



San Francisco International Airport

July 20, 2021

Therese W. McMillan
Executive Director
Metropolitan Transportation Commission
Attn: Draft EIR Comments
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

TRANSMITTED VIA E-MAIL AND U.S. MAIL
eircomments@bayareametro.gov

Subject: Draft Plan Bay Area 2050 Environmental Impact Report

Dear Ms. McMillan:

The San Francisco International Airport (SFO or the Airport) has reviewed the Draft Plan Bay Area 2050. We appreciate this opportunity to provide our comments to the Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC).

According to population and employment forecasts, the Bay Area is projected to have an additional 2 million residents, 1.4 million households, and 1 million jobs between now and 2050. Plan Bay Area 2050 sets forth a vision for future land use and transportation investments through 2050 and will serve as the region’s Sustainable Communities Strategy and Regional Transportation Plan under state Senate Bill 375 (Steinberg). Plan Bay Area 2050 includes 35 strategies for improving housing, the economy, transportation, and the environment for the Bay Area’s nine counties, with an emphasis for a more equitable and resilient future for Bay Area residents.

Comment #1: Consideration of Airport Land Use Compatibility Plan (ALUCP) for the Environs of San Francisco International Airport

As a long-term and comprehensive land use plan, it is essential that Plan Bay Area 2050 consider land use compatibility with other regional priorities, such as airport operations, as the region decides where and how to grow. SFO is surrounded by water on three sides and U.S. Highway 101 (U.S. 101) to the west. Lands immediately adjacent to the Airport have largely been developed with residential and industrial uses. Within the environs of SFO are major transportation nodes and corridors, including U.S. 101, El Camino Real, and San Francisco Bay Area Rapid Transit (BART) and Caltrain stations and rail lines. Plan Bay Area 2050 includes the following strategies:

- **H3. Allow a greater mix of housing densities and types in Growth Geographies.** Allow a variety of housing types at a range of densities to be built in Priority Development Areas (PDAs), select Transit-Rich Areas (TRAs), and select High-Resource Areas (HRAs).
- **EC4. Allow greater commercial densities in Growth Geographies.** Allow greater densities for new commercial development in select PDAs and TRAs to encourage more jobs to locate near public transit.

AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO

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Plan Bay Area 2050 identifies land west and south of the Airport along the El Camino Real corridor as PDAs.¹

The California Aeronautics Act charges the California Department of Transportation, Division of Aeronautics with adopting noise standards governing the operation of aircraft for airports based on the level of noise acceptable to a reasonable person residing in the vicinity of the airport.² The California Airport Noise Regulations promulgated by the Division of Aeronautics state that “[t]he level of noise acceptable to a reasonable person residing in the vicinity of an airport is established as a community noise equivalent level (CNEL) value of 65 dB for purposes of these regulations. This criterion level has been chosen for reasonable persons residing in urban residential areas where houses are of typical California construction and may have windows partially open. It has been selected with reference to speech, sleep and community reaction.”³ Residential uses located in areas above the 65-dB CNEL are incompatible land uses.

The California State Legislature has long recognized the need for land use decisions to take into consideration the operations of an airport and prevent inappropriate land uses that threaten or limit the operations of an airport. In 1967, the Legislature authorized the creation of Airport Land Use Commissions (ALUC) to protect the “public health, safety, and welfare by encouraging orderly expansion of airports and the adoption of land use measures that minimizes exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible land uses.”⁴

The policies of the Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (ALUCP) guide compatible development in the lands surrounding SFO with respect to noise, safety, and airspace protection associated with aircraft operations.⁵ The ALUCP recognizes the development pressures faced by the Airport’s neighboring jurisdictions, which must accommodate new housing according to their regional allocations as derived through ABAG’s Regional Housing Needs Allocation (RHNA). Furthermore, commercial and industrial development will likely increase as regional employment grows. While Plan Bay Area 2050 supports such growth within PDAs, including along the El Camino Real corridor west and south of the Airport, the approach must be balanced against compatibility with airport operations and the state’s charge to ALUCs to protect airport environs from land use incompatibilities. For instance, noise compatibility policies limit the types of uses suitable for certain properties, and airspace protection policies impose height restrictions on properties under critical aircraft arrival and departure paths. Much of the land identified as PDAs near the Airport is within the 65-dB CNEL noise contour (i.e., may experience noise greater than 65 dB CNEL), safety zone, or airspace zones. Recognizing the projected employment needs, SFO fully supports commercial and industrial development within the PDAs where consistent with ALUCP guidelines on noise, safety, and airspace; conversely, SFO does not support residential use within the PDAs where inconsistent with ALUCP guidelines on noise, safety, and airspace, especially for vulnerable, disadvantaged, or underrepresented communities that have traditionally been relegated to less desirable locations.

¹ These include PDAs named “El Camino Real” in South San Francisco, “Transit Corridors” in San Bruno, “Transit Station Area” in Millbrae, and “Downtown” and “Burlingame El Camino Real” in Burlingame.

² California Public Utilities Code section 21669.

