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June 21, 2019

ATTN: Michael Li San Francisco Planning Department 1650 Mission Street, Suite 400 San Francisco, CA 94103

Subject: Notice of Preparation of Environmental Impact Report and Notice of Public Scoping Meeting, May 22, 2019 – SFO Recommended Airport Development Plan

Dear Mr. Li:

I write on behalf of the City of Pacifica in response to the above-referenced Notice of Preparation of EIR, in connection with SFO's Airport Development Plan. In particular, I write regarding the planned scope of the EIR to address *all* environmental impacts potentially arising from the Plan, as they affect the Airport's many surrounding communities.

The Plan, as described in the Notice and as outlined in the various presentations made by SFO officials to local city councils in the preceding months contemplates a dramatic increase in the capacity of the airport's ground facilities. According to the Plan, the expansion is needed to accommodate an expected increase in passenger volume in the coming years to over 70 million. Although SFO claims that the expansion will not "change aircraft operations," it is difficult to see how such a large expansion in the Airport's ground-based facilities would not result in a corresponding increase in *air traffic* arriving at and departing from SFO on a 24-hour basis, seven days per week.

Moreover, the Notice does not acknowledge *all* arriving and departing flights, including not just passenger flights but, in addition, cargo aircraft, private jets, and helicopters. The forthcoming EIR analysis should evaluate all such aircraft, not just commercial passenger flights. Nor is there any mention of arriving and departing flights from *other* Bay Area airports, such as Oakland or San Jose, which obviously will contribute to the ground-level noise and vibration impacts.

The proposed EIR should also include enhanced measures to *monitor* the noise and vibration impacts of arriving and departing aircraft. It is not clear what types of noise and vibration monitoring systems will be in place in surrounding communities, to determine the *actual* impacts of the Airport expansion and potential increases in arriving and departing flights on the people who live and work in the many communities who are members of the Roundtable. Pacifica, in particular, is topographically higher than many communities surrounding SFO and is uniquely impacted by noise from low-flying aircraft. We understand that, although the Airport proposes new, state-of-the-art monitors, nothing in the Notice

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addresses the *number or location* of these monitors. Due to ever-increasing flights and revised flight paths, more monitors are needed and they need to be located in areas over which the new flight paths are located.

The proposed EIR should also include an analysis of the direct and indirect effects of greenhouse gas (GHG) emissions from the Airport expansion. Increased GHG emissions will reasonably be expected to result from the additional air traffic at the Airport, additional vehicle miles traveled (VMT) from arriving and departing passengers traveling in automobiles, additional VMT from new airport employees commuting in automobiles, and Airport ground support equipment servicing the increased air traffic.

In light of the foregoing, the City of Pacifica requests that the EIR for the SFO Airport Development Plan address the following specific issues:

- 1. Any and all potential noise and vibration impacts to the surrounding communities arising from the planned SFO expansion and development, and accompanying increases in air traffic arrivals and/or departures.
- 2. Inclusion in the analysis of issue 1 of all aircraft, including passenger flights, cargo aircraft, private jets, and helicopters.
- 3. Inclusion in the analysis of issues 1 and 2 of potential cumulative noise and vibration impacts from aircraft departing from or arriving at all Bay Area airports, including Oakland and San Jose.
- 4. Improved state-of-the art noise monitoring that includes more stations as well as stations located directly under or close to flight paths that are currently used by departing or arriving flights at the airports described above.
- 5. Inclusion in the analysis of issue 3 of potential direct and indirect effects of GHG emissions, including how they may contribute to increased sea level rise along Pacifica's coastline.

Please be aware that the list above is not intended to be final or exclusive. It is intended to serve merely as the starting point in the process of involving the City of Pacifica in the ongoing discussions with SFO over the Airport's future expansion and development plans, and in managing the noise impacts that in the past several years have increased and negatively impacted the residents of the City and surrounding communities.

We ask that the Planning Department provide the City of Pacifica with <u>written notice</u> as soon as the draft EIR is available for review.

Please feel free to contact me at any time regarding the points stated above or any other questions you may have as to the City's position on this important issue.

Very Truly Yours,

Kevin Woodhouse City Manager