49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
628.652.7600
www.sfplanning.org

ENVIRONMENTAL IMPACT REPORT CERTIFICATION APPEAL

SFO Recommended Airport Development Plan (RADP)

Date:	January 26, 2026
To:	Angela Calvillo, Clerk of the Board of Supervisors
From:	Lisa Gibson, Environmental Review Officer – (628) 652-7571 Tania Sheyner, tania.sheyner@sfgov.org – (628) 652-7578 Kei Zushi, kei.zushi@sfgov.org – (628) 652-7495
RE:	**Planning Case No. 2017-007468APL** **Appeal of Environmental Impact Report Certification for SFO RADP**
Hearing Date:	February 3, 2026
Attachment:	A - Summary of Scoping Comments (Draft EIR – Table 1-1)
Project Sponsor:	Audrey Park, SFO, (652) 821-7844
Appellant(s):	Rick W. Jarvis with Jarvis Fay LLP on behalf of the City of Palo Alto

Introduction

This memorandum and the attached document are a response to the letter of appeal to the board of supervisors (the board) regarding the certification of a final environmental impact report (FEIR) under the California Environmental Quality Act (CEQA) for the San Francisco International Airport (SFO or Airport) Recommended Airport Development Plan (RADP or project). The FEIR was certified by the planning commission (the commission) on November 20, 2025. The appeal to the board was filed on December 19, 2025 by Rick W. Jarvis on behalf of the City of Palo Alto (appellant).

The FEIR, which consists of the draft environmental impact report (DEIR) and the responses to comments (RTC) document, is being provided to the clerk of the board under separate cover.

The appellant submitted a supplemental appeal letter on January 23, 2026. Based on a preliminary review, the department finds that the supplemental letter does not present any new evidence that would alter the department's response to the appeal. The department may prepare a supplemental response letter to respond in further detail.

The decision before the board is whether to uphold the certification of the FEIR by the commission and deny the appeal, or to overturn the commission's decision to certify the FEIR and return the project to the planning department for additional review.

Site Description and Existing Use

SFO is geographically located primarily in unincorporated San Mateo County, California, approximately 13 miles south of downtown San Francisco, with portions of the Airport within the city boundaries of South San Francisco to the north, Millbrae to the south, and San Bruno to the west.[1] The U.S. Coast Guard Air Station San Francisco[2] and the United Airlines Maintenance and Operations Center[3] are located on Airport land but are excluded from consideration in the RADP because they are fixed, on-Airport land uses. The Airport is owned by the City and County of San Francisco (the City) and operated by and through the San Francisco Airport Commission (the airport commission).

Project Description

SFO proposes to implement the RADP, which involves a long-range plan to guide SFO's development. The 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.

Background

On June 7, 2017, SFO (hereinafter project sponsor) filed a project application for the proposed project with the planning department (hereinafter department).

The department published a DEIR, including the initial study, for the project on April 16, 2025. Written public comments were received during the public comment period from April 16, 2025 through June 2, 2025, and a public hearing was held on the DEIR on May 22, 2025, at which time public testimony was received. The department then prepared a responses to comments document to address environmental issues raised

[1] 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.
[2] The U.S. Coast Guard station is located entirely on federal land; the facilities are owned, maintained, and operated by the federal government.
[3] United Airlines maintains a land lease and the facilities developed, operated, and maintained within the Maintenance and Operations Center leasehold are owned by United Airlines.

through written comments received during the public comment period and oral comments provided at the public hearing for the DEIR. The planning department prepared revisions to the text of the DEIR in response to comments received, and corrected errors in the DEIR. The planning commission certified the FEIR on November 20, 2025.

On December 16, 2025, the airport commission adopted CEQA findings and a statement of overriding considerations and approved the project at a duly noticed public hearing.

On December 19, 2025, Rick W. Jarvis, on behalf of the City of Palo Alto, filed an appeal of the planning commission's certification of the EIR.

On December 24, 2025, the department determined that the appeal was timely.

