

*Via Email*

[bos.legislation@sfgov.org](mailto:bos.legislation@sfgov.org)

December 19, 2025

Clerk of the Board of Supervisors  
1 Dr. Carlton B. Goodlett Place, Room 244  
San Francisco, CA 94102

Re: City of Palo Alto's Appeal of Certification of FEIR for SFO  
Recommended Airport Development Plan (RADP), Case No. 2017-007468ENV

Dear Clerk of the Board of Supervisors:

The City of Palo Alto (City) hereby appeals the November 20, 2025, decision of the San Francisco Planning Commission to certify the Final Environmental Impact Report (FEIR) for the SFO Recommended Airport Development Plan (RADP), including its adoption of specified findings under the California Environmental Quality Act ("CEQA"). The Commission took these actions through adoption of Planning Commission Motion No. 21870, a copy of which is attached hereto as **Exhibit A**. The City appeals the Commission's adoption of this motion in its entirety, for the reasons stated below.

As a procedural matter, the City confirms (1) that it submitted comments to the Planning Commission during the public comment period and the public hearing on the EIR, by way of two letters dated May 30, 2025 and November 19, 2025, respectively; (2) that it is separately copying via email these appeal materials to the Environmental Review Officer (Lisa Gibson, [lisa.gibson@sfgov.org](mailto:lisa.gibson@sfgov.org)) at the same time it is filing them with the Clerk of the Board; and (3) it sent a check in the amount of the \$787 to cover the appeal filing fee, and that check was received on December 19, 2025.

The San Francisco International Airport (SFO) is proposing adoption of the RADP, which plans for development of extensive future projects at SFO, including improvements to existing and development of new terminal areas, parking and rental car facilities, and other facilities to accommodate long term aircraft operations and passenger activity, all of which will help facilitate an estimated 506,000 annual aircraft operations to accommodate 71.1 million annual passengers. And yet, while these improvements are designed to facilitate such growth, the FEIR

bizarrely assumes that such growth will happen in the future regardless of whether the RADP is approved. And the FEIR thus fails to even attempt to analyze the noise, air quality, and other substantial environmental impacts that will result from the growth in annual operations because of the RADP.

In taking this approach, the FEIR fails to comply with various CEQA requirements, including the requirement that it analyze both the direct and cumulative effects of the project and that it analyze impacts based on the existing environmental setting. “A long line Court of Appeal decisions holds … that the impacts of a proposed project are ordinarily to be compared to the actual environmental conditions existing at the time of CEQA analysis, rather than to allowable conditions defined by a plan or regulatory framework.” (*Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 320-321 [citing many cases as well as CEQA Guidelines § 15125, subd. (a)].) The Supreme Court has emphasized that “the baseline for CEQA analysis must be the existing physical conditions in the affected area,” that is, the real conditions on the ground, rather than the level of development activity that *could or should* have been present according to a plan or regulation.” (*Id.*, at 321, internal quotations and citations omitted.) In other words, the FEIR should have analyzed the operational impacts of the RADP against present-day conditions, and not hypothetical conditions presumed to exist in the future.

In addition to the fundamental inadequacy identified above, the City’s appeal is also based on all of the reasons set forth in the City’s May 30, 2025, comment letter and November 19, 2025, objection letter, copies of which are attached hereto as **Exhibit B** and **Exhibit C** respectively and incorporated herein by reference. The City further incorporates herein all other objections to the adequacy of the FEIR raised by other members of the public, including but not limited to each of the comment letters included in the Response to Comments document, such as the May 18, 2025, comment letter submitted by the Concerned Residents of Palo Alto.

