Concerned Residents of Palo Alto

November 12, 2025

Attention: Commission Secretary
49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103

To: San Francisco Planning Commission
Attn: Commission Secretary
Email: commissions.secretary@sfgov.org
Subject: Comments on Final EIR for SFO Recommended Airport Development Plan (RADP), Case No. 2017-007468ENV

Dear Commissioners,

The Concerned Residents of Palo Alto (CRPA) respectfully submit the following comments regarding the Final Environmental Impact Report (EIR) for the SFO Recommended Airport Development Plan (RADP). **These comments address deficiencies in the Responses to Comments (RTC*)* and request that the Commission withhold certification until these issues are resolved.**

The EIR's claim that "demand already exists" and that additional gates will not increase the number of operations is both circular and misleading. The issue is not whether demand exists, but whether the project enables that demand to be realized. Expanding gates and terminal capacity provides the physical means for the airport to accommodate additional aircraft activity that cannot occur under current constraints. While passenger or airline demand may be projected, it remains latent until capacity is expanded. **Under CEQA, the analysis must therefore evaluate the reasonably foreseeable increase in operations and associated impacts (e.g., noise, air quality, greenhouse gases) that the proposed expansion would enable, rather than assuming operations remain static simply because demand is characterized as pre-existing.**

1. Inadequate Response to Community and City Comments
The RTC repeats unsubstantiated conclusions that the RADP would not "change the number of aircraft operations" instead of addressing the detailed analyses submitted by the City of Palo Alto and CRPA. CEQA §15088 requires a reasoned, evidence-based response that engages with the substance of public comments. Merely restating the same conclusion, without providing data, methodology, or analysis to rebut the evidence presented, does not satisfy CEQA's standard for a good faith response. The RTC thus fails to explain why the project's increased physical capacity would not result in more aircraft operations or associated impacts.

The RTC states repeatedly that "Implementation of the RADP would not induce passenger demand, 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, or change the volume of annual passengers that choose to fly into and out of SFO." This assertion is contradicted by the project itself. Building additional gates, a new apron, and expanded maintenance facilities inherently increases the airport's ability to handle more aircraft and passengers. The claim that capacity expansion will not affect operations is analogous to asserting that adding more tables to a restaurant will not allow more

diners or adding another floor to a building will not allow more occupants. **The infrastructure expansion enables greater use of the facility, which must be analyzed under CEQA as a reasonably foreseeable impact.**

2. Continued Reliance on the Obsolete 65 CNEL Threshold
The EIR and RTC continue to apply the legacy 65 CNEL threshold as the basis for determining significance of aircraft noise impacts, even though the RTC itself asserts that 65 CNEL is "not a significance threshold." This inconsistency undermines the analysis and conflicts with both CEQA §15064(b) and NEPA's requirement to use the best available scientific information. Both laws require that significance determinations be grounded in current evidence and accurately reflect potential environmental effects.

The FAA's Neighborhood Environmental Survey (NES, 2021) found that community annoyance from aircraft noise is substantially greater at all levels than predicted by the outdated 1978 Schultz Curve. While the NES data extended only to about 50 DNL, the FAA's own model can be extrapolated to indicate that the same 12.3 percent "highly annoyed" response historically associated with 65 DNL now occurs near 46 DNL The continued use of 65 CNEL therefore lacks current scientific support and does not reflect the new NES national curve.

The Aviation Safety and Noise Abatement Act (ASNA, 49 U.S.C. §47502) requires that noise-compatibility determinations be based on valid, current scientific knowledge. The FAA itself acknowledged in Docket FAA-2023-0855 (Noise Policy Review) that its noise metrics require reevaluation but has yet to update them after more than four years. **Continuing to rely on this obsolete threshold produces analyses that understate actual community impacts and fails to meet the standards of NEPA and CEQA.** Although the FAA has not yet revised its national policy, the Airport, as the CEQA lead agency, is independently obligated to use the best available scientific information in its environmental review. **The Airport should therefore apply a more current, science-based benchmark or sensitivity analysis rather than rely solely on the outdated 65 CNEL threshold**. Waiting for the FAA or for the Aircraft Noise Advisory Committee (ANAC), which has not yet been formed, is neither necessary nor appropriate under CEQA's requirement for substantial evidence.

3. Failure to Incorporate Modern Noise Metrics
Despite repeated requests from CRPA and the City of Palo Alto, the EIR omits additional metrics such as N-Above and Lmax that describe real-world exposure and nighttime disturbance. SFO already reports N-Above data in other contexts; omitting it here conceals the number and timing of disruptive events that residents experience. Without these lived-experience metrics, the EIR does not accurately portray regional or cumulative noise conditions.

4. Lack of Regional and Cumulative Analysis
The EIR fails to assess combined impacts from SFO, Oakland, San Jose, San Carlos, and Palo Alto airports, contrary to CEQA §15130 requirements for cumulative analysis of region-wide aviation activity. Without a regional perspective, the EIR understates the true extent of aviation noise and emissions affecting Peninsula communities.

5. Requested Action
The RADP DEIR asserts that "the existing facilities could accommodate the forecast demand without implementing the RADP" (page 146) yet also states that the purpose of the project is to "accommodate long-range forecast demand at SFO" up to 506,571 operations, a 31 percent increase over 2024 actual operations. These statements are inherently contradictory. If existing facilities can already accommodate the forecast demand, then the RADP's stated purpose cannot be to accommodate that same demand. Conversely, if the RADP is needed to support a 31 percent increase in operations, then it necessarily

increases capacity and must analyze the resulting environmental impacts under CEQA. The EIR should reconcile this inconsistency and disclose whether the RADP would enable operations beyond what current facilities can accommodate.

Enabling such growth will have further detrimental effects on communities already affected by SFO's current operations. **Because these impacts remain unaddressed in the current EIR, CRPA respectfully urges the Planning Commission to delay certification and require preparation of a supplemental analysis that reflects current FAA science, modern noise metrics, and cumulative regional impacts before any Final EIR approval.**

Sincerely,

Darlene Yaplee and Marie-Jo Fremont
Concerned Residents of Palo Alto (CRPA)