CEQA, CEQA Guidelines, and San Francisco Administrative Code Chapter 31

Environmental Impact Reports
CEQA Guidelines section 15121 describes that an environmental impact report (EIR) is an informational document to inform public agency decision makers and the public generally of the "significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."

Significant Environmental Effects
CEQA Guidelines section 15064(f) provides that the determination of whether a project may have one or more significant effects shall be based on substantial evidence in the record of the lead agency. CEQA Guidelines section 15384 defines "substantial evidence" as "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached." CEQA Guidelines 15604(f)(5) offers the following guidance: "Argument, speculation, unsubstantiated opinion or narrative, or evidence that is clearly inaccurate or erroneous, or evidence that is not credible, shall not constitute substantial evidence. Substantial evidence shall include facts, reasonable assumption predicated upon facts, and expert opinion supported by facts."

The substantial evidence standard applies to challenges of an EIR's factual determinations, such as whether an impact exceeds the threshold of significance. This means that a court will uphold an agency's determination of whether a project may have a significant effect if enough relevant information and reasonable inferences from this information support a conclusion, even though other conclusions might be reached.

Chapter 31 of the San Francisco Administrative Code
Section 31.16(c)(4) of the San Francisco Administrative Code provides that, in reviewing an appeal of a CEQA decision, the board of supervisors shall determine if the "final EIR complies with CEQA, including that it is adequate, accurate and objective, sufficient as an informational document, correct in its conclusions, and reflects the independent judgment and analysis of the City and that the Planning Commission certification findings are correct."

Planning Department Responses

The concerns raised in the appeal letter are addressed in the responses below. The appellant generally restates the same concerns and issues previously raised in their responses to the notice to preparation (NOP), which was published by the department on May 22, 2019, as well as during the DEIR public comment period, which ran from April 16, 2025 through May 22, 2025, except for two issues addressed in Responses 1 and 2 below.

Response 1: The San Francisco Airport Commission's approval of the project on December 16, 2025 fully complied with CEQA Guidelines Section 15090(b) and San Francisco Administrative Code Section 31.16(b)(3). CEQA allows non-elected bodies to certify an EIR and approve projects, and the Airport Commission acted within that authority. The appeal was filed and scheduled after the Commission's approval, so no prohibition applied.

CEQA Guidelines §15090(b)
CEQA Guidelines section 15090(b) provides that when a non-elected decision-making body within a local lead agency, such as the planning commission, certifies an EIR, that certification may be appealed to the local elected decision-making body, and the local agency must provide a mechanism for such appeals. Contrary to the appellant's assertion, Section 15090(b) does not limit the authority to certify an EIR to a local agency's elected decision-making body, such as the board of supervisors, nor does it prohibit other local agencies, such as the airport commission, from approving a project.

In this case, the planning commission certified the FEIR at a duly noticed public hearing on November 20, 2025. On December 16, 2025, the airport commission adopted CEQA findings and a statement of overriding considerations and approved the project at a duly noticed public hearing. The appellant filed an appeal of the planning commission's EIR certification with the clerk of the board of supervisors on December 19, 2025. Consistent with Section 15090(b), the board of supervisors is scheduled to consider the appeal at a public hearing on February 3, 2026. Therefore, the airport commission's December 16, 2025 project approval complied with the requirements under CEQA Guidelines section 15090(b).

San Francisco Administrative Code §31.16(b)(3)
San Francisco Administrative Code Section 31.16(b)(3) generally prohibits the board of supervisors, other City boards, commissions, departments, and officials from approving a project that requires multiple City approvals after the clerk of the board has scheduled the appeal hearing and until the board of supervisors has affirmed the CEQA decision.

Contrary to the appellant's contention, the airport commission's December 16, 2025 project approval complied with section 31.16(b)(3) requirements. The appellant filed an appeal of the EIR certification on December 19, 2025, and the clerk of the board scheduled the appeal hearing after the airport commission's project approval. Accordingly, section 31.16(b)(3) did not prohibit the airport commission from approving the project on December 16, 2025. The airport commission's action was therefore consistent with the requirements of section 31.16(b)(3).

