

Stop OAK Expansion Coalition

Port of Oakland Environmental Programs and Planning Division
Colleen Liang
530 Water Street Oakland, CA 94607
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June 7th, 2021

Re: Comments on the scope and content of the Draft EIR For Oakland Airport Terminal Development

Dear Colleen Liang,

Despite local, state, national, and international climate targets to reduce Greenhouse Gas Emissions, the Oakland Airport is planning an expansion to add 17 new gates to accommodate what they anticipate is a widening demand for air travel in the Bay Area.

Aviation is the most climate-harming mode of transport due to high altitude effects. The total climate impact of flight is [on average 3 times](#)¹ the effect of the emitted CO2 alone. [Aviation accounted for 9% of California statewide and 11% of SF Bay Area greenhouse gas \(GHG\) emissions in 2019, and are on track to increase.](#)²

Public money should not be spent on fossil fuel intensive transport infrastructure. In its report [Net zero by 2050](#)³ released last month, the International Energy Agency recommends the following:

- Regional flights are shifted to high-speed rail where feasible.
- Business and long-haul leisure air travel does not exceed 2019 levels

California High Speed rail is under construction⁴ and will service 4 of the 10 top Oakland airport departure destinations.⁵

Public money should not be spent on infrastructure that is not resilient to sea level rise. The Oakland airport runways are actually below sea level during high tide events and the airport infrastructure includes multiple pumping stations to keep the runways dry at such times. The DEIR needs to study the dike system surrounding the airport and the cost of maintaining this infrastructure.

¹ "The contribution of global aviation to anthropogenic climate forcing for 2000 to 2018"
<https://www.sciencedirect.com/science/article/pii/S1352231020305689?via%3Dihub>

² See Page 2 & 6 "Reducing aircraft CO2 emissions: The role of U.S. federal, state, and local policies" Briefing by The International Council On Clean Transportation, February 2021, <https://theicct.org/sites/default/files/publications/Aviation-CO2-US-feb2021.pdf>

³ See Page 70, "Net Zero by 2050 - A Roadmap for the Global Energy Sector" by The International Energy Agency
<https://iea.blob.core.windows.net/assets/4719e321-6d3d-41a2-bd6b-461ad2f850a8/NetZeroBy2050-ARoadmapfortheGlobalEnergySector.pdf>

⁴ Map of California HSR <https://buildhsr.com/>

⁵ Top 10 destination listed here: https://en.wikipedia.org/wiki/Oakland_International_Airport

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Public money should not be invested in fossil fuel intensive travel modes that accelerate climate change and wildfires. We ask that the EIR correlate aviation's impact on climate change and the increase in severity and frequency of wildfires in California.

Public money should not be invested in air polluting activities that harm front line communities. A study in the LAX airport neighborhood shows that pregnant women exposed to high levels of pollution from the exhaust of jet planes are 14% more likely to deliver prematurely than women exposed to lower levels.⁶ We ask that the EIR study the health consequences for the population that will be exposed to increased airport activity at the Oakland Airport. The EIR must also make a thorough assessment of the noise and vibration impacts of increased flights. Communities in the take-off, climb-out, and landing glide path are already impacted by elevated sound and vibration for several miles north, south and east of the OAK. According to the Howard Terminal DEIR sound levels for residents near airports can reach 80 decibels, which is the equivalent of loud TV audio. This sound level has impacts on sleep, conversation, and mental health.⁷

We ask that the EIR scope include an estimate of total greenhouse gas emissions from jet and aviation fuels as well as airport construction and operation activities on the ground. The DEIR needs to include not only the emissions in the immediate environment of the airport but also *all Greenhouse Gas Emissions discharged by additional vehicle miles of in-state and international air travel occurring beyond California State boundaries, which are a foreseeable consequence of the project.* Furthermore, it is critical to understand that aviation's climate impact isn't limited to CO2. Due to different emissions other than just the CO2 taking place at altitude, there is a total climate impact of flights that is on average 3 times⁸ the effect of the emitted CO2 alone, so we ask that the EIR include this reality in their estimate too. When considering total greenhouse gas emissions use the CARB well-to-wheels GREET model for the fuel and lubrication oils. Also include the emissions from the manufacture and end-of-life disposal of the additional airplanes required to serve this additional demand. And finally we ask that the EIR report on the impacts of sea level rise, wildfires and air pollution that would be affected by the proposed airport expansion.

Thank you,

Ariella Granett, Berkeley, CA

Steering committee member of www.stopOAKexpansion.org

⁶ <https://www.usnews.com/news/health-news/articles/2020-07-29/if-mom-to-be-lives-near-airport-odds-for-preemie-birth-rise>

⁷ <https://www.bbc.com/future/article/20210315-why-noise-pollution-is-bad-for-your-heart>

⁸ "The contribution of global aviation to anthropogenic climate forcing for 2000 to 2018"
<https://www.sciencedirect.com/science/article/pii/S1352231020305689?via%3Dihub>