft EIR Appendix C, the federal courts have consistently upheld this logic and have long recognized that because aviation demand is driven primarily by variables other than the efficiency of airport facilities, it is not necessarily true that "if you build it, they will come."[28] The purpose of the RADP is to align the capacity of SFO's passenger terminals, ground transportation, and support facilities with the practical capacity of the existing runway system, allowing those facilities to accommodate aircraft operations and passengers corresponding to the runway system capacity at the desired passenger levels of service. As stated and supported by substantial evidence in Draft EIR Appendix C, it is well established that these types of airport development projects do not increase capacity or induce growth. For these reasons, the evaluation of aircraft noise and aircraft emissions is beyond the scope of the Draft EIR because implementation of the RADP would not result in a change to aircraft operations. These comments are noted but do not provide evidence to support claims that the Draft EIR does not adequately address the environmental impacts of implementation of the RADP. The comments will be provided to decision makers for consideration in their deliberations on approval of the RADP.

See Response GC-Non-CEQA-6 for further discussion regarding comments related to NextGen. See Response AA-1 for further discussion regarding comments related to the impact analysis approach for this EIR. See Response PD-2 for further discussion regarding comments related to biofuels. See Responses NO-2, NO-3, AQ-2, AQ-3, and AQ-4 for further discussion regarding comments related to aircraft noise and air emissions.

3.Q.9 Comment GC-Non-CEQA-9: New Forms of Aviation

This response addresses the following comment, which is quoted below:

I-Bailey-2

"Further, in anticipation of new forms of aviation, from drone deliveries to electric helicopters, ultrasonic transport with sonic booms, and other new sources of noise, realistic, unfiltered measurements that result in significant considerations for their effects on persons, animals, and quality of life need to be developed and implemented before granting any further expansion of air traffic in the SF Bay Area metroplex." *(Teresa Bailey and Ron Ullmann, Email, June 1, 2025 [I-Bailey-2, GC-Non-CEQA-9])*

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[28] National Parks & Conservation Association v. U.S. Department of Transportation. United States Court of Appeals for the Ninth Circuit 222 F.3d 677 (2000). DC.

Response GC-Non-CEQA-9

The comment states that new forms of aviation need to be measured and their impacts considered before air traffic is granted for these forms of aviation. The comment is noted. As explained on Draft EIR p. 3-5, the RADP is a plan and does not propose any project-level approvals. Additional actions and environmental review would be required to implement each subsequent RADP project. In addition, the RADP does not propose any forms of aviation, including the forms of aviation referenced in the comment. The comment does not raise specific issues pertaining to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts, and no further response is required. The comments will be provided to decision makers for consideration in their deliberations on approval of the RADP.

3.Q.10 Comment GC-Non-CEQA-10: Oakland International Airport Environmental Review

This response addresses the following comment, which is quoted below:

I-Landesmann2-2

"It was really tough to watch last November the certification of the Oakland Airport environmental review where dozens of people, organizations, and medical doctors spoke to OAK's environmental review inadequacies, but were dismissed with something along the lines of 'we know' and their authorities certified the report. This was such a missed opportunity because YOU are in the position to improve reviews when they are not used for their true purpose, to open adequate engagement, not to shut down the public.

With SFO's DEIR, San Francisco has the opportunity to do better." *(Jennifer Landesmann, Email, June 2, 2025 [I-Landesmann2-2, GC-Non-CEQA-10])*

Response GC-Non-CEQA-10

The comment expresses an opinion regarding the Oakland San Francisco Bay Airport's environmental review process and states that San Francisco has an opportunity to improve review and open adequate engagement with the public. The comment is noted. However, the Oakland San Francisco Bay Airport is an unrelated project and under a separate lead agency than the RADP. The environmental review process and opportunities for public comment and review for this EIR are described in the Draft EIR, pp. 1-4 through 1-17. The comment does not raise specific issues pertaining to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts, and no further response is required. The comments will be provided to decision makers for consideration in their deliberations on approval of the RADP.

3.Q.11 Comment GC-Non-CEQA-11: Support for Sky Posse Palo Alto Comment Letter

This response addresses the following comments, which are quoted below:

I-Jenson-1

I-Kiernan-1

I-Landesmann2-1

I-North-1

I-Rindfleisch-1

I-Samson-1

"Please take seriously the points outlined in the most recent email from the Sky Posse Palo Alto. One of the things I always dread as the weather gets warmer is the disruption from the planes since our windows are now open. It is bad enough with the windows closed, but the plane noise requires us to stop a conversation when the windows are open. And with no AC, most homes in Palo Alto must leave their windows open at night.

Please address the impact of the flight paths over our city and others." *(Maria Jenson, Email, June 1, 2025 [I-Jenson-1, GC-Non-CEQA-11])*

"Flight paths over Palo Alto negatively impact quality of life and health in our communities.

Please address these in line with the points made by Sky Posse organization." *(Bette Kiernan, Email, June 1, 2025 [I-Kiernan-1, GC-Non-CEQA-11])*

"I am writing in support of the recommendation by Sky Posse Palo Alto for the SFO DEIR." *(Jennifer Landesmann, Email, June 2, 2025 [I-Landesmann2-1, GC-Non-CEQA-11])*

"Please give full consideration to the points made in the recent email from Sky Posse. Airport noise is a huge consideration for our neighborhood on the Peninsula." *(Lindsey North, Email, June 2, 2025 [I-North-1, GC-Non-CEQA-11])*

"Dear Commissioners, I am writing to add my support for the comments sent to you recently by Sky Posse Palo Alto (see below). I live under the SIDBY waypoint affected by many of the aircraft arrival routes into SFO, including from BDEGA (west), DYAMD, PIRAT, and SERFR. We are overflown by on the order of 350 SFO arrival flights each day and the soundscape impacts of the ground noise they generate impedes many routine daily activities. Please include the points raised in the Sky Posse message in your SFO DEIR.

Thank you for your consideration." *(Thomas Rindfleisch, Email, June 2, 2025 [I-Rindfleisch-1, GC-Non-CEQA-11])*

"Sky Posse heroes—
You are incredible people. To continue to push back against this enormous profit driven bloated bully who is absolutely *ruining our beloved Palo Alto lifestyle* already—as *continue to expand* the airport? BIG RESPECT. BIG REGARD. That's what I have for you.

With much gratitude.

MS
Mark Samson
Palo Alto, CA 94303

On Jun 1, 2025, at 15:30, Sky Posse Palo Alto <skypossepostgmail.com@shared1.ccsend.com> wrote:

> **Sky Posse Palo Alto**
>
> Dear Friends,
>
> SFO's Draft Environmental Impact Report (DEIR) has a fatal flaw because it excludes flight path impacts. See our comment below on the DEIR's inaccuracies and missing information. To add your voice, questions, or to support the points we make please email cpc.sforadp@sfgov.org by 5PM Monday June 2. Written comments are expected to be released in the Fall, followed by a Hearing when the Planning Commissioners will be asked to certify SFO's review should the project go forward.
>
> Sky Posse Email to San Francisco Planning Commission:
>
> cpc.sforadp@sfgov.org
> Copy: city.council@cityofpaloalto.org, Kathryn.Angotti@sfgov.org
>
> Subject: SFO DEIR has inaccuracies, incomplete information and is inadequate without the consideration of flight path impacts" *(Mark Samson, Email, June 1, 2025 [I-Samson-1, GC-Non-CEQA-11])*

Response GC-Non-CEQA-11

The comments express support for the Sky Posse Palo Alto comment letter. The comments state that the flight path noise over Palo Alto impacts the city's residents and that the Draft EIR excludes analysis related to flight paths. As explained on Draft EIR p. 1-3, the RADP would facilitate the development of terminal and non-movement areas (i.e., area of an airport is not controlled by FAA air traffic control and includes ramps or aprons, a defined area for aircraft parking, loading, and unloading passengers or cargo, refueling, or maintenance) and landside facilities to accommodate long-term aircraft operations. In addition, as further described on Draft EIR p. 1-3, implementation of the RADP would not induce passenger demand, nor would projects under the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport (including cargo, private jets, and helicopters), or change the volume of annual passengers that choose to fly into and out of SFO. Rather, development of the terminal and non-movement areas of the airfield and landside facilities identified in the RADP would ensure that SFO is able to maintain an acceptable level of service for passengers and accommodate aircraft operations without causing severe or unrecoverable delays with regard to scheduled flights. The comments do not raise specific issues pertaining to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts, and no further response is required. The comments will be provided to decision makers for consideration in their deliberations on approval of the RADP.

3.Q.12 Comment GC-Non-CEQA-12: 1989 Masterplan

This response addresses the following comment, which is quoted below:

I-Schneider-1

"Thank you for the opportunity to comment on the Draft Environmental Impact Report for the next phase of SFO International Airport expansion plans (DEIR). My comments are based on serving on the City of Millbrae City Council and serving on the SFO Community Roundtable (SFORT) for the previous nine years (2016-2024). During much of this time SFO worked on projects that were approved in 1989 and never came back to the Roundtable or the City of Millbrae to explain what might impact the City of Millbrae. As SFO staff said at recent SFORT and the City & County of San Mateo Airport Landuse Advisory Committee (ALUC), the projects approved in 1989 are still being completed after a range of understandable delays. However, much changed during those 35 years making the time frame for that EIR and this DEIR going to 2045 problematic. This is the first of many problems with this DEIR." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-1, GC-Non-CEQA-12])*

Response GC-Non-CEQA-12

The comment raises concerns related to the EIR prepared for the SFO Master Plan adopted in 1992 and the Draft EIR prepared for the RADP. The comment notes that conditions have changed since that EIR was adopted and takes issue with the 2045 analysis year for the Draft EIR. However, the comment does not explain how or why the 2045 analysis year for the Draft EIR would be problematic.

As discussed in Draft EIR Chapter, Project Description, the SFO 1989 Draft Final Master Plan was adopted by the airport commission as the Final Master Plan (Master Plan) in 1992. The Master Plan provides a long-range landside development program for the Airport to accommodate growth in cargo and up to approximately 51 million annual passengers based on the planning horizon and forecast at the time the Master Plan was developed. The sustained increase in passenger activity at SFO coupled with ongoing implementation of projects under the 1992 Master Plan prompted the need to develop a new plan (the RADP) to accommodate future growth at SFO, to accommodate up to approximately 71 million annual passengers based on the planning horizon and the practical capacity of the airfield. The RADP is a long-range plan that would facilitate the development of terminal and non-movement areas of the airfield, as well as landside facilities to accommodate long-term aircraft operations and passenger activity levels at the Airport. Construction of projects that could occur with implementation of the RADP would occur over an approximately 20-year buildout period from 2025 to 2045. As discussed in Draft EIR Section 1.A.1, Programmatic Review of Potential Impacts, p. 1-3, the Draft EIR analyzes the RADP at a programmatic level, in accordance with CEQA Guidelines section 15168. Subsequent projects that could occur with implementation of the RADP during its long-range, demand-triggered buildout period forecast to 2045 would be subject to environmental review at such time that those projects are proposed to determine whether or not they would result in physical environmental effects that were not examined in the program EIR. The analysis of subsequent projects would be based on existing conditions at the site and vicinity, at such time a project is proposed, and would take into account any updated information relevant to the environmental analysis of the subsequent project (e.g., changes to the environmental setting or updated forecasts or models). Any required subsequent review of RADP projects would be conducted in accordance with CEQA requirements, including requirements for noticing, scoping, and public review. As noted above, the comment does not explain how or why the 2045 analysis year for the Draft EIR would be problematic. The comment is noted but does not raise specific issues pertaining to the

adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts, and no further response is required.

See Response IN-2 for further discussion regarding comments pertaining to subsequent environmental review of projects under the RADP.

3.Q.13 Comment GC-Non-CEQA-13: General Comments on Millbrae and Growth of City of Millbrae

This response addresses the following comments, which are quoted below:

I-Schneider-6

I-Schneider-13

I-Schneider-20

I-Schneider-34

"It ignores that Millbrae has since 2019 (the timeframe of monitor data used in the DEIR) constructed an entirely new neighborhoods on OUR east side. Frankly, it also ignores that when BART came in, we lost this same east side by eminent domain. We lost housing, sale tax producing operations including car rental agencies and other tax producing operations all to the benefit of SFO but genuine cost to Millbrae. Now our brand-new roads in the Gateway Neighborhood and the brand-new Bay Trail segment (not mentioned in your DEIR) will be torn apart by heavy construction vehicles carrying very heavy loads and leaving a trail of broken inert material that will fall from these trucks. That these trucks will run at least till 2045, adding to the already overburdened Millbrae Ave traffic.

Recent history, from the annual flooding of the Landing Lane Neighborhood in Millbrae, to the BART takings, to San Mateo County's arrogance in wanting to take the La Quinta Hotel to the fact that San Francisco's representatives to the SFORT never attend show that Millbrae is simply a colony of larger and much wealthier jurisdictions." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-6, GC-Non-CEQA-13])*

"Millbrae is not your colony. San Francisco exposes glorious goals to care for all. Now it is up to you to live up to the lofty San Francisco goals." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-13, GC-Non-CEQA-13])*

"Mitigation should happen in Millbrae and San Bruno who lost land to SFO, lost access to the Bay and economic opportunities to SFO and San Mateo County. SFO is 100 years behind in mitigating the impacts of its operations on the close in communities." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-20, GC-Non-CEQA-13])*

"PP 260 ish – That the County of San Mateo General Plan has no noise impact section is horrible. The city of Millbrae should force the County of SM to be responsive to the cities next to SFO located on County land. SM County has clearly been negligent in caring for county residents located in Millbrae." *(Ann Schneider, Letter,*

June 2, 2025 [I-Schneider-34, GC-Non-CEQA-13])

Response GC-Non-CEQA-13

The comments present a list of grievances of the negative impacts SFO and BART have historically had on the City of Millbrae, recounts flooding issues in the City of Millbrae, and critiques the County of San Mateo County General Plan. The comment does not raise specific issues pertaining to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts, and no further response is required. The comments will be provided to decision makers for consideration in their deliberations on approval of the RADP.

3.Q.14 Comment GC-Non-CEQA-14: Noise Insulation Program

This response addresses the following comment, which is quoted below:

I-Schneider-36

"PP264 – Noise Insulation Programs – Be honest, talk about this program in Millbrae. How windows replaced in the 1900s have caused building frame damage and windows have failed. This happening to homes under the Gap Departure are getting repaired but none in Millbrae qualify. Leaving residents to pay thousands if not tens of thousands of dollars in repair and replacement costs." *(Ann Schneider, Letter, June 2, 2025 [I-Schneider-36, GC-Non-CEQA-14])*

Response GC-Non-CEQA-14

The comment pertains to SFO's Noise Insulation Program and claims that previously replaced windows have failed. As discussed in Draft EIR Section 3.B, Noise and Vibration, p. 3.B-24, SFO has an extensive noise insulation program. Since 1983, more than 15,200 eligible properties in Daly City, Millbrae, Pacifica, San Bruno, South San Francisco, and unincorporated areas of San Mateo County have been provided with acoustical improvements at no cost to property owners. The FAA and SFO have funded installation of treatments such as new windows, doors, and ventilation systems in eligible incompatible structures within the 65 CNEL contour to mitigate aircraft noise impacts. SFO continues to offer noise insulation for eligible structures where the previous homeowners were offered but declined insulation (and therefore are not considered to be incompatible land uses under California Code of Regulations title 21, section 5014(a)(4)). Property owners located inside the contour whose homes have not been included in previous phases of the SFO Noise Insulation Program may also be eligible to receive insulation improvements under this initiative.

The comment describes concerns related to existing conditions that are not attributable to the RADP. The comment does not raise specific issues pertaining to the adequacy, accuracy, or completeness of the Draft EIR's analysis of the RADP's physical environmental impacts, and no further response is required.

3.Q.15 Comment GC-Non-CEQA-15: Do Not Support the RADP

This response addresses the following comment, which is quoted below:

O-MFCBHP-1

"My name is Leotis Martin. I live in Bayview-Hunters Point. I'm the president of the Mothers and Fathers Committee of Bayview-Hunters Point and also with Greenaction for Environmental Health and Justice.

We already been told that our impact was already bad enough, and we have a lot of people that's dying in our neighborhood from cancer and all other type of stuff. This will only bring more, more pollution to our neighborhood, where our impact is already so big. You know, the threshold is over already. To bring up something like this, it'll take it even higher.

We care about our people in Bayview. I'm not much but just one person right now, but I speak for a lot of people that live in Bayview, for a lot of people that family that died from cancer, a lot of people that have cancer right now. I've been doing this environmental work for 18 years, 19 years now. And I only went out one day and did it, and I haven't stopped -- it's because I care.

I grew up in Bayview-Hunters Point since 1966. I was six years old. I'll be 65 this year. And this is my way of giving back. One person does make a difference. Thank you." *(Leaotis Martin, President, Mothers and Fathers Committee of Bayview-Hunters Point, Transcript, May 22, 2025 [O-MFCBHP-1, GC-Non-CEQA-15])*

Response GC-Non-CEQA-15

The comment expresses opposition to the RADP. The comment does not raise specific issues pertaining to the adequacy, accuracy, or completeness of the Draft EIR's analysis of implementation of the RADP's physical environmental impacts, and no further response is required. Although general opposition to the RADP does not raise specific issues concerning the adequacy or accuracy of the Draft EIR under CEQA, such comments may be considered and weighed by decision makers prior to rendering a final decision to approve, modify, or disapprove the RADP. This consideration is carried out independent of the environmental review process.

CHAPTER 4
DRAFT EIR REVISIONS

The following changes to the text of the Draft EIR are made in response to comments on the Draft EIR or are included to clarify the Draft EIR text. The revisions reflect changes identified in Chapter 3, Comments and Responses, all of which clarify, expand, or update information presented in the Draft EIR.

The revised text does not provide new information that would result in any new significant impact not already identified in the Draft EIR and initial study or a substantial increase in the severity of an impact identified in the Draft EIR and initial study that cannot be mitigated to less than significant with implementation of mitigation measures agreed to by the project sponsor. Thus, none of the text revisions would require recirculation pursuant to CEQA Guidelines section 15088.5. The Draft EIR and this response to comments document together constitute the Final EIR for the SFO RADP project. In the revisions shown below, deleted text is shown in ~~strikethrough~~ and new text is double-underlined.

4.A Revisions to Chapter 2, Project Description

The headers on pp. 2-2 through 2-38 are revised as follows:

> Chapter 2. ~~Introduction~~ Project Description

4.B Revisions to Section 3.B, Noise and Vibration

Table 3.B-2, Summary of Long-Term and Short-Term Noise Monitoring in the Airport Vicinity, first table row for measurement location LT-3, p. 3.B-8, is revised as follows:

Measurement Location		Time Period	Noise Level[a]	Contributing Noise Sources
Long-Term (LT) Measurements (24 hours or more)				
…				
LT-3	**Millbrae. Old Bayshore Highway, across from Westin Hotel**	Tuesday 2/~~9~~8/21 Daytime Nighttime 24-hour	 65 dBA (L_{eq}) 61 dBA (L_{eq}) 68 dBA (L_{dn})	Aircraft and vehicle traffic on Old Bayshore Highway and U.S. 101
…				

"Noise-Sensitive Receptors" section, p. 3.B-12, second paragraph, is revised as follows:

> … The Belle Air Elementary School in San Bruno and the Lomita Park Elementary School~~, both~~ in ~~San Bruno~~ Millbrae, are located approximately 1,100 feet and 1,400 feet from the RADP project site boundary, respectively. …

"Nighttime Construction Noise" section, p. 3.B-39, last paragraph, is revised as follows:

> … However, given the Grand Hyatt at SFO's location on Airport property with daytime noise levels in the range of ~~72~~66 dBA, sound-rated materials used for noise abatement likely provide more than the 25 dBA exterior-to-interior noise reduction to meet Title 24 standard. …

4.C Revisions to Section 3.C, Air Quality

"On-Road Mobile Sources" section, p. 3.C-37, second paragraph, is revised as follows:

> On-road emissions were calculated using the air board's EMission FACtor (EMFAC2021) emission rate program.[258] ~~Additionally, scaling factors provided by the air board that incorporate the Clean Mile Standard, Advanced Clean Cars II, Clean Truck Check (Heavy-Duty Inspection and Maintenance), and Federal Clean Trucks Plan were applied to the EMFAC2021 emission rates because the model does not yet include these regulations.~~ The on-road criteria air pollutant emissions for each construction phase were totaled for each year of construction and, consistent with the air district's guidance, were averaged over the number of workdays in the construction phase for each construction year to determine average daily emissions on an annual basis.

The following footnote has been added at the end of the second sentence in the first paragraph of the "Employee Vehicle Trips" section and at the end of the fourth sentence in the first paragraph of the "Delivery Trucks" section, respectively, on p. 3.C-38:

> [###] If the Federal Clean Trucks Plan is not implemented or upheld as currently anticipated, actual operational trucking emissions could be higher than the modeled projections for implementation of the RADP.

"Thresholds of Significance" section, p. 3.C-41, last paragraph, is revised as follows:

> ~~Consistent with the 2024 San Francisco Planning Department's *Air Quality and Greenhouse Gas Analysis Guidelines*,~~ To account for the size and complexity of the project, health risks from DPM, gasoline TOG, and annual-average $PM_{2.5}$ concentrations were estimated at all sensitive receptors located within 3,280 feet (1,000 meters) of the Airport boundary to identify the maximum exposed individual sensitive receptor (MEISR) and the maximum exposed individual worker (MEIW). In addition, health risks at the MEISR and MEIW from existing sources are provided in this analysis for informational purposes, because the health risk thresholds presented below only apply to the RADP's incremental contribution to health risks and do not address existing health risks. The MEISR is the sensitive receptor with the highest modeled health risk. See Appendix G, Air Quality Technical Appendix, for a detailed description of all assumptions and methods used for the HRA.

4.D Revisions to Chapter 4, Other CEQA Considerations

The headers on pp. 4-2 through 4-4 are revised as follows:

> **Chapter 4. Other CEQA ~~Issues~~ Considerations**

[258] California Air Resources Board, "Welcome to EMFAC," n.d., https://arb.ca.gov/emfac/, accessed July 22, 2024.

4.E Revisions to Draft EIR Appendix B, Initial Study Section E.17, Hydrology and Water Quality

Footnote 265, p. 158, is revised as follows:

> [265] Mel Leong Treatment Plant – Sanitary and Industrial Plants, NPDES Permit Number CA0038318, California Regional Water Quality Control Board Order Number R2-~~2018-0045~~-2025-0002.

4.F Revisions to Draft EIR Appendix E.2, Travel Demand Memorandum

The page that was upside down in Appendix E.2, Travel Demand Memorandum, (p. 37) has been corrected and is available on the planning department's Environmental Review Documents webpage (https://sfplanning.org/environmental-review-documents).

4.G Revisions to Draft EIR Appendix F, Noise Technical Appendix

"Noise Impacts from Construction Activities – Nighttime" section, p. 23, third paragraph, is revised as follows:

> … However, given the Grand Hyatt at SFO's location on Airport property with daytime noise levels in the range of ~~72~~66 dBA, sound-rated materials used for noise abatement likely provide more than the 25 dBA exterior-to-interior noise reduction to meet Title 24 standard. …

The revised Appendix F is available on the planning department's Environmental Review Documents webpage (https://sfplanning.org/environmental-review-documents).

4.H Revisions to Draft EIR Appendix G.1, Air Quality Methodology Memo

Table 8, p. 17, is revised as follows:

Table 8 RADP Terminal Projects Summary of Net New Operational Area

Building	Building Area Demolition (sf)	New Construction (sf)	Net New Construction (sf)	New Paving (sf)	CalEEMod Land Use	CalEEMod Area (sf)
Boarding Area H (1)						
Boarding Area H	~~N/A~~205,600	1,618,900	1,413,300		Industrial Park	1,413,300
…						

The revised Appendix G.1 is available on the planning department's Environmental Review Documents webpage (https://sfplanning.org/environmental-review-documents).