Response 2: The EIR properly analyzes the project's environmental impacts using existing and future 2045 baseline conditions, consistent with CEQA.

CEQA Guidelines section 15125(a) generally requires that an EIR describe the physical environmental conditions in the project site vicinity at the time the notice of preparation (NOP) is published. These conditions normally constitute the baseline for determining the significance of a project. However, CEQA Guidelines section 15125(a)(2) provides an exception that allows a lead agency to use a projected future baseline as the baseline for analysis when substantial evidence demonstrates that use of existing conditions would be misleading or lack informative value for decision-makers and the public.

As explained in the DEIR section 1.A.2, the EIR provides a reasoned explanation for its use of a future 2045 baseline in the operational impact analysis for several environmental topics, as explained below. The EIR explains that comparing and assessing the environmental effects of subsequent projects that could occur under the RADP against conditions that existed in 2019, at the time of the NOP, would mislead the decision makers and the public by suggesting that:

(1) there would be no or few changes to existing conditions regarding passenger and employment growth anticipated to occur by 2045 regardless of implementation of the RADP; and

(2) all or most of the environmental impacts that could occur by 2045 are attributable solely to the RADP, rather than, for example, the passenger and employment growth anticipated to occur by 2045 regardless of implementation of the RADP.

For this reason, this EIR uses future 2045 conditions – corresponding to the anticipated RADP buildout year – as the baseline for evaluating operational (including cumulative) impacts for air quality, noise, and transportation. This approach appropriately accounts for passenger and employment growth anticipated to occur regardless of implementation of the RADP and presents a reasonable worst-case analysis.
At the same time, the EIR complies with CEQA by using existing operational conditions at SFO - including current passenger volumes, aircraft operations, and facility configurations - as the baseline for analyzing project's environmental impacts other than air quality, noise, and transportation as well as analyzing construction impacts for all topics. As explained on pp. 3.4 and 3.5 of the DEIR, the use of two baselines provides the most reasonable yet conservative scenario for analyzing projects impacts.

Finally, the appellant fails to explain how the EIR is inconsistent with the California Supreme Court's holding in *Communities for a Better Environment v. South Coast Air Quality Management Dist*. (2010) 48 Cal.4th 310. The EIR properly analyzes the project's operational impacts against existing and future 2045 baselines consistent with CEQA and applicable case law.

Response 3: The Final EIR adequately addresses the appellant's and other comments submitted during the EIR process.

The concerns referenced in the appeal, including those outlined in the City of Palo Alto's May 30, 2025 comment letter, the November 19, 2025 objection letter, and other public comments, were addressed in detail in the DEIR and in the RTC document, which comprise the FEIR. DEIR Table 1-1 provides a summary of all comments provided during the DEIR public comment period. Specifically, pages 1-9 and 1-10 of Table 1-1

present the appellant's 2019 scoping comments along with the specific sections of the DEIR and initial study (included as DEIR Appendix B) where these comments are addressed and analyzed. The RTC document includes comprehensive responses to all substantive comments received during the DEIR public review period, including those submitted by the appellant. These responses explain how the issues raised were considered and addressed in accordance with CEQA requirements.

The appellant has not provided any substantial evidence demonstrating that the FEIR failed to adequately address the concerns raised in the comments. Thus, no further response is required.

Response 4: The EIR's assumption that future growth (71.1 million [M]) annual passengers and 506,000 annual aircraft operations) would occur regardless of RADP implementation is supported by substantial evidence in the record.

The appellant generally claims that the new gates, apron/remain overnight (RON)/hold areas, and maintenance hangar proposed as part of the project are intended to relieve constraints and facilitate and accommodate growth in aircraft operations and passengers. However, the appellant has not provided any facts, data, or expert opinion that substantiate this claim. Based on this unsupported premise, the appellant further argues that increased aircraft activity constitutes a reasonably foreseeable indirect effect that must be analyzed in the EIR, or alternatively, that the EIR must disclose capacity, queueing, and schedule-enablement analysis demonstrating why such increases are not reasonably foreseeable.