Finally, the City was surprised to discover that, on Tuesday, December 16, 2025, the San Francisco Airport Commission **has already approved the Airport Development Plan** in apparent reliance upon the Planning Commission’s November 20, 2025, certification of the FEIR, even though that certification is not final and is still subject to administrative appeal. In so doing, the Airport Commission has further violated provisions of CEQA that mandate that EIRs be subject to certification by elected officials before they become final. (See CEQA Guidelines § 15090, subdivision (b).) The Airport Commission has likewise violated Section 31.16, subdivision (b)(3) of the San Francisco Administrative Code, which prohibits commissions from approving projects subject to an EIR before administrative appeals of the certification of such EIRs have been resolved. The City thus insists that the Airport Commission must take immediate action to set aside its December 16, 2025, approval of the RADP and defer further action until this appeal

Clerk of the Board of Supervisors  
December 19, 2025  
Page 3 of 3

is resolved. Please provide me with a copy of any Notice of Determination filed for any approval of the RADP.

Very truly yours,

JARVIS FAY LLP



Rick W. Jarvis

Enclosures

c (via email):

Lisa Gibson, Environmental Review Officer ([lisa.gibson@sfgov.org](mailto:lisa.gibson@sfgov.org))  
Ed Shikada, City Manager, City of Palo Alto  
Brad Eggleston, Public Works Director, City of Palo Alto  
Caio Arellano, Interim City Attorney, City of Palo Alto

# EXHIBIT A



# PLANNING COMMISSION MOTION NO. 21870

**HEARING DATE: November 20, 2025**

**Record No.:** 2017-007468ENV  
**Project Title:** **SFO Recommended Airport Development Plan**  
**Project Sponsor:** San Francisco International Airport  
Audrey Park – (650) 821-7844  
[sfoadp@flysfo.com](mailto:sfoadp@flysfo.com)  
**Staff Contact:** Kei Zushi – (628) 652-7495  
[cpc.sforadp@sfgov.org](mailto:cpc.sforadp@sfgov.org)

ADOPTING FINDINGS UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT RELATED TO THE CERTIFICATION OF A FINAL ENVIRONMENTAL IMPACT REPORT FOR THE SFO RECOMMENDED AIRPORT DEVELOPMENT PLAN (RADP). THE PROPOSED PROJECT WOULD IMPLEMENT THE RADP, WHICH INVOLVES A LONG-RANGE PLAN TO GUIDE THE SFO'S DEVELOPMENT. THE SAN FRANCISCO AIRPORT COMMISSION OPERATES AND MANAGES THE AIRPORT AS A DEPARTMENT OF THE CITY AND COUNTY OF SAN FRANCISCO. THE RADP SERVES AS A FRAMEWORK FOR FUTURE DEVELOPMENT AT SFO AND IDENTIFIES VARIOUS PROJECTS, INCLUDING THE IMPROVEMENT 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 THE AIRPORT. THE RADP PROVIDES FOR LONG-RANGE DEVELOPMENT TO ACCOMMODATE ACTIVITY LEVELS 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 CONSIDERING THE FORECAST PASSENGER AIRCRAFT FLEET MIX. 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.

## PREAMBLE

On November 20, 2025, the San Francisco Planning Commission (hereinafter "Commission") conducted a duly noticed public hearing at a regularly scheduled meeting regarding the final Environmental Impact Report ("EIR") in compliance with the California Environmental Quality Act for Record No. 2017-007468ENV.

The Project EIR files have been made available for review by the Commission and the public. The Commission Secretary is the Custodian of Records; the file for Record No. 2017-007468ENV is located at 49 South Van Ness Avenue, Suite 1400, San Francisco, California. The project EIR has also been made available for public review online at [sfplanning.org/sfceqadocs](http://sfplanning.org/sfceqadocs).

The Commission has heard and considered the testimony presented to it at the public hearing and has further considered written materials and oral testimony presented on behalf of the applicant, Department staff, and other interested parties.

MOVED, that the Commission hereby CERTIFIES the Final Environmental Impact Report identified as Case No. 2017-007468ENV, for the SFO Recommended Airport Development Plan (hereinafter “Project”), based on the following findings:

1. The City and County of San Francisco, acting through the Planning Department (hereinafter “Department”) fulfilled all procedural requirements of the California Environmental Quality Act (Cal. Pub. Res. Code Section 21000 et seq., hereinafter “CEQA”), the State CEQA Guidelines (Cal. Admin. Code Title 14, Section 15000 et seq., hereinafter “CEQA Guidelines”) and Chapter 31 of the San Francisco Administrative Code (hereinafter “Chapter 31”).
  - A. The Department determined that an environmental impact report (hereinafter “EIR”) was required and provided public notice of that determination by publication in a newspaper of general circulation on May 22, 2019. On the same date, the Department submitted the notice of preparation of an EIR and notice of public scoping meeting to the state Office of Planning and Research electronically, and emailed or mailed the notice to the Department’s list of persons requesting such notice, and to owners and occupants of properties within 300 feet of the project site on May 22, 2019.
  - B. On May 30, 2019 and June 4, 2019, the Department held public scoping meetings at the San Francisco Planning Department, 1650 Mission Street, San Francisco and Millbrae Community Center, 623 Magnolia Avenue, Millbrae, respectively, to receive public comments on the scope of the environmental analysis in the EIR for the project.
  - C. On April 16, 2025, the Department published the draft EIR (hereinafter “DEIR”) and provided public notice in a newspaper of general circulation of the availability of the DEIR for public review and comment and of the date and time of the Planning Commission public hearing on the DEIR; the Department emailed or mailed the notice to the Department’s list of persons requesting such notice, and to property owners and occupants within a 300-foot radius of the site on April 16, 2025.
  - D. Electronic copies of the notice of availability of the DEIR and the DEIR were posted to the Planning Department’s environmental review documents web page and available for download. The notice of availability of the DEIR was also posted on the website of the San Francisco County Clerk’s Office.
  - E. The notice of availability of the DEIR and of the date and time of the public hearing at the Planning Commission were posted at and near the project site on April 16, 2025.

- F. On April 16, 2025, the DEIR was emailed or otherwise delivered to government agencies and was submitted to the State Clearinghouse electronically for delivery to responsible or trustee state agencies.
- G. A notice of completion of an EIR was filed with the State Secretary of Resources via the State Clearinghouse on April 16, 2025.
- 2. The Commission held a duly advertised public hearing on said DEIR on May 22, 2025, at which opportunity for public comment was given and public comment was received on the DEIR. The period for acceptance of written comments ended on June 2, 2025.
- 3. The Department prepared responses to comments on environmental issues received at the public hearing and in writing during the 47-day public review period for the DEIR, prepared revisions to the text of the DEIR in response to comments received or based on additional information that became available during the public review period, and corrected errors in the DEIR. This material was presented in a Responses to Comments document, published on November 4, 2025, posted to the Planning Department's environmental review documents web page, distributed to the Commission, other decisionmakers, and all parties who commented on the DEIR, and made available to others upon request at the Department.
- 4. A final environmental impact report (hereinafter "FEIR") has been prepared by the Department, consisting of the DEIR, any consultations and comments received during the review process, any additional information that became available, and the Responses to Comments document, all as required by law.
- 5. The Planning Department Commission Secretary is the Custodian of Records; all pertinent documents are located in the File for Case No. 2017-007468ENV, at 49 South Van Ness Avenue, Suite 1400, San Francisco, California.
- 6. The Commission, in certifying the completion of said FEIR, hereby does find that that none of the factors that would necessitate recirculation of the FEIR under CEQA Guidelines Section 15088.5 are present. The FEIR contains no information revealing (1) any new significant environmental impact that would result from the Project or from a new mitigation measure proposed to be implemented, (2) any substantial increase in the severity of a previously identified environmental impact, (3) any feasible Project alternative or mitigation measure considerably different from others previously analyzed that would clearly lessen the environmental impacts of the Project, but that was rejected by the Project's proponents, or (4) that the Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

## DECISION

7. On November 20, 2025, the Commission reviewed and considered the information contained in the FEIR and hereby does find that the contents of said report and the procedures through which the FEIR was prepared, publicized, and reviewed comply with the provisions of CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code.
8. The Commission hereby does find that the FEIR concerning File No. 2017-007468ENV reflects the independent judgment and analysis of the City and County of San Francisco, is adequate, accurate and objective, and that the Responses to Comments document contains no significant revisions to the DEIR, and hereby does CERTIFY THE COMPLETION of said FEIR in compliance with CEQA, the CEQA Guidelines, and Chapter 31 of the San Francisco Administrative Code.
9. The Commission, in certifying the completion of said FEIR, hereby does find that the Project described in the EIR:
  - A. Would have significant unavoidable impacts on air quality: operation-related criterial air pollutant emissions.

