

Draft Subject to Change – 10/13/23

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Via Electronic & Regular Mail

cliang@portoakland.com

Ms. Colleen Liang, Acting Director
Port of Oakland
Environmental Programs and Planning Division
530 Water Street
Oakland, CA 94607

SUBJECT: OAKLAND INTERNATIONAL AIRPORT TERMINAL MODERNIZATION AND DEVELOPMENT PROJECT DRAFT EIR (SCH#: 2021050164)

Dear Colleen Liang,

The City of Alameda (City) staff and Council have reviewed the Draft Environmental Impact Report (DEIR) for the proposed Terminal Modernization and Development Project (Project) and are deeply concerned with the document's failure to identify and mitigate, to the extent feasible, all of the potentially significant adverse impacts of the Project as required by the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21000 et seq.). Of particular concern is the DEIR's vague and misleading project description as well as the inadequate analysis of the Project's potential air quality, greenhouse gas (GHG) emissions, human health risks, noise (including construction noise), and traffic/parking impacts, among others. The DEIR's failure to meaningfully consider a reasonable range of alternatives, including an environmentally superior and/or reduced size alternative, is also troublesome.

Given the severity of the airport's existing and potential future impacts on its residents, the City engaged technical specialists at public expense to provide expert advice in preparing these comments. This letter, including the attached technical expert comment letters, constitute the City's initial comments on the DEIR. Due to the lack of a clear and finite project description, baseline information and the omission of key technical studies from the DEIR, the City requests that the Port revise and recirculate the DEIR for additional public review and comment ¹

¹ The attached expert comment letters, incorporated by reference as if fully set forth herein, include technical comments and analysis from: (i) Erin Sheehy, Environmental Compliance Solutions, regarding air quality and GHG (Attachment A); (ii) Jack Freytag, Freytag & Associates, regarding noise (Attachment B); and (iii) City of Alameda Transportation Planning Unit, regarding transportation/VMT and transportation demands, among other issues (Attachment C). Please include specific responses to the attached expert comment letter in addition to responses to comments in this letter as part of the Final EIR.

The City recognizes the important role of Oakland International Airport (OAK) in connecting our region to other parts of the state and the nation and in supporting the regional economy. Modernization, safety and comfort, and related improvements should be made. However, the City opposes any expansion of airport gates or improvements that increase the number of flights at OAK until the DEIR adequately studies all reasonably foreseeable significant adverse environmental impacts to the surrounding community, and identifies all feasible mitigation measures and project alternatives.

In particular, the City believes the Project is inadequately defined, and that noise, air quality, GHG, health, safety and ground transportation impacts are not fully addressed. Additionally, feasible alternatives have been improperly screened out of the DEIR. Without proper mitigation, including best practices being implemented at other airports in California, the expansion Project will directly and unacceptably affect the well-being of the Alameda community, which is not an acceptable outcome to the City.

The EIR is “the heart of CEQA” and “the integrity of the process is dependent on the adequacy of the EIR.” (CEQA Guidelines², § 15003, subd. (a); *Laurel Heights Improvement Assn. v. Regents of University of Cal.* (1988) 47 Cal.3d 376, 392 (*Laurel Heights I*); *Berkeley Keep Jets Over the Bay Committee v. Bd. of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1355 (*Berkeley Keep Jets*)). An adequate EIR must be “prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences.” (*Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.4th 20, 26.)

As summarized herein, and as more specifically addressed in the attached letters prepared by expert technical consultants who have provided specialized analysis of certain areas of particular concern, the DEIR for the Project is so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comments is all but precluded. Accordingly, the DEIR must be revised and recirculated. (CEQA Guidelines, § 15088.5, subd. (a)(4); *Mountain Lion Coalition v. Fish & Game Com.* (1989) 214 Cal.App.3d 1043.)

I. The DEIR’s Project description is legally inadequate.

“An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.” (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192.) An accurate description of the project serves as the foundation for a complete and instructive EIR. (*Ibid.*) If the description does not clearly and accurately characterize the project, the environmental analysis will likely reflect the same mistake. (*Laurel Heights I, supra*, 47 Cal.3d 376.)

The DEIR characterizes the Project merely as a “modernization” of OAK “to accommodate the market-based passenger demand at industry standard levels.” (DEIR, pp. 2-9.)

² Cal. Code Regs., tit. 14, § 15000 et seq. (CEQA Guidelines)

Fundamental to the DEIR's analysis of Project impacts is the stated assumption that the forecasted passenger and freight activity will occur with or without the Project. (See, e.g., DEIR, pp. 2-6, 3.1-1, and 4-11.) This approach to the analysis is unsupported by substantial evidence, leads to inappropriate conclusions regarding impacts, mitigation measures and alternatives throughout the document, and ignores the growth inducing impacts associated with the Project.

Specifically, the Project proposes to add an entirely new terminal with up to 25 new aircraft gates. (DEIR, p. 2-17.) Increasing the number of gates and reconstructing and modernizing major portions of the airport will undoubtedly result in increased capacity, which will in turn induce growth in air travel, including increases in the number of flights that otherwise is infeasible given existing airport constraints. (See *Save the Plastic Bag Coalition v. City of Manhattan Beach* (2011) 52 Cal.4th 155, 175 [common sense is an important consideration at all levels of CEQA].) This fact is further demonstrated by one of the Project objectives to accommodate "larger aircraft" which, common sense dictates, includes the ability to accommodate more passengers.

What evidence does the Port have to support a finding that OAK, in its present existing condition, could accommodate the future passenger and cargo assumptions in the DEIR?

Other crucial components of the Project are also lacking in the DEIR's Project Description which is, we note, much less detailed than those prepared for similar airport modification and improvement projects in California. ³ The Project Description here, for example, includes inconsistent information regarding the amount of time construction will occur, where the phasing of construction is expected to overlap, and when, and how/when existing contamination will be remediated and clean fill imported to allow various components of the Project to move forward, among other omitted information. (See Attachment A.)

The DEIR must be revised and recirculated to fully analyze the Project's facilitation of future operational growth (passenger [MAP] and cargo) at OAK and the corresponding significant direct and indirect impacts which must be mitigated to the maximum extent feasible as required by CEQA. (See also, *Stophemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 18-19 [invalidating EIR because the project description was inconsistent and lacked site plans, cross-sections, building elevations, and illustrative massing]; *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 84-85 [project description that presented "such conflicting signals to decision makers and the public about the nature and scope of the activity being proposed...was fundamentally inadequate and misleading"].)

³ See Los Angeles World Airports (LAWA) Improvement Project DEIR at: <https://cloud1lawa.app.box.com/s/ntnwn50ld6ma3qvk4j00rmu7avtjco3h>; see also Burbank Replacement Terminal EIR at: <https://elevatebur.com/wp-content/uploads/2020/02/BUR-FEIR16-Volume1.pdf> incorporated herein by reference into the record of proceedings.

