APPLICATION FOR LAND USE CONSISTENCY DETERMINATION
San Mateo County Airport Land Use Commission
C/CAG ALUC

APPLICANT INFORMATION		
Agency: City of South San Francisco		
Project Name: Gateway of Pacific Phase 4 Density Transfer Project		
Address: 900 Gateway Blvd	APN: 015023450	
City: South San Francisco	State: CA	ZIP Code: 94080
Staff Contact: Billy Gross	Phone: 650-877-8535	Email: billy.gross@ssf.net

PROJECT DESCRIPTION

Transfer of development capacity from adjacent rail spur properties to Gateway of Pacific (GOP) Phase 4, allowing an additional 120,221 square feet to the GOP 4-N building, increasing from 5-stories (98') to 9-stories (178'). The project would require a deed restriction to reduce the development potential on the rail spurs to zero. Necessary entitlements include a General Plan Amendment to allow the density transfer, Specific Plan Amendment or Repeal, Zoning Text Amendment, GOP Master Plan Amendment, Precise Plan Modification, Development Agreement Amendment, and associated environmental review. See attached project description for detailed discussion.

REQUIRED PROJECT INFORMATION

For General Plan, Specific Plan or Zoning Amendments and Development Projects:

A copy of the relevant amended sections, maps, etc., together with a detailed description of the proposed changes, sufficient to provide the following:

1. Adequate information to establish the relationship of the project to the three areas of Airport Land Use compatibility concern (ex. a summary of the planning documents and/or project development materials describing how ALUCP compatibility issues are addressed):

   a) Noise: Location of project/plan area in relation to the noise contours identified in the applicable ALUCP.

   - Identify any relevant citations/discussion included in the project/plan addressing compliance with ALUCP noise policies.

   b) Safety: Location of project/plan area in relation to the safety zones identified in the applicable ALUCP.

   - Include any relevant citations/discussion included in the project/plan addressing compliance with ALUCP safety policies.

   c) Airspace Protection:

   - Include relevant citations/discussion of allowable heights in relation to the protected airspace/proximity to airport, as well as addressment of any land uses or design features that may cause visual, electronic, navigational, or wildlife hazards, particularly bird strike hazards.

- If applicable, identify how property owners are advised of the need to submit Form 7460-1, *Notice of Proposed /Construction or Alteration* with the FAA.

2. Real Estate Disclosure requirements related to airport proximity

3. Any related environmental documentation (electronic copy preferred)

4. Other documentation as may be required (ex. related staff reports, etc.)

Additional information For Development Projects:

1. 25 sets of scaled plans, no larger than 11" x 17"
2. Latitude and longitude of development site
3. Building heights relative to mean sea level (MSL)

ALUCP Plans can be accessed at http://ccag.ca.gov/plansreportslibrary/airport-land-use/

Please contact C/CAG staff at 650 599-1467 with any questions.

For C/CAG Staff Use Only
Date Application Received
Date Application Deemed Complete
Tentative Hearing Dates:
- ***Airport Land Use Committee***
- ***C/CAG ALUC***

C/CAG Application for Land Use Consistency Determination – Supplemental Information

AGENCY NAME: City of South San Francisco
PROJECT NAME: Gateway of Pacific (GOP) Phase 4 Density Transfer Project

PROJECT DESCRIPTION

The City seeks a consistency determination for a 120,221-square foot expansion of one building in a life sciences campus known as GOP, or Gateway of Pacific. The original GOP project was entitled in 2010 and was found to be consistent with the San Mateo County Airport Land Use Plan that was in effect at that time, which restricted building heights on the project site to no more than 261 feet. The current ALUCP includes the same height requirement. This application seeks a determination regarding the modification, which will add four floors to the "GOP 4 North" building. The modified GOP 4 North building would be 9 stories and would be adjacent to the 12-story GOP 1 building that is considered consistent with the CALUP.

Gateway of Pacific Campus Overview

In 2010, the South San Francisco City Council approved the Gateway Business Park Master Plan to facilitate construction of an approximately 1.23 million square foot office/R&D campus. The Gateway Business Park Master Plan area is now commonly referred to as the Gateway of Pacific (GOP) Campus.

In 2013, the City Council approved a Master Plan Modification and Phase 1 Precise Plan to allow for a revised phasing plan and modifications to the building designs. Staff is referring to this as the 2011 OPSP project (see Attachment 1 for a plan view).

- **Phase 1**, entitled in 2013 and which has been constructed, includes an approximately 450,000 square foot office/R&D building and a separate approximately 48,000 square foot amenity building.

- **Phases 2-3** were granted Precise Plan approvals in 2018 and are currently under construction. These phases comprise approximately 704,000 square feet of office/R&D space, structured and surface parking, and other general improvements.

- **Phase 4** (which is proposed to be amended as part of this Density Transfer project) was granted Precise Plan approvals in 2020, and was entitled as two five-story buildings totaling approximately 226,000 square feet of office/R&D space.

- **475 Eccles / Phase 5** was originally entitled in 2016 as a stand-alone project, as this site is not included in the Gateway Business Park Master Plan. It was approved to allow two office/R&D buildings totaling approximately 262,000 square feet. The 475 Eccles project is located to the southeast of the GOP Campus, separated by a former rail parcel located between the two project sites. Subsequent to the 2016 entitlements, the project applicant, BioMed Realty, acquired the rail spurs, which allows the 475 Eccles site to be directly connected to the GOP Campus. In 2020, the City approved Use Permit and Design Review Modifications to effectively make the 475 Eccles project part of the GOP Campus, and the project is now commonly referred to as GOP Phase 5.

GOP Phase 4 Density Transfer Project Overview

In 2021, the project applicant submitted an application to allow the square footage that could be developed under the 1.0 floor area ratio (FAR) applicable to the rail spur to be transferred to the GOP Phase 4 site. The GOP

4 North building would be increased by 120,221 square feet with the addition of four-floors, resulting in a nine-story building. The resulting building would provide a step-down transition between the GOP 1 North building, which was built at 12 stories, and GOP 4 South, which will remain at 5 floors as approved. The rail spurs would be deed-restricted to eliminate the development potential on the rail spurs.

The GOP Phase 4 Density Transfer Project will require the following entitlements that are subject to a Land Use Consistency Determination:

- General Plan Amendment (to allow the density transfer into the Gateway Business Park Master Plan area)
- Specific Plan Amendment or Repeal (to allow the density transfer)
- Zoning Ordinance Amendment (the Gateway Specific Plan Zoning District regulations would be amended to allow a transfer of density form an adjacent zoning district)

An environmental document has been prepared for the GOP Phase 4 Density Transfer Project - the *Gateway of the Pacific 4 Density Transfer Project, City of South San Francisco Supplemental Environmental Impact Report* (DSEIR). Excerpts from the DSEIR and the 2009 Gateway Master Plan DEIR, which the DSEIR tiers off of, are included in some of the discussion areas below.

DISCUSSION OF RELATIONSHIP TO AIRPORT LAND USE COMPATIBILITY

Noise. Location of project/plan area in relation to the noise contours identified in the applicable ALUCP. Identify any relevant citations/discussion included in the project/plan addressing compliance with ALUCP noise policies.

The GOP Campus is located outside of the airport's noise-affected 65 dBA noise contours, as indicated on the attached ALUCP Exhibit IV-8 "Noise Compatibility Zones – Detail" (Attachment 3).

The 2009 EIR also includes a discussion of compatibility with the airport land use plan, and if the project would result in a safety hazard for people residing or working in the project area. Following is the specific reference from the document.

Gateway Master Plan DEIR Reference:
Chapter 4.J – Noise, page IV.J-17.

