SAN FRANCISCO INTERNATIONAL AIRPORT

March 9, 2026

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

TRANSMITTED VIA EMAIL
kkalkin@smcgov.org

Subject: **San Francisco International Airport's Comments on the Land Use Consistency Determination for 2025 Oyster Point Project Specific Plan Update**

Dear Susy:

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 2025 Oyster Point Project Specific Plan (the Proposed Project) within the City of South San Francisco. We appreciate this opportunity to coordinate with the ALUC in evaluating the Proposed Project.

According to the application, the Proposed Project would develop remaining Phases 3D and 4D at an approximately 45-acre developer-owned site for office/research development space. The Proposed Project increases the maximum floor area ratio (FAR) from 1.25 to 2.0. The site is bounded by San Francisco Bay to the east, north and south, and portions of San Francisco Bay and Gull Drive to the west.

AIRPORT INFLUENCE AREAS

The Proposed Project lies within two Airport Influence Areas: Area A – Real Estate Disclosure Area (all of San Mateo County) and Area B – Policy/Project Referral Area, as defined by the *Comprehensive Airport Land Use Compatibility Plan for the Environs of SFO* (SFO ALUCP). Within Area A, the real estate disclosure requirements of state law apply. A property owner offering a property for sale or lease must disclose the presence of planned or existing airports within two miles of the property. Within Area B, the Board of Directors of the City/County Association of Governments of San Mateo County, acting as the designated ALUC, shall review proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezonings, and land development proposals. The real estate disclosure requirements in Area A also apply in Area B.

NOISE AND SAFETY COMPATIBILITY AND AIRSPACE PROTECTION POLICIES

The Proposed Project site is located outside the Airport's 65 dB Community Noise Equivalent Level (dB CNEL) noise contour. Therefore, the project does not appear to be incompatible with the noise compatibility policies of the SFO ALUCP. The Airport would like to remind the project proponent that while the area is outside of any defined noise zones, it does experience frequent overflights, particularly at night, as a result of noise abatement procedures designed to avoid overflights of residential areas. The project proponent should take this into account as they develop the site.

The proposed project appears to be located outside all Safety Compatibility Zones identified in the SFO ALUCP and therefore does not appear to be incompatible with the noise compatibility policies of the SFO ALUCP.

The Proposed Project is located beneath the critical aeronautical surfaces for Airport operations. As described in Exhibit IV-17 (see **Attachment A**) of the SFO ALUCP, the elevations of the critical aeronautical surfaces above the Proposed Project site are at least 300 feet above mean sea level, as defined from the 0-foot origin of the North American Vertical Datum of 1988 (AMSL NAVD88). Ground elevation at the Proposed Project site ranges from 15 to 17 feet AMSL NAVD88. While the proposal does not specifically list heights of the new buildings, there is reference to proposed maximum building heights of approximately 270 feet. If the proposal remains consistent with these heights, it would not appear to be incompatible with the airspace protection requirements of the SFO ALUCP. The Airport emphasizes that no portion of the permanent structures, including any antennas, appurtenances, davits, or architectural parapets, may penetrate the critical aeronautical surfaces defined in the SFO ALUCP.

This evaluation does not waive the requirement for any developments which result from the Proposed Project to undergo Federal Aviation Administration (FAA) airspace review as described in 14 Code of Federal Regulations Part 77 and in Exhibit IV-10 of the SFO ALUCP for both (1) the permanent structures and (2) any equipment taller than the permanent structures required to construct those structures. The FAA requires notification of proposed construction for any project that may have a potential effect on air navigation facilities. FAA Form 7460-1, Notice of Proposed Construction or Alteration, may be submitted by the project sponsor through the FAA's Obstruction Evaluation/Airport Airspace Analysis website (http://oeaaa.faa.gov). A Determination of No Hazard from the FAA should be obtained prior to project approval.

* * *

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...