II. The DEIR’s Baseline Assumptions Lack Substantial Evidence.

The DEIR’s inadequate project description is compounded by its failure to provide an adequate baseline against which the Project’s impacts can be analyzed. An accurate baseline is vital to an adequate EIR and must be established before a project’s impacts can be assessed and mitigation measures be considered. (*County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 952; *Communities for a Better Environment, supra*, 184 Cal.App.4th at pp. 88-89.)

CEQA requires that an EIR describe the physical environmental conditions within the vicinity of a project as they exist at the time the notice of preparation (NOP) is published. (CEQA Guidelines, § 15125, subd. (a).) Alternatively, if existing conditions change or fluctuate over time, the EIR may define existing conditions by referencing historic conditions or considering those conditions over a range of time periods. (*Ibid.*; *San Joaquin Raptor Rescue Center, supra*, 149 Cal.App.4th at p. 658 [environmental conditions “may vary from year to year”], citing *Fairview Neighbors v. County of Ventura* (1999) 70 Cal.App.4th 238, 242-243 [established usage of property could be considered as part of environmental setting].) The proper baseline for analyzing environmental impacts is thus premised on “what [is] actually happening” with “realized physical conditions on the ground.” (*Citizens for East Shore Parks v. State Lands Commission* (2011) 202 Cal.App.4th 549, 558; *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 321 [project impacts must be measured against “the existing physical conditions in the affected area, that is, the ‘real conditions on the ground’”].)

The Port published the NOP for the DEIR on May 7, 2021. The NOP did not mention the Project’s baseline or the environmental setting that would be considered. The DEIR, however, defines the environmental setting based on airport operations that occurred in 2019. (See DEIR, p. 2-6 [section 2.3.4 “Airport Operations”].) The DEIR briefly notes that these “forecasts were adjusted by three years to account for the COVID-19 pandemic” (id. at p. 2-8), but fails to promulgate any substantial evidence that 2019 conditions are comparable to those occurring at the time the NOP was published or why, in the Port’s view, they more accurately reflect existing baseline conditions. (CEQA Guidelines, § 15125, subd. (a) [reliance on historical conditions must be supported by substantial evidence].)

In fact, the DEIR omits evidence of airport operations from years 2020 and 2021. As a result, there is no way for readers to accurately compare historic and existing conditions against the significance of the Project’s anticipated impacts. (*Save Our Peninsula Committee v. Monterey County Board of Supervisors* (2001) 87 Cal.App.4th 99, 120-122 [methodology used for baseline other than existing conditions must be based on reasoned analysis and substantial evidence to allow for public comment and response]; *County of Amador, supra*, 76 Cal.App.4th at pp. 955-956 [a reader should not have to “cobbl[e] together information included in and appended to the EIR” to calculate historic conditions and how they would be affected in the future].)

The DEIR also notes that 2019 aviation activity levels provide a “conservative analysis” that “overstat[e] the Proposed Project’s actual impacts.” (DEIR, p. 3.1-1.) But relying on a baseline that overly-assumes the “maximum” permitted operational levels is similarly not a realistic description of existing conditions and skews the analysis throughout the EIR. (SCAQMD, *supra*, 48 Cal.4th at p. 322.) By relying on hypothetical allowable conditions that fail to accurately account for historic conditions—i.e., by averaging airport demands from 2019, 2020, and 2021—the DEIR misleads the public and agency decisionmakers as to the reality of the Project’s impacts and subverts full consideration of actual impacts, “a result at direct odds with CEQA’s intent.” (Ibid.)

For these reasons, absent accurate and complete information about the Project’s baseline setting, “it cannot be found that the EIR adequately investigated and discussed the environmental impacts of the development project.” (*Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal.App.4th 74, 87; *CBE, supra*, 184 Cal.App.4th at p. 89 [“When an EIR omits relevant baseline environmental information, the agency cannot make an informed assessment of the project’s impacts” and “the EIR [will fail] its informational purpose under CEQA”].) The baseline conditions must be clarified and the analysis of the DEIR revised accordingly.

III. The DEIR fails to adequately describe, analyze, and mitigate the Project’s significant adverse environmental effects.

The purpose of an EIR is to provide “detail sufficient to enable those who did not participate in its preparation to understand and to consider meaningfully the issues raised by the proposed project.” (*Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1197.) CEQA requires that an EIR be detailed, complete, and reflect a good faith effort at full disclosure regarding a project’s significant environmental effects to inform the public and allow decisionmakers to make intelligent, informed decisions when considering whether to approve a proposed project. (CEQA Guidelines, § 15151.) Consistent with this requirement, the information regarding a project’s impacts must be “painstakingly ferreted out.” (*Environmental Planning and Info. Council of Western El Dorado County v. County of El Dorado* (1982) 131 Cal.App.3d 350, 357.)

The DEIR fails to substantiate many of the impact conclusions. (See Attachment A [Air Quality].) In other resource categories the document underestimates the Project’s potential impacts. Mitigation is also either entirely lacking or inadequate and deferred. Throughout the DEIR, impacts are described as beyond the control of the Port because the market demand for air travel will occur regardless of the Project and because the use of the airport is under the control of the FAA. Both of these assertions lack substantial evidence.

A. The DEIR fails to adequately analyze Project noise impacts.

In addition to the comments herein, the City submits the report prepared by Mr. John Freytag, PE, INCE Bd. Certified, an airport noise expert, which is included as Attachment B hereto.

Regarding aircraft noise, although noise contour maps show that there would be no residences within the 65 CNEL contour under future project-based conditions, the methodology does not account for single event/night-time noise, which results in sleep disturbance and interferes in the regular enjoyment of indoor and outdoor environments, not just at residences but also at other sensitive receptors such as schools, churches, and hotels. (DEIR, pp. 3.11-14 to 3.11-16.) Incredibly, this is the same methodology rejected by the First Appellate District in the published decision *Berkeley Keep Jets, supra*, 91 Cal.App.4th at pp. 1377-1383. In that case, to determine whether a previous expansion of OAK would have significant noise impacts, the EIR relied exclusively on a fixed standard of 65 CNEL. (*Id.* at p. 1373.) The court explained that use of the CNEL standard precluded “any meaningful analysis of existing ambient noise levels, the number of additional nighttime flights that will occur under the [project], the frequency of those flights, to what degree single overflights will create noise levels over and above the existing ambient noise level at a given location, and the community reaction to aircraft noise, including sleep disturbance.” (*Id.* at p. 1382.)

Using an average noise level calculated over the course of an average day from an average year inaccurately represents the true nature and extent of noise impacts of OAK. Aside from general annoyance, noise can cause sleep disturbance, interfere with conversation, and therefore cause impaired learning, cognitive function, social activity, and emotional distress. (See also Attachment B.) The DEIR notes these potential impacts in theory and fails to address them in any meaningful way by using average day noise.