"***Impact IV.J-6: The proposed project could result in exposure of people residing or working at the project site to excessive noise levels from a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public or public use airport.***

The proposed project site is located within two miles of the San Francisco International Airport. Noise contours prepare for the airport indicate that the project site is located 2,700 feet outside the CNEL 60 dBA contour. Therefore, the proposed office buildings would be exposed to an aircraft generated CNEL below 60 dBA, which is considered satisfactory for commercial development by the policies of the South San Francisco General Plan and the San Mateo County Airport Land Use Commission. The policies of the East of 101 Area Plan indicate that office and retail buildings located in the project area are required to provide a minimum exterior-to-interior noise attenuation of 27 dBA to reduce indoor maximum instantaneous noise levels from aircraft to the goal of 60 dBA (Policy NO-2). Therefore, airport noise is a less than significant impact with respect to the City and County criteria but mitigation is required to be

consistent with the local land use plan (East of 101 Area Plan). Implementation of Mitigation Measure IV.J-6.1 would ensure that impacts remain ***less than significant***.

Mitigation Measure IV.J-6.1 Aircraft Noise

Prior to approval of submittal of the first building permit, an aircraft sound attenuation study must be prepared that indicates what measures will be implemented to achieve the minimum exterior-to-interior noise attenuation of 27 dBA from aircraft overflights. The study should review the exterior window/wall and roof/ceiling construction and specific, if necessary, measures such as sound-rated windows and acoustical treatments to the fresh air ventilation system."

All phases of the GOP Campus remain subject to the mitigation measures included in the Gateway Master Plan EIR.

Safety: Location of project/plan area in relation to the safety zones identified in the applicable ALUCP. Include any relevant citations/discussion included in the project/plan addressing compliance with ALUCP safety policies.

The GOP Campus Area is located outside of all five of the Safety Compatibility Zones identified in the ALUCP (Attachment 4).

Airspace Protection: Include relevant citations/discussion of allowable heights in relation to the protected airspace/proximity to airport, as well as addressment of any land uses or design features that may cause visual, electronic, navigational, or wildlife hazards, particularly bird strike hazards.

Building Heights

ALUCP Exhibit IV-14 "14 CFR Part 77 Airport Imaginary Surfaces – North Side" is attached (Attachment 5), and the GOP Campus Area that is subject to the proposed amendments is indicated in the exhibit. As indicated on the map, and referenced in the 2009 Gateway Master Plan EIR, the GOP Campus area is located far enough north of the airport so that maximum heights are significant.

Gateway Master Plan DEIR Reference:
Chapter 4.G –Hazardous Materials, page IV.G-22.

"***Impact IV.G-5: The proposed project is located within an airport land use plan area, but would not result in a safety hazard for people residing or working in the project area.***

The proposed project would be located within the jurisdiction of the Airport Land Use Plan for the San Francisco International Airport. According to the East of 101 area plan, the most stringent height limits in South San Francisco are south of Forbes Boulevard and Lindenville, just south of the project area. In this area Federal Aviation Regulations, Part 77, limits building heights to an elevation of 161 feet above mean sea level, approximately 12 to 14 stories. Building heights in the Gateway Specific Plan Area are limited to 261 feet. No proposed buildings would exceed 261 feet in height; therefore, the structures would be in compliance with the Airport Land Use Plan. The impact of the project on the Airport Land Use Plan is ***less than significant*** and no mitigations are required."

The City of South San Francisco includes the following general policies related to limiting building heights within the East of 101 Area generally and the Gateway Specific Plan area specifically:

General Plan Implementing Policy 3.5-I-4 – "Unless otherwise stipulated in a specific plan, allow building heights in the East of 101 area to the maximum limits permissible under Federal Aviation Regulations Part 77."

Zoning Ordinance – Chapter 20.220 Gateway Specific Plan
Table 20.220.004 Development Standards

Standard	Requirement	Additional Regulations
Building Form and Location		
Maximum Height (ft)	250	See Section 20.300.006 Height and Height Exceptions

Land Uses Or Design Features That May Cause Visual, Electronic, Navigational, Or Wildlife Hazards, Particularly Bird Strike Hazards

The additional four floors do not include any design features that would attract birds or increase visual, electronic, navigational or wildlife hazards. The additional four floors are subject to the same conditions as the rest of the GOP campus, which was found consistent with the CALUP. Mitigation measures to reduce light and glare were imposed in connection with approval of the Master Plan, and those measures are to be implemented in each Precise Plan. The original GOP 4 Precise Plan (approved in Resolution 2858-2020) implemented these measures, and the additional four floors would be subject to the same measures. The GOP 4 Precise Plan proposes low iron glass, which is not reflective, appears flat and smooth, and minimizes uneven distortion.

Latitude and Longitude of Development Site

37°39'40"N, 122°23'36"W

Building Heights Relative to Mean Sea Level (MSL)

The maximum height of GOP 4 North building would be 217 feet above MSL (see Attachment 6). This is less than the 261 feet above MSL that is allowed within the Gateway Specific Plan District.

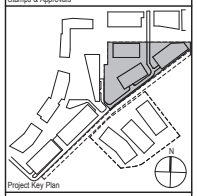
Attachments:

1. Overall Gateway of the Pacific Campus Site Plan
2. 2021 GOP 4 Density Project Reference Plan
3. ALUCP Exhibit IV-8 "Noise Compatibility Zones – Detail" (with GOP Campus Area highlighted)
4. ALUCP Exhibit IV-7 "Safety Compatibility Zones" (with GOP Campus Area noted as off the exhibit)
5. ALUCP Exhibit IV-14 "14 CFR Part 77 Airport Imaginary Surfaces – North Side" (with GOP Campus Area highlighted)
6. GOP 4 Building Heights relative to mean sea level