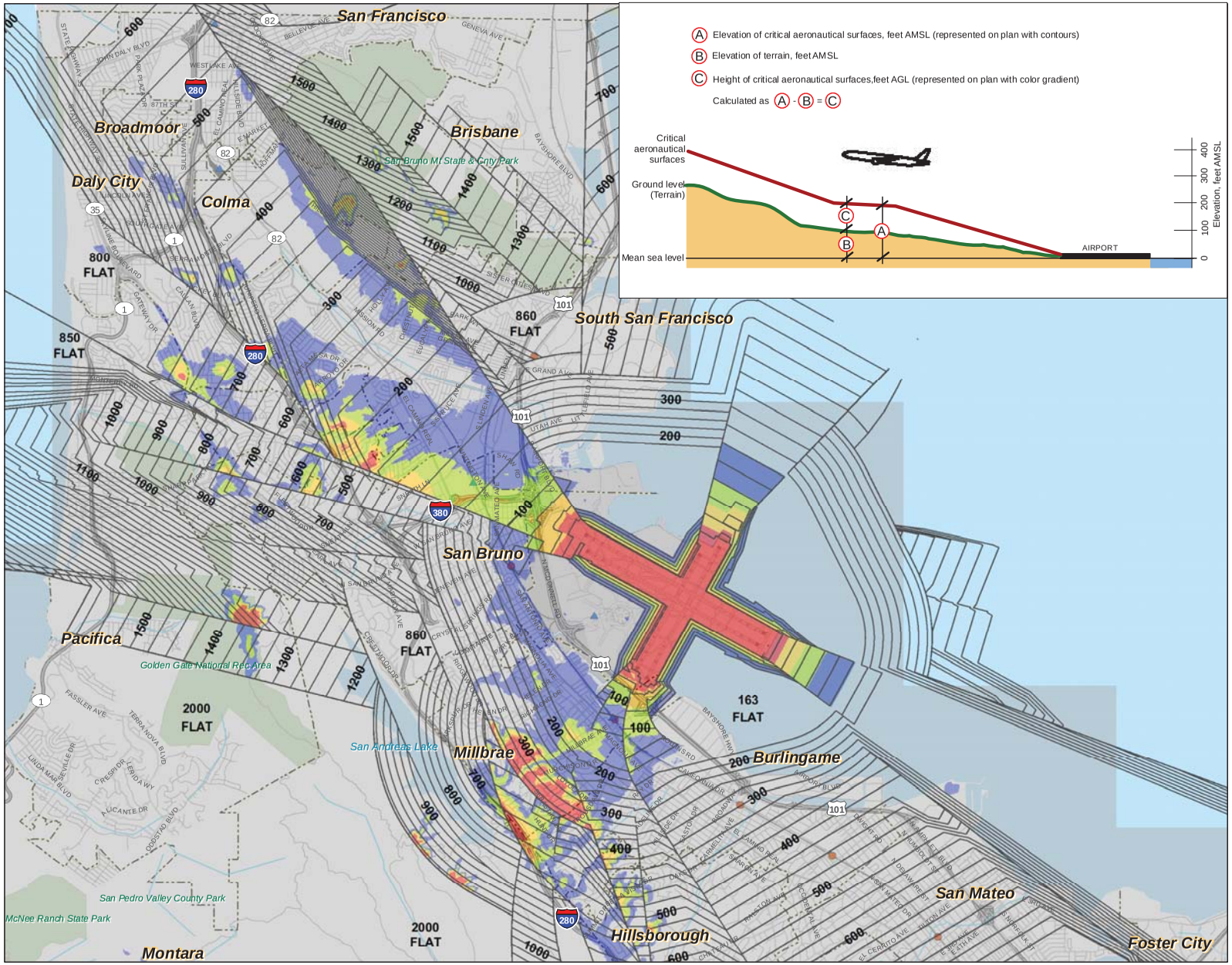
Nupur Sinha
Director of Planning and Environmental Affairs
San Francisco International Airport

Attachments:
A. SFO ALUCP Airspace Compatibility Policies

cc: K. Kennedy, SFO
C. DiPrima, SFO

ATTACHMENT A

SFO ALUCP Airspace Compatibility Policies



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

Exhibit IV-19, which is provided for information purposes only, depicts a profile view of the lowest critical airspace surfaces along the extended centerline of Runway 10L-28R – the TERPS Obstacle Departure Procedure (ODP) surface, representing standard all-engines departures, and the approximate OEI surface developed by SFO through independent study in consultation with the airlines serving SFO. The exhibit also shows the terrain elevation beneath the airspace surfaces and various aircraft approach and departure profiles, based on varying operating assumptions. The exhibit illustrates a fundamental principle related to the design of airspace protection surfaces. The surfaces are always designed below the actual aircraft flight profile which they are designed to protect, thus providing a margin of safety. Note that the ODP climb profile is above the ODP airspace surface, and the OEI climb profile is above the OEI airspace surface.

4.5.4 AIRSPACE PROTECTION POLICIES

The following airspace protection policies (AP) shall apply to the ALUCP.

