



October 16, 2023

Ms. Colleen Liang
Port of Oakland
Environmental Programs and Planning Division
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**RE: Oakland International Airport Terminal Modernization and Development Project
(SCH No. 2021050164)**

Dear Ms. Liang,

On behalf of our members and supporters, the undersigned groups urge the Port of Oakland to protect our communities, our health, and the planet, and therefore reject the Oakland International Airport Terminal Modernization and Development Project (“Project”) (SCH No. 2021050164). The Project commits the Oakland Airport to a path of expansion at exactly the wrong time. We urge the Port to reconsider how this Project fits into the City of Oakland’s ongoing commitments to protect its residents from air and noise pollution and to comply with city and state climate goals. Because these commitments cannot be squared with a major project to expand operations at the Oakland Airport, the Project should be halted for the following reasons.

The Project would add a new terminal with 16 gates, over 1,000 parking spaces, and other new facilities to the Oakland Airport. The Draft Environmental Impact Report (“Draft EIR”) claims that demand for new flights would rise regardless of whether the Project is built. But in allowing for more gates, more efficient baggage processing and screening facilities, and other infrastructure, the Project undoubtedly paves the way for more flights and more passengers in the coming years. The assumption of inevitable growth casts doubt on much of the greenhouse gas, noise, and air pollution analysis in the Draft EIR: by taking for granted the future growth in flight traffic, the Draft EIR ignores how this Project contributes significantly to that same growth.

This Project will have serious effects on air pollution and noise in the neighboring communities in East Oakland, which already rank in the 97th percentile of California communities burdened by



pollution, according to CalEnviroScreen. For example, concentrations of ultrafine particles can be four or more times higher in areas surrounding airports.¹ The small particles infiltrate homes, schools, and other gathering places where they are inhaled, pass into people's lungs, and move into their bloodstream to be carried throughout the body. Studies show that residents living near airports are more likely to be admitted to the hospital for asthma, have higher incidences of cancer and cardiopulmonary disease, and are more likely to die prematurely.² One study in 2015 estimated that premature deaths due to fine particle emissions from aviation number nearly 14,000 per year globally.³ These effects are even more acute for airport workers, who will be exposed to increased levels of air pollution from the increased flight traffic. The Draft EIR admits this will be a significant issue but deems it unavoidable because the Port does not regulate aircraft emissions themselves. That view simply does not do service to the thousands of workers who will have their health impacted by the Project.

Moreover, by inducing demand for more flights that arrive to and depart from Oakland, this Project gives a green light for aircraft emissions to rise and climate change to worsen. Over the last ten years, aviation emissions increased by 44 percent, and emissions are expected to triple again by 2050 under a business-as-usual scenario. This would constitute more than a quarter of the total emissions consistent with keeping temperature rise below 1.5°C. Maintaining this business-as-usual path will cause additional greenhouse gas pollution that we cannot afford. The Draft EIR again disclaims responsibility for this problem, asserting that the Port cannot regulate aircraft emissions. But passing the buck is not a responsible strategy for the agency to defend. The Airport project flies in the face of various efforts by the City of Oakland, California, and the federal government to reduce emissions and mitigate the effects of climate change. The Port must take more responsibility for the increased flight traffic this Project will create.

All in all, the Airport expansion project hurts far too many groups, from adjacent East Oakland communities to airport workers and communities under flight paths, to justify its completion. The Project turns a blind eye to the ever-worsening climate emergency and California's existing struggle to improve its air quality issues. The Port should instead explore other avenues to create

¹ Hudda, N. et al., Impacts of aviation emissions on near-airport residential air quality, 54 Environmental Science & Technology 8580 (2020); Shirmohammadi, F. et al., Emission rates of particle number, mass and black carbon by the Los Angeles International Airport (LAX) and its impact on air quality in Los Angeles, 151 Atmospheric Environment 82 (2017).

² Lin, S. et al., Residential proximity to large airports and potential health impacts in New York State, 81 Int. Arch. Occup. Environ. Health 797 (2008); Osaki, C. and Finkbonner, J., Final Report State Board of Health Priority: Environmental Justice (2001).

³ Yim, S.H.L. et al., Global, regional and local health impacts of civil aviation emissions, 10 Env'tl Research Letters 034001 (2015) (87% of 16,000 total premature deaths per year are attributable to fine particle pollution).



long-term sustainable transportation solutions that serve Bay Area residents. We urge the Port to refuse to certify this Draft EIR and halt this harmful Project.

Sincerely,

The [Stop OAK Expansion Coalition](#) Steering Committee and the following 56 organizations (list continues to next page)

1. [350 Bay Area](#)
2. [350 Contra Costa Action](#)
3. [350 East Bay](#)
4. [350 San Francisco](#)
5. [350 Seattle](#)
6. [1000 Grandmothers for Future Generations](#)
7. [Amazon Watch](#)
8. [Asian Pacific Environmental Network \(APEN\)](#)
9. [Bay Area - Systems Change not Climate Change](#)
10. [Biofuelwatch](#)
11. [Breathe](#)
12. [California Interfaith Power and Light](#)
13. [Californians for Energy Choice](#)
14. [Center for Biological Diversity](#)
15. [Citizens Climate Lobby, Alameda County](#)
16. [Coalition for Environmental Equity And Economics](#)
17. [Coalition for Responsible Transportation Priorities](#)
18. [Communities for a Better Environment](#)
19. [Elders Climate Action, NorCal Chapter](#)
20. [Environmental Justice Associates, First Unitarian Church of Oakland](#)
21. [Extinction Rebellion San Francisco Bay Area](#)
22. [Flight Free USA](#)
23. [Fresnans Against Fracking](#)
24. [Fridays for the Future, El Cerrito](#)
25. [Fridays for the Future, Palo Alto](#)
26. [Greenaction for Health and Environmental Justice](#)
27. [Green The Church](#)
28. [Interfaith Climate Action Network of Contra Costa County](#)



29. My Kids Klub
30. [No Coal in Oakland](#)
31. [No Coal in Richmond](#)
32. [Oakland Greens](#)
33. [Oil and Gas Action Network](#)
34. [Our City SF](#)
35. [Peace and Freedom Party, Alameda County Chapter](#)
36. [Physicians for Social Responsibility, San Francisco Bay](#)
37. [Public Health Institute](#)
38. [Railroad Workers United](#)
39. [San Leandro 2050](#)
40. [Save Our Skies East Bay](#)
41. [Scientist Rebellion, San Francisco Bay Area](#)
42. [SEIU USWW](#)
43. [Sierra Club, San Francisco Bay Chapter](#)
44. [Sunflower Alliance](#)
45. [West Berkeley Alliance for Clean Air and Safe Jobs](#)
46. [Youth vs Apocalypse](#)
47. [Youthpower Climate Action](#)

International Organizations:

48. [Alofa Tuvalu](#), Polynesian Oceania
49. [Centre for Citizens Conserving Environment & Management](#), Uganda
50. [Bevar Jordforbindelsen](#), Denmark
51. [The Corner House](#), UK
52. [Farnborough Noise Group](#), UK
53. [Flight Free Australia](#)
54. [Green Sky Thinking](#)
55. [Safe Landing](#)
56. [Stay Grounded International Network](#)