I hereby certify that the Planning Commission ADOPTED the foregoing Motion on November 20, 2025.



Jonas P. Ionin  
Commission Secretary

AYES: McGarry, Braun, Imperial, Moore, So  
NAYS: None  
ABSENT: Williams  
RECUSED: Campbell  
ADOPTED: November 20, 2025

# EXHIBIT B



## 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](mailto: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.

### **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 overflow communities.

### **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



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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.

### **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.

### **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.

### **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.

### **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

# EXHIBIT C



OFFICE OF THE CITY MANAGER

250 Hamilton Avenue, 7th Floor  
Palo Alto, CA 94301  
650.329.2392

November 19, 2025

Submitted via email

To: San Francisco Planning Commission

San Francisco Planning Department

49 South Van Ness Avenue, Suite 1400

San Francisco, CA 94103

Email: [lydia.so@sfgov.org](mailto:lydia.so@sfgov.org); [derek.braun@sfgov.org](mailto:derek.braun@sfgov.org); [theresa.imperial@sfgov.org](mailto:theresa.imperial@sfgov.org);  
[gilbert.a.williams@sfgov.org](mailto:gilbert.a.williams@sfgov.org); [kathrin.moore@sfgov.org](mailto:kathrin.moore@sfgov.org); [amy.campbell@sfgov.org](mailto:amy.campbell@sfgov.org);  
[sean.mcgarry@sfgov.org](mailto:sean.mcgarry@sfgov.org); [commissions.secretary@sfgov.org](mailto:commissions.secretary@sfgov.org); [jonas.ionin@sfgov.org](mailto:jonas.ionin@sfgov.org)

Subject: Objection to Certification of FEIR for SFO Recommended Airport Development Plan (RADP), Case No. 2017-007468ENV

Dear President So and Commissioners:

The City of Palo Alto (City) submits these comments on the Final Environmental Impact Report's Responses to Comments (RTC) for the SFO Recommended Airport Development Plan (RADP). These comments reiterate the objections raised in the City's May 30, 2025 letter, which the City incorporates by reference, and all supporting materials previously submitted into the administrative record.

**I. Core deficiency: the “no change in aircraft operations” premise is conclusory and not supported by substantial evidence in the RTC**

- The RTC asserts that SFO will reach approximately 71.1 million annual passengers and ~506,600 annual aircraft operations ‘regardless of whether the RADP is implemented’ and uses that assertion to exclude aircraft noise and aircraft emissions from CEQA review. At the same time, the RTC acknowledges that, without the RADP ‘existing facilities could accommodate forecast increases’ only with ‘unacceptable level of service’ and ‘severe or unrecoverable delays.’ By definition in Appendix C, SFO’s ‘practical capacity’ is the operations level at which delays dissipate across hours rather than cascading; thus, RADP’s new gates, apron/RON/hold areas, and maintenance hangar are designed to relieve constraints and maintain acceptable LOS—thereby increasing the likelihood and accelerating the timeframe in which actual schedules will approach the practical-capacity operations level. Under CEQA Guidelines §15064(d), this is a reasonably foreseeable indirect effect must be analyzed (aircraft-related noise and emissions), or alternatively, the FEIR must disclose the capacity/queuing/schedule-enablement analysis demonstrating why such increases are not reasonably foreseeable.
- The RTC’s acknowledgment that existing facilities can accommodate forecast demand while asserting RADP is needed to “maintain an acceptable level of service” underscores



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that the project is intended to affect how operations are processed (e.g., delay recovery/throughput). That nexus requires transparent operational evidence before excluding aircraft-related effects from CEQA scope. Absent such analysis, treating aircraft noise/emissions as out of scope is an unsupported narrowing of CEQA review.