Attachment 1 - Overall Gateway of Pacific Campus Site Plan

Flad

Stamps & Approvals



NOT FOR CONSTRUCTION

Rev	Date	Description

Project Title

BioMed Realty

601 Gateway Boulevard, Suite 1145
South San Francisco, CA 94080

GATEWAY OF PACIFIC

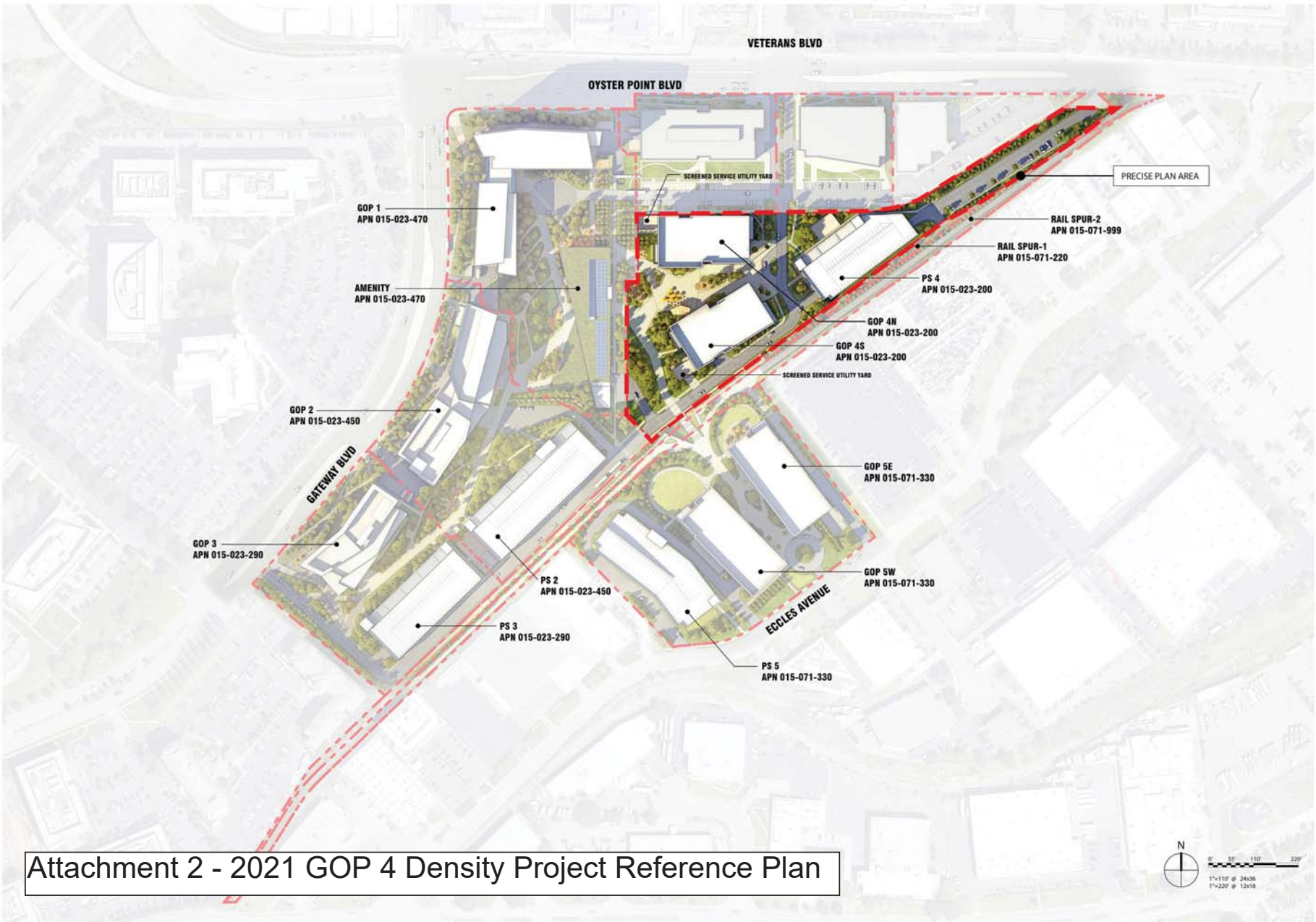
GOP 4 DENSITY TRANSFER PROJECT MODIFICATION TO PRECISE PLAN

Project Phase
Precise Plan Modifications

Date	Drawn By
09/17/2021	FLAD
Project Number	Checked By
20198-07	FLAD

Sheet Title
GOP 4&5 SITE RENDERING

Sheet Number	Rev. No.
A4-300A	



Attachment 2 - 2021 GOP 4 Density Project Reference Plan

Flad

Stamps & Approvals

Project Key Plan

NOT FOR CONSTRUCTION

Rev	Date	Description

Project Title

BioMed Realty
601 Gateway Boulevard, Suite 1145
South San Francisco, CA 94080

GATEWAY OF PACIFIC

GOP 4 DENSITY TRANSFER PROJECT MODIFICATION TO PRECISE PLAN

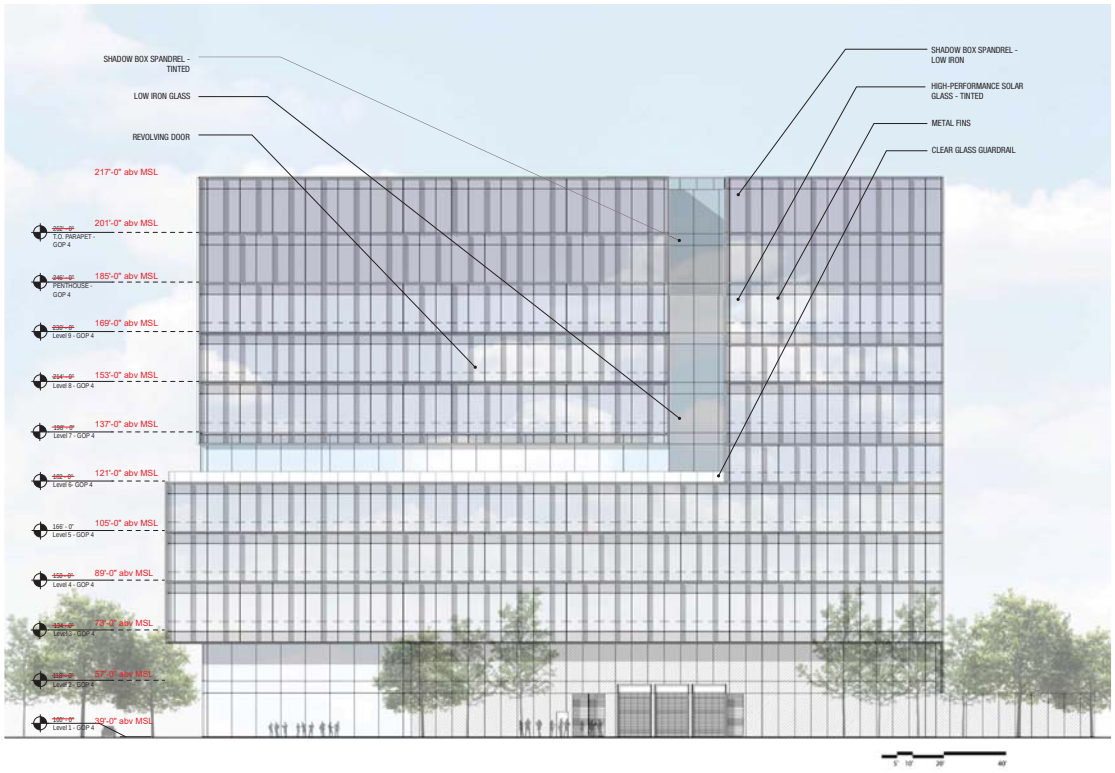
Project Phase
Precise Plan Modifications

Date	Drawn By
09/17/2021	FLAD
Project Number: 20198-07	Checked By: FLAD

Sheet Title
PROPOSED PRECISE PLAN EXTENTS

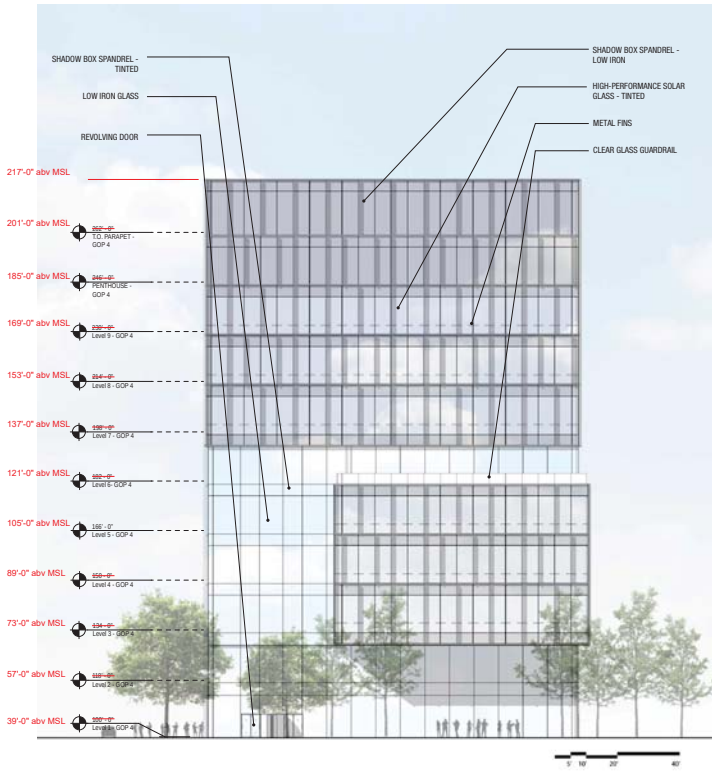
Sheet Number	Rev. No.
G4-004	

Attachment 6 - 2021 GOP 4 Building Heights relative to Mean Sea Level



1/A4-307

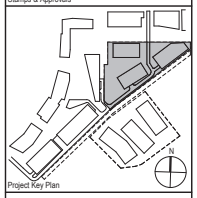
2 B4N-NORTH ELEVATION
1" = 20'-0"