The DEIR’s “informational” evaluation of the Project’s potential for sleep disturbance is buried in an appendix which is inadequate under CEQA. (DEIR, Appendix M; *Santa Clarita Organization for Planning the Environment v. County of Los Angeles* (2003) 106 Cal.App.4th 715, 722 [agency’s analysis must be contained in the EIR, not “scattered here and there in EIR appendices”].) Decisionmakers and the public should not be forced to sift through appendices in order to ferret out relevant information and analyses. (*San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App.4th 645, 659.)

Substantial evidence supports a conclusion that noise from overflights results in an adverse effect on residents of the surrounding communities. A number of residents expressed concerns about increased noise at the October 3, 2023, City Council meeting.⁴ (*Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, 733 [personal observations of noise impacts qualify as substantial evidence]; *Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872 [same].) The DEIR’s operational noise analysis must fully discuss the impacts from the frequency of overflights, single-event noise levels, the altitude of aircraft, the hours of operation, and impacts from low frequency noise, all of which are documented environmental impacts

⁴ A video recording of the City Council hearing on October 3, 2023, is included for the record of proceedings of this Project at: https://alameda.granicus.com/player/clip/3268?view_id=6&redirect=true&h=08793c1f5e04655ef58461b854c5aa9a

from the airport on surrounding communities. Other airport projects in California have completed similar analysis and, therefore, information is readily available for use in the noise impact analysis on residences, schools, businesses, hotels, and places of worship affected by the project.

The DEIR's analysis of construction noise analysis also suffers a panoply of defects.

- Environmental Setting. The DEIR discloses that there are six noise-sensitive land uses, including transient lodging/hotels, yet fails to describe where in relationship to the Project those sensitive receptors are located. (See DEIR, pp. 3.11-19 [Table 3.11-8], 3.11-18 [Figure 3.11-3 lacks the location of transient lodging/hotels]; *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 729 [“without accurate and complete information pertaining to the setting of the project and surrounding uses, it cannot be found that the [EIR] adequately investigated and discussed the environmental impacts of [a] development project”]; see *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310, 315 [the significance of a project's impacts can only be ascertained if the DEIR accurately describes the existing physical conditions from which those impacts are measured].)
- On-Site Construction. The DEIR concludes that noise from on-site construction will be less than significant with mitigation. (DEIR, p. 3.11-20.) Substantial evidence fails to support such a conclusion. The Project includes nearly 40 discrete components involving demolition of existing and construction of new structures across the 2,600-acre Project site. (DEIR, pp. 2-1, 2-25 to 2-26 [Table 2-5].) Yet, the DEIR's analysis lacks basic information about the types of construction equipment to be used, the common sound levels associated with the use of such equipment, the location on the Project site where the various equipment types would be used throughout the five-year construction period, and the location of construction activity in relationship to noise-sensitive receptors. (See DEIR, pp. 3.11-19 to 3.11-20.)

The DEIR also discloses that nighttime construction may be required in certain instances but fails to analyze those impacts. (See *Laurel Heights I, supra*, 47 Cal.3d at p. 399 [CEQA requires a good faith effort “to provide meaningful information regarding the types of activity and environmental effects that are reasonably foreseeable”].)

- Mitigation. The proposed mitigation which requires adjustment to construction sequencing and use of quiet-design equipment *where feasible*, is inadequate. (DEIR, p. 3.11-20; see *Golden Door Properties, LLC v. County of San Diego* (2020) 50 Cal.App.5th 467, 520-524 [mitigation inadequate for failure to include an objective standard of feasibility].) Such tepid language begs the question of whether the mitigation could be implemented or enforced at all—and does not

support the conclusion that its implementation would “effectively reduce the effects of construction noise on sensitive receptors to less than a 5-dBA CNEL increase.” (*Ibid.*; CEQA Guidelines, § 15126.4, subd. (a)(2) [mitigation measures must be fully enforceable].) The inadequacy of the proposed mitigation is further underscored by the fact that a 5-dBA CNEL increase is not even the identified significance threshold for construction noise impacts. (DEIR, p. 3.11-12 [a significant impact occurs if noise from on-site construction exceeds the City of Oakland construction noise limits].) Adding insult to injury, the DEIR offers a vague statement that “[a]dditional or different measures are available and if necessary ... to ensure the threshold is not exceeded,” but leaves the public and decisionmakers in the dark about what those additional or different measures may be. (*King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 869 [failure to disclose specific information about mitigation measures is a violation of CEQA]. Failure to identify specific mitigation measures also runs afoul of CEQA’s prohibition against deferral of mitigation. (CEQA Guidelines, § 15126.4, subd. (a)(1)(B) [“formulation of mitigation measures should not be deferred until some future time”].)

- Off-Site Construction. The DEIR offers nothing more than a conclusory statement that “[o]ff-site construction noise is not anticipated to result in an increase of 5 dB or greater since project construction traffic would not result in a significant increase on area roadways.” (DEIR, p. 3.11-20.) The Project involves demolition of nearly 450,000 square feet of existing structures over the course of five years (DEIR, pp. 2-10 to 2-16), and yet the DEIR remarkably neglects any discussion or analysis regarding the number of haul truck trips that would be needed to transport construction waste and debris. Instead, the DEIR makes the unsupported statement that off-site construction traffic would not double existing traffic. (See *Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 569 [EIR must contain facts and analysis, not just an agency’s bare conclusion].)
- Cumulative Impacts. The DEIR fails to evaluate the cumulative impacts of construction noise and aircraft operations. The DEIR provides no indication that OAK will cease operations during the five-year construction period. Accordingly, the cumulative impact of construction noise plus aircraft operations must be analyzed.

Finally, the DEIR lacks any information about the use of the North Field. As demonstrated during runway maintenance at the South Field between 9/22/2023 – 9/25/2023, North Field use often comes on short notice and for extended periods of time. During implementation of this Project, impacts would be extensive on surrounding communities. Noise contours from the South Field, when transposed onto the North Field, would extend well into residential neighborhoods. Furthermore, although the DEIR states that no changes are proposed to the South Field runways, terminal construction is likely to require or at least encourage diversions of passenger and freight air traffic to the North

Field. Although it may be outside of the direct control of the Port, this activity is foreseeable and should be identified and analyzed in the DEIR as a potential impact, and feasible mitigation measures should be provided.

B. The DEIR fails to adequately analyze air quality and GHG impacts.

In the areas of operational air quality impacts, greenhouse gas (GHG) emissions, and human health risks, the DEIR omits critical information and presents confusing data. The City supplements the detailed expert comments in Attachment A, regarding the inadequacies of the DEIR’s air quality, GHG and health risk impacts, with the following comments.