## **II. Failure to evaluate reasonably foreseeable indirect effects of capacity enabling facilities (Guidelines §15064(d))**

- The FEIR and RTC repeatedly assert that the RADP would not result in changes to airport operations (see AA-1, PD-1, and GC-CEQA-2) and use that premise to exclude aircraft noise and aircraft emissions from CEQA scope and to avoid analyzing reasonably foreseeable indirect effects and therefore neglect to analyze indirect effects reasonably foreseeable from the proposed capacity-enabling facilities (additional gates, apron/RON/hold space, and a maintenance hangar). The RTC also relies on Draft EIR Appendix C to claim 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,” even as it simultaneously (a) states that long-term passenger activity levels are forecast to reach approximately 71.1 million annual passengers and about 506,600 annual aircraft operations regardless of whether the RADP is implemented, and (b) acknowledges that without the RADP the Airport would face “unacceptable level of service” with “severe or unrecoverable delays.” A conclusory statement that RADP will not increase operations is not a substitute for evidence showing why these facilities cannot or would not, as a practical matter, increase throughput, alter schedules, or otherwise change flight activity patterns. Given the RTC’s own admissions that the RADP is intended to align terminal/ground facilities with the runway system’s “practical capacity,” the relief of gate/apron/hold constraints is reasonably foreseeable to affect realized operations and schedule feasibility; under CEQA Guidelines §15064(d), those indirect effects must be analyzed or supported by a transparent capacity/queuing/schedule-enablement demonstration.

## **III. Community noise disclosure: provide modern metrics and an arrivals-focused sensitivity review**

- The FEIR and RTC limit noise impacts analysis based on the predicate above, and on that basis decline to provide requested community experience metrics (e.g., N-Above, Lmax, nighttime event counts). Yet the record demonstrates that SFO already publishes N-Above in its community materials, evidencing the feasibility of an informal sensitivity analysis for overflown communities such as Palo Alto.
- The City corrected the record that Palo Alto is primarily under arrival flows; the RTC acknowledges this correction yet still provides no arrivals focused exposure disclosure because it relies on the same unsubstantiated predicate.

## **IV. Air quality: address ultrafine particulate matter and regional cumulative exposure**

- Ultrafine particulate matter (UFP) and regional cumulative exposure. The RTC acknowledges there are no adopted ambient standards or CEQA significance thresholds for

UFPs and therefore relies on PM2.5/TAC methods. Nevertheless, CEQA allows qualitative analysis and disclosure where substantial evidence indicates potential health concern. Consistent with the City's prior request for a meaningful cumulative and regional air quality analysis (including UFPs), the EIR should add an informational UFP discussion (sources, dispersion under arrival paths), a reasoned explanation of the extent to which the PM2.5/TAC HRA serves as a proxy for UFPs, and a limited monitoring or sensitivity-screen commitment for overflown communities. If SFO declines, please provide substantial evidence explaining why such disclosure is infeasible.

#### **V. Alternatives: insufficient quantitative comparison, specifically for Alternative C**

- CEQA requires enough information for meaningful evaluation, analysis, and comparison with the proposed project. The RTC argues detailed quantification is unnecessary, but given Alternative C is identified as environmentally superior among build options while also being able to meet most of the RADP project objectives compared to Alternatives A and B. Therefore, additional analysis and comparison between the RADP and Alternative C is warranted, and specifically an analysis of quantitative contrasts (construction phasing overlap, nearfield construction noise, landside traffic, and, if operational analysis warrants, aircraft related exposure). The absence of such analysis inhibits the Commission's ability to make an informed decision.

#### **VI. Forecasts and ALUCP: reconcile disparities and disclose implications**

The C/CAG Airport Land Use Committee identifies disparities between RADP demand forecasts ( $\approx 71.1$  million annual passengers and  $\approx 506,600$  operations) and the SFO ALUCP forecasts ( $\approx 27$  million passengers and 482,520 operations), and requests updating/coordination so that land use compatibility planning reflects current projections. The RTC recites this comment but does not address how this disparity is addressed in the environmental analysis.