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ATTACHMENT A

Draft EIR Public Hearing Transcripts

1 CITY AND COUNTY OF SAN FRANCISCO
2 PLANNING COMMISSION
3 ---oOo---
4
5 PROJECT TITLE:)
SFO RECOMMENDED AIRPORT)
6 DEVELOPMENT PLAN (RADP))
)
7)
CASE NO.: 2017-007468ENV)
8 _____) Pages 1 - 21
9
10
11
12
13 PUBLIC HEARING ON DRAFT EIR
14 Thursday, May 22nd, 2025
15 12:20 P.M. - 12:46 P.M.
16
17
18 Stenographically reported by:
19 Brianna Rudd, CSR 13668
20 ----------
21 JAN BROWN & ASSOCIATES
22 WORLDWIDE DEPOSITION, VIDEOGRAPHY & TRIAL SERVICES
23 701 Battery St., 3rd Floor, San Francisco, CA 94111
24 (415) 981-3498 or (800) 522-7096
25 SCHEDULING@JANBROWNASSOCIATES.COM

1 A P P E A R A N C E S
2
3
4 COMMISSIONERS:
5
6 KATHRIN MOORE, Vice President
7 DEREK BRAUN, Commissioner
8 THERESA IMPERIAL, Commissioner
9 SEAN MCGARRY, Commissioner
10 GILBERT WILLIAMS, Commissioner
11
12
13 STAFF:
14
15 JONAS IONIN, Commission Secretary
16 RICH HILLIS, Planning Director
17 KEI ZUSHI, Environmental Case Coordinator
18 TANIA SHEYNER, Environmental Case Supervisor
19
20
21 PROJECT:
22
23 AUDREY PARK, Environmental Affairs Manager, SFO
24
25 ---o0o---

Thursday, May 22, 2025 - 12:20 p.m.

P R O C E E D I N G S

---o0o---

...

(Proceedings prior to agenda item #12 not reported.)

COMMISSION SECRETARY IONIN: For item 12, Case Number 2017-007468ENV for the SFO Recommended Airport Development Plan. This is a draft Environmental Impact Report.

Please note that written comments will be accepted at the Planning Department until 5:00 p.m. on June 2nd, 2025.

(Proceedings interrupted for brief discussion regarding previous agenda item.)

COMMISSION SECRETARY IONIN: Okay. Item 12.

MR. ZUSHI: Good afternoon, commissioners. I'm Kei Zushi, department staff and the environmental case coordinator for the SFO Recommended Airport Development Plan for the proposed project.

Joining me today are Audrey Park, environmental affairs manager with SFO, and Tania Sheyner, environmental case supervisor with the Planning Department.

Okay. My presentation's up.

So the item before you today is public hearing on the SFO Recommended Airport Development Plan draft Environmental Impact Report, or the "draft EIR."

The purpose of today's hearing is to take public comment on the adequacy, accuracy and completeness of the draft EIR pursuant to the California Environmental Quality Act, or "CEQA," and San Francisco's local procedures for implementing CEQA. No certification of the document is being requested at this time.

The draft EIR was published on April 16th, 2025. The public review period for the draft EIR began on April 16th, 2025 and will continue until 5:00 p.m. on June 2nd, 2025.

I will now hand it over to Audrey Park with SFO, who will be providing an overview of the existing project site and project -- proposed project -- excuse me. After Audrey's presentation of the project description, I'll provide information regarding CEQA review that was done thus far for the project, and then we'll go over public comment opportunities as well as next steps of the overall process.

MS. PARK: Good afternoon, esteemed Planning commissioners, Planning Department staff and members of the public. My name is Audrey Park with SFO, and I'm here to provide you with an overview of the recommended

Airport Development Plan or RADP.

SFO is located about 13 miles south of downtown San Francisco and is contained on land owned entirely by the City and County of San Francisco, largely in unincorporated San Mateo County.

In 2016, SFO published the draft Final Airport Development Plan as a long-range landside development plan containing the vision for SFO to accommodate growth in demand for air travel to and from the Bay Area. As passenger demand for air travel grows over decades, it would trigger certain RADP projects for development over those decades. The RADP is about, as this growth in passenger demand occurs, how SFO can accommodate that demand in a way that elevates passenger amenities and level of service that is reflective of San Francisco.

As you can see in the site map, the RADP is largely contained -- contains the development of landside developments, such as boarding areas, parking garages, aircraft parking apron, consolidated rental car center, and these facilities are right-sized to match the capacity of the existing runway configuration. There are no changes or expansions proposed to the existing runways or to aircraft flight paths which are the sole purview of the FAA.

This slide provides the ADP study goals and

1 objectives, which is reflected in the selected --
2 selection of RADP projects. The planning study goals
3 were to continue to modernize SFO and be the airport of
4 choice to and from the Bay Area by elevating passenger
5 amenities, optimizing existing airfield or aircraft
6 movements so that there are no delays for our passengers,
7 and leveraging technology and maximizing common use
8 facilities for our airline partners, and reducing
9 overbuilding or building airline-specific facilities.
10 Overall, we want to make smart airport land use choices
11 within the limited airport land that we have today.
12 Today I've selected three representative
13 projects to describe and are reflective of the RADP.
14 First, the new Boarding Area H would provide contact
15 gates that would accommodate both international and
16 domestic flights and would reduce the need for capital
17 development of domestic only gates or international only
18 gates. There would be a secure passenger corridor for
19 convenient domestic connections to other terminals, and
20 our passengers would not have to go through security
21 checkpoints again. If passenger demand swings to the
22 international travel side, the gates would accommodate
23 international arrivals. There would be a sterile
24 corridor to the Federal Inspection Station for
25 internation arrivals. And most importantly for SFO and

for San Francisco, this new boarding area would remove the need to develop hardstand gates, where passengers would need to be bussed to the airfield and then board and deplane using stairs. While hardstands are common in other continents and SFO could accommodate air travel demand with hardstand gates, we want our passengers to board an aircraft from a comfortable and safe passenger boarding bridge that meets ADA standards as well.

The second project example is the central hub. The new central hub would replace the existing central garage which is located within the terminal area. This central garage is seismically deficient under current California Building Code. Instead of an in-kind preplacement garage, the RADP envisions an integrated multimodal ground transportation and parking facility. We envision the new central hub to accommodate different airport ground transportation modes for our passengers, with different levels designated for public transit, shuttle and charter buses, taxis and TNCs, airline and airport employee parking, as well as public parking. There would be integrated lounges, wait areas and cafes for our passengers to enhance a sense of place for all airport guests.

For the third and last example, if there continues to be a demand for aircraft maintenance, SFO

could develop a new maintenance -- aircraft maintenance hangar that could accommodate up to two additional wide-body aircraft. There's currently an existing hangar used by United and American Airlines for aircraft maintenance today. As with other RADP projects, if there is no demand in the future, we would not build it. These aircraft maintenance jobs could continue to be exported to other countries in Central or -- and South America, or they could say here, where in that case we would be able to accommodate those aircraft maintenance jobs here.

Lastly, we get the question often, so I just wanted to provide this for the Planning Commission. SFO is an enterprise department of the City and County of San Francisco. We're operated and maintained with capital developments funded wholly by the revenues generated at and financed by SFO. So I am an airport employee, City and County of San Francisco employee. My salary is paid for with revenues generated at the airport. There are no taxpayer funds used for SFO projects, and our ADP projects would also be funded by SFO revenues generated onsite.

As an enterprise department, SFO has made payments of -- annual service payments, in the city fiscal year of '24, about 56 million dollars. We would like to continue to be able to enhance, generate revenue

1 and provide that level of service, again, to our
2 passengers if they choose to fly to or from the Bay Area.
3 I'm happy to take any questions at the end.
4 Thank you.
5 MR. ZUSHI: Kei Zushi again, department staff.
6 Now I will address the project's environmental
7 impact and mitigation measures identified in the draft
8 EIR.
9 The draft EIR concludes that the project with
10 mitigation would result in less-than-significant impact
11 on cultural resources, tribal cultural resources, air
12 quality, noise and vibration and biological resources.
13 The draft EIR also concludes that the proposed project
14 with mitigation would result in significant and
15 unavoidable operational air quality impacts. All other
16 impacts from the proposed project were found to be less
17 than significant or would result in no impact.
18 To address the impacts requiring mitigation
19 measures, the draft EIR analyzed three feasible
20 alternatives to the proposed project under CEQA:
21 The no project alternative, which is an
22 alternative required to be analyzed under CEQA, would
23 represent what would be -- reasonably be expected to
24 occur in the foreseeable future if the RADP were not
25 implemented.

The reduced development alternative would remove from the proposed project the Boarding Area H international terminal building main hall expansion and aircraft maintenance hangar project to eliminate the project's significant and unavoidable operational air quality impacts.

The Boarding Area H only alternative would remove all RADP projects except the Boarding Area H project from the proposed project to eliminate the project's significant and unavoidable operational air quality impacts.

The draft EIR contains analysis of the impacts associated with the three alternatives. Those impacts are summarized in the table shown here. The alternatives represent a reasonable range of alternatives for the EIR analysis.

The no project alternative would not require any mitigation and reduce project's significant and unavoidable operational air quality impacts to less-than-significant levels without mitigation.

The reduced development alternative, or Boarding Area H only alternative, would reduce the project's significant and unavoidable operational air quality impacts to less-than-significant levels with mitigation and require several mitigation measures to reduce the

alternative's impact to less-than-significant levels, as shown on this slide.

So today we are conducting public hearing on the adequacy and accuracy of the draft EIR. For members of the public who wish to speak, please state your name for the record. We'll have a court reporter transcribe your comments based on the recordings of today's proceeding. When it is your turn, please state your name and spelling, and we ask that you speak slowly and clearly so that the court reporter can make an accurate transcript of today's proceedings.

Staff is not here to answer comments today. Comments will be transcribed and responded to in writing in the Response to Comments document. The document will respond to relevant verbal comments received today and written comments received during the public comment period and includes revisions to the draft EIR as appropriate.

Those who wish to comment on the draft EIR in writing, by mail or e-mail, may submit their comments to Kei Zushi, EIR Coordinator, at 49 South Van Ness Avenue, Suite 1400, San Francisco, or cpc.sforadp@sfgov.org by 5:00 p.m. on June 2nd, 2025. We anticipate publication of the Responses to Comments document in fall 2025, followed by the EIR certification hearing shortly after.

Unless the commission have questions, I respectfully suggest that the public hearing on this item be opened. Thank you.

COMMISSION SECRETARY IONIN: Indeed with that we should open up public comment. Members of the public, this is your opportunity to address the commission on this item. Again, this is the draft EIR.

I-Lopez-1
AA-1

MEMBER OF PUBLIC: Hi. Good afternoon. My name is Liz Lopez. I live in San Francisco.

So the airport says that implementing the airport development plan, which is inevitably an expansion project, will not induce passenger demand, but I'd like to know who is guaranteeing that, who is guaranteeing that there won't be any demand.

So, San Francisco's population overall has only grown .4% in the last decade, and SFO ridership has barely been able to hit pre-Pandemic levels. This expansion is more likely part of a much larger marketing strategy to entice more customers to use SFO, which will inevitably increase the amount of flight traffic, noise pollution and chemical pollution over residents' homes, as well as increase greenhouse gases, which will trump the output of CO2 from cars in the city.

United, the largest SFO airline, currently has 2.6 billion-dollar construction project underway and has

I-Lopez-1 (cont.)

1 added over a dozen new destinations to the roster, and
2 they say that modernization paves the way for continued
3 growth. Residents would like to know how many different
4 projects make up the overall expansion in growth
5 development plans that SFO and airlines have in their
6 pipeline -- because it's more than just this project
7 being discussed. When the NextGen Air Space
8 Modernization Project began, Bay Area residents were
9 blindsided with nontransparent data saying that the
10 impact of the project would not be significant. San
11 Francisco officials sat idly by as SFO and the FAA
12 concentrated airplane noise over unsuspecting residents,
13 decreasing their quality of life and impacting their
14 health.
15 This development project is a public health
16 issue, and I'd like San Francisco officials and SFO to be
17 honest and state the real impacts that the impending
18 operational growth will have on residents further away
19 from the airport, such as San Francisco, Palo Alto and
20 Santa Cruz, instead of just trying to blindside us yet
21 again, telling us that there will be no significant
22 impact.
23 Please do not accept the environmental review as
24 it is. It needs to include the real impact that
25 increased aviation operations will have. Make no

I-Lopez-1 (cont.)

mistake, this is an airport expansion project, which will induce passenger demand and negatively impact residents. Thank you.

I-Landesmann1-1 GC-CEQA-5

MEMBER OF PUBLIC: Hi. Good afternoon, commissioners.

I wonder if you can recognize that SFO's DEIR has standards from the disco era -- as in polyester suits -- which guarantees that the public nor you will know the true impacts of this plan, and it will not meet the standards that the public expects to see today, in 2025, from a major city's planning office. You will certainly not be able to see the human or environmental impacts as it is right now.

Why would San Francisco, instead, not make the DEIR more relevant to today's audience? Quoting the Secretary of Transportation this week, he asked, "I don't know why, when I travel around the world, I think so many other countries have safer and cleaner transportation systems." Why have something second best? We should aspire to be the safest, cleanest and most efficient in the world. Many ask that question.

I grew up in Brazil and have lived in Europe, in countries with excellent airlines and airports. The United States aviation system actually is third-rate in contrast to many developed and developing countries. In

I-Landesmann1-1 (cont.)

the European Union, agencies produce highly relevant information on airport impacts. Countries are heavily fined if they do not comply. EU agencies measure everything so that their airports and airlines are much more competitive and effective on tackling the very real impacts on people and the environment; whereas in the Bay Area, airports, just in the last few years, are presenting environmental reviews that hide the real pollution impacts, and this, when big data tools invented here in this region are available to conduct important analytics. A leading aero expert called the amount of data available "an embarrassment of riches."

And are you aware that a year's worth of all of SFO departures and arrivals over flight data can be processed in three days at a cost that is less than what it would cost to print the DEIR?

I-Landesmann1-2 GC-Non-CEQA-8

One final point: SFO's impacts are severe far south of San Francisco and San Mateo County. It takes just three to four minutes for a freighter to rattle and roar over three counties, many as far as the Santa Cruz Mountains, waking up people of all ages and economic backgrounds. Just in the last few years, SFO has deposited noise where I come -- where I live in Palo Alto, from -- and I should remind you that the DEIR is supposed to look at areas with noise between 45 and 60

I-Landesmann1-2 (cont.)

DNL as well as reportable noise. A deposit of 5 DNL did happen in my community. That's the equivalent of your cholesterol going from 200 to 300 or you putting on 60 pounds.

So I hope you will think about this, and that would answer the question as to why our system is a third-rate system and is not the cleanest in the world. Thank you.

COMMISSION SECRETARY IONIN: Thank you.

Okay. Any other member of the public who wishes to submit their testimony, now is the time to do so.

MEMBER OF PUBLIC: Can I speak?

COMMISSION SECRETARY IONIN: On the draft Environmental Impact Report?

MEMBER OF PUBLIC: Yes.

COMMISSION SECRETARY IONIN: Certainly.

O-MFCBHP-1
GC-Non-CEQA-15

MEMBER OF PUBLIC: My name is Leaotis Martin. I live in Bayview-Hunters Point. I'm the president of the Mothers and Fathers Committee of Bayview-Hunters Point and also with Greenaction for environmental health and justice.

We already been told that our impact was already bad enough, and we have a lot of people that's dying in our neighborhood from cancer and all other type of stuff. This will only bring more, more pollution to our

O-MFCBHP-1 (cont.)

neighborhood, where our impact is already so big. You know, the threshold is over already. To bring up something like this, it'll take it even higher.

We care about our people in Bayview. I'm not much but just one person right now, but I speak for a lot of people that live in Bayview, for a lot of people that family that died from cancer, a lot of people that have cancer right now. I've been doing this environmental work for 18 years, 19 years now. And I only went out one day and did it, and I haven't stopped -- it's because I care.

I grew up in Bayview-Hunters Point since 1966. I was six years old. I'll be 65 this year. And this is my way of giving back. One person does make a difference. Thank you.

UNKNOWN SPEAKER: Thank you.

COMMISSION SECRETARY IONIN: Okay. Last call for public comment.

Seeing none, public comment is closed and this matter is now for your review and comment, commissioners.

COMMISSIONER MOORE: Do we have any comments?

Commissioner Braun.

A-CPC-Braun-1 AQ-2

COMMISSIONER BRAUN: I appreciate acknowledgment of the project's significant and unavoidable impacts of mitigation that affect air pollution, and I look forward

A-CPC-Braun-1 (cont.)

to reviewing additional comments and responses to those comments.

COMMISSIONER MOORE: Thank you.

Commissioner Imperial.

A-CPC-Imperial-1 CR-1

COMMISSIONER IMPERIAL: I also read in -- the Environmental Impact Report and its outlines on different mitigation measures. And one particular that -- for me, that I find compelling or interesting is the historical resources or the tribal resources and the plans for that in terms of the mitigating and finding those issues.

A-CPC-Imperial-2 TR-6

Also, there are a lot of data in terms of the traffic and biking and walking circulation, although there are parts of it that I read those back in 2019, and I think there are some graph studies back in 2025. I wonder if any of those information, when we're talking about the traffic or pedestrian circulation, if there can be more updated data on that. I saw something that is on 2025. I'm trying to get it into the -- there's very recent. But I hope the data that we could find in terms of this Environmental Impact Report could be in the last -- or in the last year or two years. Thank you.

COMMISSIONER MOORE: I'd like to add a comment if I may.

A-CPC-Moore-1 NO-2

I'm interested as to whether or not we are looking at international metrics regarding airport noise,

A-CPC-Moore-1 (cont.)

1 airline takeoff noise and airline emission standards. I
2 know that all international airports are grappling with
3 the same issue.
4 I do know, though, that, particularly in
5 Germany, where I'm -- which I'm very familiar with, there
6 are very strict standards, particularly regarding takeoff
7 noise and air pollution at takeoff, and I'm wondering if
8 any of those considerations are being brought to this
9 project or as to whether or not there are overarching
10 international standards for performance, because we have
11 a lot of not only national but also international
12 aircraft coming to San Francisco.
13 I think that would be a discussion which I would
14 like to see addressed somewhere along the line because I
15 do believe that the gentleman who spoke about,
16 particularly the need in nearby affected communities, do
17 have concerns. We have other projects in the area coming
18 up in a few weeks, and I think all of those things are

A-CPC-Moore-2 AQ-2

19 ultimately cumulative. We already have data about where
20 the concentrations of air quality conce -- air quality
21 concentrations are, and I do think that we need to look
22 at it in a kind of layered, comprehensive way.
23 Those would be my questions. Thank you.
24 COMMISSION SECRETARY IONIN: All right,
25 commissioners. If there's no further comments on the

draft Environmental Impact Report, we can move on, commissioners, to the final item on your agenda today.

(Whereupon the hearing on agenda item #12 was adjourned at 12:46 p.m.)

--oOo--

REPORTER'S CERTIFICATE

I, BRIANNA RUDD, a Shorthand Reporter, State of California, do hereby certify:

That said proceedings were taken before me at said time and place, and were taken down in shorthand by me, a Certified Shorthand Reporter of the State of California, and were thereafter transcribed into typewriting, and that the foregoing transcript constitutes a full, true and correct report of said proceedings that took place.

IN WITNESS WHEREOF, I have hereunto subscribed my hand this 5th day of June 2025.

Brianna Rudd, CSR NO. 13668

ATTACHMENT B

Draft EIR Comment Letters and Emails

A-BART

From:	Daniel Wu
To:	cpc.sforadp@sfgov.org
Cc:	Tim Chan; Donald Dean
Subject:	BART Comments on the SFO Recommended Airport Development Plan (RADP) Draft EIR
Date:	Friday, June 06, 2025 11:41:47 AM
Attachments:	SFO_ADP_DEIR_BARTcomments.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

This email is sent on Tim Chan's behalf.

Please see the attached comments from BART on the SFO Recommended Airport Development Plan (RADP) Draft EIR.

Thank you,

Daniel Wu (he/his)
Principal Planner
BART Strategic Planning & Policy
2150 Webster Street, 8th Floor
Oakland, CA 94612
(510)287-4714 Office
(510)306-8890 Mobile
daniel.wu@bart.gov

**Please note that I am working remotely on Thursdays and Fridays.*

SAN FRANCISCO BAY AREA RAPID TRANSIT DISTRICT
2150 Webster Street, P.O. Box 12688
Oakland, CA 94604-2688
(510) 464-6000

2025

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6TH DISTRICT

Victor Flores
7TH DISTRICT

Janice Li
8TH DISTRICT

Edward Wright
9TH DISTRICT

May 30, 2025

Mr. Kei Zushi
EIR Coordinator
San Francisco Planning Department
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

RE: San Francisco Bay Area Rapid Transit District (BART) Comments on the San Francisco International Airport (SFO) Recommended Airport Development Plan (RADP) Draft Environmental Impact Report (DEIR)

Dear Mr. Zushi,

Thank you for the opportunity to review the SFO Recommended Airport Development Plan DEIR. Since 2003, BART has served SFO and continues to provide critical transit connections for airport passengers and employees throughout the region.

A-BART-1
NO-4

As described on page 2-19 of the DEIR, this project would include construction of a new Boarding Area H with multiple domestic/international-capable swing gates able to accommodate up to 8 widebody or 14 narrowbody aircraft, or some combination thereof, for domestic or international departures. Boarding Area H would extend west from the base of the International Terminal Building along North Link Road, then shift north and follow North McDonnell Road. According to Table 2-5, (page 2-39) Construction of the new Boarding Area H is anticipated to begin October 2027 continuing to May 2033.

As the project's proposed Boarding Area H would be adjacent to the aerial viaduct that supports BART's trackways, BART is very concerned with any potential construction-related disruption to BART operations, specifically from impacts related to noise, vibration, and air quality. Section 3.B of the DEIR, Noise and Vibration, states in several places (e.g., page 3.B-12 and 3.B-32) that Airport buildings would be the closest structures to construction areas. Although not mentioned in the analysis, the SFO BART station and aerial guideway are well integrated with the Airport terminals and could be affected by construction work as well, particularly from Boarding Area H. Construction noise is a concern, for both BART employees and riders, as is construction vibration due to the proximity of construction to BART's sensitive electronic and communications systems. Construction vibration should also be monitored to ensure there are no adverse effect to BART structures. Air quality issues related to construction emissions and

A-BART-2
AQ-4

A-BART-2 (cont.)

particulate matter from demolition, excavation, earth moving, and general construction activity could also be an issue for BART employees and passengers.

A-BART-3 IN-2

The DEIR covers the RADP at the programmatic level, and the RADP projects will be implemented over the next 20 years, as such, it does not provide detailed footprints of project elements or construction scenarios for those elements. Does SFO intend to do more in depth environmental analysis of discrete project elements in the future? If so, when would that analysis be provided? BART would be interested in reviewing any further in-depth environmental analysis of discrete project elements, particularly as pertaining to effects on BART operations and rider experience.

A-BART-4 GC-Non-CEQA-4

We would like to closely coordinate with SFO during project design and construction to ensure that there is minimal disruption to our operations and that access to the BART station is maintained. Construction affecting BART operations and rider experience are subject to BART's approval.

BART looks forward to continued coordination between our two agencies. If you have any questions, please contact me at tchan1@bart.gov.

Sincerely,
Tim Chan
Station Area Planning Group Manager

A-Caltrans

CALIFORNIA STATE TRANSPORTATION AGENCY GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS–10D | OAKLAND, CA 94623-0660
www.dot.ca.gov

June 2, 2025

SCH #: 2019050013
GTS #: 04-SM-2019-00675
GTS ID: 15734
Co/Rt/Pm: SM/101/18.738

Kei Zushi, Senior Planner
City and County of San Francisco Environmental Planning
49 South Van Ness Avenue #1400
San Francisco, CA 94103

Re: SFO Recommended Airport Development Plan – Draft Environmental Impact Report (DEIR)

Dear Kei Zushi:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the San Francisco International Airport (SFO) Recommended Airport Development Plan (RADP). The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the April 2025 DEIR.

Please note this correspondence does not indicate an official position or approval by Caltrans on this project and is for informational purposes only.

Project Understanding

The SFO RADP includes several projects as part of the Airport's long range development plan. These projects include terminal improvements and modernization, ground access and parking enhancements, and new Airport/Airline support facilities and utilities. All proposed projects are planned within existing airport boundaries, with some directly adjacent to U.S. 101.