As discussed in DEIR Appendix C, Airport Facilities to Accommodate Aviation Demand, prepared by Ricondo, a recognized aviation expert consultant firm, the project 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. The technical assessment by Ricondo demonstrates that operational passenger throughput at SFO is constrained by runway or airfield capacity. While the project may enhance passenger experience and operational efficiency, it does not alter the underlying runway or airfield capacity that governs the volume of aircraft passengers or operations. This expert analysis constitutes substantial evidence, and the appellant fails to provide substantial evidence demonstrating otherwise.

Given that the EIR's assumption that future growth (71.1M annual passengers and 506,000 annual aircraft operations) would occur regardless of RADP implementation is supported by substantial evidence, no additional analysis of future growth in aircraft passengers or operations is required as part of the project's environmental review. The EIR is likewise not required to analyze capacity, queuing, and schedule enablement because none of them constitutes a direct or indirect effect of the project. To the extent that the proposed project would result in direct or indirect impacts related to noise, air quality and other environmental impacts noted by the appellant, these have been analyzed appropriately and thoroughly in the EIR.

CEQA Guidelines section15126.2(e) requires analysis of reasonably foreseeable indirect effects, including growth-inducing impacts and related environmental consequences. Chapter 4 of the EIR addresses the project's reasonably foreseeable indirect effects as required under CEQA Guidelines section 15126.2(e). CEQA Guidelines section 15145 also discourages speculative analysis. Therefore, the EIR appropriately limits its analysis to impacts that are reasonably foreseeable and attributable to the project.

Response 5: CEQA does not require reconciliation of the disparity between RADP forecasts (71.1M annual passengers and 506,600 annual aircraft operations) and SFO Airport Land Use Compatibility Plan (ALUCP) forecasts (27M annual passengers and 482,520 annual aircraft operations) as part of the environmental review for the project.

As discussed in section 3.Q.2 of the RTC document, the disparity between the RADP and ALUCP forecasts will need to be addressed in the appropriate planning context. The ALUCP, which is SFO's land use compatibility plan, is designed to ensure that land uses around the Airport are compatible with its operations. However, updating the forecast information in the ALUCP is not required for CEQA compliance. This is because, as discussed above and in DEIR Appendix C, Airport Facilities to Accommodate Aviation Demand, implementation of the project would not induce passenger demand, increase the capacity of the airfield, change the configuration of the existing runaways, change the number of aircraft operations or aircraft types operation at the Airport, or change the volume of annual passengers that chose to fly into and out of SFO.

Accordingly, the appellant's comment does not demonstrate that the EIR's analysis is inadequate or inaccurate. No further response is required.

Response 6: The EIR's analysis of noise impacts complies with CEQA and is supported by substantial evidence. The appellant has not demonstrated otherwise.

The appellant incorrectly claims that the DEIR relies solely on the 65 dB Community Noise Equivalent Level (CNEL) threshold to determine the significance of noise impacts, asserting that the metric is inconsistent with current research or federal guidance. Contrary to the appellant's assertion, the EIR evaluates the types of noise sources and activities that would be associated with the project using appropriate significance thresholds, as explained in section 3.F.2 of the RTC, pp. 3-27 through 3-33. These noise sources and activities include, but are not limited to, construction-related heavy equipment and traffic noise (EIR Impact NO-1), operational noise from stationary sources and project-related traffic (EIR Impact NO-3), and cumulative noise impacts (EIR Impact C-NO-1).

While the EIR references SFO's existing and future aircraft-operations noise contours (EIR pp. 3.B-55 and 3.B-57), these references explicitly acknowledge that implementation of the project would not result in changes to aircraft operations. Consequently, the 65 CNEL contour would remain unchanged with or without project implementation. The 65 CNEL contour is referenced solely to describe the existing noise environment and to confirm that the RADP would not alter aircraft noise conditions; it is not used as a significance threshold for evaluating the project impacts.

