

# Sky Posse Palo Alto

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## **Board of Supervisors: File No. 251277 Hearing of persons interested in or objecting to the certification of a Final Environmental Impact Report for the proposed SFO Recommended Airport Development Plan (RADP)**

As one of the five organizations that provided comments on inaccuracies and incomplete information about SFO Arrivals in SFO's Development Environmental Impact Report (EIR) during the public comment period, we viewed the City of Palo Alto's [December 19](#) appeal of the Final EIR (FEIR) as an opportunity for stakeholders to address the real impacts of airport development on population health and productivity. With SFO management declining the City of Palo Alto's initiative to meet to reach a collaborative solution, the board now has the opportunity to provide leadership by ensuring that CEQA is fulfilled and to avert its use to potentially withhold important and serious environmental effects from the public.

It was evident at the Planning Commission's November 20 Certification hearing that *significant disagreements about the FEIR and SFO Arrivals were raised before and during the hearing*. Thus, it is alarming that the San Francisco Airport Commission on December 16 expeditiously used the Planning Commission's certification to approve SFO's development plan. FEIR inaccuracies and incomplete information risk compromising the integrity of San Francisco's financing representations. Controversies with the FEIR need to be resolved first.

The City of Palo Alto's [January 23](#) letter supplementing its appeal, states that "***Palo Alto is particularly interested in ensuring that SFO adequately analyzes noise impacts from flights arriving at SFO***" which aligns with our recommendation during the Draft EIR comment period, that SFO produce an analysis of SFO's Arrival Flight paths. This is neither a difficult nor costly ask. SFO possesses arrivals data going back to the 1990s; it has access to powerful analysis tools to produce relevant flight path statistics, as well as noise baselines (historical and prospective analysis): essential information for assessing the impacts of SFO's development plans on all stakeholders but particularly those affected by overflight noise now and in the future.

The Planning Department's [January 26](#) arguments for exempting SFO from adequately analyzing noise mirrors SFO's stance in 2014, when SFO arrivals began flying lower and louder. SFO *repeatedly* assured City officials, Congressional representatives, and the public that "nothing has changed." Only after citizens launched a petition, local scientists independently collected noise measurements, and our group obtained in February 2015 - via FAA Freedom of Information Act request - a multi-year historical database tracing altitudes and number of flights for all Bay Area airport traffic for a 35-nautical-mile radius of SFO, did the extent of the changes become clear. It would have been far more constructive and transparent for SFO to have

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proactively conducted and shared the analysis that community members were ultimately forced to pursue.

To correct the FEIR, we offered the following suggestion in our comments in the Draft DEIR:

***“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.”***

Should the board decide to uphold the Planning Commission's certification by accepting the arguments from the Planning Department, and if the City of Palo Alto pursues judicial review, we expect that the forecasts the FEIR relies on will need to be scrutinized as well as their application for simplistic exemptions. Regarding the dispute of what constitutes “induced demand” we know some fundamental truths. First, SFO actively competes to attract and retain passengers in a competitive Bay Area market rather than passively awaiting demand. This is evident from SFO's trademark infringement lawsuit against Oakland which seeks to protect and expand SFO's brand by preventing OAK from incorporating “San Francisco” Second, SFO invests extensively in efforts to overcome operational constraints, particularly bad weather that frequently reduces landings and overall capacity. Through collaboration with the FAA on airspace procedure design, the airport targets higher throughput even in poor visibility conditions. Third, and critically, SFO's obstacle-reducing initiatives make the RADP's investments even more essential, as the enhancements to gates, terminals, and access go hand in hand with fewer weather-related slowdowns and stronger Bay Area market share - enabling SFO to reach its forecasted capacity more efficiently and sooner. **The FEIR must address how the RADP contributes to this dynamic (fueled by SFO's demonstrated priorities and behaviors), which can increase environmental impacts, rather than treating growth as completely external and independent of the project.**

We urge the Board to please return the project to the Planning Department to add analysis of SFO Arrival flight paths to ensure full CEQA compliance and to protect public health.

Thank you,

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