1 B4N-EAST ELEVATION
1" = 20'-0"

Flad

Stamps & Approvals



NOT FOR CONSTRUCTION

Rev	Date	Description

Project Title

BioMed Realty
601 Gateway Boulevard, Suite 1145
South San Francisco, CA 94080

GATEWAY OF PACIFIC

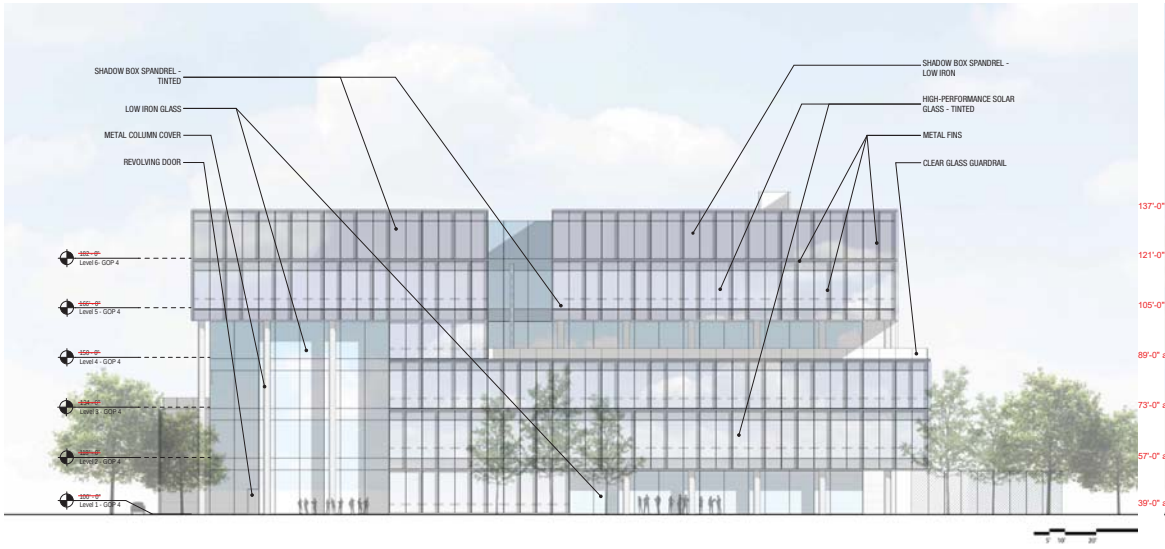
GOP 4 DENSITY TRANSFER PROJECT MODIFICATION TO PRECISE PLAN

Project Phase
Precise Plan Modifications

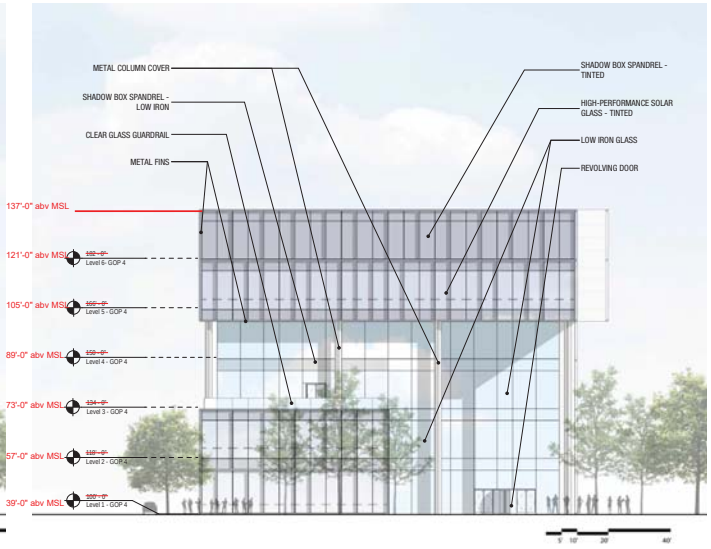
Date	Drawn By
09/17/2021	FLAD
Project Number	Checked By
20198-07	FLAD

Sheet Title
B4 NORTH - EXTERIOR ELEVATIONS

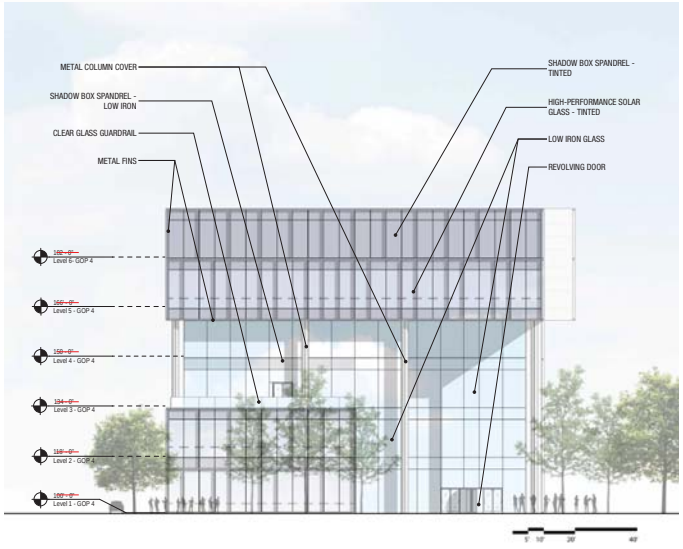
Sheet Number	Rev. No.
A4-301	



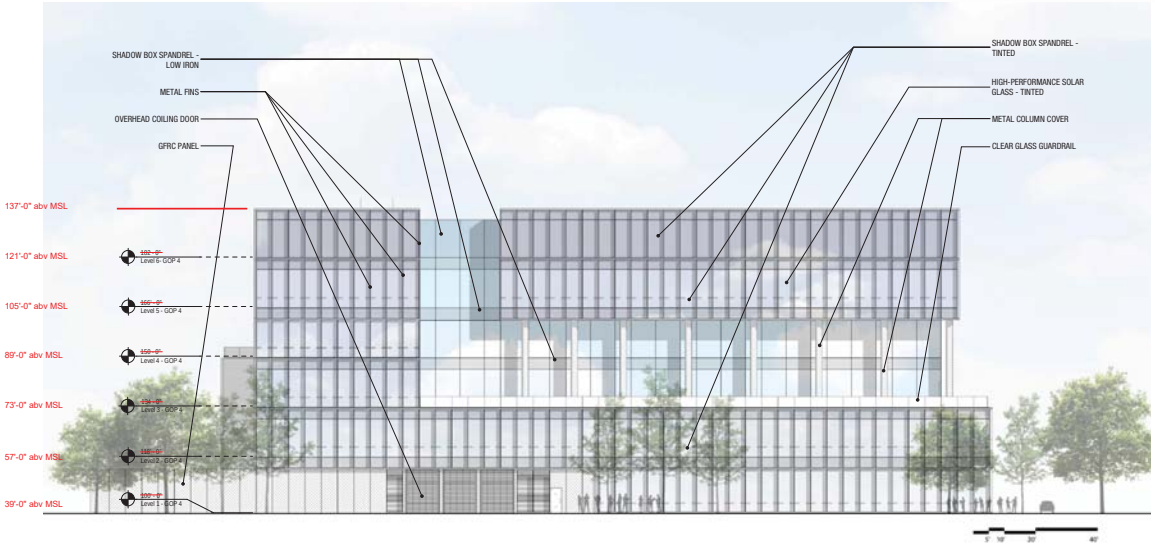
4 **B4S-NORTH ELEVATION**
1" = 20'-0"



3 **B4S-EAST ELEVATION**
1" = 20'-0"



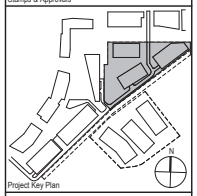
2 **B4S-WEST ELEVATION**
1" = 20'-0"



1 **B4S-SOUTH ELEVATION**
1" = 20'-0"