The EIR applies a 65 dBA threshold only in its analysis of operational traffic noise impacts, consistent with noise standards adopted by the applicable local jurisdictions for land use compatibility purposes (e.g., City of South San Francisco, see EIR p. 3.B-22). Although the Federal Aviation Administration's (FAA) 2021 analysis indicates a substantial increase in the percentage of individuals reporting high levels of annoyance from aircraft noise, the FAA has not adopted or proposed any policy changes or revised significance criteria in response to the survey. Further, as discussed above and throughout the EIR, implementation of the project would not alter aircraft operations or aircraft noise emissions. Therefore, consideration of alternative analytical methods related to aircraft noise is not required under CEQA. The FAA's 2021 analysis does not undermine the adequacy, accuracy, or completeness of the EIR's noise analysis.

In sum, the EIR's employs appropriate metrics and thresholds to describe the existing noise environment and to evaluate the project's potential noise impacts. The EIR complies with CEQA and provides the project's noise impacts based on substantial evidence.

Response 7: The EIR's analysis of air quality impacts complies with CEQA and is supported by substantial evidence. The appellant has not demonstrated otherwise.

As described in EIR Section 3.C, pp. 3.C-1 through 3.C-88, the air quality analysis evaluates project-related emissions of criteria air pollutants, including particular attention to particulate matter (PM_{10} and $PM_{2.5}$), ozone precursors, and toxic air contaminants (TACs). The analysis is conducted in accordance with applicable regulatory guidance and methodologies established by the Bay Area Air District (formerly the Bay Area Air Quality Management District), the California Air Resources Board (CARB), and the U.S. Environmental Protection Agency (EPA) and consistent with the planning department's Air Quality and Greenhouse Gas Analysis Guidelines.

The EIR's analysis of PM_{10} and $PM_{2.5}$ includes consideration of ultrafine particulate matter (UFPs). PM_{10} and $PM_{2.5}$ are particles with diameters less than 10 microns or 2.5 microns, respectively. A micron is one millionth of a meter. UFPs are particles with diameters less than 0.1 micron. Since both PM_{10} and $PM_{2.5}$ include smaller particles, the analysis of PM_{10} and $PM_{2.5}$ includes UFPs by definition.[4]

At present, there are no federal, state, or regional ambient air quality standards or adopted significance thresholds for UFPs. Accordingly, the EIR appropriately focuses on criteria pollutants and TACs for which health-based standards and accepted significance thresholds exist. This approach is consistent with CEQA requirements, regulatory practice, and established scientific and policy frameworks for evaluating air quality and health risk impacts. Therefore, the EIR provides an adequate and accurate analysis of the project's potential air quality and health risk impacts. The EIR's air quality analysis is supported by substantial evidence, and the appellant has not provided substantial evidence demonstrating otherwise.

Response 8: The EIR's analysis of cumulative impacts complies with CEQA and is supported by substantial evidence The appellant has not demonstrated otherwise.

Under CEQA Guidelines section 15130(a), an EIR must evaluate cumulative impacts that may result from a project in conjunction with other current or reasonably foreseeable projects (collectively, "cumulative projects"). However, an EIR is not required to analyze cumulative projects that would not be expected to combine with the proposed project to result in a significant environmental impact.

The cumulative projects analyzed in the RADP EIR are presented in Table 3-2 in the DEIR, pp. 3.8 through 3.10. The analysis relied on both the list-based approach and a projections-based approach consistent with CEQA requirements. The appellant requests that the EIR analyze the aircraft noise and air quality impacts from the project in combination with impacts from other existing airports in the San Francisco Bay Area, including the Oakland San Francisco Bay Airport (OAK), San Jose Mineta International Airport (SJC), San Carlos Airport (SQL), and Palo Alto Airport (PAO) to reflect overflight impacts on downrange communities.