A-Caltrans-1
TR-1

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Vehicle Miles Traveled (VMT) analysis for land use projects, please review Caltrans' Transportation Impact Study Guide (*link*).

A-Caltrans-1 (cont.)

While VMT per employee is not expected to increase with the implementation of the RAPD, since the plan would result in 2,700 new employees that would not have existed in the baseline scenario, total VMT is expected to increase as a result of the RADP. We encourage the project applicant to develop and implement an effective Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. TDM programs should be documented with annual monitoring reports by a TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take to achieve those targets.

Please consider the mitigation measures listed below; these are quantified by California Air Pollution Control Officers Association (CAPCOA) and are shown to efficiently reduce regional VMT:

- Implement Commute Trip Reduction Program
- Provide Ridesharing Program
- Implement Subsidized or Discounted Transit Program
- Provide End-of-Trip Bicycle Facilities
- Provide Employer-Sponsored Vanpool
- Implement Shared Vehicle Program (car/bike/E-bike/scooter)

Additionally, in Appendix E: Transportation Technical Appendix, E.2 Travel Demand Memorandum, several pages appear upside down: pages 31, 33, 35, and 37 (.pdf pages 531, 533, 535, 537).

A-Caltrans-2 NO-1

Noise

Appendix F: Noise Technical Appendix. There are some inconsistencies across sections in the Noise Technical Appendix. Please review the sections mentioned below to ensure accuracy and consistency.

- Section 3.1, Existing Ambient Noise levels: "..across the street from the Westin Hotel (LT-3) to the south of the Airport from February 8, 2021 (Monday) to February 10, 2021 (Wednesday)." The underlined date is inconsistent with the date of February 9, 2021 stated in Table 2.

- Section 4.3, Noise Impacts from Construction Activities – Nighttime. The third paragraph states that "given the Grand Hyatt at SFO's location on Airport property with daytime noise levels in the range of 72 dBA. Please specify in which table this is reflected.

A-Caltrans-3
AQ-1

Air Quality

Appendix G: Air Quality Technical Appendix. There are some inconsistencies across sections in the Noise Technical Appendix. Please review the sections mentioned below to ensure accuracy and consistency.

- In the introduction the report notes that the air quality analysis considers a comparison between the 2045 Future Baseline without RADP and the 2045 Future Baseline with RADP. Please specify where the calculation of the 2045 Future Base Line without RADP is located.

- Table 8, RADP Terminal Projects Summary of Net New Operational Area: please explain why the Net New Construction would be 1,413,300 square feet (s.f.) if New Construction is 1,618,900 s.f. and Building Area Demolition is N/A.

- In the Delivery Trucks section, the report notes using modeling output from "OFFROAD2021-ORION." (.pdf page 745). Previously, the report noted that "OFFROAD2017-ORION" would be used for consistency (.pdf page 740). Please clarify which version of the Off-Road Equipment Model was used in the Delivery Trucks section.

- In the Air Quality section of the DEIR (3.C.) and in Appendix G (Air Quality Technical Appendix) the radius used for measuring health impacts in exposure of sensitive receptors is inconsistent between 1,000 meters and 1,000 feet. Please clarify which measurement was used.

A-Caltrans-4
TR-2

Construction-Related Impacts

As noted in Section 3.A.4, project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits (*link*). Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

In addition, please note the following upcoming Caltrans projects are within the vicinity of the proposed project and may pose a construction conflict and require coordination between Caltrans and the Planning Department:

- *San Mateo 101 Multi-Asset Paving Project:* Paving rehabilitation and roadway facility upgrades along U.S. 101 throughout San Mateo County (Post Mile 0.0 to 21.8).

A-Caltrans-4 (cont.)

San Mateo 101 San Bruno Ave Interchange Project: Interchange reconfiguration on U.S. 101 at San Bruno overcrossing to change existing partial cloverleaf design to a compact diamond layout (Post Mile 20.38).

- *San Mateo 101 Upgrade Bridge Rails at Seven Structures:* Replacing existing bridge rails with concrete barriers or sidewalks at seven locations along U.S. 101 (Post Mile 0.9 to 23.4).

A-Caltrans-5 TR-3

System Planning

Caltrans System Planning has recently completed the 101 South Comprehensive Multimodal Corridor Plan (*link*) that has identified U.S. 101 as the primary access route to and from SFO. Please note that there are several upcoming and long-term transportation projects planned around SFO to which the RADP may potentially contribute additional vehicular traffic by Cumulative Year 2045:

- *San Mateo 101 Peninsula Crossing:* Paving and intersection improvements at the U.S. 101 Northbound on/off ramp and old Bayshore Highway (Post Mile 16.74).
- *San Mateo 101/ San Bruno Ave Interchange Project:* Interchange reconfiguration on U.S. 101 at San Bruno overcrossing to change existing partial cloverleaf design to a compact diamond layout (Post Mile 20.38).
- *San Mateo 101 Managed Lanes Project North of 1-380:* Implementation of a managed lane in each direction of U.S. 101 between the U.S. 101/1-380 Interchange in South San Francisco and the San Mateo/San Francisco County Line (Post Mile R20.63 to 26.11). This project is listed under MTC's Express Lanes – Regional Category.
- *I-380 Corridor and Interchange Improvements*: Interchange improvements at U.S. 101 and El Camino Real (State Route 82), and a new Eastbound freeway lane between I-280 and El Camino Real, with an open period of Year 2021-2035.

A-Caltrans-6 GC-CEQA-3

Climate Change

In the 2020 Caltrans District 4 Adaptation Priorities Report (*link*), U.S. 101 adjacent to the project location is identified as a high-priority Caltrans asset vulnerable to sea level rise, storm surge, and climate change impacts, including increased precipitation. Caltrans would like to be included in discussions, to stay informed as Caltrans is interested in engaging in multi-agency collaboration early and often, to find multi-benefit solutions that protect vulnerable shorelines, communities, infrastructure, and the environment. For any questions or concerns, please contact the Caltrans Bay Area Climate Change Planning Coordinators at D4_ClimateResilience@dot.ca.gov.

A-Caltrans-7
CR-1

Cultural Resources
Should construction activities within Caltrans' Right-of-Way (ROW) take place in relation to this project, these mitigation measures shall be implemented if there is an archaeological discovery. If there is an inadvertent archaeological or burial discovery within Caltrans' ROW, please immediately contact the Caltrans Office of Cultural Resource Studies at (510) 847-1977. A staff archaeologist will evaluate the finds within one business day after contact. Caltrans requires review of any potential data recovery plans within Caltrans' ROW.

A-Caltrans-8
TR-2

Encroachment Permit
As noted in Section 3.A.4, please be advised that any temporary or permanent work including traffic control that encroaches in, under, or over any portion of the State highway ROW requires a Caltrans-issued encroachment permit.

The Office of Encroachment Permits requires 100% complete design plans and supporting documents to review and circulate the permit application package. The review and approval of encroachment projects is managed through the Encroachment Permits Office Process (EPOP) or the Project Delivery Quality Management Assessment Process (QMAP), depending on project scope, complexity, and completeness of the application. Please use the following resources to determine the appropriate review process:

- TR-0416 Applicant's Checklist (*link*)
- Caltrans Encroachment Projects Processes – Informational Video (*link*)
- Flowchart, Figure 1.2 in Section 108, Overview of the Encroachment Review Process, of Chapter 100 – The Permit Function, Caltrans Encroachment Permit Manual (*link*)

The permit approval typically takes less than 60 days, but may take longer depending on the project scope, size, complexity, completeness, compliance with applicable laws, standards, policies, and quality of the permit package submitted. Projects requiring exceptions to design standards, exceptions to encroachment policies, or external agency approvals may need more time to process.

To obtain more information and download the permit application, please visit Caltrans Encroachment Permits (*link*).

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Mary McGee, Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination

opportunities or project referrals, please visit Caltrans LDR website (*link*) or contact LDR-D4@dot.ca.gov.

Sincerely,

YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

A-Millbrae

City of Millbrae

621 Magnolia Avenue, Millbrae, CA 94030

May 22, 2025 VIA ELECTRONIC MAIL & U. S. MAIL

Kei Zushi, EIR Coordinator
San Francisco Planning
49 South Van Ness Ave, Suite 1400
San Francisco, CA 94103

Re: City of Millbrae Comments Regarding the Draft EIR for the SFO Recommended Airport Development Plan ("RADP"), 2017-007468ENV

Dear Mr. Zushi,

The City of Millbrae ("City") appreciates the opportunity to review and comment on the Draft Environmental Impact Report ("DEIR") for the Recommended Airport Development Plan ("RADP"), as prepared by San Francisco Planning. In addition, please accept these comments as they also apply to the RADP. Due to its adjacent proximity to the San Francisco International Airport ("Airport"), the City of Millbrae is uniquely affected by Airport operations, traffic, air quality, and noise. As so many airport passengers, employees and service providers live, work, stay and travel through the City of Millbrae each and every day, it is difficult to overstate how intertwined the airport's operations are on our community. Even minor changes to airport operations can affect our community and quality of life. Our residents have long been concerned with the effects of noise, air quality and traffic from the Airport. We appreciate the opportunity to provide comments on the following topics of concern and look forward to working together with your agency on their solutions.

A-Millbrae-1
GC-Non-CEQA-1

Site 7

The City of Millbrae has long been concerned about current and future Airport operations and construction activities that utilize the Airport's "Site 7" parcel located on Aviador Avenue (APN: 092030050). This parcel has historically been used to store building and construction materials, soil, debris, heavy equipment, and cargo containers, and will continue to be used for staging and transportation to serve projects elsewhere on Airport property as they occur. The Airport's use of this parcel contributes to uncompensated impacts on the City from heavy truck traffic, dust, and noise. This directly affects the City of Millbrae because the adjacent and surrounding streets leading to Site 7 need more frequent pavement repairs, landscaping maintenance, and street and sidewalk sweeping than other comparable areas of the City. As many of the projects identified in the RADP will rely on Site 7 for staging and construction materials storage, the Airport should

A-Millbrae-1 (cont.)

work with the City to develop adequate solutions to reduce the effects of dust, noise, and heavy vehicle traffic. Solutions could include working with the City of Millbrae to provide construction traffic control plans, dust control plans/dust remediation strategies, street sweeping assistance, landscaping services, and/or developing some form of assistance or compensation for the City's infrastructure maintenance costs stemming from the Airport's use of Site 7.

A-Millbrae-2 CU-1

The Site 7 facility is also located adjacent to a planned route for the future connection of the San Francisco Bay Trail around the Airport, which will likely result in an increased number of recreational users regularly passing by the facility. As Site 7 is an Airport parcel, and the Bay Trail is a future project planned for development along Airport property, the Bay Trail should have been considered and identified in the RADP.

A-Millbrae-3 GC-Non-CEQA-8

Noise

The City of Millbrae has long been impacted by noise from Airport operations, construction and traffic. Measuring and disclosing impacts from short and long-term noise is reliant on data collected from established noise monitoring locations. These locations are generally identified along the eastern perimeter of the City of Millbrae, as noted in Figure 3.B-2 of the DEIR, locations which are at the lowest elevations of the City of Millbrae and close to the Airport's perimeter. These noise monitoring locations generally do not have a clear line of sight to aircraft, a major noise generator, and, due to their limited number and location, are limited in their ability to measure noise impacts on the City of Millbrae. Because the City rises in elevation to the west of the Airport, noise monitoring locations at the lowest elevations along the eastern boundary of the City are unable to measure ambient noise impacts from Airport operations on western residential portions of the City which are located at higher elevations. These sensitive residential neighborhoods directly overlook the Airport with a clear line of sight to aircraft take off and landings and have long been affected by unmeasured noise from aircraft operations. Future growth from the Recommended Airport Development Plan will affect all portions of the City and therefore noise levels should continuously be monitored with permanent noise monitoring stations established by SFO in multiple areas of the City, including new monitoring stations that should be placed in western residential neighborhoods that overlook the Airport at higher elevations. This would provide the City and the Airport with more accurate overall noise measurements and help establish a more appropriate baseline for further evaluation and discussion of Airport noise impacts.

A-Millbrae-4 TR-4

Traffic Impacts

SFO has long been a major generator of uncompensated traffic impacts on the City of Millbrae's transportation infrastructure and, through the planned projects and growth identified in the RADP, the Airport will continue to do so. The DEIR identifies that auto trips will constitute a 36 percent increase over the number of auto trips under the 2019 existing conditions. One factor that has been especially concerning for the City of Millbrae comes from the growing impact of rideshare and livery vehicles serving SFO passengers, referred to as transportation network companies (TNCs) and charter-party carriers (TCPs). A major portion of this increase identified will come from these transportation providers.

A-Millbrae-4 (cont.)

The City of Millbrae currently experiences a surge of TNC and TCP vehicles on City streets during highly sensitive non-peak hour late-night hours due to the number and volume of passengers arriving and departing on flights scheduled around midnight hours, often to Pacific rim and east coast destinations. The impact from these service providers has not been clearly measured because the data is limited to an evaluation of peak-hour conditions that do not take into account the noise and traffic generated by these service providers in the middle of the night. As their business model requires them to wait until called or hired for their services, and because the current TNC lots along McDonnel Road are inadequately sized to serve the number and frequency of returning vehicles providing this service, these transportation providers tend to loiter on local Millbrae streets and parking lots until capacity becomes available in the TNC lots. This affects the City of Millbrae because we are experiencing very high volumes of TNC and TCP traffic along Millbrae Avenue and Rollins Road in the middle of the night, leading to traffic noise and decreased air quality from idling vehicles. This also affects our police response services during overnight hours because of the increase in the number of TNC drivers, their patrons, and related business activity during hours of the night that would not otherwise experience as much traffic or business activity. Despite their effect on local streets and public services, TNC providers are not required to obtain a business license or operational permit, limiting the City's ability to obtain compensation for their impacts.

As the Airport grows to accommodate more passengers through the accommodation of larger aircraft, the number of TNCs and TCPs will continue to increase and therefore impact the City of Millbrae through noise, air pollution, and wear and tear on the City's transportation infrastructure. It is imperative that the Airport further analyze the unique impact from TNCs and TCPs during late- and mid-night hours and relocate all TNC and TCP staging lots away from their current location near Millbrae Avenue along McDonnell Road. We encourage SFO to work with the City of Millbrae on addressing this issue in the future.

Conclusion

These are just a few of the ongoing concerns that the City of Millbrae has regarding the Airport's operational impacts. We appreciate the opportunity to provide you with our comments and look forward to working together with your agency on solutions. You are welcome to contact me for further discussion at amogensen@ci.millbrae.ca.us or (650) 259-2342.

Sincerely,

Andrew J. Mogensen, AICP
Community Development Director
City of Millbrae

A-PaloAlto

CITY OF PALO ALTO

OFFICE OF THE CITY MANAGER

250 Hamilton Avenue, 7th Floor
Palo Alto, CA 94301
650.329.2392

May 30, 2025

Submitted via email
To: Kei Zushi, EIR Coordinator
San Francisco Planning Department
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
Email: cpc.sforadp@sfgov.org

Subject: Comments on the Draft Environmental Impact Report for the SFO Recommended Airport Development Plan (RADP), Case No. 2017-007468ENV

Dear Mr. Zushi:

The City of Palo Alto appreciates the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Recommended Airport Development Plan (RADP) at San Francisco International Airport (SFO). We recognize the role of SFO as a major regional transportation hub and support thoughtful, sustainable planning. However, we remain concerned that the DEIR does not adequately address environmental impacts to surrounding communities, particularly with respect to noise, air quality, alternatives analysis, and the overall framing of project capacity. Many of the issues raised in our 2019 scoping comments remain unaddressed.

A-PaloAlto-1
IN-1

Continued Omission of Key Issues Raised in Scoping

The City's scoping comments, submitted in 2019 and included in Appendix A of the DEIR, identified specific concerns regarding aircraft noise and air quality impacts on communities such as Palo Alto that lie directly under major departure corridors. We requested that the EIR consider impacts beyond the immediate airport vicinity, evaluate cumulative air traffic from regional airports, and utilize updated, health-protective metrics. The current DEIR does not respond to these concerns in a meaningful way. The analysis remains geographically limited and continues to rely on outdated standards that fail to reflect the actual experience of overflown communities.

A-PaloAlto-2
NO-2

Use of Outdated Noise Thresholds

The DEIR relies exclusively on the 65 dB CNEL threshold to determine significance of noise impacts, a metric that no longer reflects current research or federal guidance. The Federal Aviation Administration's 2021 *Neighborhood Environmental Survey* (NES) found that significant annoyance and health effects occur at much lower levels of exposure. The FAA's own data demonstrate that

A-PaloAlto-2 (cont.)

DNL 65 is no longer an appropriate benchmark for community noise tolerance, and continued reliance on it undermines the adequacy of the DEIR under CEQA.

CEQA requires that significance determinations be based on scientific and factual data (Guidelines §15064(b)) and that agencies use reasonable, commonly accepted methodologies for impact analysis (Guidelines §15147). The DEIR does not incorporate any supplementary noise metrics such as N-Above or N-Above-Ambient—metrics that are already in use by SFO in its own reporting—and it fails to provide contour data in more granular increments. This approach does not meet CEQA's standard for a full and accurate disclosure of potential impacts.

A-PaloAlto-3 AQ-2

Incomplete Air Quality Analysis

The air quality analysis in the DEIR omits any discussion of ultrafine particulate matter (UFPs), which are increasingly recognized as a significant public health concern, particularly for communities situated under flight paths at lower altitudes. These emissions are associated with jet engine exhaust during climb-out and other low-elevation operations. The omission of this impact category is a significant gap in the analysis and fails to meet CEQA's requirement to consider the full range of potentially significant health-related environmental effects.

A-PaloAlto-4 AA-1

Unsubstantiated Claim Regarding Capacity

The DEIR states repeatedly that implementation of the RADP will not result in increased capacity at SFO. This conclusion is difficult to accept given the nature and scale of the proposed improvements. The plan includes:

- A new terminal (Boarding Area H) with up to 14 additional gates;
- A new 243,000-square-foot aircraft apron to accommodate additional parking and remote operations; and
- A new maintenance hangar sized for two widebody aircraft.

Each of these elements directly enables the airport to handle more aircraft, improve turnaround times, and support expanded schedules. The assertion that these infrastructure investments will not affect overall operations is, frankly, incomprehensible. Under CEQA, agencies must evaluate not only direct impacts but also reasonably foreseeable indirect effects (Guidelines §15064(d)). By denying the clear relationship between these projects and future activity levels, the DEIR avoids a substantive analysis of environmental consequences tied to increased throughput.

A-PaloAlto-5 AL-1

Inadequate Alternatives Analysis

The alternatives analysis in the DEIR is similarly lacking. While the DEIR identifies Alternatives A, B, and C, it does not provide a clear, quantitative comparison of their respective impacts across major environmental categories. CEQA requires that an EIR "describe a range of reasonable alternatives" and evaluate them in sufficient detail to support informed decision-making (Guidelines §15126.6). Simply asserting that one alternative results in "fewer impacts" than another is not adequate without data to support that conclusion.

Given that Alternative A is identified as the environmentally superior option and that Alternative C is the next-best alternative, the DEIR should have included a more robust analysis of Alternative C in

A-PaloAlto-5 (cont.)

particular—especially since it would have materially different outcomes for air quality and noise than the proposed project.

A-PaloAlto-6 GC-CEQA-1

Request for Recirculation

In light of the deficiencies noted above, the City of Palo Alto finds that the DEIR does not comply with CEQA. The analysis is incomplete, fails to respond to previous input, and omits key data required for a full evaluation of environmental impacts. The conclusions presented in the DEIR—particularly regarding capacity and significance thresholds—are not supported by substantial evidence.

We respectfully request that the DEIR be revised and recirculated to include:

- Updated noise metrics and thresholds;
- A meaningful cumulative and regional air quality analysis, including ultrafine particulates;
- A realistic assessment of capacity expansion and related impacts; and
- A more comprehensive, quantitative alternatives analysis.

We appreciate your consideration of these comments and would welcome the opportunity to discuss these concerns further.

Sincerely,

Ed Shikada
City Manager

A-USEPA

REGION 9
SAN FRANCISCO, CA 94105

March 30, 2025

Kei Zushi
Senior Planner and Transportation Demand Management Team Lead
City and County of San Francisco, Environmental Planning Division
49 South Van Ness Avenue
San Francisco, California 94103

Subject: EPA comments on the San Francisco Airport Recommended Airport Development Plan Draft Environmental Impact Report

Dear Kei Zushi:

The United States Environmental Protection Agency has reviewed the Draft Environmental Impact Report (Draft EIR) prepared by the City and County of San Francisco (City) to assess the environmental impacts of a proposal to approve the Recommended Airport Development Plan (RADP). The RADP includes 20 projects related to terminals, ground access, and airport support facilities and utilities, to be completed over 20 years and will total 6.4 million square feet of demolition, 14.4 million square feet of new construction, 8.0 million square feet of net new construction, and 375,000 square feet of net new paving.

While the document available for review was prepared to comply with California Environmental Quality Act requirements, the EPA is also providing our feedback and recommendations to the Federal Aviation Administration for the purpose of future National Environmental Policy Act analysis. The EPA understands that there is no federal action at this time, and we understand that the FAA may prepare an Environmental Impact Statement or Environmental Assessment should the project proceed and should a federal action be proposed that requires NEPA compliance. These comments are also intended to contribute to early environmental review coordination to assist the FAA as "*Information exchanged among the Sponsor, Consultants, and environmental specialists fosters effective, efficient airport planning. It also promotes completing the subsequent NEPA process in a timely, efficient manner*".[1]

A-USEPA-1
AQ-2

Air Quality Mitigation

In section 3.C.4, the Draft EIR indicates that scaling factors that incorporate the Federal Clean Trucks Plan, among others, were applied to the air modeling construction and demolition emission rates. The

[1] California Airports Best Practices Guide, https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/f0017458-californiabestpracticesguide-20080715.pdf

A-USEPA-1 (cont.)

EPA appreciates that the City included these emission rates into the modeling. However, the EPA notes that the future status of the Federal Clean Trucks Plan is unclear and the construction emissions modeling results may differ as a result. We recommend the City, in the Final EIR, disclose that the status of the plan is tenuous and that actual trucking emissions may be different than modeled.

A-USEPA-2 AQ-3

In section S.3, Table S-1, the Draft EIR describes the impacts and mitigation from the RADP and subsequent projects. Mitigation measure M-AQ-3a: Clean Off Road Construction Equipment describes the requirements that project sponsors must comply with should a project-specific analysis determine that an RADP project would result in a significant criteria air pollutant impact. The EPA appreciates the listed mitigation and recommends the City, in the Final EIR, commit to usage of lower emitting and/or zero-emission equipment by including equipment eligibility requirements and/or weighted selection criteria in construction requests for proposals.

Similarly, we note that Mitigation Measure M-AQ-4e specifies requirements for electric landscaping equipment, and we recommend that the City commit to lower emitting and/or zero-emission landscaping equipment in projects under this plan.

Furthermore, as the Draft EIR states in the Noise Abatement Procedures, "[San Francisco International Airport] encourages airlines to limit the time auxiliary power units are used by using ground power and pre-conditioned air" (pg. 3.B-24). The EPA appreciates that SFO encourages these measures; we recommend that the City commit to operational emissions mitigation by creating and enforcing auxiliary power unit usage, implementing policies that encourage visits of cleaner aircrafts, and utilizing lower or zero emission taxi equipment where applicable. We also recommend the City disclose SFO's adoption targets for electric ground support equipment.

A-USEPA-3 HY-1

Stormwater and Wastewater Mitigation

The EPA notes that the programmatic Draft EIR provides a framework of the proposed RADP, without specific project level information. In section E.17 of Appendix B, the Draft EIR briefly discusses the various permits that SFO would comply with to protect water quality and reduce stormwater impacts, but does not describe the specific pollutant control measures that would be implemented to comply with the permits. As such, it is unclear how these future control measures would protect water quality. The EPA recommends that the Final EIR and future NEPA analysis clarify the specific pollutant control measures that would be implemented to comply with the permits listed in the Hydrology and Water Quality Section, and describe how these measures will protect water quality. Furthermore, as part of the suite of pollutants of concern in San Francisco Bay, we note that there is an existing implementation plan for polychlorinated biphenyls (PCBs) under a Total Maximum Daily Load (TMDL) overseen by the San Francisco Bay Regional Water Quality Control Board and the regional stormwater permit.[2] We recommend addressing any project activities that could contribute to mobilization of PCBs from building materials or prior use and describing potential mitigations to comply with the TMDL. Additionally, Regional Board National Pollutant Discharge Elimination System (NPDES) permit No. CA003818 was recently reissued in February 2025, and we recommend amending Footnote 265 to refer to this new permit.