Flad

Stamps & Approvals



NOT FOR CONSTRUCTION

Rev	Date	Description

Project Title

BioMed Realty
601 Gateway Boulevard, Suite 1145
South San Francisco, CA 94080

GATEWAY OF PACIFIC

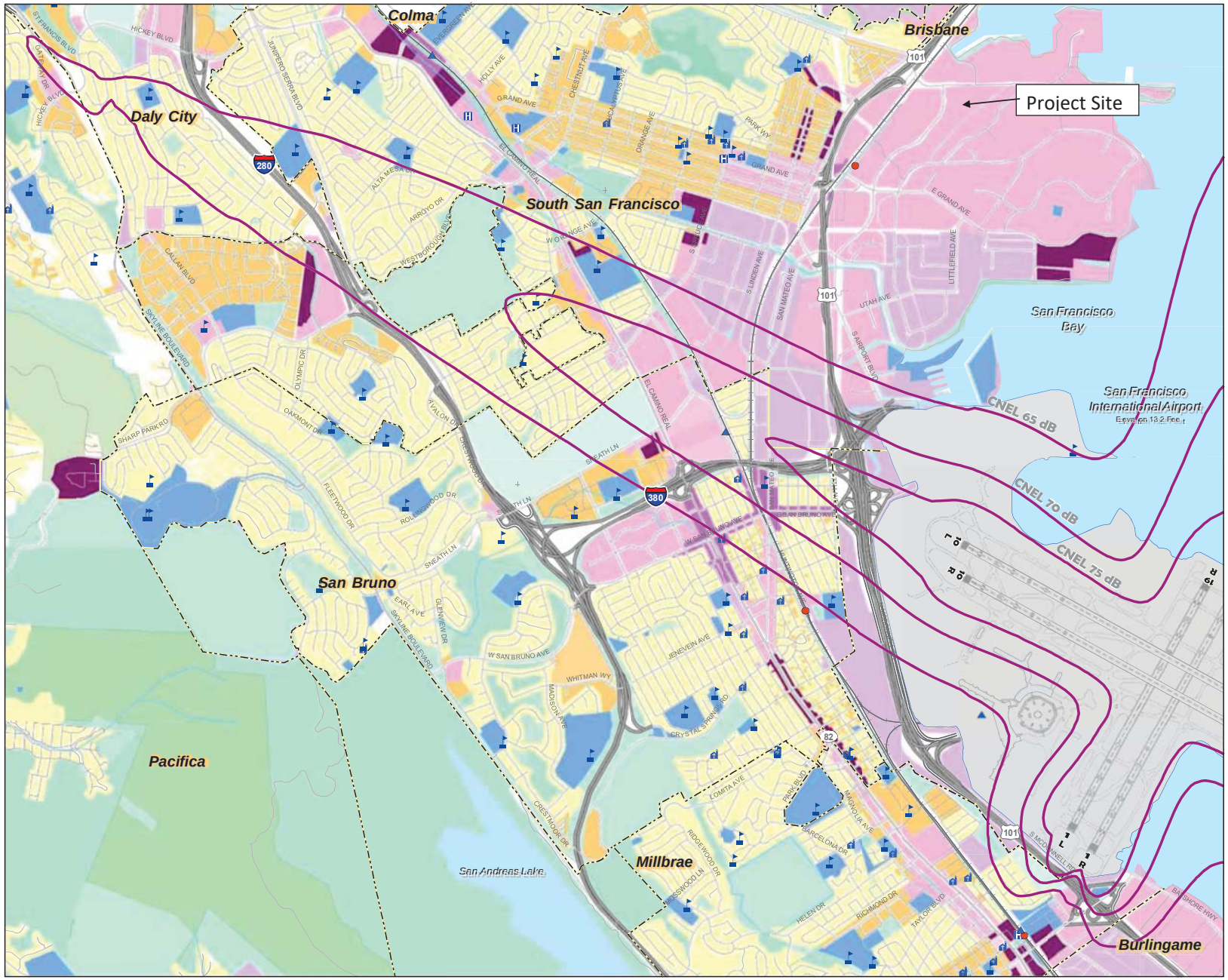
GOP 4 DENSITY TRANSFER PROJECT MODIFICATION TO PRECISE PLAN

Project Phase
Precise Plan Modifications

Date	Drawn By
09/17/2021	FLAD
Project Number	Checked By
20198-07	FLAD

Sheet Title
B4 SOUTH - EXTERIOR ELEVATIONS

Sheet Number	Rev. No.
A4-303	



LEGEND

- CNEL Contour, 2020 Forecast
- Airport Property
- BART Station
- CALTRAIN Station
- School
- Place of Worship
- Hospital
- Municipal Boundary
- Railroad
- Freeway
- Road

Planned Land Use Per General Plans:

- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Transit Oriented Development
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space
- Planned use not mapped

Sources:

Noise Contour Data:
- Draft Environmental Assessment, Proposed Runway Safety Area Program, San Francisco International Airport. URS Corporation and BridgeNet International, June 2011

County Base Maps:
- San Mateo County Planning & Building Department, 2007

Local Plans:
- Burlingame Bayfront Specific Area Plan, August 2006
- Burlingame Downtown Specific Plan, January 2009
- Burlingame General Map, September 1984
- North Burlingame/ Rollins Road Specific Plan, February 2007
- Colma Municipal Code Zoning Maps, December 2003
- Daly City General Plan Land Use Map, 1987
- Hillsborough General Plan, March 2005
- Millbrae Land Use Plan, November 1998
- Pacifica General Plan, August 1996
- San Bruno General Plan, December 2008
- San Mateo City Land Use Plan, March 2007
- San Mateo County Zoning Map, 1992
- South San Francisco General Plan, 1998

NORTH

0 0.1 0.2 0.4 Miles

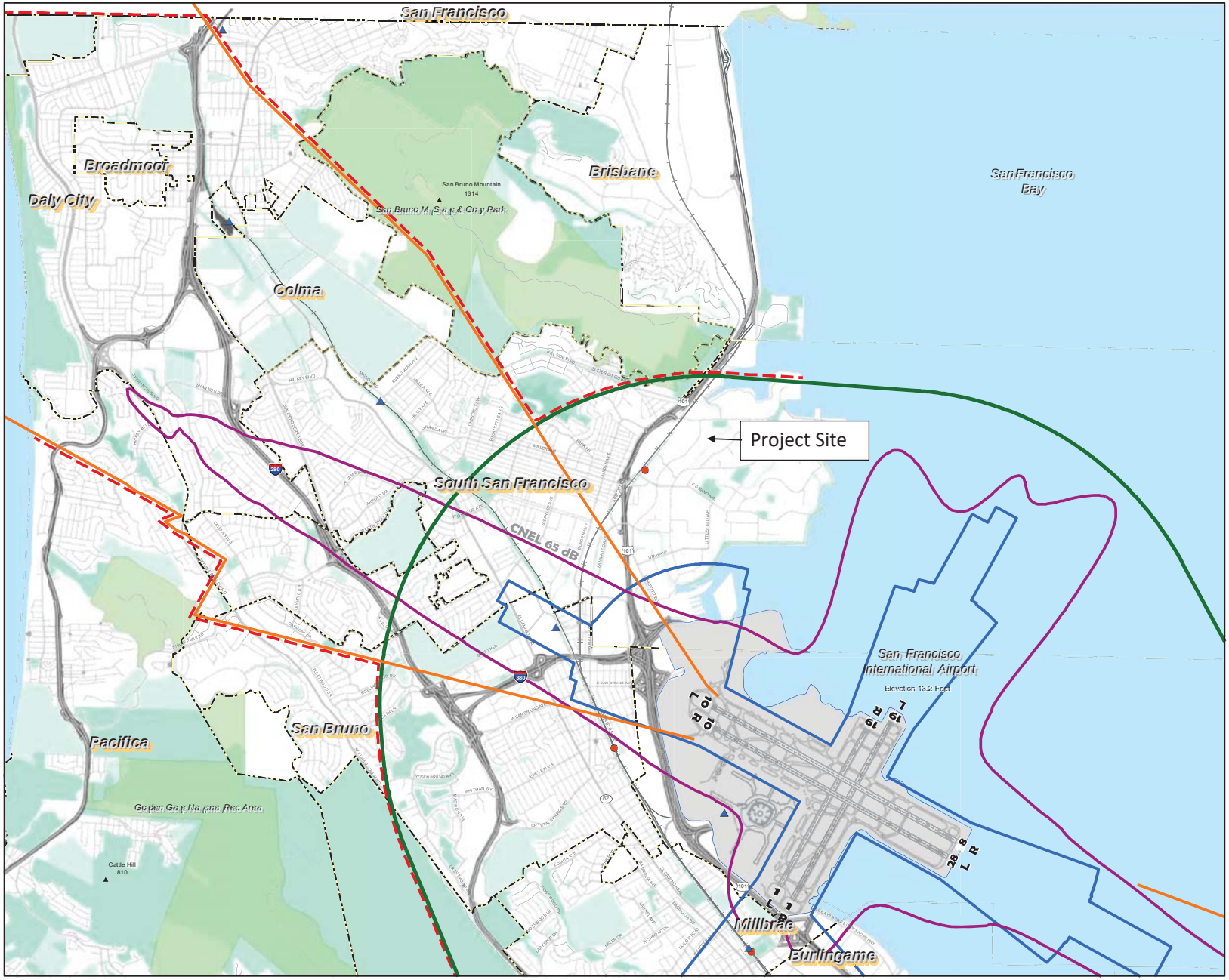
Exhibit IV-6

NOISE COMPATIBILITY ZONES -- DETAIL

Comprehensive Airport Land Use Plan
for the Environs of San Francisco International Airport