#### **VII. Recirculation is warranted (Guidelines §15088.5)**

- The RTC states recirculation is not required, but because key information is missing or asserted rather than demonstrated, most notably the operational/throughput evidence underlying the exclusion of aircraft noise/air emissions, the lack of a regional cumulative screen, and insufficient alternatives quantification, significant new information is needed for informed decision-making, triggering recirculation.

#### **Requests to cure deficiencies**

To correct the foregoing deficiencies and ensure an adequate EIR, the City requests that the Planning Department:

- Provide substantial evidence support for the "no change in operations" predicate. Disclose the capacity/queuing/schedule enablement analysis that demonstrates why the specific RADP elements (new gates, apron/RON/hold space, maintenance hangar) cannot increase practical throughput or alter schedules; if such analysis does not exist, prepare it and revise the EIR accordingly.

2. Conduct a regional cumulative analysis of aircraft noise and air quality that evaluates combined exposure across SFO, OAK, SJC, SQL, and PAO to reflect overflight impacts on downrange communities.
3. Add an informational, non-threshold community exposure sensitivity review using modern metrics (N-Above, Lmax, nighttime event counts) for arrival path communities, noting that SFO already reports N-Above. This improves transparency irrespective of CEQA significance thresholds for construction/ground source noise.
4. Include a qualitative and, where feasible, screening level ultrafine particulate matter assessment for overflight areas, explaining methods, limitations, and how subsequent project level review will monitor and mitigate where warranted.
5. Expand alternatives analysis with quantitative contrasts for Alternative C on high salience metrics (construction emissions phasing/overlap, nearfield construction noise, landside traffic, and—if operational analysis reveals differences—aircraft related exposure).
6. Reconcile forecast/ALUCP disparities in coordination with C/CAG ALUC and disclose implications for land use compatibility and environmental effects; if additional analysis is required, incorporate it before certification.
7. Recirculate the Draft EIR after completing the above revisions to provide meaningful public review and informed decision-making.

The City respectfully requests that the Planning Commission decline to certify the RADP FEIR until the above deficiencies are addressed. Please provide notice of all future hearings, staff reports, responses, and determinations related to the RADP FEIR and project approvals.

Sincerely,



Ed Shikada  
City Manager  
City of Palo Alto



OFFICE OF THE CITY ATTORNEY

CITY OF  
**PALO**  
**ALTO** 250 Hamilton Avenue, 8th Floor  
Palo Alto, CA 94301  
650.329.2171

December 18, 2025

RECEIVED  
BOARD OF SUPERVISORS  
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2025 DEC 19 AM08:54  
*JA*

VIA FEDEX  
Office of the Clerk of the Board  
1 Dr. Carlton B. Goodlett Place, Room 244  
San Francisco, CA 94102

**RE: SFO Recommended Airport Development Plan (RADP), Case No. 2017-007468ENV**

Dear Clerk,

Attached is a check for a CEQA appeal filing fee, which is being submitted on behalf of the City of Palo Alto's appeal in the decision made in the case referenced above. Please note that the appellate filing will be submitted electronically. Thank you for your prompt attention to this matter.

Kind regards,  
/s/  
Katherine Bello  
Sr. Legal Secretary



CITY OF PALO ALTO  
P.O. Box 10250  
Palo Alto, CA 94303-0862  
(650) 329-2399

General Warrant No: 3091621  
Check Date: 12/18/2025  
Check Total: \$ 787.00  
Vendor No.: 207929

PAY TO: SAN FRANCISCO PLANNING

Page: 1 of 1

DESCRIPTION	INV. REFERENCE	P/O NUMBER	COSTCENTER GLACOUNT	DISCOUNT	TAX	FREIGHT	AMT
CEQA Appeal	2017-007468ENV	1900124701	18030003 31010	0.00	0.00	0.00	787.00

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(650) 329-2399

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90-2267 GENERAL WARRANT NO.  
1211 3091621

12/18/2025

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VOID OVER \$\*\*\*\*\*787.00\*  
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To  
The  
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CLERK OF THE BOARD OF SUPERVISORS  
1 DR CARLTON B GOODLETT PLACE RM 2  
SAN FRANCISCO CA 94102

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