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July 22, 2024

Michael Colbruno, President  
Port of Oakland  
530 Water Street  
Oakland, CA 94607

Dear President Colbruno,

The Stop Oak Expansion Coalition is writing on behalf of its 78 member organizations to request that the Port of Oakland conduct and publish a Health Impact Assessment (HIA) for its proposed modernization/expansion plan for the airport *prior to* release of its Final Environmental Impact Report (FEIR). This supports the request made by the Alameda County Public Health Department (ACPHD) in its October 2023 Public Comment letter in response to the Port's Draft Environmental Impact Report (DEIR).

Questions about the health impacts the Port's draft plan would have on Oakland residents, particularly those living close to the airport, would have been asked at the Council's Community Economic Development Committee meeting on May 14, if any Port representative had appeared as requested. Although the Port has since indicated it will wait until *after* the FEIR is released before communicating with the city, **we strongly urge the Port to conduct and publish the HIA before the FEIR is released.** The findings of the HIA should be included in a recirculated EIR (REIR) so that the public has an opportunity to comment on the record about the public health consequences of the plan. This will make it possible for the Port to include essential health impact mitigation measures in the FEIR.

As the ACPHD pointed out in its comments on the Draft Environmental Impact Report:

"Given these likely population health concerns and the scale and complexity of the airport expansion project, we recommend that the EIR include a comprehensive analysis of the public health impacts of the Proposed Project, such as through a Health Impact Assessment. Health Impact Assessment (HIA) is a recognized and well-defined process to evaluate the potential health implications of a policy or decision...A comprehensive and systematic evaluation of the Proposed Project's impacts on human health and the distribution of those effects within the population is especially critical as part of CEQA

requirements for EIRs to adequately inform the public about health and safety impacts...”

The ACPHD called attention to the Port’s overall responsibility to the people of Oakland, recommended:

“Establishing a more comprehensive and detailed evaluation of specific health impacts to provide the public and decision makers an opportunity for meaningful consideration of the nature and magnitude of increasing airport emissions. This can be accomplished effectively through commissioning a Health Impact Assessment. While the Port does not regulate aviation, the Proposed Project facilitates increased aviation activity that has likely significant population level health consequences.”

A Health Impact Assessment also is consistent with the Environmental Justice Element of the City of Oakland’s General Plan, which states, “One of the most pressing environmental justice issues in Oakland is the disproportionate pollution burden that West and East Oakland neighborhoods face, largely due to proximity to the Port of Oakland, industrial land, and its associated uses such as truck transport. Coupled with Oakland’s economic history, these land use patterns were created by zoning choices, racial exclusion, and urban renewal.”

The ACPHD focuses its health concerns on neighborhoods closest to the airport, including East Oakland, saying:

"East Oakland residents have the highest rates of asthma hospitalization in the county. From 2018-2020, there were 936.6 asthma hospitalizations and Emergency Department visits per 100,000 for adults in East Oakland, and 1256.1 per 100,000 for children. This is more than three times higher than the overall Alameda County rate. Cancer, heart disease, stroke, and chronic lower respiratory disease are among the top 10 causes of death in East Oakland and together account for 43.4% of all deaths. These diseases are associated with—but not solely attributable to— air pollution, and East Oakland residents are dying from them at higher rates than residents countywide. Life expectancy in some census tracts of East Oakland is 12 years less than life expectancy in tracts with the highest life expectancy in the county....numerous studies of airport emissions from around the world indicate that air quality near major airports can be significantly affected by emissions from air mobile sources. One 2014 study measured particle number (PN) concentrations downwind from Los Angeles International Airport. It found that LAX emissions adversely impacted air quality much further than reported in previous airport studies, increasing PN. The Environmental Protection Agency reported that aircraft engines are responsible for approximately 10.5 percent of the cancer cases within a defined geographic location (approximately 16 square miles) surrounding Chicago’s Midway Airport."

The ACPHD also addresses aircraft noise in a dedicated section of its report and states that aircraft noise "could increase the risk of cardiovascular concentrations four-fold as far as 10 miles downwind. Another 2018-2019 study of SEA-TAC found that communities underneath and

downwind within 10 miles of jets landing at the airport are exposed to a type of ultrafine particle pollution that is distinctly associated with aircraft.”

This situation demands consideration in future planning for the airport. As ACPHD notes:

“Environmental Justice principles hold that: “No group of people, including ethnic, or a socioeconomic group, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies.” A long history of environmental racism has led to intentional overburdening of pollution in communities of African Americans, Latinx, Indigenous People, Asian Americans and Pacific Islanders, migrant farmworkers, and low-income workers. As a result, they face increased risks of health problems like cancer and respiratory issues.”

The Port can also use the findings of an HIA to ensure that any proposed modernization or expansion is consistent with the goals set in the City’s Equitable Climate Action Plan (ECAP), adopted in 2020, and the city’s 2045 Carbon Neutrality Goal. As ECAP notes:

“The Port of Oakland continues to plan for reducing the GHG emissions of both seaport and airport activities. Because the Port operates with an independent Board of Directors, emission reduction strategies and programs related to its operations and management are not included in the ECAP. *As a major source of emissions, and as a visible and important part of the local economy and community, the Port can implement strategies that will further the City’s efforts to achieve the low-carbon future described in the ECAP.*” (emphasis added)

The Health Impact Assessment is vital to the city’s residents. It is essential that the Port, as an independent department of the City of Oakland, ensure that any modernization/expansion plans are aligned with the City’s goals. Commissioning a Health Impact Assessment by a qualified independent public health expert is an essential first step in doing so. This would build on the HIA conducted by the West Oakland Environmental Improvement Project and Environmental Defense Fund that identified East Oakland, West Oakland and Fruitvale neighborhoods as having high levels of mortality due to nitrous oxide (NO<sub>2</sub>). (See the Environmental Justice Element Figure 3-11, attached).

We suggest that a list of such qualified independent public health experts would include, but is not limited to:

- Raimi and Associates
- Center for Global Healthy Cities at UC Berkeley
- Change Lab Services

We encourage you, before you hire the organization to conduct the Health Impact Assessment, to confirm with the ACPHD that they consider your prospective chosen organization to be qualified to

conduct an HIA using the “recognized and well designed process” referred to in the ACPHD’s October 16, 2023 Public Comment letter.

We conclude by reminding the Port that, as the ACPHD said in its comments, “A ‘business as usual’ approach to this proposed development would lead to burdens on communities that have historically borne the brunt of health, environmental and economic inequity.”

Please advise us of the Port’s plans regarding the Health Impact Assessment requested by the Alameda County Public Health Department. For purposes of follow up, please contact Steering Committee member Lin Griffith at [lin@stopoakexpansion.org](mailto:lin@stopoakexpansion.org).

Best regards,

A handwritten signature in black ink that reads "Kay Guinane". The signature is fluid and cursive, with the first name "Kay" and last name "Guinane" clearly legible.

Kay Guinane, Steering Committee Member

Stop Oak Expansion Coalition

CC:

Andreas Cluver, First Vice-President, Port Commission

Barbara Leslie, Second Vice-President, Port Commission

Arabella Martinez, Commissioner

Jahmese Myres, Port Commissioner

Stephanie Dominguez-Walton, Port Commissioner

Yui Hay Lee, Port Commissioner

Sheng Thao, Mayor of Oakland

Oakland City Council

Colleen Chawla, Kimi Watkins-Tartt, Micholas Moss, MD, Alameda County Health Care Services Agency, Public Health Department