From:	Board of Supervisors (BOS)
To:	BOS-Supervisors; BOS-Legislative Aides
Cc:	BOS-Operations; BOS Legislation, (BOS); Calvillo, Angela (BOS); De Asis, Edward (BOS); Entezari, Mehran (BOS); Mchugh, Eileen (BOS); Ng, Wilson (BOS); Somera, Alisa (BOS)
Subject:	FW: Written Comment for the Record – SFO RADP Final EIR Appeal (File No. 251277)
Date:	Thursday, January 29, 2026 11:38:12 AM
Attachments:	RADP Appeal - Concerned Residents of Palo Alto_20260123.pdf

Hello,

Please see attached and below communication regarding File No. 251277: Hearing - Appeal of Final Environmental Impact Report Certification - SFO Recommended Airport Development Plan.

Regards,

John Bullock
Office of the Clerk of the Board
San Francisco Board of Supervisors
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-5184
BOS@sfgov.org | www.sfbos.org

From: Darlene Yaplee <darlene.yaplee@gmail.com>
Sent: Friday, January 23, 2026 4:56 PM
To: Board of Supervisors (BOS) <board.of.supervisors@sfgov.org>
Cc: Marie-Jo Fremont <mariejofremont1@gmail.com>; Darlene E. Yaplee <darlene.yaplee@gmail.com>
Subject: Written Comment for the Record – SFO RADP Final EIR Appeal (File No. 251277)

Re: File No. 251277, Appeal of Certification of the Final Environmental Impact Report for the SFO Recommended Airport Development Plan

Dear Clerk of the Board of Supervisors,

Please find attached written comments submitted for the record regarding File No. 251277, the appeal of the certification of the Final Environmental Impact Report for the SFO Recommended Airport Development Plan.

The attached document describes impacts experienced by Palo Alto residents and is submitted for consideration by the Board of Supervisors in advance of and in connection with the February 3, 2026 hearing.

Respectfully submitted,

Marie-Jo Fremont
Co-Founder, Concerned Residents of Palo Alto
Chief Policy Officer, Aviation-Impacted Communities Alliance (AICA)

Darlene Yaplee
Co-Founder, Concerned Residents of Palo Alto
President and Co-Founder, Aviation-Impacted Communities Alliance (AICA)

Concerned Residents of Palo Alto

Submitted for the Record
Re: File No. 251277 – Appeal of Certification of the Final EIR for the SFO Recommended Airport Development Plan
February 3, 2026 Hearing

Why Palo Alto Experiences Distinct Arrival Noise Impacts Under New FAA Procedures

What Changed for Palo Alto and Why It Matters

Beginning in 2015, the FAA implemented NextGen Performance-Based Navigation in the Northern California Metroplex, and in particular the Bay Area, replacing radar-directed routes with precise, satellite-based routes called RNAVs, eliminating some arrival routes, and reducing the in-trail spacing between two aircraft on the same route. All these changes affected where and how airplanes flew, and especially which arrival route they used to reach SFO.

In Palo Alto, a unique convergence of 3 SFO arrival routes (including 2 RNAV routes), combined with lower altitudes, new speed requirements, and other Metroplex changes fundamentally changed how many, how often, and how loudly aircraft fly over Palo Alto for over ten years now.

As part of the NextGen changes in the Bay Area, the FAA:

- **Reshaped the SFO Class B airspace** allowing aircraft to fly lower over Palo Alto, which increases noise because planes are closer to the ground.

- **Introduced two new RNAV arrival routes** (SERFR in 2015 and PIRAT in 2019) causing more flights over the same Palo Alto neighborhoods resulting in more aircraft noise. These 2 RNAV routes are flown precisely and narrowly in a 0.2-mile-wide corridor, rather than being previously dispersed over a 3-mile or wider corridor. Furthermore, the FAA made poor design decisions that resulted in more noise than expected because the new routes require pilots to deploy flaps, apply speed brakes, or increase engine power to maintain air speed or altitude over Palo Alto instead of over the Bay. Such maneuvers create a lot of additional noise on the ground.

- **Established a new, lower altitude, major convergence point over Palo Alto for 3 SFO arrival routes over the Peninsula** by replacing the 5,000 ft MENLO waypoint near US 101 and the Dumbarton Bridge with the 4,000 ft SIDBY waypoint over the Eleanor Pardee Park in Palo Alto.