AP-1 COMPLIANCE WITH 14 CFR PART 77, SUBPART B, NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION

AP-1.1 Local Government Responsibility to Notify Project Sponsors

Local governments should notify sponsors of proposed projects at the earliest opportunity to file Form 7460-1, *Notice of Proposed Construction or Alteration*, with the FAA for any proposed project that would exceed the FAA notification heights, as shown approximately on Exhibit IV-10. Under Federal law, it is the responsibility of the project sponsor to comply with all notification and other requirements described in 14 CFR Part 77. This requirement applies independent of this ALUCP.

AP-1.2 FAA Aeronautical Study Findings Required Before Processing Development Application

The sponsor of a proposed project that would exceed the FAA notification heights, as shown approximately on Exhibit IV-10, shall present to the local government permitting agency with his or her application for a development permit, a copy of the findings of the FAA's aeronautical study, or evidence demonstrating that he or she is exempt from having to file an FAA Form 7460-1. It is the responsibility of the local agency to consider the FAA determination study findings as part of its review and decision on the proposed project.

AP-2 COMPLIANCE WITH FINDINGS OF FAA AERONAUTICAL STUDIES

Project sponsors shall be required to comply with the findings of FAA aeronautical studies with respect to any recommended alterations in the building design and height and any recommended marking and lighting of their structures for their proposed projects to be deemed consistent with this ALUCP.

AP-3 MAXIMUM COMPATIBLE BUILDING HEIGHT

In order to be deemed consistent with the ALUCP, the maximum height of a new building must be the lower of (1) the height shown on the SFO critical aeronautical surfaces map (Exhibits IV-17 and IV-18), or (2) the maximum height determined not to be a "hazard to air navigation" by the FAA in an aeronautical study prepared pursuant to the filing of Form 7460-1.

For the vast majority of parcels, the height limits established in local zoning ordinances are lower than the critical airspace surfaces. In those cases, the zoning district height regulations will control. Compliance with the zoning district height and the SFO critical aeronautical surfaces map, however, does not relieve the construction sponsor of the obligation to file a FAA Form 7460-1 *Notice of Proposed Construction or Alteration*, if required, and to comply with the determinations resulting from the FAA's aeronautical study.

For a project to be consistent with this ALUCP, no local agency development permits shall be issued for any proposed structure that would penetrate the aeronautical surfaces shown on Exhibits IV-17 and IV-18 or the construction of which **has not** received a Determination of No Hazard from the FAA, or which would cause the FAA to increase the minimum visibility requirements for any instrument approach or departure procedure at the Airport.

AP-4 OTHER FLIGHT HAZARDS ARE INCOMPATIBLE

Proposed land uses with characteristics that may cause visual, electronic, or wildlife hazards, particularly bird strike hazards, to aircraft taking off or landing at the Airport or in flight are incompatible in Area B of the Airport Influence Area. They may be permitted only if the uses are consistent with FAA rules and regulations. Proof of consistency with FAA rules and regulations and with any performance standards cited below must be provided to the Airport Land Use Commission (C/CAG Board) by the sponsor of the proposed land use action.

Specific characteristics that may create hazards to aircraft in flight and which are incompatible include:

(a) Sources of glare, such as highly reflective buildings or building features, or bright lights, including search lights or laser displays, which would interfere with the vision of pilots making approaches to the Airport.

(b) Distracting lights that that could be mistaken by pilots on approach to the Airport for airport identification lighting, runway edge lighting, runway end identification lighting, or runway approach lighting.

(c) Sources of dust, smoke, or water vapor that may impair the vision of pilots making approaches to the Airport.

(d) Sources of electrical interference with aircraft or air traffic control communications or navigation equipment, including radar.

(e) Land uses that, as a regular byproduct of their operations, produce thermal plumes with the potential to rise high enough and at sufficient velocities to interfere with the control of aircraft in

flight. Upward velocities of 4.3 meters (14.1 feet) per second at altitudes above 200 feet above the ground shall be considered as potentially interfering with the control of aircraft in flight.[17]

(f) Any use that creates an increased attraction for wildlife, particularly large flocks of birds, that is inconsistent with FAA rules and regulations, including, but not limited to, FAA Order 5200.5A, *Waste Disposal Sites On or Near Airports*, FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants On or Near Airports*, and any successor or replacement orders or advisory circulars. Exceptions to this policy are acceptable for wetlands or other environmental mitigation projects required by ordinance, statute, court order, or Record of Decision issued by a federal agency under the National Environmental Policy Act.