Most troubling, the DEIR includes only alleged “answers”. Emission calculations are not included. There is no explanation (i.e., no math shown) as to how operational criteria pollutant, GHG and toxic air contaminant (TAC) emission calculations were derived. No backup documentation, equipment assumptions, aircraft exhaust information, emission factors or methodology is included, thereby rendering meaningful third-party review virtually impossible. As a result, the document fails to adequately disclose to the public and decision-makers potential impacts associated with air pollution exposure. (See *Laurel Heights I, supra*, 47 Cal.3d at pp. 404-405 [“Conclusory comments in support of environmental conclusions are generally inappropriate” . . . “there must be a disclosure of the analytic route the agency traveled from evidence to action” . . . “[t]o facilitate CEQA’s informational role, the EIR must contain facts and analysis, not just the agency’s bare conclusions or opinions”].)

While the document indicates significant adverse impacts from operational volatile organic compounds (VOCs), oxides of nitrogen (NOx), GHGs, and chronic health effects, no air quality mitigation measures are proposed to avoid or reduce such impacts. CEQA requires more. (*Cleveland National Forest Foundation v. San Diego Assn. of Governments* (2017) 17 Cal.App.5th 413, 432-434 [“The core of an EIR is the mitigation” section; CEQA requires agencies “to adopt feasible mitigation measures to substantially lessen or avoid otherwise significant adverse environmental impacts”])

The document also omits calculations of TAC emissions expected to result from the Project. Such emissions would form the basis of a human health risk assessment. As a result, it is unclear how the analysis presented in the DEIR could have been conducted. Risk results that are presented are based on unrealistic and unsubstantiated claims that despite significant increases in passenger, cargo, and aircraft operations, toxic emissions will decrease in the future to below current levels. The Port of Oakland, therefore, contends that after significantly expanding OAK’s operations, residences would experience a health “benefit” in the form of reduced calculated cancer cases.

It is highly unlikely that not a single construction task on a project of this magnitude would result in any significant emissions. (See Attachment A.)

We note that the air quality measurement stations for existing conditions are located in Oakland, some distance from the airport and not reflective of the communities that are most directly affected. Impact assessment should be based on more precise and meaningful analysis. In particular, an assessment of the gross emissions is not the same as addressing the concentrations and dispersion of emissions into the community.

Instead of volunteering a suite of mitigation measures to reduce this impact, the DEIR identifies existing electrification programs as the only step to be taken at the new terminal. Nominally, the Port needs to be committed to a permanent shift to unleaded fuels, use of Tier 4 off-road construction equipment, TDM measures for employees and passengers, emissions free transportation to and from satellite parking, and other electrification or decarbonization commitments by the Port, which could potentially mitigate direct and indirect impacts of the Project. Emission calculations (and all associated inputs, assumptions, modeling, etc.) should be included in a revised DEIR and recirculated for public review and comment.

The City directs the Port to the following Mitigation Monitoring and Reporting Program (MMRP) for the LAX Airfield and Terminal Modernization Project for which detailed mitigation measures were included under CEQA, available at:

<https://cloud1lawa.app.box.com/s/7e0sjr5t6hd9abn2frxbr5qohdvs6r3n>

The City also directs the Port to the Eagle Rock Aggregates Oakland Terminal Project 2021 for comprehensive mitigation measures adopted to address construction and air quality related impacts, available at:

https://www.portofoakland.com/files/PDF/PortOak_ERA_FSEIR_Vol.1_SEIR_Nov2021_ADA.pdf

The DEIR must be revised and recirculated to include detailed mitigation measures and how implementation of those measures may avoid or reduce significant impacts of the Project, quantified to the extent feasible.

C. The DEIR fails to adequately analyze transportation impacts.

The City supplements the expert comments included as Attachment C with the following additional comments.

The Alameda 2040 General Plan includes a Mobility Element with programs to reduce vehicular travel to improve the environmental impacts, safety and convenience of an equitable multimodal transportation system. The DEIR does not address conformance with any of the policies and actions contained therein. Furthermore, the assessment minimizes the effects of the project on Alameda roadways, residents and visitors, particularly related to the proposed Maitland parking lot. Aside from traffic impacts, the DEIR must evaluate noise, light/glare, and air quality impacts of that location and consider alternatives.

Knowing that the Port does not directly influence the air travel patterns of the region and beyond, the City understands that there are still certain ways the Port influences the supply and demand including the way in which the facility accommodates tenants and encourages or discourages certain actions by pilots specifically and airlines generally.

D. The DEIR fails to adequately analyze impacts to safety.

Safety of the community is addressed in passing on page 3.8-24 of the DEIR. The City has adopted the Health and Safety Element as part of the Alameda General Plan 2040 (https://irp.cdn-website.com/f1731050/files/uploaded/AGP_Book_June2022_Amend-1.pdf, p. 82.). The Health and Safety Element includes an overriding objective to “[p]rotect Alameda residents from the harmful effects of exposure to excessive noise from aircraft, buses, boats, trucks and automobiles, and adjacent land uses.” (Health and Safety Element, p. 136.) The objective is followed by numerous policies and actions, many of which address aircraft noise, as well as safety and air quality impacts. These should be noted in the DEIR and addressed as criteria in the Land Use and Planning chapter and other chapters that address impacts to the City in light of the designated Airport Area of Influence (see Figure 7.4 of the Element). The DEIR also fails to include any reference to the safety standards cited in the Alameda County’s Airport Land Use Plan or Airport Land Use Commission’s regulations.

IV. The DEIR’s alternatives analysis is deficient.

CEQA requires an EIR to “describe a range of reasonable alternatives to the project ... which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects ... and evaluate the comparative merits of the alternatives.” (CEQA Guidelines, §§ 15126.6, subd. (a), 15002, subd. (a)(3).) The DEIR, however, fails to meet this fundamental requirement.

The DEIR analysis of alternatives is inadequate, as it is misguided and conclusory. The DEIR narrows the alternatives discussion to the No Project Alternative as the only feasible option, and then determines that this option, while environmentally superior, is unable to meet any of the project objectives and therefore should be rejected as well. In fact, there are several alternatives that could and should be considered. We believe many of the goals of the Project could be achieved without expansion and should be explored further in the Port’s planning and environmental analysis. If there are financial or other reasons why such an alternative would be infeasible, this should be disclosed as part of the decision-making process, but it should not completely preclude discussion of the alternatives in the DEIR.

A. The DEIR fails to analyze an adequate range of Project alternatives.

The DEIR provides a “three-factor” framework for evaluating eight alternatives to the Project, including the No Project Alternative and the Project itself. (DEIR, pp. 4-1–4-4.) Based on these factors, the DEIR screens from further analysis six project alternatives and ultimately selects the “No Project Alternative” as the only feasible option, but then

determines that, while environmentally superior, the option is unable to meet any of the Project's objectives. In turn, the DEIR does not consider or analyze *any other alternatives to the Project*. This violates CEQA.