³ Title 21 California Code of Regulations section 5006

⁴ California Public Utilities Code section 21670.

⁵ ALUCP for the Environs of San Francisco International Airport (November 2012) available here:

https://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf

ABAG can respond to the growing development pressure faced by SFO's neighboring communities by adjusting local application of the RHNA, to consider the land use compatibility and environmental impacts due to their proximity to airport operations. As ABAG develops its RHNA allocation methodology in tandem with the Sustainable Communities Strategy, there is an opportunity to consider housing distribution alternatives, while promoting compatible land uses with airports throughout the region. For SFO, the subregion share for San Mateo County will directly influence the housing allocations assigned to the cities within the Airport environs. We believe that sound decisions at the regional level would support compatible land use planning at the local level, which is essential to the sustainability of both future communities and airports. Airport staff are available to share mapping tools showing noise compatibility, airspace protection, and safety areas with ABAG and MTC, to help guide decisions on development in the environs of SFO.

The issue of airport land use compatibility is not unique to SFO and applies to all of the region's airports. The Bay Area's airports are essential assets to regional transportation infrastructure and the economy, and should be thoroughly considered as ABAG and MTC refine and analyze a preferred scenario for Plan Bay Area 2050.

Comment #2: Support Strategy T12. Build an Integrated Regional Express Lanes and Express Bus Network

The Airport supports transportation strategy RTPID 21-T12-128 for regional express bus service from Vallejo to SFO:

RTPID - 21-T12-128, Express Bus | Service Expansion | ReX (Premium)|Green Line (Vallejo to SFO Airport) - This program includes funding to implement new express bus service along I-80, I-280 and US-101 (on express lanes where available) between Vallejo and San Francisco International Airport. Improvements include high-frequency service (10 min peak headways); capital improvements such as in-line bus stations on freeways and arterials; and station area amenities like upgraded local bus stops, taxi/TNC loading zones, and improved bicycle/pedestrian infrastructure.

This express bus service would improve transportation options from as far as Vallejo and would be beneficial for Airport workers and for passengers, by reducing the number of transfers that would be needed and reducing the travel time. Without this service, workers and passengers may opt to take automobiles for long distances, adding congestion to the roads and greenhouse gas and other pollutants to the air.

Comment #3 Strategy EN01. Protect Shoreline Communities Affected by Sea Level Rise

The Airport generally supports efforts to protect shoreline communities from sea level rise and flooding. In fact, SFO is embarking on the development our own Shoreline Protection Program to protect the Airport's assets and operations from flooding and future sea level rise. Plan Bay Area 2050 strategy RTPID 21-EN01-130 addresses sea level rise adaptation infrastructure:

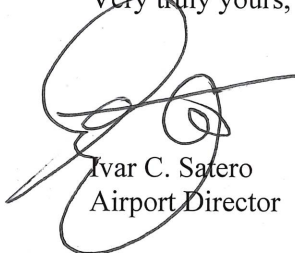
RTPID - 21-EN01-130, SLR Adaptation Infrastructure | Regional - This program includes funding to implement adaptation infrastructure in locations that are forecasted to be permanently inundated with two feet of sea level rise by 2050, providing protection from king tides and storms. This program includes actions such as the elevation of critical infrastructure and implementation of ecotone levees, traditional levees, sea walls, and

marsh restoration and adaptation. Examples of adapting critical transportation infrastructure include I-880 (ALA), SR- 84 (ALA), I-580/US-101/SMART (MRN), BART (MUL), SR-237/VTA (SCL), and US-101 (SM).

While we applaud Plan Bay Area 2050's long-term strategies for adaptation to sea level rise, we caution that not all types of protection from flooding and sea level rise are compatible with airport operations. In particular, nature-based solutions such as ecotone levees and marsh restoration and adaptation can be wildlife attractants. As noted in the ALUCP, 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 Airport Influence Area B, and may be permitted only if the uses are consistent with Federal Aviation Administration (FAA) rules and regulations.⁶ Ecotone levees and marshes have the potential of attracting wildlife in the area, which is prohibited by the ALUCP. We urge that ABAG and MTC include guidance with this strategy to prohibit the use of nature-based solutions for flooding within five miles of public use airports consistent with FAA Advisory Circular 150/5200-33C, Hazardous Wildlife Attractants On or Near Airports.

The Airport appreciates your consideration of these comments. If I can be of assistance as ABAG and MTC consider airport land use compatibility in their regional planning efforts, please do not hesitate to contact Nupur Sinha, Acting Planning Director, at (650) 821-9464 or at nupur.sinha@flysf.com.

Very truly yours,



Ivar C. Satero
Airport Director

cc: Susy Kalkin, Airport Land Use Committee
Amy Choi, Caltrans, Division of Aeronautics, Chief
Audrey Park, SFO, Acting Environmental Affairs Manager

⁶ Characteristics that may create hazards to aircraft in flight and which are incompatible include 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 150/5200-33C, Hazardous Wildlife Attractants On or Near Airports, and any successor or replacement orders or advisory circulars (ALUCP AP-4, IV-59-60).