

CEQA EIR APPEAL HEARING

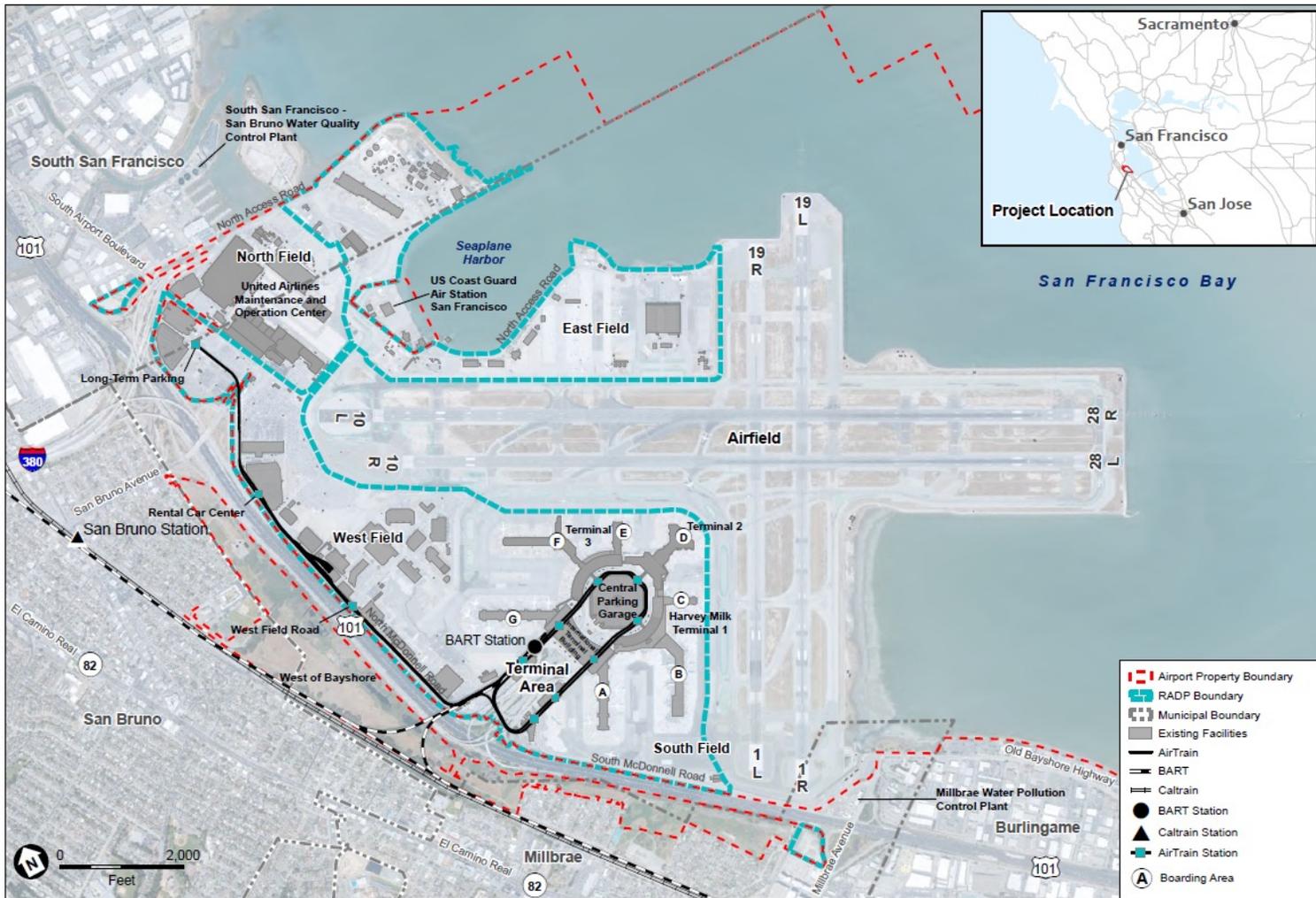
SFO RECOMMENDED AIRPORT DEVELOPMENT PLAN (RADP)



Board of Supervisors – February 3, 2026

San Francisco
Planning

Location of SFO



SOURCE: Esri, 2024; San Mateo County, 2023; SFO, 2024; ESA, 2024

Note: 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 grants a city or county intergovernmental immunity from complying with another governmental body's zoning and building permit laws.

SFO Recommended Airport Development Plan EIR

FIGURE 2-1
PROJECT LOCATION

Project Description



- SFO proposes to implement the **RADP**, which involves a **long-range plan** to guide the Airport's development.
- The RADP includes:
 - Improvements and development of **terminal facilities**,
 - Modification of certain **non-movement areas of the airfield**, and
 - Improvements to **landside facilities** to accommodate long-term aircraft operations and passenger activity levels at SFO.

Department's Key Responses



- This CEQA appeal constitutes an improper use of CEQA.
- The RADP would not induce aircraft passengers and operations at SFO.
- CEQA allows lead agencies to determine the most appropriate and informative baseline to use in the EIR.
- The EIR fully complies with CEQA. The department is not required to recirculate the EIR for public review.
- The San Francisco Airport Commission's approval of the project on December 16, 2025 fully complied with all applicable procedural requirements.

Department's Responses:

This CEQA appeal constitutes an improper use of CEQA



- This appeal **contravenes** the state legislature's **explicit directive** that CEQA **not** be used:
 - To **gain leverage** in the appellant's ongoing negotiations with SFO regarding the FAA actions (Metroplex) taken in **2015** that modified certain **flight paths** over Palo Alto.
 - For **reasons unrelated to environmental protection.**

Department's Responses:

Appellant disregards substantial evidence in the record



- Appellant **disregards** substantial evidence in the record (Draft EIR Appendix C) that the project would **not** induce **aircraft passenger demand and operations** at SFO.
- Appellant's assertion that the project could induce aircraft passengers and operations at SFO is **not supported by substantial evidence**.

Department's Responses:

Appellant misstates the law regarding future baseline



- CEQA Guidelines §15125 **allows** lead agencies to select most appropriate and informative baseline; includes using both **existing** and **future** baselines.
- As Appellant points out, CEQA prohibits EIRs from using **hypothetical** baseline conditions, such as baselines invented based on **speculative** assumptions regarding aircraft noise or air quality emissions.
- **Appropriate baselines were used** considering what the proposed project would impact.

Department's Responses: The EIR fully complies with CEQA



- The EIR analysis of **noise, air quality, and cumulative impacts** complies with CEQA.
- The EIR properly analyzes a **reasonable range of alternatives** to the project as required by CEQA.
- Planning Department is **not** required to **recirculate** the EIR for public review.

Department's Responses:

Appellant misstates the law regarding procedural requirements



- CEQA §15090(b) does **not** limit the authority to **certify** an EIR to an **elected decision-making body** (e.g., Board of Supervisors).
- San Francisco Administrative Code §31.16(b)(3) did **not** prohibit the **airport commission** from **approving** the project on December 16, 2025.

Department's Recommendation



Department respectfully request that the Board reject the appeal and uphold the Planning Commission's certification of the EIR