The DEIR's "alternatives screening criteria," which incorporate the Project's objectives, are too narrowly defined to allow adequate and meaningful consideration of a reasonable range of alternatives. (See *North Coast Rivers Alliance v. Kawamura* (2015) 243 Cal.App.4th 647, 688 [project objectives cannot be artificially narrow or so restrictively construed that they preclude meaningful consideration of alternatives].) The DEIR finds that all proposed alternatives do not meet most of the Project objectives, and, in turn, fails to analyze *any* of those alternatives in meaningful detail. The specificity of each criterion, however, improperly renders any feasible alternative impossible. (*Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1089 (Watsonville), original emphasis ["The purpose of an EIR is not to identify alleged alternatives that meet few if any of the project's objectives so that these alleged alternatives may be readily eliminated"].) Rather, "[m]eaningful analysis of alternatives in an EIR requires an analysis of meaningful alternatives." (*Save Our Capitol! v. Dept. of General Services* (2023) 87 Cal.App.5th 655, 705.)

For example, the DEIR rejects both "Environmental Avoidance Alternatives"—i.e., the "Retain Terminal 1 Ticketing and Baggage Claim Building (M101)" and the "Use of Hardstands with No New Terminal" alternatives—even though each alternative would avoid impacts to historic resources and have substantially similar or less significant impacts to air quality, GHG, special-status species, and wetland impacts. (DEIR, pp. 4-8–4-9.) The DEIR nevertheless screens them from further consideration by reasoning that neither alternative would meet the Project's objectives or would be reasonable in terms of constructability, cost, level of service, and operational functionality. (*Ibid.*) But constructability and cost, alone, are insufficient to completely forego thoughtful consideration of alternatives that would otherwise reduce or avoid significant *environmental* impacts. (See *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1354 ["A potential alternative should not be excluded from consideration merely because it 'would impede to some degree the attainment of the project objectives, or would be more costly'"]; *Uphold Our Heritage v. Town of Woodside* (2007) 147 Cal.App.4th 587, 598–603 [substantial evidence did not support town's conclusion that alternatives to demolishing historic residence were legally and economically infeasible].) Nor should increases in passenger travel times and terminal congestion outweigh consideration of alternatives that would otherwise avoid significant environmental impacts. (DEIR, p. 4-9; *ibid.*)

The DEIR's rationale for screening other alternatives from consideration is similarly thin. While an EIR need not analyze alternatives that are infeasible, "the actual infeasibility of a potential alternative does not preclude the inclusion of that alternative among the reasonable range of alternatives." (*Watsonville, supra*, 183 Cal.App.4th at p. 1087.) This is because "[i]t is virtually a given that the alternatives to a project will not attain all of the

project’s objectives.” (*Ibid.*) Nevertheless, the DEIR only provides half-page summaries to ultimately conclude that not a single one of the proffered alternatives could be further analyzed. (See DEIR, pp. 4-4–4-10.) These summaries, which “may be accurately described as ‘cursory at best,’” fail to provide any substantial evidence as to why each alternative is inherently infeasible. (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 738.) For example, the summaries do not specify which Project Objectives will not be satisfied and make sweeping assumptions without any supportive evidence about potential impacts. (E.g., DEIR, p. 4-8 [explaining “high costs” or “unlikely” that agencies would authorize certain requisite permits].)

As a result, this discussion of an artificially narrow range of alternatives omits relevant and crucial information, thereby subverting the purposes of CEQA and rendering the DEIR legally inadequate. (*Id.* at pp. 738–739; *Laurel Heights I, supra*, 47 Cal.3d at pp. 404–405 [“Those alternatives and the reasons they were rejected...must be discussed in the EIR in sufficient detail to enable meaningful participation and criticism by the public”].)

B. The DEIR fails to analyze an environmentally superior alternative.

The DEIR also fails to analyze an “environmentally superior alternative.” Though the DEIR concludes that “[t]he environmentally superior alternative is the No Project Alternative,” it correctly recognizes that “the EIR *shall* also identify an environmentally superior alternative among the other alternatives.” (DEIR, Ch. 4, Alternatives at p. 4-14; CEQA Guidelines, § 15126.6, subd. (e)(2).) Confusingly, however, the DEIR merely selects *the proposed Project* as the environmentally superior alternative. (DEIR, p. 4-14.) This approach is counterintuitive—the Project cannot be an alternative to itself, much less one that is “environmentally superior.” (*Laurel Heights I, supra*, 47 Cal.3d at p. 403; CEQA Guidelines, § 15126.6, subd. (e)(2).)

By selecting the Project as the environmentally superior alternative, the DEIR overlooks two alternatives that would, in fact, be environmentally superior. The DEIR concedes that the Project will have significant and unavoidable impacts to a historic resource by destroying Terminal 1. As such, the EIR “must consider and discuss feasible alternatives that would avoid or lessen any significant adverse environmental impact” to historic resources. (*Los Angeles Conservancy v. City of West Hollywood* (2017) 18 Cal.App.5th 1031, 1038; Pub. Resources Code, § 21084.1.)

The “Retain Terminal 1” and the “Use of Hardstands” Alternatives would avoid the proposed Project’s impacts to historic resources by preserving Terminal 1. The DEIR concedes: “With respect to Factor 3 Screening criteria, this alternative would have similar air quality, GHG emissions, special-status species, and wetlands impacts as the Proposed Project. However, this alternative would avoid significant impacts to historic resources.” (DEIR, p. 4-9.) For the “Use of Hardstands” Alternative, the DEIR similarly concludes: “With respect to Factor 3 Screening criteria, this alternative would not have the historic resource impacts, beyond retrofitting to meet current seismic and fire code standards, described for the Proposed Project but would have similar air quality and GHG

emissions impacts as the Proposed Project.” (DEIR, p. 4-9.) But instead of selecting these Alternatives and analyzing them in further detail so that the public can “reach an intelligent decision as to the environmental consequences and relative merits of the available alternatives to the proposed project,” the DEIR summarily rejects them by simply stating they would not meet all of the Project’s objectives. (*Laurel Heights I, supra*, 47 Cal.3d at p. 404; DEIR, pp. 4-8–4-9.) As a result, the DEIR provides no information to the public that would enable it to understand, evaluate, and respond to the bare assertion that “a retrofit and expansion cannot be accomplished in a manner that would both support operations and maintain [Terminal 1’s] attributes as a historic resource,” and thus “would not avoid a significant impact to historic resources.” (DEIR, p. 4-8.)

For these reasons, the DEIR’s premature exclusion of these alternatives violates CEQA because “[e]nvironmentally superior alternatives *must be examined* whether or not they would impede to some degree the attainment of project objectives.” (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 650, 738, emphasis added.)

