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Submitted via email

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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 overflowed 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 overflowed 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 (≈ 71.1 million annual passengers and $\approx 506,600$ operations) and the SFO ALUCP forecasts (≈ 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:

1. 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