[2]https://www.waterboards.ca.gov/sanfranciscobay/water_issues/programs/TMDLs/sfbaypcbstmdl.html#:~:text=The%20Watershed%20Permit%20(R2%E2%80%932012,to%20the%20San%20Francisco%20Bay

Thank you for the opportunity to review this Draft EIR. The EPA appreciates the sustainability commitments identified for construction and operations at SFO, and we encourage the FAA to include them in the future NEPA documents associated with the project. We would appreciate receiving an electronic copy of the Final EIR once it has been published and look forward to coordinating with FAA when the NEPA process is initiated for any portions of the project. If you have any questions, please contact me at (415) 972-3629, or contact Martin Nguyen, the lead reviewer for this project, at (415) 972-3590 or nguyen.martin@epa.gov.

Sincerely,

Francisco Dóñez
Manager
Environmental Review Section 2

cc: David Kessler
Regional Environmental Protection Specialist, Airports Division, Western-Pacific Region, Federal Aviation Administration

Rebecca Nordenholt
San Francisco Region Coordinator, San Francisco Bay Regional Water Quality Control Board

Wendy Goodfriend
Director, Planning and Climate Protection, Bay Area Air Quality Management District

I-Alton

From: Larry Alton
To: cpc.sforadp@sfgov.org
Subject: Aircraft noise in Palo Alto, CA caused by low altitude flights directly over the city
Date: Sunday, June 01, 2025 7:07:59 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Commissioners:

I-Alton-1
GC-Non-CEQA-8

On behalf of thousands of Midpeninsula residents impacted by noise and air quality impacts from SFO-bound flight paths, we respectfully submit that SFO's DEIR is inadequate as long as it does not consider flight path impacts. At the May 22 public Hearing SFO's presentation suggested that "*There are no changes or expansions proposed to the existing runway or to aircraft flight paths, which are the sole purview of the FAA.*" As this report and process is meant to protect the environment and people who stand to be negatively affected by SFO's development plan, please consider our feedback as follows:

I-Alton-2
GC-Non-CEQA-7

INACCURACIES:

#1 SFO is incorrect to say that flight paths are "***the sole purview***" *of the FAA.* An airport's role is *required* in flight path oversight.

After serious miscalculations about regional noise effects from the implementation of the FAA's Nextgen program for Northern California in 2014, the FAA expanded the role of airports as regards flight paths. SFO has since been on the FAA's Technical Working Groups for flight path design **and the Government Accountability Office recommended for the FAA to clarify how a flight path change is initiated and processed**. The FAA's publication "*How the FAA engages with Airport and Community Roundtables*" now describes the role of an Airport authority;

Step 2 of the FAA's criteria for Flight Path development states,

"*All requests not made by the airport authority or internal FAA sections responsible for air traffic control (ATC) and flight procedure development (e.g., ATC, flight standards, FPT, etc.)* ***require airport authority concurrence*** *prior to submission*."

This is consistent with US Aviation policy which states that *aircraft noise is a* ***shared responsibility*** *between airport authorities, airlines, state and local government, communities, and the Federal Aviation Administration*. Furthermore, communities expect airport sponsors to **balance** the interests of various stakeholders.

#2 **It is also inaccurate that flight paths will "not change"** when petitions for changes are ongoing largely from airlines and the airport itself.

The FAA continuously makes changes to flight paths *in response* to SFO's needs and the needs of the National Airspace System. It is impossible for flight paths to be static given that in addition to the FAA's internal changes *(e.g., ATC, flight standards, FPT,*

I-Alton-2 (cont.)

etc.) requests are initiated by airlines - including for private use flight paths. SFO also has flight path procedures (navigation rules) for its new landing system "GBAS" which can INCREASE noise and SFO controls these procedures.

It is evident that the FAA looks to airports to provide **local context** in efforts to be responsive to the public and to consider the environment and people. SFO's misrepresentation that "flight paths will not change" has broken trust before. Unless this is addressed, SFO is misinforming the FAA on current and future projects, and leaving the public in the dark about potential consequences from SFO's operations.

I-Alton-3
GC-Non-CEQA-8

INCOMPLETE INFORMATION AND MISSING REGIONAL HISTORY:

SFO's claim that "*no changes or expansions proposed to the existing runway or to aircraft flight paths"* mixes two sets of airport infrastructure that have distinct impacts and mitigation options.

The public needs to be informed that while runways are not changing, SFO's flight paths are not static; flight path procedure (navigation rules) design and the level of usage of flight paths from increasing operations can increase noise and air quality impacts. Not only are flight paths distinct infrastructure from runways, flight paths can be more deleterious in terms of affecting more sensitive areas and people. The menu of potential mitigations for flight paths is also distinct. Quieter aircraft engines for example do not help address flight path noise but thoughtful flight path design and compliance can meaningfully mitigate night time noise. These mitigations however cannot be employed if the airport is denying how directly their project will impact noise. Adding a gate to serve more passengers means more flights, more flight path impacts. Moreover SFO's plan leverages powerful airline programs to induce more operations for more profits. As noted by public comment at the May 22 Hearing, United Airlines has a $2.6 billion construction project to re-establish SFO as the airline's global gateway. This expands United's route networks with **more flights**, including promotional flights that are not at full passenger capacity but add **more noise**.

Airport-airline projects influence noise as happened with Nextgen when airlines requested lower altitudes for SFO's arrivals which greatly increased noise. The failure to recognize community concerns over flight path changes led to an FAA Initiative and official community meetings with FAA and local leaders in three counties; thousands of citizens weighed in over months to come up with consensus recommendations to address flight path noise and night time operations. The DEIR's omission of the impacts of flight path changes undermines recent regional history to address just this issue, and ignores opportunities identified by citizens, local officials and the FAA to mitigate flight path impacts affecting people's health and the environment.

I-Alton-4
NO-2

INQUIRY ON THE NOISE SIGNIFICANCE THRESHOLD:

We would like to know the reason why SFO looks at the +1.5dB increase in 65 CNEL criteria when the FAA's Environmental Policies and Procedures Guideline Order 1050.1F looks at a 3 dB increase in DNL 60-65 dB and +5 dB for **45-60 dB** as well.

CEQA allows the flexibility to use significance thresholds below 65 CNEL and more metrics

I-Alton-4 (cont.)

to consider local context, so it is disappointing that only the higher threshold criteria (65) is applied which effectively *lowers the standard* for SFO's environmental review. As SFO is aware, the FAA has scientific studies that provide substantial evidence that 65 DNL or 65 CNEL is no longer supported to identify community concerns. The FAA surveyed 10,000 residents living near 20,000 representative airports with results showing that aircraft noise causes greater levels of community annoyance compared to other transportation noise and, a need for more sensitive criteria to evaluate aircraft noise. There are also legal considerations about noise threshold criteria to assess areas that qualify for insulation, vs National Environmental Policy Act requirements.

I-Alton-5
GC-Non-CEQA-8

RECOMMENDATION:

We recommend that an additional report is needed on SFO's Arrival flight path noise impacts to inform on regional impacts; at a minimum to consider the top five areas with the highest number of complaints. Particularly an analysis of all night time overflights is necessary; sleep being critical for physical and mental health and productivity. SFO has extensive data to accomplish regional noise assessments, and with various metrics. In addition, provide details such as target altitudes and current navigation rules for SFO arrival flight paths. The report should also describe how SFO makes decisions on flight path requests; how pre- and post-implementation reviews of flight path changes are managed, and who is responsible for keeping communities informed.

I-Alton-6
GC-Non-CEQA-8

There are at least 50 Surf Air extremely noisy low altitude executive jet flights directly over Palo Alto to and from the San Carlos Airport. every day.

I-Alton-5 (cont.)

Please reject any environmental review for SFO that excludes SFO's regional impacts.

Thank you for your attention,

Larry Alton
Retired NASA Engineer

I-Bailey

From: Teresa Bailey
To: cpc.sforadp@sfgov.org
Subject: SFO DEIR response
Date: Sunday, June 01, 2025 8:17:36 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear San Francisco Planning Commissioners,

I am writing regarding the SFO DEIR.

I-Bailey-1
GC-Non-CEQA-8

I wish to state that my family and I concur with Sky Posse Palo Alto's response (copied below for your reference), and add that as residents of unincorporated Santa Clara County, Los Altos sphere of influence, that we share the same concerns, and that pushing the problem to the next area south of Palo Alto is not a meaningful response to these criticisms.

Residents of all ages and taxpayers have rights to healthy peace and quiet and enjoyment of their homes and properties such that increased numbers of flights and their attendant noise pollution is contrary to the health and well-being of all residents. Slight reductions in dBA measurements are not adequate metrics to address the full spectrum of sound experienced by persons and animals whose health depends on not being regularly bombarded by full spectrum sounds that are not captured by dBA or by the averaging processes of commonly used metrics that effectively remove most of the effects of noise exposure by statistical slights of hand, but do nothing to measure the actual effects, both physiological and psychological of this industrial aviation exposure.

I-Bailey-2
GC-Non-CEQA-9

Further, in anticipation of new forms of aviation, from drone deliveries to electric helicopters, ultrasonic transport with sonic booms, and other new sources of noise, realistic, unfiltered measurements that result in significant considerations for their effects on persons, animals, and quality of life need to be developed and implemented before granting any further expansion of air traffic in the SF Bay Area metroplex.

Thank you for your consideration of these remarks.
Teresa Bailey
Ron Ullmann
Los Altos (Unincorporated Santa Clara County)

Subject: SFO DEIR has inaccuracies, incomplete information and is inadequate without the consideration of flight path impacts

I-Bailey-3
GC-Non-CEQA-8

Dear Commissioners:

I-Bailey-3 (cont.)

On behalf of thousands of Midpeninsula residents impacted by noise and air quality impacts from SFO-bound flight paths, we respectfully submit that SFO's DEIR is inadequate as long as it does not consider flight path impacts. At the May 22 public Hearing SFO's presentation suggested that "*There are no changes or expansions proposed to the existing runway or to aircraft flight paths, which are the sole purview of the FAA.*" As this report and process is meant to protect the environment and people who stand to be negatively affected by SFO's development plan, please consider our feedback as follows:

I-Bailey-4
GC-Non-CEQA-7

INACCURACIES:

#1 SFO is incorrect to say that flight paths are "***the sole purview***" *of the FAA.* An airport's role is *required* in flight path oversight.

After serious miscalculations about regional noise effects from the implementation of the FAA's Nextgen program for Northern California in 2014, the FAA expanded the role of airports as regards flight paths. SFO has since been on the FAA's Technical Working Groups for flight path design **and the Government Accountability Office recommended for the FAA to clarify how a flight path change is initiated and processed**. The FAA's publication "*How the FAA engages with Airport and Community Roundtables*" now describes the role of an Airport authority;

Step 2 of the FAA's criteria for Flight Path development states,

"*All requests not made by the airport authority or internal FAA sections responsible for air traffic control (ATC) and flight procedure development (e.g., ATC, flight standards, FPT, etc.)* ***require airport authority concurrence*** *prior to submission*."

This is consistent with US Aviation policy which states that *aircraft noise is a* ***shared responsibility*** *between airport authorities, airlines, state and local government, communities, and the Federal Aviation Administration*. Furthermore, communities expect airport sponsors to **balance** the interests of various stakeholders.

#2 **It is also inaccurate that flight paths will "not change"**when petitions for changes are ongoing largely from airlines and the airport itself.

The FAA continuously makes changes to flight paths *in response* to SFO's needs and the needs of the National Airspace System. It is impossible for flight paths to be static given that in addition to the FAA's internal changes *(e.g., ATC, flight standards, FPT, etc.)* requests are initiated by airlines - including for private use flight paths. SFO also has flight path procedures (navigation rules) for its new landing system "GBAS" which can INCREASE noise and SFO controls these procedures.

It is evident that the FAA looks to airports to provide **local context** in efforts to be responsive to the public and to consider the environment and people. SFO's misrepresentation that "flight paths will not change" has broken trust before. Unless this is

I-Bailey-4 (cont.)

addressed, SFO is misinforming the FAA on current and future projects, and leaving the public in the dark about potential consequences from SFO's operations.

I-Bailey-5
GC-Non-CEQA-8

INCOMPLETE INFORMATION AND MISSING REGIONAL HISTORY:

SFO's claim that "*no changes or expansions proposed to the existing runway or to aircraft flight paths"* mixes two sets of airport infrastructure that have distinct impacts and mitigation options.

The public needs to be informed that while runways are not changing, SFO's flight paths are not static; flight path procedure (navigation rules) design and the level of usage of flight paths from increasing operations can increase noise and air quality impacts. Not only are flight paths distinct infrastructure from runways, flight paths can be more deleterious in terms of affecting more sensitive areas and people. The menu of potential mitigations for flight paths is also distinct. Quieter aircraft engines for example do not help address flight path noise but thoughtful flight path design and compliance can meaningfully mitigate night time noise. These mitigations however cannot be employed if the airport is denying how directly their project will impact noise. Adding a gate to serve more passengers means more flights, more flight path impacts. Moreover SFO's plan leverages powerful airline programs to induce more operations for more profits. As noted by public comment at the May 22 Hearing, United Airlines has a $2.6 billion construction project to re-establish SFO as the airline's global gateway. This expands United's route networks with **more flights**, including promotional flights that are not at full passenger capacity but add **more noise**.

Airport-airline projects influence noise as happened with Nextgen when airlines requested lower altitudes for SFO's arrivals which greatly increased noise. The failure to recognize community concerns over flight path changes led to an FAA Initiative and official community meetings with FAA and local leaders in three counties; thousands of citizens weighed in over months to come up with consensus recommendations to address flight path noise and night time operations. The DEIR's omission of the impacts of flight path changes undermines recent regional history to address just this issue, and ignores opportunities identified by citizens, local officials and the FAA to mitigate flight path impacts affecting people's health and the environment.

I-Bailey-6
NO-2

INQUIRY ON THE NOISE SIGNIFICANCE THRESHOLD:

We would like to know the reason why SFO looks at the +1.5dB increase in 65 CNEL criteria when the FAA's Environmental Policies and Procedures Guideline Order 1050.1F looks at a 3 dB increase in DNL 60-65 dB and +5 dB for **45-60 dB** as well.

CEQA allows the flexibility to use significance thresholds below 65 CNEL and more metrics to consider local context, so it is disappointing that only the higher threshold criteria (65) is applied which effectively*lowers the standard* for SFO's environmental review. As SFO is aware, the FAA has scientific studies that provide substantial evidence that 65 DNL or 65 CNEL is no longer supported to identify community concerns. The FAA surveyed 10,000 residents living near 20,000 representative airports with results showing that aircraft noise causes greater levels of community annoyance compared to other transportation noise and, a need for more sensitive criteria to evaluate aircraft noise. There are also legal

I-Bailey-6 (cont.)

considerations about noise threshold criteria to assess areas that qualify for insulation, vs National Environmental Policy Act requirements.

RECOMMENDATION:

I-Bailey-7
GC-Non-CEQA-8

We recommend that an additional report is needed on SFO's Arrival flight path noise impacts to inform on regional impacts; at a minimum to consider the top five areas with the highest number of complaints. Particularly an analysis of all night time overflights is necessary; sleep being critical for physical and mental health and productivity. SFO has extensive data to accomplish regional noise assessments, and with various metrics. In addition, provide details such as target altitudes and current navigation rules for SFO arrival flight paths. The report should also describe how SFO makes decisions on flight path requests; how pre- and post-implementation reviews of flight path changes are managed, and who is responsible for keeping communities informed.

Please reject any environmental review for SFO that excludes SFO's regional impacts.

Thank you for your attention,

Sky Posse Palo Alto

I-Ben-Efraim

From: Nadav Ben-Efraim
To: cpc.sforadp@sfgov.org
Cc: city.council@cityofpaloalto.org; Kathryn.Angotti@sfgov.org
Subject: Comments on SFO"s Draft Environmental Impact Report
Date: Sunday, June 01, 2025 4:36:38 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I-Ben-Efraim-1
GC-Non-CEQA-8

I support the submission of comments on SFO's Draft Environmental Impact Report, highlighting the inclusion of flight path impacts as a critical issue. Your disregard to our quality of life is deplorable. SFO should not be allowed to increase or change traffic load or patterns it solves the noise issues with current flight patterns.
Regards,
Nadav Ben-Efraim
Palo Alto

I-Chueh

From: Justin Chueh
To: cpc.sforadp@sfgov.org
Cc: city.council@cityofpaloalto.org; Lurie, Daniel (MYR); Mike Nakornkhet (AIR); Eric.Henshall@mail.house.gov; Justin Chueh
Subject: SFO DEIR is inadequate without the consideration of flight path impacts
Date: Monday, June 02, 2025 12:47:11 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Commissioners:

I-Chueh-1
GC-Non-CEQA-8

On behalf of thousands of Midpeninsula residents impacted by noise and air quality impacts from SFO-bound flight paths, we respectfully submit that SFO's DEIR is inadequate as long as it does not consider flight path impacts. At the May 22 public Hearing SFO's presentation suggested that "*There are no changes or expansions proposed to the existing runway or to aircraft flight paths, which are the sole purview of the FAA*." As this report and process is meant to protect the environment and people who stand to be negatively affected by SFO's development plan, please consider our feedback as follows:

I-Chueh-2
GC-Non-CEQA-7

INACCURACIES:

#1 SFO is incorrect to say that flight paths are "**the sole purview**" of the FAA. An airport's role is *required* in flight path oversight.

After serious miscalculations about regional noise effects from the implementation of the FAA's Nextgen program for Northern California in 2014, the FAA expanded the role of airports as regards flight paths. SFO has since been on the FAA's Technical Working Groups for flight path design and **the Government Accountability Office recommended for the FAA to clarify how a flight path change is initiated and processed**. The FAA's publication "*How the FAA engages with Airport and Community Roundtables*" now describes the role of an Airport authority;

Step 2 of the FAA's criteria for Flight Path development states,

"All requests not made by the airport authority or internal FAA sections responsible for air traffic control (ATC) and flight procedure development (e.g., ATC, flight standards, FPT, etc.) **require airport authority concurrence** prior to submission."

This is consistent with US Aviation policy which states that *aircraft noise is a **shared responsibility** between airport authorities, airlines, state and local government, communities, and the Federal Aviation Administration*. Furthermore, communities expect airport sponsors to **balance** the interests of various stakeholders.

#2 **It is also inaccurate that flight paths will "not change"** when petitions for changes are ongoing largely from airlines and the airport itself.

The FAA continuously makes changes to flight paths *in response* to SFO's needs and the needs of the National Airspace System. It is impossible for flight paths to be static given that

I-Chueh-2 (cont.)

in addition to the FAA's internal changes (e.g., ATC, flight standards, FPT, etc.) requests are initiated by airlines - including for private use flight paths. SFO also has flight path procedures (navigation rules) for its new landing system "GBAS" which can INCREASE noise and SFO controls these procedures.

It is evident that the FAA looks to airports to provide **local context** in efforts to be responsive to the public and to consider the environment and people. SFO's misrepresentation that "*flight paths will not change*" has broken trust before. Unless this is addressed, SFO is misinforming the FAA on current and future projects, and leaving the public in the dark about potential consequences from SFO's operations.

I-Chueh-3
GC-Non-CEQA-8

INCOMPLETE INFORMATION AND MISSING REGIONAL HISTORY:

SFO's claim that "*no changes or expansions proposed to the existing runway or to aircraft flight paths*" mixes two sets of airport infrastructure that have distinct impacts and mitigation options.

The public needs to be informed that while runways are not changing, SFO's flight paths are not static; flight path procedure (navigation rules) design and the level of usage of flight paths from increasing operations can increase noise and air quality impacts. Not only are flight paths distinct infrastructure from runways, flight paths can be more deleterious in terms of affecting more sensitive areas and people. The menu of potential mitigations for flight paths is also distinct. Quieter aircraft engines for example do not help address flight path noise but thoughtful flight path design and compliance can meaningfully mitigate night time noise. These mitigations however cannot be employed if the airport is denying how directly their project will impact noise. Adding a gate to serve more passengers means more flights, more flight path impacts. Moreover SFO's plan leverages powerful airline programs to induce more operations for more profits. As noted by public comment at the May 22 Hearing, United Airlines has a $2.6 billion construction project to re-establish SFO as the airline's global gateway. This expands United's route networks with **more flights**, including promotional flights that are not at full passenger capacity but add **more noise**.

Airport-airline projects influence noise as happened with Nextgen when airlines requested lower altitudes for SFO's arrivals which greatly increased noise. The failure to recognize community concerns over flight path changes led to an FAA Initiative and official community meetings with FAA and local leaders in three counties; thousands of citizens weighed in over months to come up with consensus recommendations to address flight path noise and night time operations. The DEIR's omission of the impacts of flight path changes undermines recent regional history to address just this issue, and ignores opportunities identified by citizens, local officials and the FAA to mitigate flight path impacts affecting people's health, quality of life, and the environment.

I-Chueh-4
NO-2

INQUIRY ON THE NOISE SIGNIFICANCE THRESHOLD:

We would like to know the reason why SFO looks at the +1.5dB increase in 65 CNEL criteria when the FAA's Environmental Policies and Procedures Guideline Order 1050.1F looks at a 3 dB increase in DNL 60-65 dB and +5 dB for **45-60 dB** as well.

CEQA allows the flexibility to use significance thresholds below 65 CNEL and more metrics

I-Chueh-4 (cont.)

to consider local context, so it is disappointing that only the higher threshold criteria (65) is applied which effectively *lowers the standard* for SFO's environmental review. As SFO is aware, the FAA has scientific studies that provide substantial evidence that 65 DNL or 65 CNEL is no longer supported to identify community concerns. The FAA surveyed 10,000 residents living near 20 representative airports with results showing that aircraft noise causes greater levels of community annoyance compared to other transportation noise, and a need for more sensitive criteria to evaluate aircraft noise. There are also legal considerations about noise threshold criteria to assess areas that qualify for insulation, vs National Environmental Policy Act requirements.

I-Chueh-5
GC-Non-CEQA-8

RECOMMENDATION:

We recommend that an additional report is needed on SFO's Arrival flight path noise impacts to inform on regional impacts; at a minimum to consider the top five areas with the highest number of complaints. Particularly an analysis of all night time overflights is necessary; sleep being critical for physical and mental health and productivity. SFO has extensive data to accomplish regional noise assessments, and with various metrics. In addition, provide details such as target altitudes and current navigation rules for SFO arrival flight paths. The report should also describe how SFO makes decisions on flight path requests; how pre- and post-implementation reviews of flight path changes are managed, and who is responsible for keeping communities informed.

Please reject any environmental review for SFO that excludes SFO's regional impacts.

Thank you for your attention,

Justin Chueh
Palo Alto CA

I-Delong

From: lisa delong
To: cpc.sforadp@sfgov.org
Cc: city.council@cityofpaloalto.org; Lurie, Daniel (MYR); Mike Nakornkhet (AIR); Eric.Henshall@mail.house.gov
Subject: Revised SFO DEIR
Date: Monday, June 02, 2025 1:24:53 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello,

I-Delong-1
GC-Non-CEQA-8

I live in Crescent Park neighborhood in Palo Alto. We are close to the City of Palo Alto Airport and on the arriving flight path of what feels like most of the airplanes coming into SFO. Both airports have had increased activity and noise for all of us residents in these areas of PA/MP/Mt. View, etc. that are located near the bay.

We ask that you and the boards/committees, etc. keep vigilant on our behalf of keeping the noise level, sight level, pollution level as low as possible so that the quality of our daily and nightly life in our most valuable asset remains pleasant and valued.

Having reports that aren't honest , aren't complete, or inaccurate are undermining our lifestyle here. Please operate in the way you would if you lived here in the flight path zones.