C. The DEIR must be recirculated with a revised alternatives analysis meeting the requirements of CEQA.

The absence of an alternatives analysis renders the DEIR legally inadequate. While it is not the responsibility of the reviewers such as City staff and elected officials to become airport planners before commenting on these aspects of the EIR and the Project, in order to provide informed comments, the City encourages the Port to recirculate the DEIR with a revised alternatives analysis.

At a minimum, the revised analysis should thoroughly consider the “Retain Terminal 1” or “Use of Hardstands” Alternatives, as they will avoid the Project’s significant impacts to historic resources. The analysis should also provide substantial evidence as to whether and how each Alternative can reduce or avoid the Project’s significant impacts to noise, air quality, greenhouse gas emissions, and transportation so that the public can adequately understand how a project of this scale will impact nearby residents, including those residing in Alameda.

There are also several other alternatives to the Project that could and should be considered. We believe many of the goals of the Project could be achieved without an increase in gates and should be explored further in the Port’s planning and environmental analysis. For example, a subset of Project features could be selected for implementation, focused on terminal modernization, to improve the service characteristics of the airport without generating the impacts of the increased travel volume of the Project. Alternatively, if there are financial or other reasons such an alternative would be infeasible, this should be disclosed as part of the decisionmaking process, but it should not completely preclude discussion of the alternatives in the EIR. (See *Uphold Our Heritage, supra*, 147 Cal.App.4th at pp. 602–603.)

The City therefore implores the Port to redraft the DEIR’s alternatives analysis and meaningfully consider, at the very least, the “environmental avoidance alternatives” that it prematurely rejected so that informed decisionmaking can be fostered. In the same vein, the DEIR should also consider a “Reduced Project Alternative” that improves modernization and service characteristics without generating increased travel and the ensuing adverse environmental effects. (See *Watsonville, supra*, 183 Cal.App.4th at pp. 1087–1088.) Otherwise, the absence of *any* alternatives analysis renders the DEIR legally deficient under CEQA. (*Habitat & Watershed Caretakers v. City of Santa Cruz* (2013) 213 Cal.App.4th 1277, 1304–1305 [an EIR that “fail[s] to mention, discuss, or analyze any feasible alternatives...fail[s] to satisfy the informational purpose of CEQA”].)

V. Settlement Agreements

The City and Port have entered into various settlement agreements and monitoring programs related to community noise and other impacts of OAK over the years. The City and community (CLASS) believe those agreements warrant amendment based on the passage of time and the scope of the Project and overall airport operations. Such amendments can only be accomplished after a full and accurate accounting is made of the Project’s impacts, mitigation measures and alternatives. At this time, the City believes the DEIR to be inadequate for this purpose, especially in light of its failure to acknowledge the existence of the settlement agreements and the parties’ collaborative efforts on the Airport Noise Program.

OAK is currently operating under programs that resulted from prior settlement agreements, entered into over 20 years ago. Although those agreements may warrant revisiting, the City seeks confirmation that the Port remains committed to continuing the Airport Noise Program and ongoing stakeholder outreach, as well as advocating on behalf of the airport communities with the Federal Aviation Administration to address noise concerns. The City also requests that the Port provide a forum to meet with community stakeholders to discuss the Project’s direct and indirect impacts and ways in which the Port plans to mitigate those impacts before certifying the EIR.

VI. Conclusions

The City appreciates the opportunity to submit its comment letter on this important project, and respectfully requests that the Port provide detailed responses to the issues raised in this comment letter. The City requests that the inadequacies of the DEIR be corrected, that a revised DEIR be recirculated, and that the Port be inclusive in the public process and allow reasonable time for the public to weigh in on this complex subject matter.

We look forward to collaborating with the Port to ensure that community concerns about the Project are fully addressed.

Please contact Allen Tai at atai@alamedaca.gov with any questions or if you would like to set up a meeting to discuss the City’s concerns. Please also provide Mr. Tai with copies

Draft Subject to Change – 10/13/23

of all future public notices issued for the Project, including all notices issued pursuant to CEQA and the Ralph M. Brown Act.

Sincerely,

Jennifer Ott
City Manager

Cc: Honorable Mayor Marilyn Ezzy Ashcraft and Alameda City Councilmembers
Andrea K. Leisy Esq., Remy Moose Manley, LLP

Encl.

Attachment A: Letter from Erin Sheehy, Environmental Compliance Solutions
Attachment B: Letter from John C. Freytag, P.E., Freytag & Assoc. LLC
Attachment C: Memo from Allen Tai, City of Alameda
Attachment D: Public Comment Letters on Project

ATTACHMENT A



October 13, 2023

Ms. Jennifer Ott
City Manager
City of Alameda
2263 Santa Clara Avenue
Alameda, CA 94501

SUBJECT: OAKLAND INTERNATIONAL AIRPORT (OAK) TERMINAL
MODERNIZATION AND DEVELOPMENT
PROJECT DRAFT EIR (SCH#: 2021050164)

Dear Ms. Ott:

Environmental Compliance Solutions, Inc. (ECS) has reviewed the aforementioned Draft Environmental Impact Report (DEIR) and provides the following comments. Our review focuses specifically on the Air Quality, Greenhouse Gas and Human Health Risk Assessment sections.

ECS was established in 1995. We specialize in preparing air quality analyses, air dispersion modeling, health risk assessments and greenhouse gas inventories for compliance with California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) in various environmental documents (including for airport projects). ECS has prepared air quality sections of documents for numerous projects on behalf of Los Angeles World Airports (LAWA) as well as San Diego International Airport. We have also provided third-party technical review for airport and other complex industrial CEQA/NEPA documents.

Attached to this letter are the professional qualifications for myself and my associate who assisted with this review.

I. General Observations on DEIR Inadequacies

In the areas of construction air quality impacts, operational air quality impacts, greenhouse gas (GHG) emissions, and human health risks, the DEIR omits important information and presents confusing data. The document includes only alleged “answers.” Emission calculations are not included in a technical appendices or elsewhere for the public to review. There is no explanation as to how construction

criteria pollutants, operational criteria pollutants, GHG and toxic air contaminant (TAC) emission calculations were derived. No backup documentation, equipment assumptions, aircraft assumptions, inputs, emission factors or methodology is included; thereby rendering meaningful third-party review impossible. As a result, the document fails to adequately disclose to the public and decision-makers potential impacts associated with air pollution exposure as required by CEQA.

While the document indicates significant adverse impacts from operational reactive organic gases (ROG), oxides of nitrogen (NOx), GHGs, and chronic health effects, no mitigation measures are proposed to avoid or substantially lessen these significant impacts.