C/CAG

City/County Association of Governments
of San Mateo County, California



Sources:

100:1 FAA Notification Zone: Ricondo & Associates, Inc. and Jacobs Consultancy, based on 14 CFR Part 77, Subpart B, Section 77.9.

Outer Boundary of TERPS Approach and OEI Departure Surfaces: San Francisco International Airport, Jacobs Consultancy, and Planning Technology Inc., 2009

Safety Compatibility Zones: Jacobs Consultancy Team, 2009; Ricondo & Associates, Inc., 2011

Noise Contour: URS Corporation and BridgeNet International. Draft Environmental Assessment, San Francisco International Airport Proposed Runway Safety Area Program, June 2011

NORTH

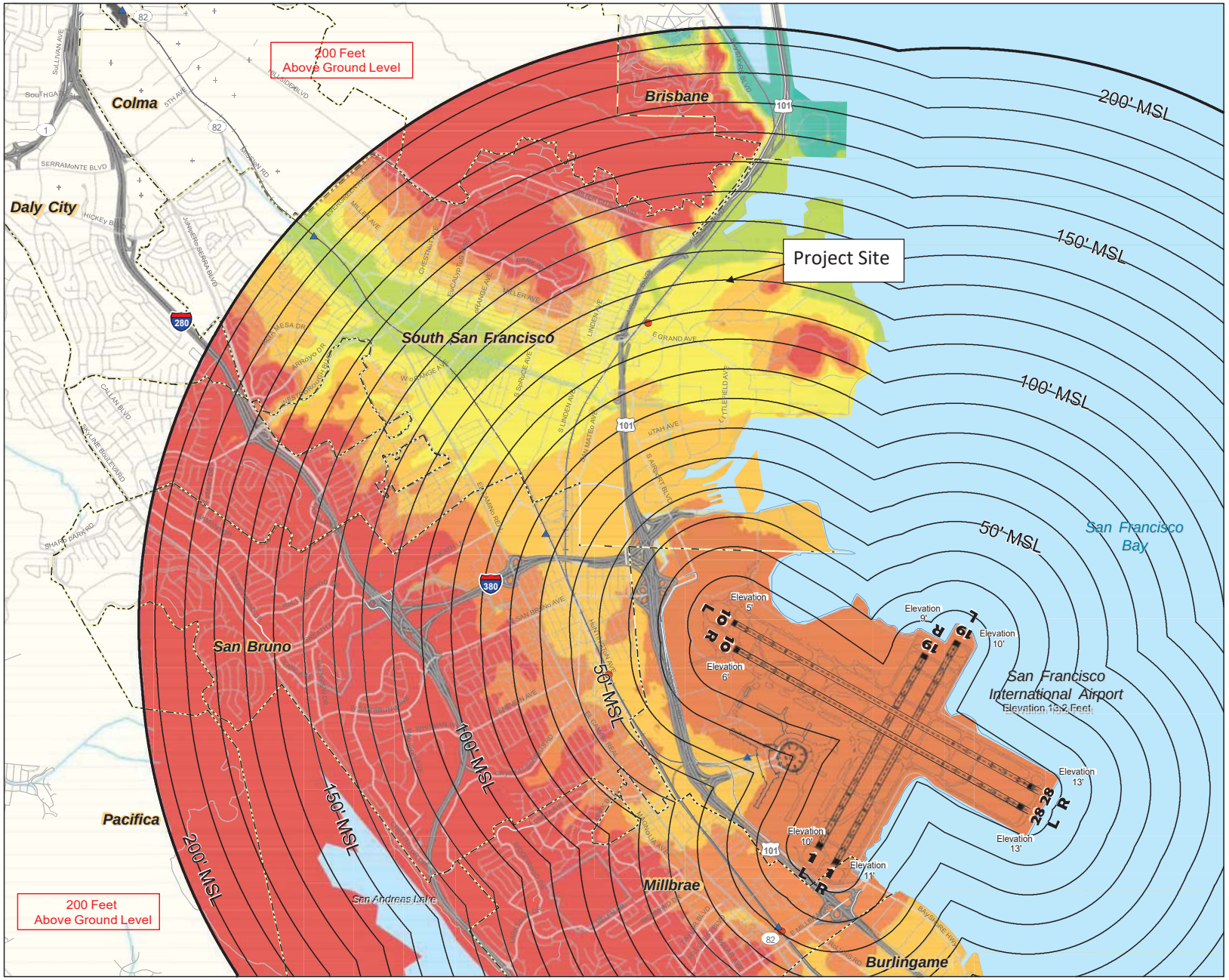
0 0.2 0.4 0.8 Miles

Exhibit IV-3
AIRPORT INFLUENCE AREA B -- NORTH SIDE
Comprehensive Airport Land Use Plan
for the Environs of San Francisco International Airport

C/CAG
City/County Association of Governments
of San Mateo County, California

SURFACE INTERSECTION ANALYSIS INFORMATION - AIRPORT CODE "SFOP"								
Coordinate System: WGS84			Date: 04/20/22			Model: SFO_Composite_2012_11DEC12_R2		
Latitude	Longitude	Site El.(AMSL)	Ht.(AGL)	Overall Ht.(AMSL)	Max Ht. (AMSL)	Exceeds By	Under By	Surface
37° 39' 39.9381"	122° 23' 39.2121"	39.1	178	217.1	539		321.9	SFO_RW01L_EUGEN5_DP
Total penetrations above surfaces: 0								
Total penetrations below surfaces: 1								

Zone Analysis			
X	Y	Range	Safety Zones
6013392.85	2068730.61	Under 65 db	None



FAA NOTIFICATION REQUIREMENTS

A structure proponent must file FAA Form 7460-1, Notice of proposed Construction or Alteration, for any proposed construction or alteration that meets any of the following Notification Criteria described in 14 CFR part 77.9:

§77.9(a) - A height more than 200 feet above ground level (AGL) at its site;

§77.9(b) - Within 20,000 feet of a runway more than 3,200 feet in length, and exceeding a 100:1 slope imaginary surface (i.e., a surface rising 1 foot vertically for every 100 feet horizontally) from the nearest point of the nearest runway. The 100:1 surface is shown as follows:

- 20,000 Feet Limit From Nearest Runway
- 100 Elevation Above Mean Sea Level

Heights of 100:1 Surface Above Ground (AGL)

- Terrain penetrations of Airspace Surface
- Less than 30
- 30-65
- 65-100
- 100-150
- 150-200
- 200 and more

§77.9(c) - Roadways, railroads, and waterways are evaluated based on heights above surface providing for vehicles; by specified amounts or by the height of the highest mobile object normally traversing the transportation corridor;

§77.9(d) - Any construction or alteration on any public-use or military airport (or heliport).