Regards, Lisa DeLong
Palo Alto resident

I-Duisenberg

From: jeannie duisenberg
To: cpc.sforadp@sfgov.org
Cc: city.council@cityofpaloalto.org; Kathryn.Angotti@sfgov.org
Subject: SFO"s Draft EIR
Date: Sunday, June 01, 2025 8:17:10 PM

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I-Duisenberg-1
GC-Non-CEQA-8

For SFO to omit the inclusion of fight path study in the DEIR is a problem that renders the EIR incomplete at best if not frankly duplicitous.
Flight paths ARE the problem and SFO must exercise its oversight in this study.

I am quite certain the fight path/airplane noise disturbance, particularly in the night is grossly underreported by those of us affected adversely by it. That is because it is very convenient to report an incident from the middle of the night with the details required for veracity unless one writes it down, thus further disturbing sleep.(3 noisy night incidents this past month are still awaiting my reporting). There is a general fatigue about reporting since it has been more than a decade that we have been trying to bring about some relief from flight path disturbance. I think another general call to action for reporting during a finite period of study twould be revelatory.

Not to consider flight path status in the DEIR is inexcusable.

Sincerely,
Jeannie Duisenberg
Palo Alto, CA

I-Fischer

From:	Mike Fischer
To:	cpc.sforadp@sfgov.org
Cc:	Palo Alto City Council; Kathryn.Angotti@sfgov.org
Subject:	SFO DEIR has inaccuracies, incomplete information and is inadequate without the consideration of flight path impacts
Date:	Sunday, June 01, 2025 3:58:15 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Commissioners:

I-Fischer-1
GC-Non-CEQA-8

On behalf of thousands of Midpeninsula residents impacted by noise and air quality impacts from SFO-bound flight paths, we respectfully submit that SFO's DEIR is inadequate as long as it does not consider flight path impacts. At the May 22 public Hearing SFO's presentation suggested that "*There are no changes or expansions proposed to the existing runway or to aircraft flight paths, which are the sole purview of the FAA.*" As this report and process is meant to protect the environment and people who stand to be negatively affected by SFO's development plan, please consider our feedback as follows:

I-Fischer-2
GC-Non-CEQA-7

INACCURACIES:

#1 SFO is incorrect to say that flight paths are "***the sole purview***" *of the FAA.* An airport's role is *required* in flight path oversight.

After serious miscalculations about regional noise effects from the implementation of the FAA's Nextgen program for Northern California in 2014, the FAA expanded the role of airports as regards flight paths. SFO has since been on the FAA's Technical Working Groups for flight path design **and the Government Accountability Office recommended for the FAA to clarify how a flight path change is initiated and processed**. The FAA's publication "*How the FAA engages with Airport and Community Roundtables*" now describes the role of an Airport authority;

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This is consistent with US Aviation policy which states that *aircraft noise is a* ***shared responsibility*** *between airport authorities, airlines, state and local government, communities, and the Federal Aviation Administration*. Furthermore, communities expect airport sponsors to **balance** the interests of various stakeholders.

#2 **It is also inaccurate that flight paths will "not change"** when petitions for changes are ongoing largely from airlines and the airport itself.

The FAA continuously makes changes to flight paths *in response* to SFO's needs and the needs of the National Airspace System. It is impossible for flight paths to be static given

I-Fischer-2 (cont.)

that in addition to the FAA's internal changes *(e.g., ATC, flight standards, FPT, etc.)* requests are initiated by airlines - including for private use flight paths. SFO also has flight path procedures (navigation rules) for its new landing system "GBAS" which can INCREASE noise and SFO controls these procedures.

It is evident that the FAA looks to airports to provide **local context** in efforts to be responsive to the public and to consider the environment and people. SFO's misrepresentation that "flight paths will not change" has broken trust before. Unless this is addressed, SFO is misinforming the FAA on current and future projects, and leaving the public in the dark about potential consequences from SFO's operations.

I-Fischer-3
GC-Non-CEQA-8

INCOMPLETE INFORMATION AND MISSING REGIONAL HISTORY:

SFO's claim that "*no changes or expansions proposed to the existing runway or to aircraft flight paths"* mixes two sets of airport infrastructure that have distinct impacts and mitigation options.

The public needs to be informed that while runways are not changing, SFO's flight paths are not static; flight path procedure (navigation rules) design and the level of usage of flight paths from increasing operations can increase noise and air quality impacts. Not only are flight paths distinct infrastructure from runways, flight paths can be more deleterious in terms of affecting more sensitive areas and people. The menu of potential mitigations for flight paths is also distinct. Quieter aircraft engines for example do not help address flight path noise but thoughtful flight path design and compliance can meaningfully mitigate night time noise. These mitigations however cannot be employed if the airport is denying how directly their project will impact noise. Adding a gate to serve more passengers means more flights, more flight path impacts. Moreover SFO's plan leverages powerful airline programs to induce more operations for more profits. As noted by public comment at the May 22 Hearing, United Airlines has a $2.6 billion construction project to re-establish SFO as the airline's global gateway. This expands United's route networks with **more flights**, including promotional flights that are not at full passenger capacity but add **more noise**.

Airport-airline projects influence noise as happened with Nextgen when airlines requested lower altitudes for SFO's arrivals which greatly increased noise. The failure to recognize community concerns over flight path changes led to an FAA Initiative and official community meetings with FAA and local leaders in three counties; thousands of citizens weighed in over months to come up with consensus recommendations to address flight path noise and night time operations. The DEIR's omission of the impacts of flight path changes undermines recent regional history to address just this issue, and ignores opportunities identified by citizens, local officials and the FAA to mitigate flight path impacts affecting people's health and the environment.

I-Fischer-4
NO-2

INQUIRY ON THE NOISE SIGNIFICANCE THRESHOLD:

We would like to know the reason why SFO looks at the +1.5dB increase in 65 CNEL criteria when the FAA's Environmental Policies and Procedures Guideline Order 1050.1F looks at a 3 dB increase in DNL 60-65 dB and +5 dB for **45-60 dB** as well.

CEQA allows the flexibility to use significance thresholds below 65 CNEL and more metrics

I-Fischer-4 (cont.)

to consider local context, so it is disappointing that only the higher threshold criteria (65) is applied which effectively *lowers the standard* for SFO's environmental review. As SFO is aware, the FAA has scientific studies that provide substantial evidence that 65 DNL or 65 CNEL is no longer supported to identify community concerns. The FAA surveyed 10,000 residents living near 20,000 representative airports with results showing that aircraft noise causes greater levels of community annoyance compared to other transportation noise and, a need for more sensitive criteria to evaluate aircraft noise. There are also legal considerations about noise threshold criteria to assess areas that qualify for insulation, vs National Environmental Policy Act requirements.

I-Fischer-5
GC-Non-CEQA-8

RECOMMENDATION:

We recommend that an additional report is needed on SFO's Arrival flight path noise impacts to inform on regional impacts; at a minimum to consider the top five areas with the highest number of complaints. Particularly an analysis of all night time overflights is necessary; sleep being critical for physical and mental health and productivity. SFO has extensive data to accomplish regional noise assessments, and with various metrics. In addition, provide details such as target altitudes and current navigation rules for SFO arrival flight paths. The report should also describe how SFO makes decisions on flight path requests; how pre- and post-implementation reviews of flight path changes are managed, and who is responsible for keeping communities informed.

Please reject any environmental review for SFO that excludes SFO's regional impacts.

Thank you for your attention,

Michael C. Fischer

763 E. Charleston Rd.
Palo Alto CA 94303
650 855 9816

I-Hanasoge

From: Srinivas
To: cpc.sforadp@sfgov.org
Subject: Comment for SFO ADP- EIR
Date: Wednesday, May 21, 2025 8:48:55 PM
Attachments: SFO EIR feedback.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Kei Zushi

49 South Van Ness Ave, Suite 1400 San Francisco, CA 94102

Dear SFO Airport Planning Team,

I-Hanasoge-1 AA-1

I am writing to express my deep concern as a resident of Foster City regarding the proposed airport development plan and the corresponding Environmental Impact Report (EIR). Our community is significantly affected by aircraft noise, with over 400 flights per day, and we strongly oppose the plans to expand capacity by 30% as it will exacerbate the already alarming number of flights over our homes.

Specific Concerns:

I-Hanasoge-2 NO-3

1. Lack of Noise Impact Information in the EIR: The current EIR does not provide sufficient information on the noise impacts of the proposed expansion. We urge you to specifically address community noise impacts in the EIR, including capturing specific noise impacts to Foster City. Currently there is no mention of this issue.

I-Hanasoge-3 GC-Non-CEQA-8

2. Misleading Statements: While SFO claims that the expansion will not change runway configuration or flight paths, nor expand the airport property footprint or increase runway capacity, these statements do not address the significant noise impact due to increasing airport capacity. We believe these words are misleading and do not accurately reflect the true implications of the expansion.

I-Hanasoge-4 NO-5

3. Need for Noise Reduction Mitigation: Instead of increasing noise impacts, SFO should focus on reducing them. Currently, we see no mitigation path for the alarming noise levels in the Foster City area. We request that SFO prioritize noise reduction measures to minimize the impact on surrounding communities.

Request for Action:

I-Hanasoge-5 NO-3

We respectfully request that SFO:

- Conduct a thorough noise impact assessment and include the results in the EIR
- Provide transparent and accurate information about the potential noise impacts of the expansion
- Prioritize noise reduction measures to mitigate the effects of increased air traffic on surrounding communities

I-Hanasoge-6 GC-Non-CEQA-8

We appreciate your attention to this matter and look forward to a more comprehensive and considerate approach to addressing the concerns of Foster City residents.

Sincerely,

Srinivas Hanasoge
Resident of Foster City

Note: I have also attached these comments in PDF. Please confirm receipt of these comments.

To, Kei Zushi

San Francisco International Airport

49 South Van Ness Ave, Suite 1400 San Francisco, CA 94102

Dear SFO Airport Planning Team,

I am writing to express my deep concern as a resident of Foster City regarding the proposed airport development plan and the corresponding Environmental Impact Report (EIR). Our community is significantly affected by aircraft noise, with over 400 flights per day, and we strongly oppose the plans to expand capacity by 30% as it will exacerbate the already alarming number of flights over our homes.

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Request for Action:

We respectfully request that SFO:

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- Provide transparent and accurate information about the potential noise impacts of the expansion
- Prioritize noise reduction measures to mitigate the effects of increased air traffic on surrounding communities

We appreciate your attention to this matter and look forward to a more comprehensive and considerate approach to addressing the concerns of Foster City residents.

Sincerely,

Srinivas Hanasoge
Resident of Foster City

I-Jenson

From: Maria Jenson
To: cpc.sforadp@sfgov.org
Cc: Lurie, Daniel (MYR); Mike Nakornkhet (AIR); city.council@cityofpaloalto.org; Eric.Henshall@mail.house.gov
Subject: Re: REVISED: SFO DEIR is inadequate without the consideration of flight path impactsre:
Date: Monday, June 02, 2025 11:26:31 AM

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I-Jenson-1
GC-Non-CEQA-11

Please take seriously the points outlined in the most recent email from the Sky Posse Palo Alto. One of the things I always dread as the weather gets warmer is the disruption from the planes since our windows are now open. It is bad enough with the windows closed, but the plane noise requires us to stop a conversation when the windows are open. And with no AC, most homes in Palo Alto must leave their windows open at night.

Please address the impact of the flight paths over our city and others.

Maria Jenson
612-669-0732

I-Jimenez

From: Stacy Jimenez-Mayor
To: cpc.sforadp@sfgov.org
Subject: Public Comments on Recommended Airport Development Plan
Date: Monday, June 02, 2025 4:16:39 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Greetings!

I am writing to express several concerns that have been brought to my attention regarding the SFO Recommended Airport Development Plan (RADP).

I-Jimenez-1
GC-Non-CEQA-8

In Foster City, the noise impacts resulting from SFO traffic cannot be undermined. I have had resident after resident complain, and while there may be nuances I do not understand not having been a part of this process, I share the following concerns.

While the airport is expected to see increased air traffic and passengers, it does not appear that this study addressed the noise concerns resulting from this traffic on local communities, Foster City being one.

I-Jimenez-2
AA-1

Specifically, under Noise and Vibration, it states the implementation of the RADP would not induce passenger demand or change the volume of annual passengers that choose to fly into and out of SFO. Therefore, given the implementation of the RADP would not result in changes related to aircraft or the configuration of the existing runways, aircraft noise is not analyzed.

However, on page 195 of the pdf (3.A-13 of the document), it states the implementation of the RADP would facilitate the development of terminal and non-movement areas of the airfield, as well as landside facilities to accommodate long-term passenger activity levels at the Airport forecast to reach approximately 506,000 annual aircraft operations, which is the estimated annual practical capacity of the existing runways regardless of whether the RADP is implemented.

I-Jimenez-3
AA-1

This DEIR also speaks to increasing employment, increasing traffic, etc. due to the RADP.

I-Jimenez-4
AA-1

Whether the capacity of the airport isn't changing, the RADP will be facilitating an increase to the current number of people SFO serves (58M currently served vs the capacity of 71M people). This will undoubtedly increase the number of current flights, thus will be impacting surrounding communities, specifically Foster City due to flight paths, with more aircraft noise.

I believe this needs to be addressed in the DEIR and how increased aircraft noise will be mitigated. Please consider these concerns to ensure there is no further noise impact on surrounding communities.

Regards,

Stacy Jimenez
Mayor

I-Kiernan

From: Bette
To: cpc.sforadp@sfgov.org; Sky Posse Palo Alto
Subject: Palo Alto Flight Paths
Date: Sunday, June 01, 2025 4:04:52 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

I-Kiernan-1
GC-Non-CEQA-11

Flight paths over Palo Alto negatively impact quality of life and health in our communities.

Please address these in line with the points made by Sky Posse organization.

Sincerely

Bette Kiernan

Bette Kiernan, MFT
1540 Oak Creek Drive 407
Palo Alto, CA 95304

(650) 324-3639
betteuk@aol.com

I-Landesmann2

From: Jennifer Landesmann
To: cpc.sforadp@sfgov.org
Cc: city.council@cityofpaloalto.org; Lurie, Daniel (MYR); Mike Nakornkhet (AIR); Eric.Henshall@mail.house.gov
Subject: SFO DEIR NEEDS IMPROVEMENT
Date: Monday, June 02, 2025 3:17:11 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear San Francisco Planning Commissioners,

I-Landesmann2-1
GC-Non-CEQA-11

I am writing in support of the recommendation by Sky Posse Palo Alto for the SFO DEIR.

I-Landesmann2-2
GC-Non-CEQA-10

It was really tough to watch last November the certification of the Oakland Airport environmental review where dozens of people, organizations, and medical doctors spoke to OAK's environmental review inadequacies, but were dismissed with something along the lines of "we know" and their authorities certified the report. This was such a missed opportunity because YOU are in the position to improve reviews when they are not used for their true purpose, to open adequate engagement, not to shut down the public.

With SFO's DEIR, San Francisco has the opportunity to do better.

I-Landesmann2-3
NO-2

At the May 22 Hearing, I raised the issue of international standards. Countries belong to International Civil Aviation Organizations (ICAO). ICAO has a four-part framework to address noise https://www.icao.int/environmental-protection/pages/noise.aspx.

ICAO Balanced Approach
1. Reduction of Noise at Source
2. Land-Use Planning and Management
3. Noise Abatement Operational Procedures
4. Operating Restrictions

In a nutshell airports around the world use ICAO's Balanced approach because their countries adhere to it. Whereas, although the US is an ICAO leader, the *practice* in the US is that the Balanced Approach is ignored or practiced in bits. Airlines comply with ICAO "reduction of noise at the source" (making jet engines quieter for example); airports focus on "Land-Use Planning and Management" which is 99% an insulation program. And a KEY opportunity to reduce noise (especially at night) - "Operational Procedures" - are largely neglected. In ICAO's balanced approach, "restrictions" are meant for measures of last resort, when nothing else has worked. Beyond these country initiatives however, it is so basic that communities expect OUR regional airport to advocate for better stewardship and to protect treasured open space in the Bay Area as well as the neighbors it counts as customers. I love San Francisco, and I want San Francisco to love the MidPeninsula.

I-Landesmann2-4
GC-Non-CEQA-8

If SFO is going to be in a league of world class airports, it should please join world class airports by assessing Flight Paths and Operational Procedures instead of denying them in what will arguably be SFO's signature environmental review. I reiterate the message from Sky Posse below which reflects the expectations of communities today and from an agency such as SFO.

Jennifer Landesmann
Palo Alto, CA 94301

I-Landesmann2-5
GC-Non-CEQA-8

On behalf of thousands of Midpeninsula residents impacted by noise and air quality impacts from SFO-bound flight paths, we respectfully submit that SFO's DEIR is inadequate as long as it does not consider flight path impacts. At the May 22 public Hearing SFO's presentation suggested that "*There are no changes or expansions proposed to the existing runway or to aircraft flight paths, which are the sole purview of the FAA*." As this report and process is meant to protect the environment and people who stand to be negatively affected by SFO's development plan, please consider our feedback as follows:

I-Landesmann2-6
GC-Non-CEQA-7

INACCURACIES:

> #1 SFO is incorrect to say that flight paths are "**the sole purview**" of the FAA. An airport's role is *required* in flight path oversight.

After serious miscalculations about regional noise effects from the implementation of the FAA's Nextgen program for Northern California in 2014, the FAA expanded the role of airports as regards flight paths. SFO has since been on the FAA's Technical Working Groups for flight path design and **the Government Accountability Office recommended for the FAA to clarify how a flight path change is initiated and processed**. The FAA's publication "*How the FAA engages with Airport and Community Roundtables*" now describes the role of an Airport authority;

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This is consistent with US Aviation policy which states that *aircraft noise is a **shared responsibility** between airport authorities, airlines, state and local government, communities, and the Federal Aviation Administration*. Furthermore, communities expect airport sponsors to **balance** the interests of various stakeholders.

> #2 **It is also inaccurate that flight paths will "not change"** when petitions for changes are ongoing largely from airlines and the airport itself.

The FAA continuously makes changes to flight paths *in response* to SFO's needs and the needs of the National Airspace System. It is impossible for flight paths to be static given that in addition to the FAA's internal changes (e.g., ATC, flight standards, FPT, etc.) requests are initiated by airlines - including for private use flight paths. SFO also has flight path procedures (navigation rules) for its new landing system "GBAS" which can INCREASE noise and SFO controls these procedures.

It is evident that the FAA looks to airports to provide **local context** in efforts to be responsive to the public and to consider the environment and people. SFO's misrepresentation that "*flight paths will not change*" has broken trust before. Unless this is addressed, SFO is misinforming the FAA on current and future projects, and leaving the public in the dark about potential consequences from SFO's operations.

I-Landesmann2-7
GC-Non-CEQA-8

INCOMPLETE INFORMATION AND MISSING REGIONAL HISTORY:

SFO's claim that "*no changes or expansions proposed to the existing runway or to aircraft flight paths*" mixes two sets of airport infrastructure that have distinct impacts and mitigation options.

The public needs to be informed that while runways are not changing, SFO's flight paths are not static; flight path procedure (navigation rules) design and the level of usage of flight paths from increasing operations can increase noise and air quality impacts. Not only are flight paths distinct infrastructure from runways, flight paths can be more deleterious in terms of affecting more sensitive areas and people. The menu of potential mitigations for flight paths is also distinct. Quieter aircraft engines for example do not help address flight path noise but thoughtful flight path design and compliance can meaningfully mitigate night time noise. These mitigations however cannot be employed if the airport is denying how directly their project will impact noise. Adding a gate to serve more passengers means more flights, more flight path impacts. Moreover SFO's plan leverages powerful airline programs to induce more operations for more profits. As noted by public comment at the May 22 Hearing, United Airlines has a $2.6 billion construction project to re-establish SFO as the airline's global gateway. This expands United's route networks with **more flights**, including promotional flights that are not at full passenger capacity but add **more noise**.

Airport-airline projects influence noise as happened with Nextgen when airlines requested lower altitudes for SFO's arrivals which greatly increased noise. The failure to recognize community concerns over flight path changes led to an FAA Initiative and official community meetings with FAA and local leaders in three counties; thousands of citizens weighed in over months to come up with consensus recommendations to address flight path noise and night time operations. The DEIR's omission of the impacts of flight path changes undermines recent regional history to address just this issue, and ignores opportunities identified by citizens, local officials and the FAA to mitigate flight path impacts affecting people's health, quality of life, and the environment.

I-Landesmann2-8
NO-2

INQUIRY ON THE NOISE SIGNIFICANCE THRESHOLD:

We would like to know the reason why SFO looks at the +1.5dB increase in 65 CNEL criteria when the FAA's Environmental Policies and Procedures Guideline Order 1050.1F looks at a 3 dB increase in DNL 60-65 dB and +5 dB for **45-60 dB** as well.

CEQA allows the flexibility to use significance thresholds below 65 CNEL and more metrics to consider local context, so it is disappointing that only the higher threshold criteria (65) is applied which effectively *lowers the standard* for SFO's environmental review. As SFO is aware, the FAA has scientific studies that provide substantial evidence that 65 DNL or 65 CNEL is no longer supported to identify community concerns. The FAA surveyed 10,000 residents living near 20 representative airports with results showing that aircraft noise causes greater levels of community annoyance compared to other transportation noise, and a need for more sensitive criteria to evaluate aircraft noise. There are also legal considerations about noise threshold criteria to assess areas that qualify for insulation, vs National Environmental Policy Act requirements.

I-Landesmann2-9
GC-Non-CEQA-8

RECOMMENDATION:

We recommend that an additional report is needed on SFO's Arrival flight path noise impacts to inform on regional impacts; at a minimum to consider the top five areas with the highest number of complaints. Particularly an analysis of all night time overflights is necessary; sleep being critical for physical and mental health and productivity. SFO has extensive data to accomplish regional noise assessments, and with various metrics. In addition, provide details such as target altitudes and current navigation rules for SFO arrival flight paths. The report should also describe how SFO makes decisions on flight path requests; how pre- and post-implementation reviews of flight path changes are managed, and who is responsible for keeping communities informed.

I-Lyman

From: Susan Lyman
To: cpc.sforadp@sfgov.org
Subject: flawed SFO DEIR NEEDS REVISIONS
Date: Monday, June 02, 2025 10:58:31 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear SF / SFO planning commission:

I-Lyman-1
GC-Non-CEQA-8

As a resident of South San Francisco who has for 18 years (and counting) rented an apartment directly under the 2015-2017 NextGen flight path, I want to make my voice heard about what seems to be a real lack of consideration from the comission about noise pollution.

In the 2 years after NextGen was implemented, from 2015 to 2017 / early 2018, a low-flying and insanely loud plane would fly directly over my apartment at least every 10 minutes; often every 5 minutes. ALL DAY AND INTO THE WEE HOURS OF THE NIGHT.

It was impossible to have a conversation, listen to the radio, or even think - the noise was so invasive. The duplex would physically rattle every time one of these low planes flew over.

After 2 years of submitting as many noise complaints as I could, SFO / FAA finally changed the plan so that the preponderance of flights went over water instead of directly over a long-suffering residential area.

However, there are still plenty of low/loud flights - presumably due to runway repairs or strong winds - in these instances, flights start very early in the morning and can be heard as late as 2AM.

As someone who has been affected by a ridiculous degree of flight noise, I want to STRONGLY STATE that the SFO Draft Environmental Report (DEIR) should do what is VERY OBVIOUS:

INCLUDE FLIGHT PATH IMPACT and noise pollution - and to do this NOT using the flawed "average" reading, but to take into account peak noise and the frequency of noise.

I would dare any one of the commissioners to live where I live under the NextGen conditions of 2015-2017 and to not go insane. You have NO IDEA what it is like to deal with frequent noise like this until you have lived through days, weeks, months, and years of it.

SFO itself has long been a source of profit for the city of San Francisco, while the residents of South San Francisco bear the brunt of the annoyance and health impacts caused by noisy planes.

And SFO itself has a RESPONSIBILITY to be a good neighbor to the people affected by its operations - and to take our issues seriously and ACT ON THEM, rather than simply bending a knee to SF and to airlines who want to maximize profits, while they sit far away insulated from the noise and pollution from SFO.

SFO has, per the FAA, authority to weigh in on air traffic and flight path planning, and to agree or disagree.

SFO seems to have no issue at all with United's major project to add significantly more capacity to SFO. I propose that everyone high up at SFO, the FAA, and United be forced to live indefinitely under a low, loud NextGen flight path and then see how they would vote...