The document does not include, for example, calculations of toxic air contaminant (TAC) emissions expected to result from the project. Such emissions would form the basis of a human health risk assessment (HHRA); so, it is unclear how the analysis presented herein could have been conducted. Risk results are based on unrealistic and unsubstantiated claims that despite significant increases in passenger, cargo, and aircraft operations, toxic emissions will *decrease* in the future to below current levels. The Port of Oakland contends that, upon after significantly expanding Oakland Airport's operations, residences would experience a health "benefit" in the form of reduced calculated cancer cases despite an additional 11 million annual passengers (MAP) and more than 240,000 tons of additional cargo.

No evidence to support any of the air quality analyses has been included. Emission calculations (and all associated inputs, assumptions, modeling, etc.) should be included in a revised DEIR, which should be recirculated for public review and comment.

Appendix E, entitled *Human Health Risk Assessment* does not include any emission calculations. TACs are simply listed by concentration rates with no explanation as to how the emissions were calculated or which sources result in which emission types.

The basis for the Notice of Preparation's dismissal of the potential Odor impacts from this significant airport expansion project is also entirely lacking in any explanation. Direct and indirect odors from construction emissions and increased operations will occur and should be analyzed.

II. No Mitigation Measures Proposed

Despite identifying significant air quality and human health impacts, no air quality-related mitigation measures are proposed as part of the DEIR or as project features.

Mitigation measures must be incorporated wherever feasible to reduce significant adverse impacts.

To state that there are no feasible mitigation measures is false. Further, the statement about electrification of infrastructure is in no way presented as a committed mitigation measure nor is it clear whether or not credit was already taken for this potential future measure.

We recommend that the Port review the Mitigation Monitoring and Reporting Plans (MMRPs) adopted as part of the EIR's prepared and certified by other jurisdictions for similar large airport projects, including for measures to ensure the protection of public health.

Specifically, the DEIR states the following:

“The majority of ROG and NOX emissions result from aircraft operations, which the Port does not have the authority to regulate. The Port has provided electrical infrastructure throughout the terminals and cargo areas for use by commercial and cargo airlines and would install this electrical infrastructure in the new terminal and relocated cargo area.” This is NOT a mitigation measure. [page 3.3-29]

Page 3.3-27 states, “In addition to the BAAQMD basic Best Management Practices (BMPs) for construction-related fugitive dust emissions, the Port also would implement, *to the extent feasible and applicable*, the following enhanced BMPs for construction-related fugitive dust emissions...” These caveats imply that there is no guarantee or assurance that these measures will be implemented and therefore render the measures unenforceable. Further, BMPs are not true mitigation measures because they are not discretionary or adopted by a decisionmaking body as a matter of policy. It is also unclear from the DEIR whether emission reduction credits were taken for abovementioned BMPs.

The document also finds that GHG emissions will result in significant adverse environmental impacts, yet no mitigation measures are offered as required under CEQA. For GHG Impacts, the only “mitigation measure” proposed is essentially the same, “the majority of the Proposed Project’s GHG emission increases would result from market-based demand and related aircraft emissions and the Port does not have the authority to mitigate air pollutant emissions associated with aircraft operations.”

Again, as mentioned above, this is not a mitigation measure.

Human health impacts to airport workers is found to be significant, yet no mitigation is proposed.

III. Inaccurate Air Quality Baseline

The DEIR states on multiple occasions the following, “To provide a conservative analysis, the Port has elected in this DEIR to compare the aviation activity-based impacts of the Proposed Project in 2028 and 2038 to the 2019 OAK aviation activity level conditions, thus overstating the Proposed Project’s actual impacts.” (DEIR, page 3.3-32, 3.11-15, etc.) The use of the 2019 activity level is neither the most recent data available nor is it overstating emissions. There is no back-up data for years 2020, 2021 or even 2022 to verify that 2019 is in any way an overestimation.

The Notice of Preparation (NOP) itself was not released until mid-2021; therefore, there was no reason to use 2019 in the Draft EIR. Further, since the NOP was so woefully inadequate, there was no disclosure of the baseline year under air quality or any other impact area to indicate that this was the study year.

The choice of 2019 as the baseline year was a strategic choice that does the opposite of overstating emissions. Had the Port chosen 2020 or 2021, one has to assume that the baseline would have been lower; thereby more accurately illustrating project-related emission increases. This assumption is not verified since baseline levels for those years were not presented. The document should be revised and recirculated using more updated baseline data.

State CEQA Guidelines Section 15088.5b(a)(4) - Recirculation of an EIR prior to Certification, states the following; “The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.” This DEIR contains air quality conclusions with no supporting evidence to verify them; therefore, the document must be revised and recirculated.

IV. Operational Emission Impacts

No operational emission calculations are included in this document. Our comments are based on the results (i.e., “answers” and “conclusions”) provided herein.

Table 2-1 - Forecast Summary for Oakland, indicates that 2019 MAP was 13.4. This number increases to 24.7 MAP in 2038. The table also indicates that passenger airline activity increases by approximately 68,000 without taking cargo aircraft into consideration. Cargo is expected to increase from 642,405 tons to 884,087 tons by 2038. Aircraft operations are forecast to increase from 242,757 to 323,501.

With this in mind, it is literally impossible to reach the emission levels disclosed in this section. For example, Table 3.3-11 - Net Change in 2028 and Existing Operational Emissions Estimates Compared to BAAQMD’s Threshold of Significance. There is no pending or currently available zero-emission technology that could accommodate this activity increase while actually reducing emissions; let alone result in project emission

benefits as the table indicates. Renewable fuel sources that may be available in the future certainly cannot bring emissions down to these levels; particularly jet fuel combustion which would never be expected to be zero emissions.

Table 3.3-9 indicates that carbon dioxide (CO) and NO_x emissions are virtually identical in 2028 (1,070 and 1,037 tons per year respectively). Fifty percent of CO and approximately 92 percent of NO_x results from aircraft exhaust. Yet by 2038, the proposed project shows substantial increases in NO_x of 3,061 pounds per day (or 1,117,265 pounds per year) and an inexplicable *decrease* in CO. [cf. DEIR Tables 3.3-10 and 3.3-12.]

How is this possible since both are byproducts of fuel combustion? PM₁₀ (another exhaust pollutant increases from 2019 to 2038 by only 27 pounds per day. This makes no sense and is not supported by any substantial evidence in the EIR. [Page 3.3-31, Table 3.3-12]

Eliminating CO emissions as an impact further eliminates any potential need for CO Hotspots Analysis Modeling as required by BAAQMD's 2017 CEQA Guidance document [Section 6.0]

This analysis is lacking any validity while presenting implausible and misleading results. Any increases in operational air emissions should be properly analyzed in the DEIR and reflected in a project human health risk assessment (HHRA), discussed in detail below.