4.5.5 iALP AIRSPACE TOOL

In consultation with C/CAG, SFO developed the iALP Airspace Tool, a web-based, interactive tool to evaluate the relationship of proposed buildings with the Airport's critical airspace surfaces. The iALP Airspace Tool is designed to assist planners, developers, and other interested persons with the implementation of the airspace protection policies of the SFO ALUCP. The tool helps users determine: (1) the maximum allowable building height at a given site, and/or (2) whether a building penetrates a critical airspace surface, and by how much, given the proposed building height.

A more detailed description of the iALP Airspace Tool and a tutorial explaining how to use it is presented in **Appendix J**. Use of this tool, however, does not relieve a project sponsor of the duty to comply with all federal regulations, including the obligation to file Form 7460-1, Notice of Proposed Construction or Alteration, with the FAA.

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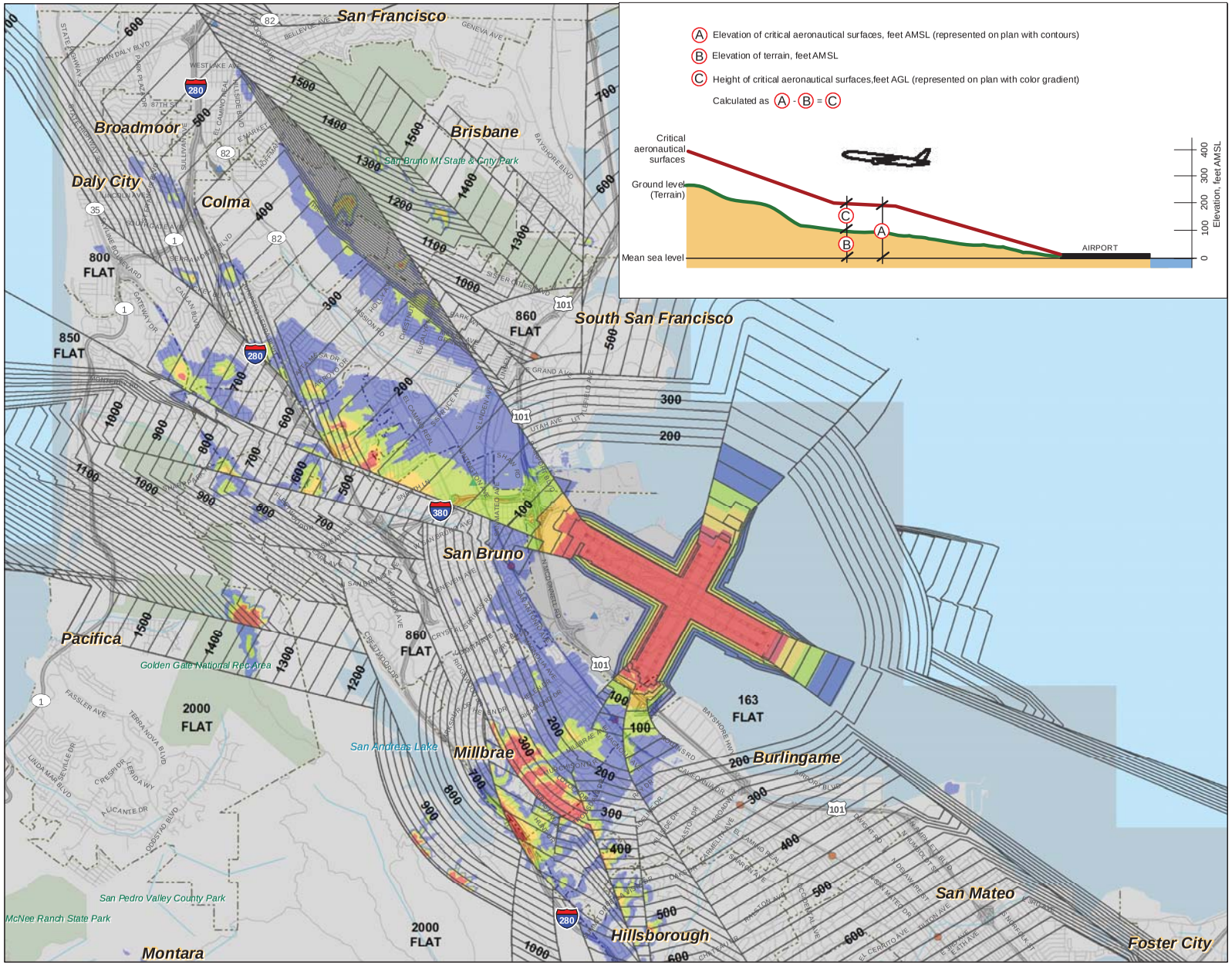

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