[4] The average human hair is about 70 microns wide for a sense of scale.

However, the appellant does not identify any specific cumulative projects at these other airports that could combine with the proposed project to result in a significant cumulative impact requiring analysis in this EIR.

As explained in various sections in the EIR and DEIR Appendix C, Airport Facilities to Accommodate Aviation Demand, the project 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. Accordingly, the project would not generate any aircraft noise or air quality impacts that could combine with aircraft noise or air quality impacts from projects at these other airports, if any. The EIR's analysis is supported by substantial evidence. The appellant has not demonstrated otherwise.

Response 9: The EIR properly analyzes a reasonable range of alternatives to the project as required by CEQA.

CEQA Guidelines section 15126.6 requires an EIR to describe a reasonable range of alternatives to the project that would feasibly attain most of the basic objectives of the project while avoiding or substantially lessening one or more of the project's significant effects and to evaluate the comparative merits of the alternatives. Section 15126.6(d) requires an EIR to discuss an alternative's significant effects, if any, in less detail than the project's significant effects.

The appellant asserts that the EIR must include additional analysis and comparison between the project and Alternative C because it is identified as the environmentally superior alternative that would meet most of the project objectives compared to Alternatives A and B. However, the appellant does not cite any CEQA provision or case law that requires such additional analysis or comparison.

Contrary to the appellant's assertion, the EIR's approach to alternatives analysis is consistent with CEQA requirements for a meaningful comparison of Alternative C with the project for the decision makers and the public. The EIR is not required to include additional analysis or comparison of alternatives requested by the appellant.

Response 10: The planning department is not required to recirculate the EIR for public review.

The appellant requests recirculation of the EIR for additional public review under CEQA Guidelines section 15088.5, alleging that the EIR lacks information, or contains unsupported information, related to capacity analysis, regional cumulative impacts, and quantification of alternatives.

CEQA Guidelines section 15088.5 requires a lead agency to recirculate an EIR when significant new information is added to the EIR after public notice of the availability of the draft EIR for public review is provided, but before EIR certification. The term "information" can include changes in the project or environmental setting as well as additional data or other information. However, new information added to an EIR is not considered "significant" unless the EIR is revised in a way that deprives the public of a meaningful opportunity to comment on a substantial adverse environmental effect of the project or a feasible mitigation measure or project alternative that the project proponent has declined to adopt.

As explained above and in the RTC document, the EIR adequately analyzes the project's physical environmental impacts in accordance with CEQA. The appellant has not provided substantial evidence to the contrary. Further, the appellant does not identify any significant new information added to the EIR after publication of the DEIR. Rather, the appeal reflects a disagreement with the department's responses to previously submitted comments, which does not constitute a basis for recirculation under CEQA.

Conclusion

For all of the reasons provided in this appeal response, the FEIR complies with the requirements of CEQA and the CEQA Guidelines, and provides an adequate, accurate, and objective analysis of the potential impacts of the proposed project. The appellant has not demonstrated that the planning commission's certification of the FEIR was not supported by substantial evidence in the record. Therefore, the department respectfully recommends that the board uphold the planning commission's certification of the FEIR and deny the appeal.

Attachment A - Summary of Scoping Comments (Draft EIR – Table 1-1)