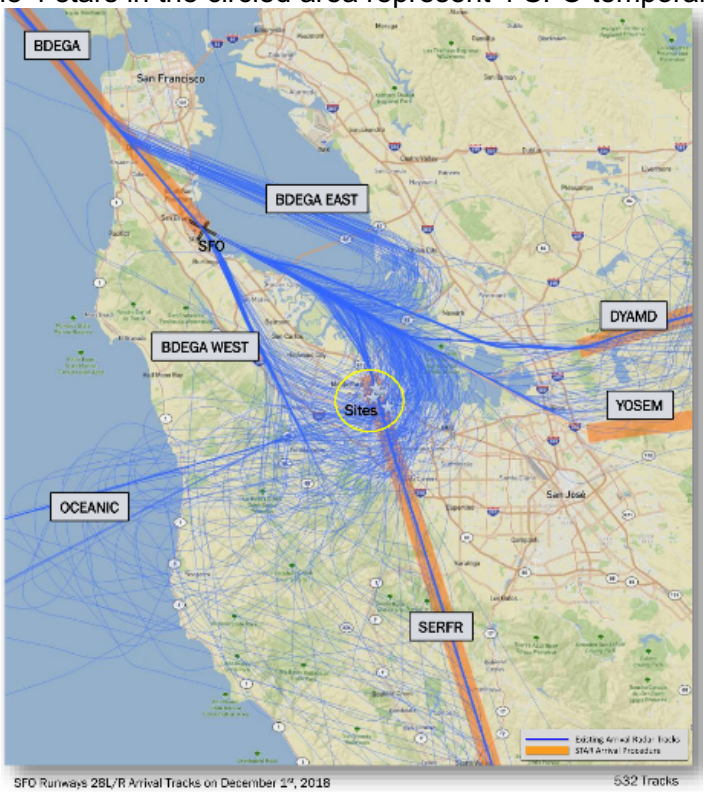
In addition, the **growth in SFO traffic compounded the NextGen effects**. As shown on the visuals below, **SFO arrivals increased 46.6% between 2013 and 2019**.

As a result, aircraft that once flew across a broad area are now locked into very narrow corridors, flying the same exact paths over the same Palo Alto residential neighborhoods, hundreds of times each day, often less than 2 minutes apart, at all hours of the day except between 1am and 4am unless weather conditions cause delays. Palo Alto is uniquely affected because the FAA selected SIDBY as the convergence point for 3 SFO arrival routes that account for over 50% of SFO, which translates into 250 to 350 SFO arrivals per day depending on the season and weather conditions.

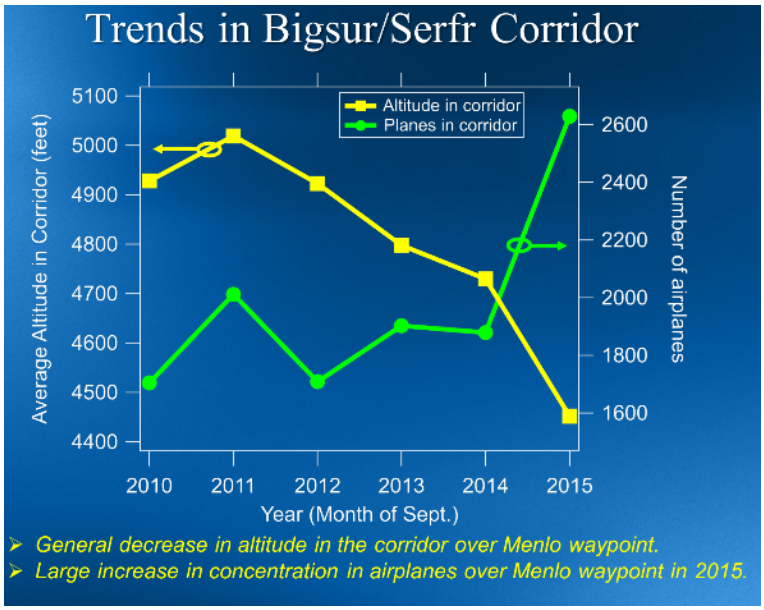
In short, NextGen not only added flights through a different route usage but also concentrated arrival flights over Palo Alto, lowered them, and made them louder, creating persistent and repeated noise impacts that are not experienced in the same way by neighboring cities away from SFO. Simultaneously, SFO traffic growth aggravated the effects. Additional SFO growth will no doubt further intensify aircraft noise impacts over Palo Alto.

The following visuals show how SFO arrivals have affected Palo Alto:

- **3 major arrival routes intersect over Palo Alto:** SERFR (south arrivals), BDEGA WEST (north arrivals), and OCEANIC (west arrivals), which became PIRAT RNAV in 2019. The graph displays the ground tracks of SFO arrivals for one day December 1, 2018 (source: SFO Report #2019-007 by BridgeNet. The circled area represents Palo Alto. The 4 stars in the circled area represent 4 SFO temporary noise monitors.



