

# C/CAG

## CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

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June 2, 2025

Kei Zushi, EIR Coordinator  
49 South Van Ness Avenue, Suite 1400  
San Francisco, CA 94103  
via email: [cpc.sforadp@sfgov.org](mailto:cpc.sforadp@sfgov.org)

RE: SFO Recommended Airport Development Plan (RADP) DEIR Comments

Dear Mr. Zushi,

On behalf of the City/County Association of Governments of San Mateo County (C/CAG), I would like to thank you for the opportunity to review and comment on the Draft EIR for the RDAP for SFO.

As the Airport Land Use Commission for San Mateo County, C/CAG is charged with protecting the public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of local land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around the County's airports. Chief among its responsibilities is to prepare, adopt, maintain and administer an Airport Land Use Compatibility Plan (ALUCP) for SFO. Accordingly, C/CAG's primary concern is with how the RADP and the forecast growth identified in the DEIR may impact the public health and welfare of San Mateo County residents, as well as whether this level of anticipated growth will trigger the need to update the ALUCP.

C/CAG Airport Land Use Committee staff offers the following comments for your consideration:

- DEIR section 3.B.1 states that implementation of the RADP would not induce passenger demand, or change the number of aircraft operations, so the DEIR does not analyze aircraft noise. However, the forecast operations and passenger throughput (71.1 million annual passengers and 506,600 aircraft operations) are significantly higher than those included in other related documents, including the 1992 *SFO Master Plan* and the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport*, adopted in November 2012, (SFO ALUCP). The SFO ALUCP includes airport activity forecasts (which project to 2028) based on 2010 data. The SFO ALUCP's 2028 forecasts identified approximately 27 million passengers and 482,520 total operations. Comparatively, the DEIR for the RADP projects a "High Constrained" annual demand level, as noted above, that represents a more than 250% increase in annual passengers and 5% increase in aircraft operations over those forecast in the SFO ALUCP.

As indicated, there is a large disparity between the projections in these documents which should be analyzed to ensure the impact of the airport's growth forecasts is properly reflected in the ALUCP. If the potential noise impact of this level of forecast flight activity has been analyzed in a previously certified environmental document, it is requested that such analysis be clearly referenced in this DEIR. Alternately, if this has not yet been done, then C/CAG believes the DEIR must be revised to include this analysis.

The ALUCP is a critical tool for identifying and minimizing potential land use incompatibilities, so it is important that the document reflect the most current projections, especially given the significant gap in the operational forecasts between the SFO ALUCP and the RADP. Accordingly, C/CAG requests that the SFO Airports Commission direct its staff to initiate ALUCP update discussions, including a significant funding commitment, as part of this overall planning effort.

Thank you again for the opportunity to review and comment on the DEIR. If you have any questions, please contact me or Susy Kalkin, C/CAG ALUC staff, at [kkalkin@smcgov.org](mailto:kkalkin@smcgov.org).

Sincerely,

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