Structure proponents or their representatives may file via traditional paper forms via uS mail, or online at the FAA's oE/AAA website, http://oeaaa.faa.gov

LEGEND

- BART Station
- CALTRAIN Station
- Municipal Boundary
- Railroad
- Freeway
- Road

Note:

per 14 CFR part 77, developers proposing structures taller than the indicated elevations must file Form 7460-1 with the FAA at least 30 days before the proposed construction. However, due to local requirements for a favorable FAA determination as a contingency for project approval, it is advisable to file the Form 7460-1 as soon as possible because the FAA can take several months to undertake aeronautical reviews.

Source:

Ricondo & Associates, Inc. and Jacobs Consultancy, based on 14 CFR part 77, Subpart B, Section 77.9.

NoRTH

0 0.15 0.3 0.6 Miles

Exhibit IV-11

FAA NOTIFICATION FORM 7460-1 FILING REQUIREMENTS -- NORTH SIDE

Comprehensive Airport Land use plan for the Environs of San Francisco International Airport

C/CAG

City/County Association of Governments of San Mateo County, California

San Francisco International Airport

April 19, 2022

TRANSMITTED VIA E-MAIL
kkalkin@smcgov.org

Susy Kalkin
ALUC Staff
City/County Association of Governments of San Mateo County
555 County Center, 5th Floor
Redwood City, CA 94063

Subject: ***Application for Land Use Consistency Determination for Gateway of Pacific Phase 4 Density Transfer Project, South San Francisco***

Thank you for notifying San Francisco International Airport (SFO or the Airport) regarding the Airport Land Use Commission's (ALUC) land use consistency determination for the Gateway of the Pacific (GOP) 4 Density Transfer Project (the Proposed Project) within the City of South San Francisco (the City). We appreciate this opportunity to coordinate with ALUC in considering and evaluating potential land use compatibility issues for the Project.

According to the Application for Land Use Consistency Determination, the Proposed Project is located at 900 Gateway Boulevard (Assessor's Parcel Number 015-023-450), southeast of the intersection of Gateway Boulevard and Oyster Point Boulevard, in the City of South San Francisco. The Proposed Project includes transfer of up to 120,221 square feet of development potential from undeveloped adjacent property (at GOP 5) and use it to expand one of the buildings approved for Phase 4 of the Gateway Business Park Master Plan Project (GOP 4). GOP 4 was originally approved by the South San Francisco Planning Commission in 2020 for two five-story buildings (at an elevation of 137 feet as defined from the origin of the North American Vertical Datum of 1988 [NAVD88]) and a six-story parking structure. The Proposed Project would include expansion of the GOP 4 North building by four floors, for a total of nine floors estimated at an elevation of 217 feet NAVD88.

The Proposed Project site is inside Airport Influence Area B as defined by the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (SFO ALUCP). The Proposed Project site would be located outside the 65 decibel Community Noise Equivalent Level contour and the safety compatibility zones, and therefore would not appear to be inconsistent with the Noise and Safety Compatibility policies adopted in the SFO ALUCP.

As depicted on Exhibit IV-17 of the SFO ALUCP (see Attachment), the critical aeronautical surfaces above the Proposed Project are at an elevation of between approximately 510 and 540 feet above mean sea level (AMSL) as defined from the origin of the North American Vertical Datum of 1988 (NAVD88). Thus, the estimated maximum elevation of the Proposed Project (217 feet NAVD88) would be below the critical aeronautical surfaces and the Proposed Project would not appear to be incompatible with the Airspace Compatibility Policies of the SFO ALUCP, subject to the issuance of a Determination of No Hazard from the Federal Aviation Administration (see below) for any proposed structures and determinations from the City/County Association of Governments of San Mateo County as the designated Airport Land Use Commission. While not it does not affect this review, the applicant incorrectly cites ALUCP Exhibit IV-14,

Post Office Box 8097 San Francisco, California 94128 Tel 650.821.5000 Fax 650.821.5005 www.flysfo.com

which depicts 14 CFR Part 77 Airport Imaginary Surfaces, as limiting building heights in the area. Instead, the correct exhibit should be ALUCP Exhibit IV-17 (attached), which depicts the critical aeronautical surfaces that should not be exceeded. Nevertheless, the Proposed Project height would still be below the critical aeronautical surfaces.

This determination does not negate the requirement for the Proposed Project sponsor to undergo Federal Aviation Administration review as described in 14 Code of Federal Regulations Part 77 for both (1) the permanent structures and (2) any temporary cranes or other equipment taller than the permanent buildings which would be required to construct those structures.

The Airport appreciates your consideration of these comments. If I can be of assistance, please do not hesitate to contact me at (650) 821-6678 or at nupur.sinha@flysfo.com.

Sincerely,

DocuSigned by:
Nupur Sinha
7D552AE6A4CE495...

Nupur Sinha
Director of Planning and Environmental Affairs
San Francisco International Airport

Attachment

cc: Sean Charpentier, C/CAG
Audrey Park, SFO

and associated with human disease of varying severity.

b. Biosafety Level 3 practices, safety equipment, and facility design and construction are applicable to clinical, diagnostic, teaching, research, or production facilities in which work is done with indigenous or exotic agents with a potential for respiratory transmission, and which may cause serious and potentially lethal infection.

c. Biosafety Level 4 practices, safety equipment, and facility design and construction are applicable for work with dangerous and exotic agents that pose a high individual risk of life-threatening disease, which may be transmitted via the aerosol route and for which there is no available vaccine or therapy.

4.5 Airspace Protection

The compatibility of proposed land uses with respect to airspace protection shall be evaluated in accordance with the policies set forth in this section. These policies are established with a twofold purpose:

1. To protect the public health, safety, and welfare by minimizing the public's exposure to potential safety hazards that could be created through the construction of tall structures.

2. To protect the public interest in providing for the orderly development of SFO by ensuring that new development in the Airport environs avoids compromising the airspace in the Airport vicinity. This avoids the degradation in the safety, utility, efficiency, and air service capability of the Airport that could be caused by the attendant need to raise visibility minimums, increase minimum rates of climb, or cancel, restrict, or redesign flight procedures.

4.5.1 FEDERAL REGULATIONS REGARDING TALL STRUCTURES

14 Code of Federal Regulations (CFR) Part 77, *Safe, Efficient Use and Preservation of the Navigable Airspace*, governs the FAA's review of proposed construction exceeding certain height limits, defines airspace obstruction criteria, and provides for FAA aeronautical studies of proposed construction. **Appendix F** describes the FAA airspace review process and the extent of FAA authority related to airspace protection.

4.5.2 PART 77, SUBPART B, NOTIFICATION PROCESS

Federal regulations require any person proposing to build a new structure or alter an existing structure with a height that would exceed the elevations described in CFR Part 77, Subpart B, Section 77.9, to prepare an FAA Form 7460-1, *Notice of Proposed Construction or Alteration*, and submit the notice to the FAA. The regulations apply to buildings and other structures or portions of structures, such as mechanical equipment, flag poles, and other projections that may exceed the aforementioned elevations.

Exhibit IV-10 depicts the approximate elevations at which the 14 CFR Part 77 notification requirements would be triggered; see **Exhibit IV-11** for a close-up view of the northern half and **Exhibit IV-12** for a close-up view of the southern half of the area. These exhibits are provided for informational purposes only. Official determinations of the areas and elevations within which the federal notification requirements apply are subject to the authority of the FAA. The FAA is empowered to require the filing of notices for proposed construction based on considerations other than height. For example, in some areas of complex airspace and high air traffic volumes, the FAA may be concerned about the potential for new construction of any height to interfere with electronic navigation aids. In these areas, the FAA will want to review all proposed construction projects.