I-Lyman-1 (cont.)

Airplane noise is a SHARED RESPONSIBILITY between SFO, airlines, state/local government, and the FAA.

I-Lyman-2 NO-3

As a long-standing citizen of South SF who pays taxes, votes in every election, and is negatively impacted by airport noise, I demand that the commision take seriously their responsibility to the communities affected by such noise - and to use REALISTIC noise pollution criteria (including the 45-60dB range) - not a lame average.

I-Lyman-3 GC-Non-CEQA-5

I want SFO, the SF planning commision, the FAA, and the airlines to be MUCH more transparent and inclusive of the community in standards, plans, and decision making.

This is your public duty, and I expect you to do no less.

Susan Lyman

I-Neiderhofer

From: Suzy Niederhofer-Councilmember
To: cpc.sforadp@sfgov.org
Subject: Public Comments on DEIR of SFO Recommended Airport Development Plan
Date: Sunday, May 25, 2025 11:10:12 AM
Attachments: image001.png
image002.png
image003.png
image004.png
image005.png
image006.png

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Hello

I am writing to express my concern with the DEIR of the SFO Recommended Airport Development Plan (RADP).

I-Neiderhofer-1
AA-1

On page 241 of the pdf (3.B-1 of the document) under Noise and Vibration, it states the implementation of the RADP would not induce passenger demand or change the volume of annual passengers that choose to fly into and out of SFO. Therefore, given the implementation of the RADP would not result in changes related to aircraft or the configuration of the existing runways, aircraft noise is not analyzed.

However, on page 195 of the pdf (3.A-13 of the document), it states the implementation of the RADP would facilitate the development of terminal and non-movement areas of the airfield, as well as landside facilities to accommodate long-term passenger activity levels at the Airport forecast to reach approximately 506,000 annual aircraft operations, which is the estimated annual practical capacity of the existing runways regardless of whether the RADP is implemented.

This DEIR also speaks to increasing employment, increasing traffic, etc. due to the RADP.

Whether the capacity of the airport isn't changing, the RADP will be facilitating an increase to the current number of people SFO serves (58M currently served vs the capacity of 71M people). This will undoubtedly increase the number of current flights, thus will be impacting surrounding communities, specifically Foster City due to flight paths, with more aircraft noise.

I believe this needs to be addressed in the DEIR and how increased aircraft noise will be mitigated. Please consider these concerns to ensure there is no further noise impact on surrounding communities.

These are my comments as a Councilmember, not speaking for the City.

Suzy Niederhofer
Councilmember | City of Foster City

(650) 286-3502 | www.fostercity.org
610 Foster City Boulevard | Foster City, CA 94404

I-North

From: Lindsey North
To: cpc.sforadp@sfgov.org
Subject: SFO DEIR and flight path impacts
Date: Monday, June 02, 2025 7:05:45 AM

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I-North-1
GC-Non-CEQA-11

Please give full consideration to the points made in the recent email from Sky Posse. Airport noise is a huge consideration for our neighborhood on the Peninsula.

Lindsey North
Palo Alto

I-Rindfleisch

From: Thomas Rindfleisch
To: cpc.sforadp@sfgov.org
Cc: city.council@cityofpaloalto.org; Lurie, Daniel (MYR); Mike Nakornkhet (AIR); Eric.Henshall@mail.house.gov
Subject: SFO DEIR is inadequate without the consideration of flight path impacts
Date: Monday, June 02, 2025 11:25:58 AM

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I-Rindfleisch-1
GC-Non-CEQA-11

Dear Commissioners, I am writing to add my support for the comments sent to you recently by Sky Posse Palo Alto (see below). I live under the SIDBY waypoint affected by many of the aircraft arrival routes into SFO, including from BDEGA (west), DYAMD, PIRAT, and SERFR. We are overflown by on the order of 350 SFO arrival flights each day and the soundscape impacts of the ground noise they generate impedes many routine daily activities. Please include the points raised in the Sky Posse message in your SFO DEIR.

Thank you for your consideration, Thomas Rindfleisch

31 Tevis Place
Palo Alto, CA

I-Rindfleisch-2
GC-Non-CEQA-8

On behalf of thousands of Midpeninsula residents impacted by noise and air quality impacts from SFO-bound flight paths, we respectfully submit that SFO's DEIR is inadequate as long as it does not consider flight path impacts. At the May 22 public Hearing SFO's presentation suggested that "*There are no changes or expansions proposed to the existing runway or to aircraft flight paths, which are the sole purview of the FAA*." As this report and process is meant to protect the environment and people who stand to be negatively affected by SFO's development plan, please consider our feedback as follows:

I-Rindfleisch-3
GC-Non-CEQA-7

INACCURACIES:

> #1 SFO is incorrect to say that flight paths are "**the sole purview**" of the FAA. An airport's role is *required* in flight path oversight.

After serious miscalculations about regional noise effects from the implementation of the FAA's Nextgen program for Northern California in 2014, the FAA expanded the role of airports as regards flight paths. SFO has since been on the FAA's Technical Working Groups for flight path design and **the Government Accountability Office recommended for the FAA to clarify how a flight path change is initiated and processed**. The FAA's publication "*How the FAA engages with Airport and Community Roundtables*" now describes the role of an Airport authority;

Step 2 of the FAA's criteria for Flight Path development states,

"All requests not made by the airport authority or internal FAA sections responsible for air traffic control (ATC) and flight procedure development (e.g., ATC, flight standards, FPT, etc.) **require airport authority concurrence** prior to submission."

I-Rindfleisch-3 (cont.)

This is consistent with US Aviation policy which states that *aircraft noise is a **shared responsibility** between airport authorities, airlines, state and local government, communities, and the Federal Aviation Administration*. Furthermore, communities expect airport sponsors to **balance** the interests of various stakeholders.

> #2 **It is also inaccurate that flight paths will "not change"** when petitions for changes are ongoing largely from airlines and the airport itself.

The FAA continuously makes changes to flight paths *in response* to SFO's needs and the needs of the National Airspace System. It is impossible for flight paths to be static given that in addition to the FAA's internal changes (e.g., ATC, flight standards, FPT, etc.) requests are initiated by airlines - including for private use flight paths. SFO also has flight path procedures (navigation rules) for its new landing system "GBAS" which can INCREASE noise and SFO controls these procedures.

It is evident that the FAA looks to airports to provide **local context** in efforts to be responsive to the public and to consider the environment and people. SFO's misrepresentation that "*flight paths will not change*" has broken trust before. Unless this is addressed, SFO is misinforming the FAA on current and future projects, and leaving the public in the dark about potential consequences from SFO's operations.

I-Rindfleisch-4
GC-Non-CEQA-8

INCOMPLETE INFORMATION AND MISSING REGIONAL HISTORY:

SFO's claim that "*no changes or expansions proposed to the existing runway or to aircraft flight paths*" mixes two sets of airport infrastructure that have distinct impacts and mitigation options.

The public needs to be informed that while runways are not changing, SFO's flight paths are not static; flight path procedure (navigation rules) design and the level of usage of flight paths from increasing operations can increase noise and air quality impacts. Not only are flight paths distinct infrastructure from runways, flight paths can be more deleterious in terms of affecting more sensitive areas and people. The menu of potential mitigations for flight paths is also distinct. Quieter aircraft engines for example do not help address flight path noise but thoughtful flight path design and compliance can meaningfully mitigate night time noise. These mitigations however cannot be employed if the airport is denying how directly their project will impact noise. Adding a gate to serve more passengers means more flights, more flight path impacts. Moreover SFO's plan leverages powerful airline programs to induce more operations for more profits. As noted by public comment at the May 22 Hearing, United Airlines has a $2.6 billion construction project to re-establish SFO as the airline's global gateway. This expands United's route networks with **more flights**, including promotional flights that are not at full passenger capacity but add **more noise**.

Airport-airline projects influence noise as happened with Nextgen when airlines requested lower altitudes for SFO's arrivals which greatly increased noise. The failure to recognize community concerns over flight path changes led to an FAA Initiative and official community meetings with FAA and local leaders in three counties; thousands of citizens weighed in over months to come up with consensus recommendations to address flight path noise and night time operations. The DEIR's omission of the impacts of flight path changes undermines recent regional history to address just this issue, and ignores opportunities identified by citizens, local

I-Rindfleisch-4 (cont.)

officials and the FAA to mitigate flight path impacts affecting people's health, quality of life, and the environment.

I-Rindfleisch-5 NO-2

INQUIRY ON THE NOISE SIGNIFICANCE THRESHOLD:

We would like to know the reason why SFO looks at the +1.5dB increase in 65 CNEL criteria when the FAA's Environmental Policies and Procedures Guideline Order 1050.1F looks at a 3 dB increase in DNL 60-65 dB and +5 dB for **45-60 dB** as well.

CEQA allows the flexibility to use significance thresholds below 65 CNEL and more metrics to consider local context, so it is disappointing that only the higher threshold criteria (65) is applied which effectively *lowers the standard* for SFO's environmental review. As SFO is aware, the FAA has scientific studies that provide substantial evidence that 65 DNL or 65 CNEL is no longer supported to identify community concerns. The FAA surveyed 10,000 residents living near 20 representative airports with results showing that aircraft noise causes greater levels of community annoyance compared to other transportation noise, and a need for more sensitive criteria to evaluate aircraft noise. There are also legal considerations about noise threshold criteria to assess areas that qualify for insulation, vs National Environmental Policy Act requirements.

I-Rindfleisch-6 GC-Non-CEQA-8

RECOMMENDATION:

We recommend that an additional report is needed on SFO's Arrival flight path noise impacts to inform on regional impacts; at a minimum to consider the top five areas with the highest number of complaints. Particularly an analysis of all night time overflights is necessary; sleep being critical for physical and mental health and productivity. SFO has extensive data to accomplish regional noise assessments, and with various metrics. In addition, provide details such as target altitudes and current navigation rules for SFO arrival flight paths. The report should also describe how SFO makes decisions on flight path requests; how pre- and post-implementation reviews of flight path changes are managed, and who is responsible for keeping communities informed.

Please reject any environmental review for SFO that excludes SFO's regional impacts.

Thank you for your attention,

Sky Posse Palo Alto

I-Samson

From: Mark Samson
To: skypossepost@gmail.com
Cc: Kathryn.Angotti@sfgov.org; cpc.sforadp@sfgov.org; city.council@cityofpaloalto.org
Subject: Re: See Sky Posse Comment on the Inadequacy of SFO's Draft Environmental Review - due 5PM Monday June 2nd
Date: Sunday, June 01, 2025 5:24:02 PM

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Sky Posse heroes—

I-Samson-1
GC-Non-CEQA-11

You are incredible people. To continue to push back against this enormous profit driven bloated bully who is absolutely *ruining our beloved Palo Alto lifestyle* already—as *continue to expand* the airport ? BIG RESPECT. BIG REGARD. That's what I have for you.

With much gratitude.

MS
Mark Samson
Palo Alto, CA 94303

On Jun 1, 2025, at 15:30, Sky Posse Palo Alto <skypossepost-gmail.com@shared1.ccsend.com> wrote:

Sky Posse Palo Alto

Dear Friends,

SFO's Draft Environmental Impact Report (DEIR) has a fatal flaw because it excludes flight path impacts. See our comment below on the DEIR's inaccuracies and missing information. To add your voice, questions, or to support the points we make please email cpc.sforadp@sfgov.org by 5PM Monday June 2. Written comments are expected to be released in the Fall, followed by a Hearing when the Planning Commissioners will be asked to certify SFO's review should the project go forward.

Sky Posse Email to San Francisco Planning Commission:

cpc.sforadp@sfgov.org
Copy: city.council@cityofpaloalto.org, Kathryn.Angotti@sfgov.org

Subject: SFO DEIR has inaccuracies, incomplete information and is inadequate without the consideration of flight path impacts

I-Samson-2
GC-Non-CEQA-8

Dear Commissioners:

On behalf of thousands of Midpeninsula residents impacted by noise and air quality

I-Samson-2 (cont.)

impacts from SFO-bound flight paths, we respectfully submit that SFO's DEIR is inadequate as long as it does not consider flight path impacts. At the May 22 public Hearing SFO's presentation suggested that "*There are no changes or expansions proposed to the existing runway or to aircraft flight paths, which are the sole purview of the FAA.*" As this report and process is meant to protect the environment and people who stand to be negatively affected by SFO's development plan, please consider our feedback as follows:

I-Samson-3
GC-Non-CEQA-7

INACCURACIES:

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I-Samson-4
GC-Non-CEQA-8

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I-Samson-4 (cont.)

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I-Samson-5 NO-2

INQUIRY ON THE NOISE SIGNIFICANCE THRESHOLD:

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I-Samson-6 GC-Non-CEQA-8

RECOMMENDATION:

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I-Samson-6 (cont.)

flight path changes are managed, and who is responsible for keeping communities informed.

Please reject any environmental review for SFO that excludes SFO's regional impacts.

Thank you for your attention,

Sky Posse Palo Alto

SPREAD THE WORD

Ask neighbors to JOIN OUR CALLS TO ACTION and to get updates by sending "SUBSCRIBE" to info@skypossepaloalto.org

MOST IMPORTANT
Report intrusive jet noise!
The number of reporters matters (enlist neighbors who are bothered by intrusive jet noise to report!)

Use any of these methods:

The APP stop.jetnoise.net
OR
EMAIL sfo.noise@flysfo.com
SFO PHONE 650.821.4736/Toll free 877.206.8290.
ONLINE:
SFO traffic: click here for the link
SJC traffic: click her for the link
Other airports: click here for more info

Sky Posse Palo Alto | Suite 200 2225 East Bayshore Avenue | Palo Alto, CA 94303 US

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Constant Contact

I-Schneider

From: Ann Schneider
To: cpc.sforadp@sfgov.org
Subject: SFO DEIR resending again comments
Date: Monday, June 02, 2025 5:38:58 PM
Attachments: SFO DEIR Comments June 2 2025 Ann Schneider.docx

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Kei Zushi, EIR Coordinator
49 South Van Ness Ave., Suite 1400
San Francisco, CA 94103
Cpc.sfoadp@sfgov.org
Due by 5 pm June 2, 2025 June 2, 2025

RE: Comments on SFO DEIR (2045 estimated planning period)

Dear SF Planning Commissioners

I-Schneider-1
GC-Non-CEQA-12

Thank you for the opportunity to comment on the Draft Environmental Impact Report for the next phase of SFO International Airport expansion plans (DEIR). My comments are based on serving on the City of Millbrae City Council and serving on the SFO Community Roundtable (SFORT) for the previous nine years (2016-2024). During much of this time SFO worked on projects that were approved in 1989 and never came back to the Roundtable or the City of Millbrae to explain what might impact the City of Millbrae. As SFO staff said at recent SFORT and the City & County of San Mateo Airport Landuse Advisory Committee (ALUC), the projects approved in 1989 are still being completed after a range of understandable delays. However, much changed during those 35 years making the time frame for that EIR and this DEIR going to 2045 problematic. This is the first of many problems with this DEIR.

I-Schneider-2
AA-1

The worst problem is this DEIR is about construction projects and to a very tiny degree using data from ongoing operations. BUT this work is to allow SFO to expand from 52 million passengers per year to 71 million passengers. It also ignores the addition of cargo flights, private jet aviation, and the very near future of heli-taxis. All of which will greatly impact the people in the close in communities of Millbrae and San Bruno. Other close in cities will feel some impact but due to land will also benefit by providing services. The very creation of SFO took away economic opportunity for Millbrae and San Bruno but truly hit Millbrae really hard taking away most of our lowlands, access to the Bay and tearing down our hillsides. It is why we fought to the State Supreme Court to separate from unincorporated San Mateo County and became a city on January 14, 1948. Sadly, more of Millbrae was lost to Burlingame in a 1954 lawsuit allowing Burlingame the industrial land that supports SFO operations like airline catering and car rentals.

I-Schneider-3
GC-Non-CEQA-5

Following is a list of errors and omissions within the 440-page DEIR. I don't list them all and I mainly looked at the impact on the people and community of Millbrae. Sadly, I believe that both the San Francisco Planning Commission and the San Francisco Airport Commission, or staff have little knowledge of the "close in communities around SFO. Your decisions have grave impacts on over one hundred thousand people. I would like to think that no one has ever told you the history of SFO and the historical damage caused to the City of

I-Schneider-3 (cont.)

Millbrae that began when we were unincorporated San Mateo County. In this you are not alone as the County of San Mateo has also forgotten the damage they did to the people living in then unincorporated Millbrae. People who lived here long before Mills Field (the predecessor of SFO), the relocation of the old Bayshore Highway to assist the expansion of SFO, and the change from a small bi-plane airport to one of the biggest airports in the USA and world today.

This DEIR also takes advantage of the myth of ambient noise and ambient air pollution that SFO operations place on the close in communities including Millbrae. In other words, it assumes cities like Millbrae create ambient noise and air pollution when most of that is from SFO and 101 itself including the traffic to and from SFO. It also ignores that the reason the Millbrae Transit Station exists is to serve SFO (and that is why Calif. High Speed Rail and the enormous impact on Millbrae is planned). It ignores the cut through traffic created by SFO's existence. SFO is responsible for a range of pollutants and traffic in Millbrae already so to call this existing or ambient problems is historically incorrect.

I-Schneider-4 HY-1

It completely ignores the fact that SFO's existence blocks storm water drainage. It ignores the fact that Millbrae floods when SFO does not maintain Lomita Canal (formerly a creek that drained Millbrae and San Bruno into SF Bay, forever blocked now by SFO/101. It ignores the history of SFO not maintaining Lomita Canal so storm water can move. It ignores the historic fact that SFO often said no to turning on the water pumps to move said storm water into Millbrae's Highline Canal.

I-Schneider-5 GC-Non-CEQA-1

It ignores the history of the "Adrian Lot" that was wetlands. Until very recently, this property had vegetation that helped to mitigate both noise from taxiing and departing planes, but also 101 traffic. That this same vegetation helped trap air pollutants, especially particulate matter. That this property is the first thing people on 101 south see as they pass or enter Millbrae. Now they see piles of dirt and broken concrete. This hardly is welcoming and is a huge slap in the face of Millbrae and its people. While hundreds of millions are spent making SFO attractive, the exact opposite is done to Millbrae by using Adrian Lot as a construction staging area or really a heavy industrial recycling operation for construction and demolition materials (C&D).

I-Schneider-6 GC-Non-CEQA-13

It ignores that Millbrae has since 2019 (the timeframe of monitor data used in the DEIR) constructed an entirely new neighborhoods on OUR east side. Frankly, it also ignores that when BART came in, we lost this same east side by eminent domain. We lost housing, sale tax producing operations including car rental agencies and other tax producing operations all to the benefit of SFO but genuine cost to Millbrae. Now our brand-new roads in the Gateway Neighborhood and the brand-new Bay Trail segment (not mentioned in your DEIR) will be torn apart by heavy construction vehicles carrying very heavy loads and leaving a

I-Schneider-6 (cont.)

trail of broken inert material that will fall from these trucks. That these trucks will run at least till 2045, adding to the already overburdened Millbrae Ave traffic.

Recent history, from the annual flooding of the Landing Lane Neighborhood in Millbrae, to the BART takings, to San Mateo County's arrogance in wanting to take the La Quinta Hotel to the fact that San Francisco's representatives to the SFORT never attend show that Millbrae is simply a colony of larger and much wealthier jurisdictions. This DEIR might be just about demolishing some buildings and constructing some new ones. But every plane has a negative impact on Millbrae and SFO does ZERO mitigation in Millbrae. The use of Aviador Lot for past, current, and future heavy construction and demolition operations is the basic definition of environmental INJUSTICE. The best and only alternative for the use of Aviador Lot for any current or future SFO operations including those in the Shoreline Protect Plan is to NOT USE AVIADOR LOT AT ALL. Further, SFO should be providing a range of air quality monitors in Millbrae and San Bruno and report on all releases, all overflights and all other situations that can cause harm to the people of Millbrae.

I-Schneider-7 GC-Non-CEQA-8

I-Schneider-8 GC-Non-CEQA-1

I-Schneider-9 AQ-5

I-Schneider-10 GC-Non-CEQA-5

I would wish that this will happen. But Millbrae has truly no say in anything SFO does. Power is in the hands of you the San Francisco Planning Commission. More power to all of you since the County of San Mateo has abrogated their responsibility to care for all the people in the close in communities as shown by allowing SFO to do whatever it wants on San Mateo County land.

I-Schneider-11 GC-Non-CEQA-1

I-Schneider-12 TR-5

You can change this. You can stop the use of Aviador Lot, put in the monitors, require this DEIR to use updated science and C-Weighted noise reports and serious work on PM2.5 and other air pollutants. You can work with Millbrae to stop cut through traffic or use SFO profits to help fix Millbrae's roads (2nd worst in San Mateo County).

I-Schneider-13 GC-Non-CEQA-13

Millbrae is not your colony. San Francisco exposes glorious goals to care for all. Now it is up to you to live up to the lofty San Francisco goals.

Sincerely,

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MS Environmental Science, Univ of San Francisco
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Cc: Tom Williams, City Manager, City of Millbrae
Andrew Mogenson, Community Development Director, City of Millbrae
Honorable, Stephen Rainaldi, Councilmember, City of Millbrae, SFO Roundtable
Michael van Every, President & Managing Partner, Republic Urban Properties
Hon. Jackie Speier, Supervisor, County of San Mateo, District 1, SFO Roundtable
Hon. Christine Krolick, Councilmember, City of Hillsborough, SFO Roundtable
Hon. Terry O'Connell, Councilmember, City of Brisbane, SFO Roundtable

Attachment A – Specific Errors, omissions in DEIR

I-Schneider-14
NO-2

S-4, S-5, S-6 – Nighttime use of Aviador Lot – Noise Plan will include noise impacts to be below 45 dBA in doors. But this is using A weighted not C weighted noise – will not include low frequency noise and vibration - will provide a noise plan but clearly homes are within several hundred feet. SFO plans to use this lot until and at least till 2045, that is decades of noise, not just a couple of years of construction. Mitigation – do not use Aviador Lot for any SFO construction.

I-Schneider-15
CR-2

Page 26 - Note all Bayside Manor Neighborhood is older that 45 years, all are potentially historic. Millbrae has discussed the process of designation of this and other neighborhoods as historic as they are so SFO will have to mitigate long term existing noise, air pollution and traffic impacts.

I-Schneider-16
NO-5

Elaborate on sound curtains for operations on Aviador lot and if they work, why aren't they being used at airport taxiways and runways.

I-Schneider-17
NO-3

Impact NO-3 – actions would not impact living or working in area – Heavy trucks and concrete crushing operations are not going to impact Bayside Manor and Gateway neighborhoods. This isn't true now nor in the future. SFO even acted against City and Gateway to remove trees so big construction vehicles using Aviador lot could make turns from Rollins Road. Trees that would have absorbed some of the existing air pollution and in a very tiny way some of the noise.

I-Schneider-18
AQ-2

Impact AQ-3 try not to use portable generators especially those diesel powered. The entire east side of Millbrae is considered at high risk to PM2.5, Diesel PM 2.5, heat impacts, traffic, flooding. All related to SFO and yes, HWY 101. As reported in President Biden's Justice 40 report. None of this data is included in any part of this DEIR. Best mitigation – do not use Aviador lot. Too close to homes, already heavily impacted by taxiways and Departures on Runways 1L/R. And greatly impacted by all reverse flow ongoing operations.

I-Schneider-19
AQ-3

Page 39 S-22 Mitigation: Order of mitigation activities – puts SFO first, then "offsite within neighborhoods surrounding the airport, then within the cities of SSF, SB and Millbrae. But there is no neighborhood more impacted within the surrounding neighborhoods than Millbrae. See Insulation program and how it ignores Millbrae using 1980 sound criteria and avoidance of low frequency noise issues greatest at departures.

I-Schneider-20
GC-Non-CEQA-13

Mitigation should happen in Millbrae and San Bruno who lost land to SFO, lost access to the Bay and economic opportunities to SFO and San Mateo County. SFO is 100 years behind in mitigating the impacts of its operations on the close in communities.