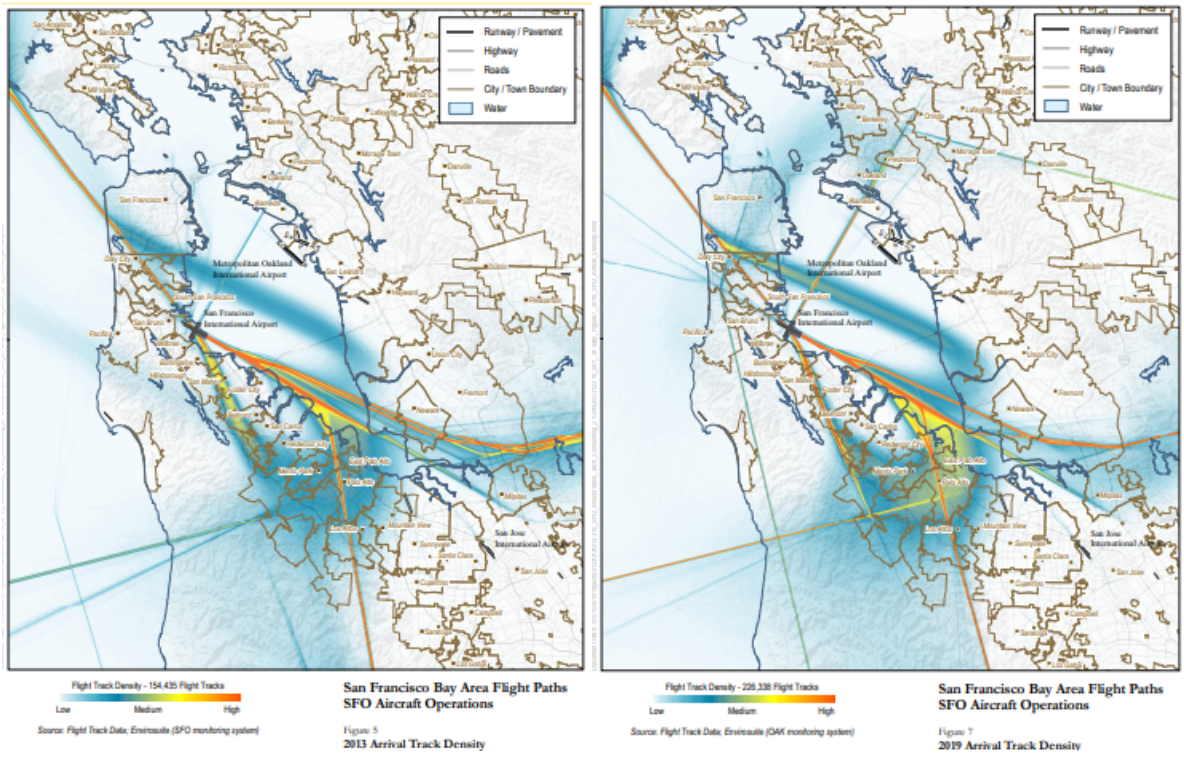
- **While SFO traffic went down 3% in 2015, the number of planes over the MENLO waypoint increased by about 40%.**
    - As part of NextGen, the FAA stopped using the MENLO waypoint near US 101 and the Dumbarton Bridge and used the new SIDBY waypoint over Eleanor Pardee Park in Palo Alto.
    - MENLO was a waypoint near US 101 and the Dumbarton Bridge at 5,000 ft over East Palo Alto. MENLO was used by the BSR (Big Sur) SFO arrival route before BSR was replaced by the SERFR RNAV arrival route. Originally SERFR used MENLO at 4,000 ft, which was later replaced by the SIDBY waypoint at 4,000 ft.
    - SFO traffic went down from 32,954 operations in September 2014 to 31,900 operations in September 2015 (source: SFO Airport Director's Reports), representing a 3% decrease in operations.
    - In contrast, and as shown on the graph below, traffic over the MENLO waypoint increased by about 40% from September 2014 to September 2015: as shown by the green line in the graph, over 2,600 planes in September 2015 overflew MENLO while fewer than 1,850 planes overflew MENLO in September 2014 (Source: Sky Posse Los Altos and Palo Alto 2016).
    - Note also the decrease in average altitude over the MENLO waypoint from over 4,700 ft in September 2014 to 4,450 ft in September 2015 (yellow line in the graph).



- **SFO arrivals increased 46.6% between 2013 and 2019**. There were 154,435 SFO arrivals in 2013 and 226,338 SFO arrivals in 2019 (source: SFO report 2021). In addition, as shown on the graphs below, the number of planes and concentration over Palo Alto drastically increased:
    - The 2013 graph shows **one narrow corridor over Palo Alto (BSR) while 2019 shows 2 narrow corridors (SERFR, PIRAT) intersecting over Palo Alto. In addition, BDGA-West arrivals became concentrated and more numerous over the Peninsula.**
        - BSR, SFO arrivals from the south, was replaced by SERFR in 2015.
        - OCEANIC, SFO arrivals from the west, was replaced by PIRAT in 2019.
        - BDEGA-West, SFO arrivals from the north, was concentrated through

NextGen changes.

- Overall, the 2013 graph shows a low flight density blue zone over Palo Alto (based on a scale of 154,435 flight tracks) while the 2019 graph shows a medium flight density yellow zone over Palo Alto (based on a scale of 226,338 flight tracks). **Going from a blue density zone on a lower scale to a yellow density zone on a higher scale indicates a substantial increase in SFO arrival traffic over Palo Alto.** In addition, what is not shown on the slides is that this drastic **increase in the number of flights over Palo Alto took place at low altitudes around 4,000 ft and that early speed brakes and flap deployment routinely occurs over Palo Alto because of poor FAA design decisions upstream.**



Respectfully Submitted,

Marie-Jo Fremont
Co-Founder, Concerned Residents of Palo Alto
Chief Policy Officer, Aviation-Impacted Communities Alliance (AICA)

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