Commenter	Summary of Comment	Draft EIR and/or Initial Study Section
	• The NOP does not acknowledge all arriving and departing flights, including not just passenger flights but, in addition, cargo aircraft, private jets, and helicopters. The forthcoming EIR analysis should evaluate all such aircraft, not just commercial passenger flights.	Accommodate Aviation Demand
	• There is no mention in the NOP of arriving and departing flights from other Bay Area airports, such as Oakland or San Jose, which obviously will contribute to the ground-level noise and vibration impacts.	• **Section 3.B**, Noise and Vibration
	• The EIR should include enhanced measures to monitor the noise and vibration impacts of arriving and departing aircraft. It is not clear what types of noise and vibration monitoring systems will be in place in surrounding communities to determine the actual impacts of the Airport expansion and potential increases in arriving and departing flights on the people who live and work in the many communities who are members of the Roundtable. Pacifica, in particular, is topographically higher than many communities surrounding SFO and is uniquely impacted by noise from low-flying aircraft. We understand that, although the Airport proposes new, state-of-the-art monitors, nothing in the NOP addresses the number or location of these monitors. Due to ever-increasing flights and revised flight paths, more monitors are needed and they need to be located in areas over which the new flight paths are located.	
	• The EIR should include an analysis of the direct and indirect effects of greenhouse gas (GHG) emissions from the Airport expansion, including how they may contribute to increased sea level rise along Pacifica's coastline. Increased GHG emissions will reasonably be expected to result from the additional air traffic at the Airport, additional vehicle miles traveled (VMT) from arriving and departing passengers traveling in automobiles, additional VMT from new airport employees commuting in automobiles, and Airport ground support equipment servicing the increased air traffic.	• **Appendix B**, **Section E.9**, Greenhouse Gas Emissions
City of Palo Alto (Ed Shikada, City Manager)	• The EIR should consider noise impacts on Palo Alto and other cities within at least a 50-mile radius of SFO and display noise contours starting at 45 dB CNEL and in increments of 5 dB. Consider the cumulative impact of noise of all current and anticipated air traffic operations (private or commercial arrivals and departures, passenger and cargo planes, helicopters, etc.) at all three of the Bay Area's international airports (SFO, Oakland, and San José).	• **Section 3.B**, Noise and Vibration

Commenter	Summary of Comment	Draft EIR and/or Initial Study Section
	• The EIR should include/evaluate improved and expanded noise monitoring of all arriving and departing aircraft. Monitors should be deployed in communities within at least a 50-mile radius of SFO. Permanent noise monitoring stations should be located in communities beyond the SFO Roundtable member communities, as several jurisdictions that are part of the Santa Clara/Santa Cruz Roundtable are impacted by SFO's operations. Specifically, more noise monitoring stations should be located directly under or nearby current flight paths (vectored and non-vectored) of departures and arrivals.	
	• The EIR should consider greenhouse gas emissions and air quality impacts on Palo Alto and other cities within at least 50 miles of the airport. Include measurement of emissions on the ground, specifically the level of ultra-fine particles, in locations where aircraft fly below 5,000 feet. Consider the cumulative impact of emissions of all current and anticipated air traffic operations (private or commercial arrivals and departures, passenger and cargo planes, helicopters, etc.) at all three of the Bay Area's international airports (SFO, Oakland, and San José).	• **Section 3.C**, Air Quality • **Appendix B**, **Section E.9**, Greenhouse Gas Emissions
City of San Bruno (Jovan Grogan, City Manager)	• The RADP projects will exacerbate increasing traffic gridlock along U.S. Highway 101 and local access roads that serve both the Airport and the City's residents and businesses. For example, San Bruno Avenue is a key important local access road that serves both the Airport and San Bruno. The RADP projects could result in cumulative traffic volumes that exceed the capacity of certain ramps and cause significant queue impacts if the EIR does not identify adequate mitigation measures to relieve critical traffic movements.	• **Section 3.A**, Transportation and Circulation
	• The City is concerned about the RADP's proposed addition of 10,000 parking spaces and the related to transportation and circulation impacts on City streets, El Camino Real, and adjacent major freeways including Highway 101, Interstate 280 and Interstate 380.	
	• These transportation and circulation concerns are only one of many concerns the City has with respect to the Airport's proposed RADP and variant. Accordingly, the City respectively requests that the Planning Department consult with the City of South San Francisco's Planning Department on the analysis of potential transportation and circulation, noise, and air quality impacts on the City's residents, businesses, and public infrastructure and facilities while it is preparing the Draft EIR prior to public release. *Such consultation should be completed prior to the EIR public release. In addition, please include the City on the notice list for the final EIR release and the RADP*.	