I-Schneider-21
AQ-5

PP 42 S-24 PM25 and odors states no mitigation required. But using air quality data from a monitor in San Francisco. At minimum SFO needs to place air quality monitors in the close in communities – see the map of the study area to be consistent. Also consider the topography of Millbrae with canyons that concentrate both air pollution, odors, and noise.

I-Schneider-22
GC-Non-CEQA-1

PP 44 – S-26 – states no adverse effect on land use plans – Aviador Lot clearly has impact on existing Millbrae infrastructure including roads, new bay trail section, vegetation, quality of life and Impact AE=1 scenic vista – Aviador lot reduction of existing vegetation already damaged scenic vista. Big piles of construction and demolition debris also damaging scenic vistas. S-27 SFO past project work and Shoreline Protection Plan work have already changed Aviador Lot negatively. In the later plan work only until 2035 now extending to 2024 and beyond based on delays in previous work by SFO since 1989 Plan.

I-Schneider-23
GC-Non-CEQA-1

C-AE-1 – no cumulative impact on aesthetics – simply not true. Just the fence and fallen gravel on the new bay trail is beyond aesthetics, it is dangerous to users who can experience tires getting damaged or gravel caught in skaters wheels leading to falling. Use of Aviador Lot is a physical danger to all people walking or cycling in this area.

I-Schneider-24
RE-1

PP80 S-62 There will be substantial deterioration of degradation of recreational facilities with damage done to the Bay Trail. Damage has already been occurring with heavy truck traffic and loss of vegetation.

I-Schneider-25
UT-1

S-62 UT-1, 3, 4 – using Millbrae to achieve recycling goals while degrading Millbrae's environmental with C&D activities is moving your problem into a different community. All C&D activity should remain on east side of 101.

I-Schneider-26
PS-1

PS-1 – would not alter existing government facilities. Sadly, SFO already impacts existing Millbrae facilities, the pumping station to drain Lomita Canal into Highline Canal. Stating that this set of operations won't cause damage is not truthful when historical data shows SFO not maintaining operations west of 101.

I-Schneider-27
BI-1

Page 82 Biological Impacts – 1, 2, 3, 4. Plans to removed trees will help snakes but hurt people in Millbrae. SFO should be required to work with Millbrae to enhance wetlands west of 101 while also helping with storm water retention, ground water recharge (from SFPUC wells in Millbrae) while improving nature's capacity to absorb noise and air pollution.

I-Schneider-28
GC-CEQA-1

PP 113 Stating that you are working with Millbrae by coming to Millbrae on June 4, 2019, is sadly laughable. Truly SFO and City & County of SF treat us like a colony, to be ignored and then patted on the head that you care because you came to the City six years ago? How entitled and privileged are all San Franciscans that you gain all the financial advantages and make Millbrae (and San Bruno) deal with the bulk of the problems. Burlingame and SSF also impacted but they have land to do economic development to help offset the damage SFO operations, not just construction due to their communities.

I-Schneider-29
GC-Non-CEQA-5

PP 108 S-89 Completely ignored SFO realigning taxiways and pulling Runway

I-Schneider-30
GC-Non-CEQA-1

PP220-245 – Construction Staging operations 2-41 = Aviador Lot – should be moved to SFO footprint east of 101. Stop all traffic, noise, air pollution impacts in a way to mitigate for moving runways 1 L/R 450 feet closer to Millbrae and greatly increasing noise all over Millbrae as low frequency noise concentrates as it moves up the hillsides.

I-Schneider-31
NO-2

PP 248 and on: One day noise monitors = all over 68 dBA (A weighted not C weighted, then says no impact, simply not true, not using 21st century noise metrics. Ignoring all discussions conducted at SFORT and at the Ground Based Noise meetings since 2018 and on. Sadly, the CC of SF representatives assigned to SFORT rarely ever attend (Mayor and Board of Supervisors appointments). Another sign is that CC of SF doesn't really care about the impact SFO has on close in or any other community.

I-Schneider-32
NO-3

PP 252 S.B-12 Lomita Park School is in Millbrae not San Bruno as stated. This is full on snarky but if SF Planning Staff or the DEIR consultants talked to me, as a former Mayor of Millbrae and long-time SFORT member, I could have saved you this significant and obnoxious error.

I-Schneider-33
NO-2

PP 254 S.B-14 HUD allowance – SFO already exceeds these on Millbrae if C-Weighted noise were considered. Existing Noise Contours are incorrectly set at A-Weighted. Also, annoyance at 65 decibels is now commonly considered to happen at 50 dBA so clearly SFO if FAA updated 1980 criteria is causing real health impacts on the people of Millbrae. And having 3 homes on Nandina in Millbrae within the CNEL contours is again simply not a real reflection of the impacts by SFO.

I-Schneider-34
GC-Non-CEQA-13

PP 260 ish – That the County of San Mateo General Plan has no noise impact section is horrible. The city of Millbrae should force the County of SM to be responsive to the cities

I-Schneider-34 (cont.)

next to SFO located on County land. SM County has clearly been negligent in caring for county residents located in Millbrae.

I-Schneider-35 NO-2

PP 261 3.B-10 This table clearly shows that more of Millbrae is impacted by constant departures and taxing. If this DEIR is trying to get out of doing real mitigation, this section should be expanded to say why SFO is ok even if noise is greater than that listed on this table.

I-Schneider-36 GC-Non-CEQA-14

PP264 – Noise Insulation Programs – Be honest, talk about this program in Millbrae. How windows replaced in the 1900s have caused building frame damage and windows have failed. This happening to homes under the Gap Departure are getting repaired but none in Millbrae qualify. Leaving residents to pay thousands if not tens of thousands of dollars in repair and replacement costs.

I-Schneider-37 AA-1

Nighttime operations forget that 77% of flights depart off runways 1 and runway 28 departures also blast Millbrae. The expansion of cargo flights, often leaving between midnight and 3 am (or till 5 am) are very heavy creating great low frequency noise and vibration incidents. The DEIR might be about new construction projects but, in the end, going from 52 million passengers per year to 71 million by using larger and heavier planes will greatly increase noise impacts to Millbrae.

I-Schneider-38 NO-3

PP 2713.B-31 San Bruno has a 10dBA ambient operational noise rule. SFO should treat all close in communities to the same level of care. The fact that SF has no vibration codes, but SSF does mean all communities should get these same vibration standards, but SFO now should be treated the same.

I-Schneider-39 NO-3

PP 276 Charts show all above 65 dBA but then doesn't include buildings in the insulation programs.

I-Schneider-40 AQ-2

PP 305/6 – Air Quality discussions PM – fine particulate matter PP 312 – 3.C-12 The FAA completed a study in 2019, bringing the results to SFORT in October 2019 showing much greater creation of PM2.5 and smaller generated by jet engines. None of this latest information is included in this DEIR. Be honest, look at the dangers of PM2.5 and PM2.5 diesel on close in communities.

I-Schneider-41 AQ-6

PP 314 3.C-14 talks about odors but there are no monitors provided by SFO. Many Millbrae neighborhoods commonly experience noxious odors from SFO with Marino Vista getting the worst from planes at gates at the International Terminal and Terminal 1 A Gates. But fumes have traveled as far as the 400 block of Palm Ave (see Fire Department complaints and site visits) and Millbrae Central Park. The DEIR uses a monitor up in San Francisco on Arkansas as the rational for there being no odors. SFO should be required to place odor and air pollution monitors in several neighborhoods in Millbrae and San Bruno. Close in

I-Schneider-41 (cont.) Communities should not have to pay for this. SFO is a huge industrial operation that has for 100 years got away with not monitoring the pollution it causes.

I-Schneider-42 AQ-2 PP349 Fugitive Dust – perfect, this is what has been, is and will be happening on Aviador Lot. Mitigation does not conduct operations of any kind on Aviador Lot.

I-Schneider-43 AQ-3 PP 370 – Mitigation, there are over 100 years of damage done to Millbrae by Mills Field and SFO. The County of San Mateo has at least 6 direct revenue streams from SFO and its operations. Millbrae has none even while providing the roads to get to Aviador Lot. ALL mitigation in lieu of fees should be spent in Millbrae firsts then San Bruno or combined as we are the communities most hurt by SFO current, future, and historical operations. At least homes in San Bruno fall within the 65 CNEL contour and can get some mitigation. Millbrae basically gets NONE. Mitigation funds should go to Millbrae.

I-Schneider-44 GC-CEQA-4 PP 381 3.C – DEIR states impacts are less than significant due to existing noise/air pollution. But most of that is because of SFO and 101 operations. 101 operations would be less impactful if Old Bayshore was not moved right next to existing Millbrae neighborhoods, Marino Vista and Bayside Manor. This was done for a previous SFO expansion. Millbrae paid the costs.

O-CCAG

C/CAG

CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

Atherton • Belmont • Brisbane • Burlingame • Colma • Daly City • East Palo Alto • Foster City • Half Moon Bay • Hillsborough • Menlo Park • Millbrae • Pacifica • Portola Valley • Redwood City • San Bruno • San Carlos • San Mateo • San Mateo County •South San Francisco • Woodside

June 2, 2025

Kei Zushi, EIR Coordinator
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
via email: cpc.sforadp@sfgov.org

RE: SFO Recommended Airport Development Plan (RADP) DEIR Comments

Dear Mr. Zushi,

On behalf of the City/County Association of Governments of San Mateo County (C/CAG), I would like to thank you for the opportunity to review and comment on the Draft EIR for the RDAP for SFO.

As the Airport Land Use Commission for San Mateo County, C/CAG is charged with protecting the public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of local land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around the County's airports. Chief among its responsibilities is to prepare, adopt, maintain and administer an Airport Land Use Compatibility Plan (ALUCP) for SFO. Accordingly, C/CAG's primary concern is with how the RADP and the forecast growth identified in the DEIR may impact the public health and welfare of San Mateo County residents, as well as whether this level of anticipated growth will trigger the need to update the ALUCP.

O-CCAG-1
GC-Non-CEQA-2

C/CAG Airport Land Use Committee staff offers the following comments for your consideration:

- DEIR section 3.B.1 states that implementation of the RADP would not induce passenger demand, or change the number of aircraft operations, so the DEIR does not analyze aircraft noise. However, the forecast operations and passenger throughput (71.1 million annual passengers and 506,600 aircraft operations) are significantly higher than those included in other related documents, including the 1992 *SFO Master Plan* and the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport,* adopted in November 2012, (SFO ALUCP). The SFO ALUCP includes airport activity forecasts (which project to 2028) based on 2010 data. The SFO ALUCP's 2028 forecasts identified approximately 27 million passengers and 482,520 total operations. Comparatively, the DEIR for the RADP projects a "High Constrained" annual demand level, as noted above, that represents a more that 250% increase in annual passengers and 5% increase in aircraft operations over those forecast in the SFO ALUCP .

O-CCAG-1 (cont.)

As indicated, there is a large disparity between the projections in these documents which should be analyzed to ensure the impact of the airport's growth forecasts is properly reflected in the ALUCP. If the potential noise impact of this level of forecast flight activity has been analyzed in a previously certified environmental document, it is requested that such analysis be clearly referenced in this DEIR. Alternately, if this has not yet been done, then C/CAG believes the DEIR must be revised to include this analysis.

The ALUCP is a critical tool for identifying and minimizing potential land use incompatibilities, so it is important that the document reflect the most current projections, especially given the significant gap in the operational forecasts between the SFO ALUCP and the RADP. Accordingly, C/CAG requests that the SFO Airports Commission direct its staff to initiate ALUCP update discussions, including a significant funding commitment, as part of this overall planning effort.

Thank you again for the opportunity to review and comment on the DEIR. If you have any questions, please contact me or Susy Kalkin, C/CAG ALUC staff, at kkalkin@smcgov.org .

Sincerely,

_____

Sean Charpentier
C/CAG Executive Director
scharpentier@smcgov.org

O-CRPA

CONCERNED RESIDENTS OF PALO ALTO

Public Comment for Draft Environmental Impact Report (draft EIR) for the SFO Recommended Airport Development Plan (RADP)

May 18, 2025

Submitted via email: cpc.sforadp@sfgov.org
Attn: Kei Zushi, EIR Coordinator
49 South Van Ness Ave, Suite 1400
San Francisco, CA 94103

Dear Mr. Zushi,

Thank you for the opportunity to submit the attached comment regarding the Recommended Airport Development at San Francisco International Airport (SFO).

O-CRPA-1
GC-Non-CEQA-8

As documented in the Airport Director's reports, SFO received 813,627 noise complaints in 2024: about 70% –793,375 complaints– were SFO aircraft (other noise complaints are related to other airports).This large number of complaints reflects the ongoing and significant impact of SFO operations on surrounding communities, including those located miles from the airport, much of which stems from FAA NextGen changes.

While SFO does not control flight paths or airline scheduling, it remains a key stakeholder with clear authority over airport development, infrastructure, and capacity planning. **SFO must take responsibility for not exacerbating community harm through decisions that would enable a 30% growth in operations**. SFO wants to accommodate up to 506,571 operations, which is 30% more operations than the 385,507 actual operations in 2024.

SFO has indicated an interest in acting responsibly: SFO stated for instance that it would discontinue Ground-Based Augmentation System (GBAS) procedures if they prove louder than comparable non-GBAS procedures. **That standard should be upheld —and extended to all projects under SFO's control. No development should proceed without a clear demonstration that it will not increase noise, emissions, or other burdens on already-impacted communities. The current DEIR does not show that except for the No Project - Alternative A.**

O-CRPA-2
NO-3

It is unfortunate that the RADP did not address many of the comments that were previously raised by cities and individuals, including the request by Dave Pine, San Mateo County Supervisor, District 1 in his July 10, 2019 comment to provide a comprehensive review of all potential impacts on communities. All comments submitted in 2019 are available on pages 46-72 of the RADP DEIR Appendix A. For example, as described on pages 120 of the RADP DEIR pdf and 55 of the RADP DEIR Appendix A pdf, the Environmental Impact Report should consider the impacts on the communities overflown by additional SFO traffic. The scope should

O-CRPA-2 (cont.)

not be limited to communities adjacent to the airport or using only DNL 65 to determine significant impacts. Specifically, the EIR should:

- Document the changes in noise impacts on communities heavily impacted by SFO, such as Palo Alto, using the N-Above and N-Above-Ambient metrics, not just CNEL, and display the results in 5 dB increments (starting at 40 dB for CNEL). The DEIR should no longer rely on the outdated DNL 65 noise threshold because it ignores FAA findings from the Neighborhood Environmental Survey that showed that harm occurs at much lower levels than DNL 65. SFO has already calculated ambient noise levels at all locations where permanent or temporary noise monitors have been deployed. Additionally, SFO regularly reports N-Above metrics in its monthly Airport Director's Reports, demonstrating both familiarity with and capability to apply these metrics.
- Consider the total impact of noise caused by all private or commercial air traffic operations (arrivals and departures, passenger and cargo planes, helicopters) at multiple Bay Area airports (SFO, Oakland, San Jose, San Carlos, and Palo Alto).

O-CRPA-3 AQ-2

- Measure emissions on the ground, specifically the level of ultra-fine particles, at locations overflown by aircraft flying at or below 5,000 feet. Note that there is no mention of ultrafine particles in the Air Quality section 3.C, which starts on page 301 of the RADP DEIR pdf, even though ultrafine particles are dangerous for humans.

O-CRPA-4 PD-1

The DEIR claims the project is not necessary to accommodate demand, yet proposes capacity-expanding projects (additional gates, apron, and maintenance hangar) without disclosing how this will increase the number of aircraft operations over already-impacted communities.

- The purpose of the project is not to accommodate forecast demand –which existing facilities can handle– but rather to meet the goals and objectives of the Airport Development Plan. As stated on page 146 of the RADP DEIR pdf, "*While the existing facilities could accommodate the forecast demand without implementing the RADP, the goals & objectives of the Draft Final ADP would not be met*". We listed the project objectives at the end of our comments as a reference (see pages 129-130 of RADP DEIR pdf).

O-CRPA-5 GC-CEQA-2

- While SFO's mission emphasizes delivering a world-class airport experience and expanding its role as an international gateway, the San Francisco General Plan provides important context and balance. In particular, Objective 5 and Policy 5.1 (page 202 of RADP DEIR pdf) clearly state that any expansion of SFO must be balanced with protecting the quality of life in surrounding communities: "*Objective 5: Support and enhance the role of San Francisco as a major destination and departure point for travelers making interstate, national, and international trips. Policy 5.1: Support and accommodate the expansion of San Francisco International Airport, while balancing this expansion with the protection of the quality of life in the communities that surround the Airport."* Expansion that increases operational impacts —without meaningful mitigation or public accountability— undermines this policy directive. A truly exceptional airport experience must also include being a responsible neighbor to the communities affected by its operations. SFO should prioritize maintaining and updating existing facilities, not

O-CRPA-5 (cont.)

expanding facilities that will enable more operations and result in more negative impacts on communities especially when existing facilities can accommodate forecast demand.

O-CRPA-6
GC-Non-CEQA-3

SFO claims the need to accommodate the forecasted demand of roughly 500,000 operations (498,853 operations for Base constrained and 506,571 operations for High Constrained, see Table 1 page 10 of RADP DEIR Appendix C pdf) **even though SFO did not reach in 2024 pre-COVID-19 activity levels as indicated in the statement that** "*SFO is projected to recover to pre-COVID-19 activity levels in 2024*" (see page 145 of the RADP DEIR pdf),

- SFO peaked in 2018 with 470,164 operations for the year and decreased by 2.5% in 2019 to 458,164 operations.
- In contrast, actual operations in 2024 were only 386,507, which is 83,657 fewer operations than in 2018 and 71,657 fewer operations than in 2019 (SFO source).
- While the first 3 months of 2025 show an average 8.4% growth over the same period in 2024, ongoing political and economic uncertainties make sustained growth far from guaranteed. Given the gap between forecasted and actual activity, SFO should update and revise its operational forecast using verified data from the first half of 2025 for a more realistic RADP.

O-CRPA-7
AA-1

Fundamentally, the RAPD DEIR is an expansion of SFO's capacity, which in turn allows for more aircraft operations.

- SFO claims in the RAPD DEIR document that "*implementation of the RADP would not induce passenger demand (i.e., induce the public to choose to fly if and/or where they otherwise would not), nor would the RADP increase the capacity of the airfield, change the configuration of the existing runways, change the number of aircraft operations or aircraft types operating at the Airport (including cargo, private jets, and helicopters), or change the volume of annual passengers that choose to fly into and out of SFO*" (for examples on page 19 of the RADP DEIR pdf and page 4 of the RADP DEIR Appendix A). As stated by the City of Pacifica in their June 21, 2019 comments, "*though SFO claims that the expansion will not "change aircraft operations,", it is difficult to see how such a large expansion in the Airport's ground-based facilities would not result in a corresponding increase in air traffic arriving at and departing from SFO on a 24-hour basis, seven days per week*" (see page 54 of RADP DEIR Appendix A).
- **However, SFO is proposing to build additional gates** (Boarding area H – project 1)**, a new 243,000-square-foot feet apron** (called the Race Track under Taxiways A and B shift and Race Track - project 10)**, and a new aircraft maintenance hangar** (Aircraft Maintenance Hangar- project 26) **that will directly enable more operations because**:
    - **The new Boarding area H will increase the number of gates to accommodate up to 8 widebody or 14 narrowbody aircraft** (or a combination of both) though boarding area H will require eliminating one gate at boarding area G (see page 7 of the RADP DEIR Appendix A pdf). **More gates mean more operations** because gate availability is a critical constraint in scheduling operations.

O-CRPA-7 (cont.)

- **Building a new 243,000-square-foot apron** to hold aircraft waiting for gates as well as park aircraft remotely **will enable more operations** because larger aprons increase the capacity for parking aircraft and loading/unloading aircraft (see page 11 of the RADP DEIR Appendix A pdf).
- **Building a new 181,000-square-foot maintenance hangar** to accommodate maintenance of two additional widebody aircraft and other maintenance activities **will enable more operations** because the number of hangars directly impacts the capacity of an airport. See page 17 of the RADP DEIR Appendix A pdf.

- The statement "*As to the question of the implementation of the RADP projects inducing growth, it is demonstrated that growth is a function a factor* [sic] *of demographic and economic conditions and is not influenced by facilities*" (page 4 of the RAPD DEIR Appendix C pdf) appears overly simplistic because:
  - **Facilities directly influence an airport's capacity and growth**. For example, more gates attract new airlines or routes, encourages existing airlines to schedule more flights because of more gates and faster turnarounds, and supports higher passenger throughput which drives up operations
  - The statement on page 7 of Appendix A that "*Currently, the airport is deficient in gates and is accommodating scheduled flights through remote hard stands*[15] *and bussing passengers to and from the gates*" is puzzling given that SFO traffic peaked in 2018 with 470,164 operations and had only 386,507 operations in 2024. Unfortunately, SFO did not provide any data about the percentage of hard stands vs gates used in 2024.
  - SFO refers to a Ninth Circuit court case where the court sided with the Burbank airport regarding a new terminal: *"The Ninth Circuit disagreed and rejected that argument, noting that the data showed that enplanements would grow regardless of whether or not the new terminal was built"* (see page 15 of the RAPD DEIR Appendix C). However, SFO omitted a very important detail. **The Burbank airport did not increase gate capacity when rebuilding its terminal** –the number of gates remained the same. On the other hand, increasing gate capacity at an existing terminal or building a new terminal with new gates like the new SFO boarding area H will enable operations growth. It's like adding more tables at a restaurant to enable more customers to be seated simultaneously.

O-CRPA-8 NO-3

Building more gates in the boarding area H, an additional apron area, and a new maintenance hangar will increase the negative impacts on residential areas because it will enable more operations.

- Residential areas nearest to Boarding area H like San Bruno and Millbrae will be impacted because Boarding area H will be closer by 600 ft to the nearest residential area (currently boarding area G is about 2500 ft from the nearest residential area, and boarding area H will be about 1900 ft from the nearest residential area). SFO states that "*this would not constitute a considerable change from existing conditions with respect to noise levels from aircraft as aircraft currently parked in the same location where Boarding Area H would be constructed. Therefore, there would be no considerable change in associated noise levels from aircraft gating at the new Boarding Area H*" (see

O-CRPA-8 (cont.)

page 295 of the RADP DEIR pdf). However, parking an aircraft versus emplaning and deplaning cargo and passengers are very different activities with very different noise footprints. SFO claims that the change will not be considerable without providing any supporting noise data to distinguish between the impacts of parked aircraft and those actively loading or unloading passengers and cargo.

O-CRPA-9 AL-1

Alternative B is also expanding SFO's capacity because it will still build a new 243,000-square-foot airport apron. SFO describes Alternative B as a lesser impact option as described on page 397 and Table 5-2 on page 434 of the RADP DEIR pdf file. Under alternative B,

- Boarding Area H would not be built (project 1 - see page 147 of the RADP DEIR pdf file)
- The Main Hall of the International Terminal Building would not be expanded (project 3 - see page 157 of the RADP DEIR pdf file)
- No new aircraft maintenance hangar would be built (project 18 - see page 165 of the RADP DEIR pdf file)

Alternative B is intended to eliminate the significant adverse air quality impacts such as ROG emissions, which is an ozone precursor. However, **Alternative B still represents an expansion because a new 243,000-square-foot apron will be built thus increasing the airfield capacity and operations efficiency.** Even though the footprint of the airport is not expanding, or the runways are not changing, the proposed Alternative B still expands SFO's capacity to handle more operations.

O-CRPA-10 GC-CEQA-2

In conclusion, the DEIR states that the purpose of the project is not to accommodate forecast demand—demand that, by the document's own analysis, can be met with existing facilities—but rather to achieve broader goals such as enhancing the passenger experience. However, the necessary balance between facility improvements and protection of community quality of life, as outlined in the San Francisco General Plan, has not been clearly demonstrated. The DEIR does not explain how this expansion aligns with that policy directive or how any resulting increase in community impacts would be addressed.

O-CRPA-11 AA-1

While the DEIR does not explicitly disclose sufficient analysis of potential operational changes over affected communities, capacity-expanding elements—such as new gates, apron space, and maintenance facilities—will increase the number of future operations. These elements warrant a much more thorough evaluation of their environmental implications.