The FAA has developed an on-line tool for project sponsors to use in determining whether they are required to file a Notice of Proposed Construction or Alteration. Sponsors of proposed projects are urged to refer to this website to determine whether they are required to file Form 7460-1 with the FAA:

https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm

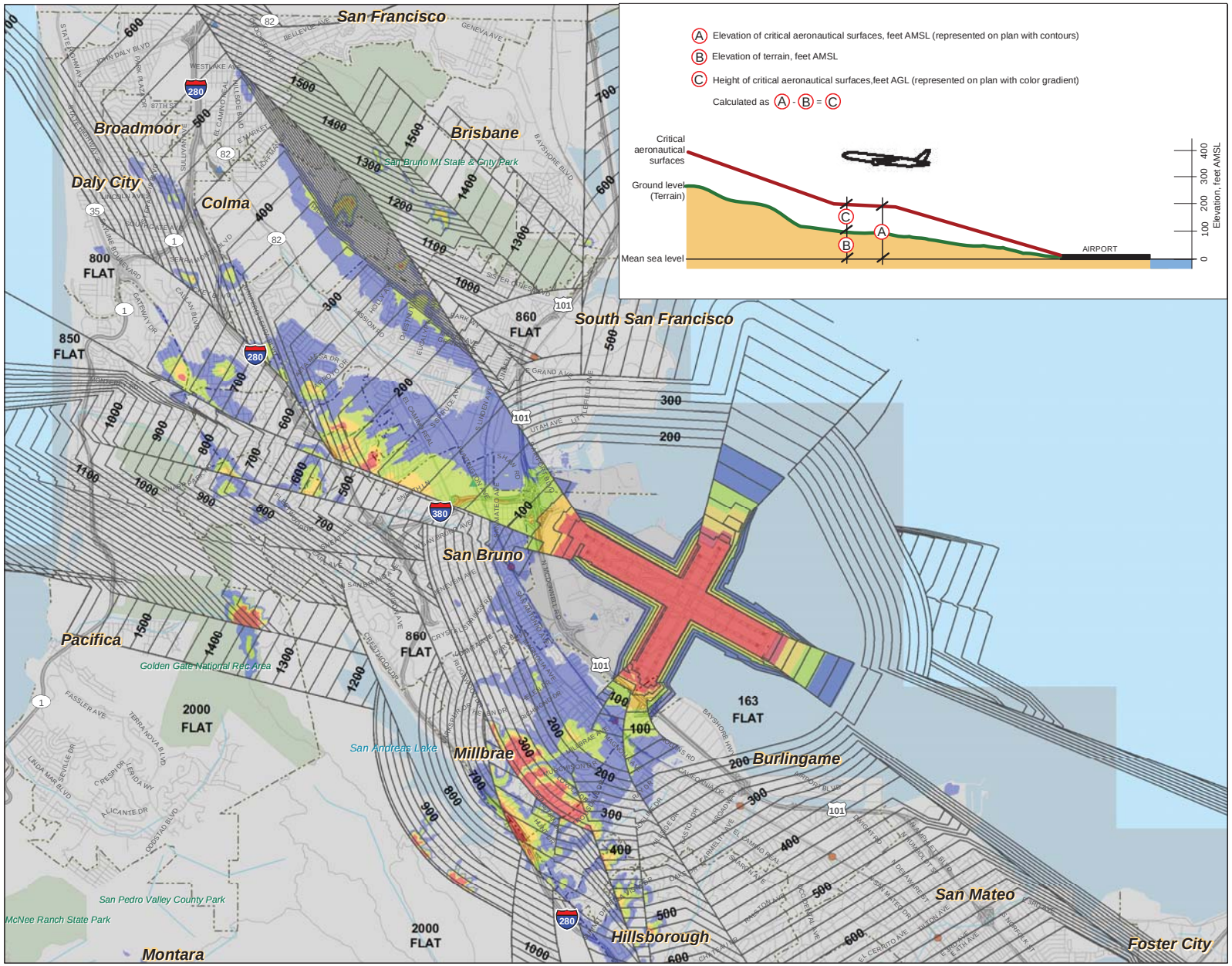
4.5.3 AIRSPACE MAPPING

Part 77, Subpart C, establishes obstruction standards for the airspace around airports including approach zones, conical zones, transitional zones, and horizontal zones known as "imaginary surfaces." **Exhibit IV-13** depicts the Part 77 Civil Airport Imaginary Surfaces at SFO. The imaginary surfaces rise from the primary surface, which is at ground level immediately around the runways. The surfaces rise gradually along the approach slopes associated with each runway end and somewhat more steeply off the sides of the runways. The FAA considers any objects penetrating these surfaces, whether buildings, trees or vehicles travelling on roads and railroads, as obstructions to air navigation. Obstructions may occur without compromising safe air navigation, but they must be marked, lighted, and noted on aeronautical publications to ensure that pilots can see and avoid them.

Close-up views of the north and south sides of the Part 77 surfaces are provided in **Exhibit IV-14** and **Exhibit IV-15**, respectively. Additionally, **Exhibit IV-16** provides an illustration of the outer approach and transitional surfaces located on the southeast side of the Part 77 surfaces.

Together with its tenant airlines, SFO has undertaken a mapping effort to illustrate the critical aeronautical surfaces that protect the airspace required for multiple types of flight procedures such as those typically factored into FAA aeronautical studies, as shown on **Exhibit IV-17** and **Exhibit IV-18**. These aeronautical surfaces include those established in accordance with FAA Order 8260.3B, *U.S. Standard for Terminal Instrument Procedures (TERPS)*, and a surface representing the airspace required for One-Engine Inoperative (OEI) departures from Runway 28L (to the west through the San Bruno Gap).[16] The exhibits depict the lowest elevations from the combination of the OEI procedure surface and all TERPS surfaces. The surfaces are defined with Required Obstacle Clearance (ROC) criteria to ensure safe separation of aircraft using the procedures from the underlying obstacles. Any proposed structures penetrating these surfaces are likely to receive Determinations of Hazard (DOH) from the FAA through the 7460-1 aeronautical study process. These surfaces indicate the maximum height at which structures can be considered compatible with Airport operations.

[16] See Appendix F, Section F.3.2 for a discussion of one-engine inoperative procedures.



LEGEND

- A — 100 — Elevation of critical aeronautical surfaces, feet Above Mean Sea Level (AMSL), North American Vertical Datum of 1988 (NAVD88)
- C **Height of Critical Aeronautical Surfaces, Feet Above Ground Level (AGL)**
  - 35 and lower
  - 35- 65
  - 65 - 100
  - 100 - 150
  - 150 and more
- Airport Property
- BART Station
- CALTRAIN Station
- Regional Park or Recreation Area
- Municipal Boundary
- Railroad
- Freeway
- Road

Notes:

1. This map is intended for informational and conceptual planning purposes, generally representing the aeronautical surfaces considered most critical by San Francisco International Airport (SFO) and its constituent airlines. It does not represent actual survey data, nor should it be used as the sole source of information regarding compatibility with airspace clearance requirements in the development of data for an FAA Form 7460-1, Notice of Proposed Construction or Alteration. SFO does not certify its accuracy, information, or title to the properties contained in this plan. SFO does make any warrants of any kind, express or implied, in fact or by law, with respect to boundaries, easements, restrictions, claims, overlaps, or other encumbrances affecting such properties.

2. This map does not replace the FAA's obstruction evaluation / airport airspace analysis (OE/AAA) review process. Proposing construction at elevations and heights that are lower than the critical aeronautical surfaces shown on this map, (a) does not relieve the construction sponsor of the obligation to file an FAA Form 7460-1, and (b) does not ensure that the proposal will be acceptable to the FAA, SFO, air carriers, or other agencies or stakeholders. SFO, San Mateo County, and local authorities having jurisdiction reserve the right to re-assess, review, and seek modifications to projects that may be consistent with this critical aeronautical surfaces map but that through the FAA OE/AAA process are found to have unexpected impacts to the safety or efficiency of operations at SFO.

Sources: San Francisco International Airport, Jacobs Consultancy, and Planning Technology Inc., 2009

NORTH

0 0.25 0.5 1 Miles

Exhibit IV-17

CRITICAL AERONAUTICAL SURFACES -- NORTHWEST SIDE

Comprehensive Airport Land Use Plan
for the Environs of San Francisco International Airport

C/CAG

City/County Association of Governments
of San Mateo County, California