O-CRPA-12 AL-1

In addition, per CEQA Guidelines, one must identify the environmentally superior alternative and the next option if the "no project" alternative is the environmentally superior alternative. As stated on page 436 of the RAPD DEIR pdf, **Alternative A (No Project Alternative) is the environmentally superior alternative and Alternative C (Boarding Area H Only Alternative) is the environmentally superior alternative among the other options considered**. However, as stated previously, Boarding Area H will increase gates capacity, thus increasing the number of operations and the noise and emissions impacts on communities. Furthermore, under CEQA, the environmental review must be based on current, representative data and provide a transparent assessment of foreseeable impacts. Continued reliance on the DNL 65 threshold as the sole indicator of noise significance does not reflect the experience of many

O-CRPA-12 (cont.) overflown communities, as demonstrated by the FAA's own 2021 Neighborhood Environmental Survey. Per CEQA, a detailed analysis of Alternative C is absent from the DEIR and must be performed. Without addressing this limitation and incorporating non-DNL noise metrics, the DEIR falls short of CEQA's requirements for a complete and informed analysis.

O-CRPA-13 IN-1 To better align the project with applicable planning and environmental policies—including the San Francisco General Plan Objective 5 and Policy 5.1—which calls for balancing airport expansion with the protection of quality of life in surrounding communities—the following actions are recommended to promote a more transparent and community-responsive approach:

Address comments made in 2019 by various cities and individuals (see pages 46-72 of the RADP DEIR pdf and Appendix A, pages 46-72).

O-CRPA-14 GC-CEQA-1 **Demonstrate no net increase in community harm.** No project should proceed without a clear showing that it will not increase noise, emissions, or other burdens on already-impacted communities.

O-CRPA-15 AL-1
- **Quantify and compare the environmental impacts of all alternatives A, B, and C.** The summary information provided in the RADP DEIR is at a very high level and is not quantitative. Describing the impacts of alternatives A, B, or C as less than the impacts of the RADP is not an appropriate evaluation because you cannot tell the differences in impacts across the alternatives. The summary information provided in the RADP DEIR is at a very high level and is not quantitative. Describing the impacts of alternatives A, B, or C as less than the impacts of the RADP is not an appropriate evaluation because you cannot tell the differences in impacts across the alternatives.

O-CRPA-16 NO-2
- **Use non-DNL metrics that are more representative of the noise experienced by communities.** Document noise impacts using N-Above and N-Above-Ambient metrics (not just CNEL), and present data in 5 dB increments starting at 40 dB.

O-CRPA-17 NO-3
- **Analyze total regional aircraft noise impacts.** Evaluate combined noise exposure from all private and commercial aircraft from/to SFO, Oakland, San Jose, San Carlos, and Palo Alto.

O-CRPA-18 AQ-2
- **Measure ultra-fine particle emissions.** Include ground-level measurements of ultrafine particles under flight paths below 5,000 feet, which are currently missing from the air quality analysis.

O-CRPA-19 GC-Non-CEQA-3
- **Update and revise forecast data.** Reassess project justification using current, verifiable operations data—especially considering SFO's continued post-COVID recovery lag and economic uncertainty.

O-CRPA-20 PD-1 **Do not expand operational capacity.** Limit development to maintaining, updating, or replacing existing facilities—not building new infrastructure (e.g., gates, apron, hangar) that enables increased aircraft operations.

O-CRPA-21 AL-1 **Provide a detailed analysis for informed decision-making on Alternative C (Boarding Area H Only Alternative)** given that Alternative A (No Project Alternative) is the

O-CRPA-21 (cont.) environmentally superior alternative, **and Alternative C is the next best alternative under CEQA guidelines.**

O-CRPA-22 NO-2 Regardless of CEQA, the DEIR must go beyond the outdated DNL 65 threshold and incorporate more current and representative data such as the FAA's 2021 Neighborhood Environmental Survey (NES), which provides relevant and scientifically supported insights into community response to aircraft noise. While CEQA does not mandate the use of any specific noise metric, it requires that the noise analysis be based on reasonable assumptions, reflect actual community impacts, incorporate credible scientific information, and be supported by substantial evidence. Failure to do so risks rendering the DEIR legally inadequate.

Respectfully submitted,

Darlene Yaplee and Marie-Jo Fremont

Co-founders of Concerned Residents of Palo Alto

Reference to RADP DEIR - Project Objectives

"The project sponsor seeks to achieve the following objectives by undertaking the RADP.
1. Provide a long-range development plan that elevates the passenger experience at the Airport and accommodates forecast passenger demand and aviation activity in a safe, cost-effective, operationally efficient, environmentally conscious, and flexible manner.
2. Maximize practical airfield capacity[32] and operational efficiency in the existing physical geometry of the runways; there would be no changes to the existing runways geometry and configuration under the RADP.
3. Maximize gate capacity, geometry, and flexibility of airline use to efficiently accommodate forecast aviation activity, without relying on remote gates/hard stands that would require bussing operations to accommodate boarding/deplaning passengers on the airfield.
4. Optimize passenger processing areas including terminal lobby and security check point flows to meet future needs and incorporate new technologies.
5. Maximize shared-use facilities in the terminal areas and Airport and airline support facilities, as well as enable shared use by providing technology, bag claim flexibility, and connectivity for passengers and baggage across all terminals.
6. Achieve industry standards and airport planning principles by prioritizing efficient flow of aircraft, passengers, and goods through the Airport, through optimizing flows in the following order of priority: Airport operations area/airside; Airport facilities that are passenger facing such as terminals and gate areas, and associated passenger/aircraft support facilities (e.g., ground service equipment); landside Airport facilities including ground transportation, passenger parking, and rental car facility; other Airport and airline support facilities within the Airport property, including ground transportation and passenger parking; and off-airport uses such as catering, warehousing, and remote passenger parking.
7. Provide sufficient on-Airport parking to accommodate long-term passenger activity levels and transport passengers and employees to/from the terminal areas using AirTrain to the greatest extent possible"

O-CSFN1

From: Zushi, Kei (CPC)
To: cpc.sforadp@sfgov.org
Subject: FW: Strongly urging CONTINUANCE for Planning Commission Hearing May 22, 2025 Agenda Item #12 SFO Recommended Airport Development Plan (RADP) - Case Number 2017 - 007468ENV
Date: Tuesday, May 20, 2025 9:22:56 AM

From: aeboken <aeboken@gmail.com>
Sent: Monday, May 19, 2025 11:29 AM
To: CPC-Commissions Secretary <commissions.secretary@sfgov.org>; Zushi, Kei (CPC) <kei.zushi@sfgov.org>; Mike Nakornkhet (AIR) <mike.nakornkhet@flysfo.com>; Kevin Kone (AIR) <Kevin.Kone@flysfo.com>; Ronda Chu (AIR) <Ronda.Chu@flysfo.com>; Chu, Carmen (ADM) <carmen.chu@sfgov.org>; Strong, Brian (ADM) <brian.strong@sfgov.org>; Faust, Kate (ADM) <kate.faust@sfgov.org>
Subject: Strongly urging CONTINUANCE for Planning Commission Hearing May 22, 2025 Agenda Item #12 SFO Recommended Airport Development Plan (RADP) - Case Number 2017 - 007468ENV

> This message is from outside the City email system. Do not open links or attachments from untrusted sources.

TO: SF Planning Commissioners

cc: SFO
cc: Capital Planning Committee

FR: Eileen Boken,
O-CSFN1-1 State and Federal Legislative Liaison
GC-CEQA-1

Coalition for San Francisco Neighborhoods*

*For identification purposes only.

RE: Planning Commission Hearing May 22, 2025 Agenda Item #12 SFO Recommended Airport Development Plan (RADP) - Case Number 2017 - 007468ENV

Position: Strongly urging CONTINUANCE

Capital plans are typically heard first at the Capital Planning Committee.

O-CSFN1-1 (cont.)

I would strongly urge the Planning Commission to continue this item until after it's heard at the Capital Planning Committee.

###

Sent from my Verizon, Samsung Galaxy smartphone

O-CSFN2

From: aeboken
To: Audrey Park (AIR); Zushi, Kei (CPC)
Subject: RE: SFO Recommended Airport Development Plan Draft EIR
Date: Friday, May 30, 2025 12:12:44 PM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hello Audrey and Kei,

Many thanks to both of you for your excellent presentations at the Planning Commission hearing on May 22, 2025.

O-CSFN2-1
PD-2

Based on those presentations, I have the following questions:

- Since the public comment at the Planning Commission hearing focused mainly on air pollution, what is SFO doing to transition from Jet A Kerosene to Biofuels?

- To avoid unnecessary expansion of infrastructure, does SFO intend to continue to transition from dedicated carrier check-in counters and gates to multiple carrier use of check-in counters and gates?

- Does SFO intend to implement gauge controls to restrict regional aircraft aka puddle jumpers to make more efficient use of air space and avoid wake vortex?

O-CSFN2-2
GC-CEQA-3

- Does the DEIR address sea level rise issues as SFO is particularly vulnerable?

O-CSFN2-3
GC-Non-CEQA-8

- Does the DEIR address air pollution and noise over the Westside of San Francisco as eastbound aircraft are increasingly taking short cuts over the Inner Sunset and Parkside? These aircraft are also increasingly flying at lower altitudes which is a public safety concern.

Best,

Eileen Boken,
State and Federal Legislative Liaison

Coalition for San Francisco Neighborhoods*

*For identification purposes only.

Sent from my Verizon, Samsung Galaxy smartphone

-------- Original message --------
From: "Audrey Park (AIR)" <Audrey.Park@flysfo.com>
Date: 5/30/25 9:56 AM (GMT-08:00)
To: aeboken@gmail.com

Subject: SFO Recommended Airport Development Plan Draft EIR

Good morning, Eileen: I'm SFO's point of contact on the subject item and understand you had some questions/concerns about CEQA and city procedures pertaining to it.

Would you be available for a touch base today? I can be reached at 650-821-7844 or at 650-255-7624 at your convenience.

Thanks. Looking forward,

SFO

Audrey Park
Environmental Affairs Manager | Bureau of Planning & Environmental Affairs
San Francisco International Airport | P.O. Box 8097 | San Francisco, CA 94128
Office: 650.821.7844 | Mobile: 650.255.7624 | flysfo.com

Facebook | X | YouTube | Instagram | LinkedIn | Threads

O-CSFN3

From: aeboken
To: cpc.sfbrapd@sfgov.org; Zushi, Kei (CPC); Audrey Park (AIR); CPC-Commissions Secretary; Mike Nakornkhet (AIR); Kevin Kone (AIR)
Subject: DEIR Comments - SFO Recommended Airport Development Plan (RADP) - Case Number 2017 - 007468ENV
Date: Monday, June 02, 2025 6:01:52 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

TO: Planning Department, Planning Commission and SFO

FR: Eileen Boken,

State and Federal Legislative Liaison

Coalition for San Francisco Neighborhoods*

*For identification purposes only.

RE: DEIR Comments - SFO Recommended Airport Development Plan (RADP) - Case Number 2017 - 007468ENV

INTRODUCTION

O-CSFN3-1
CU-1

As a veteran of the decade long opposition to runway expansion at SFO, I'm inherently sceptical of SFO capital plans.

As in many prior EIRs, this Draft EIR is narrowly focused.

It does not examine the cumulative impacts from SFO let alone SFO in combination with the other two major Bay Area airports.

The DEIR seems to work on the premise that "What happens here stays here" and does not acknowledge the impacts on the runways and beyond the boundaries of the airport itself.

This is inconsistent with the nature of industry itself as impacts can occur miles away from the airport.

PROJECTS

O-CSFN3-2
PD-1

The overall goal of most of the projects in the DEIR is to increase passenger capacity by focusing on terminal and pickup/dropoff reconfiguration.

Much of the terminal sprawl is from carrier-dedicated check-in counters, carrier-dedicated gates and the separation of domestic and international facilities.

The proposed project addresses many of these issues with an innovative approach to reconfiguring Terminal H.

With the overall increase in the number of passengers there would likely need to be an increase in the overall number of flights.

Based on the fleet mix of current carriers, how could this be accomplished without runway expansion?

O-CSFN3-3
GC-Non-CEQA-5

SFO has been resistant to implementing gauge controls despite one of SFO's stated goals is to "Become the #1 Long-Haul and International Gateway of Choice".

Gauge controls would free up slots by eliminating regional aircraft aka puddle jumpers.

Issues with regional jets at SFO were highlighted with a recent near miss between a Bombardier CRJ-200 regional jet headed to Fresno and an Airbus A320 headed to Dallas.

Here is the link to the SF Chronicle article:

https://url.avanan.click/v2/r01/___https://www.sfchronicle.com/bayarea/article/sfo-united-near-miss-20353875.php___.YXAzOnNmZHQyOmE6bzo2ZDYwMWMxZTZmNWYwNWE3ZWU1NTFjOTBjYTU4ODAzMTo3OmNmNDU6ZmE1YWEzMWIxNjRlYjRkOGZjYWUyMWRmYjRmNDVjMmM0MjUxZWZhY2I2NTBkYmMzZDZjZTdjOTkwMjZjN2I1NTp0OkY6Tg

Fresno is not a long-haul destination.

Besides regional jets having wake vortex issues with larger jets, they increase congestion in airspace which is already congested by three major Bay Area airports.

O-CSFN3-4
NO-3

Increased flights result in increased air pollution and increased noise pollution.

O-CSFN3-5
CU-1

These are the cumulative impacts of airport expansion and the resulting increase in number of flights.

O-CSFN3-6
AQ-2

There is no indication in the DEIR whether SFO is increasing its use of aviation biofuels as a replacement of Jet A Kerosene or blending aviation biofuels with Jet A Kerosene to reduce air pollution.

O-CSFN3-7
GC-Non-CEQA-8

There is no indication in the DEIR on how SFO intends to reduce noise pollution and meet the goals of its SFO Fly Quiet program.

In fact, noise pollution from inbound and outbound SFO flights is already becoming worse.

Eastbound flights out of SFO are increasingly taking shortcuts over the Westside of San Francisco and flying over the Inner Sunset and Parkside.

These eastbound flights are also flying at increasingly lower altitudes.

Inbound flights on final approach to SFO are also flying at increasingly lower altitudes.

If the DEIR had studied these cumulative impacts indirectly created by the RADP projects, then these related issues would have been studied.

###

Sent from my Verizon, Samsung Galaxy smartphone

O-SCREAAM

From:	Elizabeth Lopez
To:	cpc.sforadp@sfgov.org
Cc:	Matthew Stevens
Subject:	Public Comment for Draft Environmental Impact Report (draft EIR) for the SFO Recommended Airport Development Plan (RADP)
Date:	Monday, June 02, 2025 12:36:43 PM
Attachments:	Public Comment for SFO Draft Environmental Impact Report.pdf

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Mr. Zushi,

Please see the attached PDF document for our public comments regarding the DEIR of the SFO RADP.

Sincerely,

Matthew Stevens - Founder of SCREAAM.org

Liz Lopez - SCREAAM.org

Public Comment for Draft Environmental Impact Report (draft EIR) for the SFO Recommended Airport Development Plan (RADP)

June 2, 2025

Submitted via email: cpc.sforadp@sfgov.org

Attn: Kei Zushi, EIR Coordinator
49 South Van Ness Ave., Suite 1400
San Francisco, CA 94103

Dear Mr. Zushi,

Thank you for the opportunity to submit our comments regarding the Recommended Airport Development at San Francisco International Airport (SF).

O-SCREAAM-1
GC-Non-CEQA-3

We would like to bring your attention to inaccuracies that exist in the draft environmental review documents that are a cause for concern.

On page 5 of DEIR the FAA is quoted as saying that, "forecasts of future levels of aviation activity are the basis for effective decisions in airport planning. These projections are used to determine the need for new or expanded facilities."

If effective decisions rely on accurate forecasts **why is the DEIR relying on an outdated forecast document to determine the need for this project?** *The San Francisco International Airport Forecast Update* was completed in 2014 which **uses old 2013 data in order to estimate what travel demand would be like in 2018, 2023,** and beyond. For example, we don't need to forecast what travel demand might be in 2018 and 2023 because we already have that data.

We would also like to understand the impact of using outdated obsolete information to guide forecasting in this report.

O-SCREAAM-2
GC-Non-CEQA-6

The commission may not be familiar with the after effects of NextGen modernization projects and the turmoil it brought to bay area communities back in 2015 – 2017 and have yet to be resolved. Community groups have been formed all over the nation, including San Francisco, as residents strived to inform themselves on a dense subject matter. Flights that used to fly over many different paths now fly over fewer areas, concentrating noise pollution over certain households, negatively impacting home life with constant loud aviation industry noise – all day and night.

O-SCREAAM-3
GC-Non-CEQA-8

The EIR should propose that any new flight operations being added to system be spread out onto new flight paths so that burden is not deliberately placed onto people who are currently

O-SCREAAM-3 (cont.)

being affected. We are asking why a certain segment of the population in San Francisco are being disproportionately discriminated against in regard to aviation noise pollution from SFO and **why the EIR is not accurately reporting how increased capacity will affect San Francisco residents nor any residents across the Bay Area who live outside of the 65CNEL boundary?**

O-SCREAAM-4 AA-1

Pushing to increase SFO's capacity by 30% when San Francisco's population has only grown .4% in the last 10 years and with SFO enplanements yet to even reach and maintain pre-2019 levels even though we are already in 2025, doesn't fit the narrative of need.

The claim that this plan will not induce demand is unsubstantiated. We request that the committee look deeper into this statement. Even United notes in one of their newsroom announcements that, "A five-year $2.6 billion airport construction project set to be completed in 2029, which includes **modernization and expansion of Terminal 3 at SFO**, **will pave the way for the airline's continued growth** and elevate the customer experience."

Residents want assurances that as SFO expands, that they do so responsibly and act in good faith and that is why we as concerned citizens are writing this letter.

Sincerely,

Matthew Stevens - Founder of SCREAAM.org

Liz Lopez - SCREAAM.org

O-SPPA

Note in the Comments and Responses chapter that their June 1 email was received by the planning department but was superseded by this June 2 email.

From: Sky Posse Post
To: cpc.sforadp@sfgov.org
Cc: city.council@cityofpaloalto.org; Lurie, Daniel (MYR); Mike Nakornkhet (AIR)
Subject: REVISED: SFO DEIR is inadequate without the consideration of flight path impacts
Date: Monday, June 02, 2025 9:56:32 AM

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Dear Commissioners:

O-SPPA-1
GC-Non-CEQA-8

On behalf of thousands of Midpeninsula residents impacted by noise and air quality impacts from SFO-bound flight paths, we respectfully submit that SFO's DEIR is inadequate as long as it does not consider flight path impacts. At the May 22 public Hearing SFO's presentation suggested that "*There are no changes or expansions proposed to the existing runway or to aircraft flight paths, which are the sole purview of the FAA*." As this report and process is meant to protect the environment and people who stand to be negatively affected by SFO's development plan, please consider our feedback as follows:

O-SPPA-2
GC-Non-CEQA-7

INACCURACIES:

#1 SFO is incorrect to say that flight paths are "**the sole purview**" of the FAA. An airport's role is *required* in flight path oversight.

After serious miscalculations about regional noise effects from the implementation of the FAA's Nextgen program for Northern California in 2014, the FAA expanded the role of airports as regards flight paths. SFO has since been on the FAA's Technical Working Groups for flight path design and **the Government Accountability Office recommended for the FAA to clarify how a flight path change is initiated and processed**. The FAA's publication "*How the FAA engages with Airport and Community Roundtables*" now describes the role of an Airport authority;

Step 2 of the FAA's criteria for Flight Path development states,

> "All requests not made by the airport authority or internal FAA sections responsible for air traffic control (ATC) and flight procedure development (e.g., ATC, flight standards, FPT, etc.) **require airport authority concurrence** prior to submission."

This is consistent with US Aviation policy which states that *aircraft noise is a **shared responsibility** between airport authorities, airlines, state and local government, communities, and the Federal Aviation Administration*. Furthermore, communities expect airport sponsors to **balance** the interests of various stakeholders.

#2 **It is also inaccurate that flight paths will "not change"** when petitions for changes are ongoing largely from airlines and the airport itself.

The FAA continuously makes changes to flight paths *in response* to SFO's needs and the needs of the National Airspace System. It is impossible for flight paths to be static given that in addition to the FAA's internal changes (e.g., ATC, flight standards, FPT, etc.) requests are initiated by airlines - including for private use flight paths. SFO also has flight path procedures (navigation rules) for its new landing system "GBAS" which can INCREASE noise and SFO controls these procedures.

It is evident that the FAA looks to airports to provide **local contex**t in efforts to be responsive to the public and to consider the environment and people. SFO's misrepresentation that "*flight paths will not change*"

O-SPPA-2 (cont.)

has broken trust before. Unless this is addressed, SFO is misinforming the FAA on current and future projects, and leaving the public in the dark about potential consequences from SFO's operations.

O-SPPA-3
GC-Non-CEQA-7

INCOMPLETE INFORMATION AND MISSING REGIONAL HISTORY:

SFO's claim that "*no changes or expansions proposed to the existing runway or to aircraft flight paths*" mixes two sets of airport infrastructure that have distinct impacts and mitigation options.

The public needs to be informed that while runways are not changing, SFO's flight paths are not static; flight path procedure (navigation rules) design and the level of usage of flight paths from increasing operations can increase noise and air quality impacts. Not only are flight paths distinct infrastructure from runways, flight paths can be more deleterious in terms of affecting more sensitive areas and people. The menu of potential mitigations for flight paths is also distinct. Quieter aircraft engines for example do not help address flight path noise but thoughtful flight path design and compliance can meaningfully mitigate night time noise. These mitigations however cannot be employed if the airport is denying how directly their project will impact noise. Adding a gate to serve more passengers means more flights, more flight path impacts. Moreover SFO's plan leverages powerful airline programs to induce more operations for more profits. As noted by public comment at the May 22 Hearing, United Airlines has a $2.6 billion construction project to re-establish SFO as the airline's global gateway. This expands United's route networks with **more flights**, including promotional flights that are not at full passenger capacity but add **more noise**.

Airport-airline projects influence noise as happened with Nextgen when airlines requested lower altitudes for SFO's arrivals which greatly increased noise. The failure to recognize community concerns over flight path changes led to an FAA Initiative and official community meetings with FAA and local leaders in three counties; thousands of citizens weighed in over months to come up with consensus recommendations to address flight path noise and night time operations. The DEIR's omission of the impacts of flight path changes undermines recent regional history to address just this issue, and ignores opportunities identified by citizens, local officials and the FAA to mitigate flight path impacts affecting people's health, quality of life, and the environment.

O-SPPA-4
NO-2

INQUIRY ON THE NOISE SIGNIFICANCE THRESHOLD:

We would like to know the reason why SFO looks at the +1.5dB increase in 65 CNEL criteria when the FAA's Environmental Policies and Procedures Guideline Order 1050.1F looks at a 3 dB increase in DNL 60-65 dB and +5 dB for **45-60 dB** as well.

CEQA allows the flexibility to use significance thresholds below 65 CNEL and more metrics to consider local context, so it is disappointing that only the higher threshold criteria (65) is applied which effectively *lowers the standard* for SFO's environmental review. As SFO is aware, the FAA has scientific studies that provide substantial evidence that 65 DNL or 65 CNEL is no longer supported to identify community concerns. The FAA surveyed 10,000 residents living near 20 representative airports with results showing that aircraft noise causes greater levels of community annoyance compared to other transportation noise, and a need for more sensitive criteria to evaluate aircraft noise. There are also legal considerations about noise threshold criteria to assess areas that qualify for insulation, vs National Environmental Policy Act requirements.

O-SPPA-5
GC-Non-CEQA-7

RECOMMENDATION:

We recommend that an additional report is needed on SFO's Arrival flight path noise impacts to inform on regional impacts; at a minimum to consider the top five areas with the highest number of complaints. Particularly an analysis of all night time overflights is necessary; sleep being critical for physical and mental health and productivity. SFO has extensive data to accomplish regional noise assessments, and with various metrics. In addition, provide details such as target altitudes and current navigation rules for

O-SPPA-5 (cont.)

SFO arrival flight paths. The report should also describe how SFO makes decisions on flight path requests; how pre- and post-implementation reviews of flight path changes are managed, and who is responsible for keeping communities informed.

Please reject any environmental review for SFO that excludes SFO's regional impacts.

Thank you for your attention,

Sky Posse Palo Alto