Page 3-3.16 – 19 outlines numerous air quality models and programs said to have been used to calculate emissions from this project. It appears to be a blueprint for how emissions from airports should be estimated. However, the document does not include any of these calculations.

Table 3.3-6- Aircraft, Ground Service Equipment, Ground Access Vehicles and Stationary Source Emissions (Tons per year), provides an alleged emissions total from various airport categories for 2019 without providing any back up as to how those calculations were derived. For the adequacy of the document to be evaluated, all work must be shown. Understanding 2019 (or 2020 baseline – see Baseline discussion below) emissions are critical to then making the determination of potential impacts from the full project as compared with baseline activities.

The Proposed Project includes modernizing Terminals 1 and 2, consolidating passenger processing functions (e.g., ticketing, baggage check-in, baggage claim, security screening), constructing expanded international arrival facilities, constructing a new terminal, relocating existing cargo and support facilities, and improving the terminal area roadway, parking areas, and support facilities. [page 2-10]

Extensive demolition and construction activities are expected to occur over a five or six-year period. The DEIR is inconsistent in its project description regarding the construction timeframe which is critical as construction emissions would potentially contribute to adverse health impacts to sensitive receptors in the vicinity of the Project, including the large new proposed parking lot. This is one of several flaws in the project description which infects the analysis of potential impacts. Fourteen sections of the airport will be demolished and rebuilt, including both passenger terminals a new, third passenger terminal will be constructed. The maximum timeframe for construction related activities must be identified and the air, GHG and noise related impacts quantified and mitigated.

Air quality impacts are analyzed as if the flights were part of the Project (impacts are determined significant and unavoidable, and beyond the ability of the Port to mitigate). This indicates that the activity is part of the Project and should be evaluated as such, with appropriate mitigation, rather than improperly segmented as it appears. Additional flights would be required to carry approximately 11 million more people and more than 240,000 tons of cargo. But for the Project, would OAK be able to accommodate the future forecasted MAP and cargo flights?

There are numerous BAAQMD, California Air Resources Board (CARB), and Environmental Protection Agency (EPA) rules and regulations that apply to both operation and construction of this proposed project. For example, BAAQMD has responsibility for regulating and permitting stationary sources and assuring that State and Federal controls on mobile sources are implemented. Potentially applicable BAAQMD Regulations include, but are not limited to:

- Regulation 2 – New Source Review (NSR)
- Rule 2-2-202 Best Available Control Technology (BACT)
- Rule 2-2-212: Cumulative Increase
- Rule 2-2-221: Offsets
- Regulation 6 – Particulate Matter
- Rule 6-1-301: Ringlemann No. 1 Limitation
- Rule 6-1-310: Total Suspended Particulate Concentration Limits
- Rule 6-1-311: Total Suspended Particulate Weight Limits
- Rule 6-6-301: Prohibition of Trackout onto Paved Roadways

Any and all applicable rules, regulations, policies, plans, requirements etc. should be enumerated and presented in a revised and recirculated DEIR.

V. Construction Impacts

Appendix F to the DEIR includes numerous confusing and unsubstantiated CalEEMod construction analysis runs. CalEEMod appears to have been used to calculate construction impacts. It further appears as though all tasks were analyzed separately (i.e., not concurrently) which is improbable given there will be overlapping construction, demolition and ongoing airport flight operations for which the direct and cumulative air and GHG emissions must be identified.

The summary stating that not a single construction task or combination of tasks exceeds BAAQMD's conservative CEQA Threshold of Significance is not plausible.

To attempt to illustrate the gross underestimation of construction-related emissions, please see the Final Negative Declaration for the U.S. Navy Commissary Demolition certified for the Port of Los Angeles (Port of Los Angeles, 2014)

[https://kentic.portoflosangeles.org/getmedia/e050ffb1-02f4-46ae-a270-248a0b09f51d/Initial_Study_Negative_Declaration]

The project involved demolition of approximately 78,000 square feet. Calculated construction emissions were as follows:

Oxides of Nitrogen - 93.8 pounds/day

Volatile Organic Compounds - 9.2 pounds per day

PM10 and PM2.5 - 25.2 pounds per day.

For purposes of comparison, one task highlighted in Table 3.3-7 is to Demolish OMC Hangar and Related Structures and Remove Associated Parking, which totals 252,000 square feet. This demolition is more than three times the size as what was evaluated by the Port of Los Angeles. Even taking into account updates to the CalEEMod model, this task would easily exceed the BAAQMD's significant thresholds by itself.

However, the document indicates that the busiest day of construction *ever* for the OAK modernization results in less than 2 pounds of PM10.

This is further contradicted by the fact that page 794 of the 888 pdf for Appendix F – Air Quality shows PM10d (daily) as 4.17 pounds from one specific task. Again, the results table indicates that no construction day ever exceeds 1.9 pounds of PM10. While emission days may have been averaged, it seems mathematically impossible to have arrived at an “averaged” day of less than two pounds of emissions with so many significant construction tasks occurring as all other tasks would have had to result in zero emissions.

Further taking into account that the Draft EIR itself discloses ten other construction tasks occurring at the same time, it is unfathomable that the foreseeable emissions from these activities are being identified and honestly presented as required by CEQA. Rather, air and GHG emissions appear to have been significantly underreported in this document, which is misleading and disingenuous.

Construction Staging

Construction emissions are presented with overlapping construction and operational emissions beginning in 2028. This begs the question why overlapping emissions weren't disclosed from project year one, which is 2025 when construction is anticipated to begin. The Draft EIR therefore grossly understates the cumulative impacts for three years.

Table 3.3-7 - Proposed Construction Component Anticipated Start and End Times, is baffling. The construction-related activities that would occur during 2025 are broken into 3 stages. The tasks appear to occur solely in 2025; all of which are overlapping to a large extent. Combining all of the activities (as the DEIR dates indicate) cannot possibly result in insignificant air quality emissions. Regardless of the fact that a detailed construction schedule was not provided, there is no possible way emissions would not be significant and unavoidable.

Moving to the 2026 construction year in the same table, how is it possible that there are still tasks from Stage 2? The dates for the tasks listed in 2025 all end by 12/31/2025 yet some are carried over into 2026. Please explain what the actual construction phasing and staging will look like as part of a construction plan and disclose the location(s), number of construction workers, hours of work, pieces of equipment, heavy-duty truck trips, etc., so that the DEIR assumptions are clarified as part of the project description and so that the air quality analysis may be substantiated.

Furthermore, the project description inadequately describes the construction-related disruptions (traffic, noise and air quality) that will persist for many years and therefore must be fully disclosed and mitigated. In particular, the various airside project components, including demolition, paving, and reconstruction will require interim solutions for each phase of work that will result in shifting air traffic and other activities around the airport site that could result in other impacts to the surrounding communities and environment.

At various places throughout the document, the construction schedule is listed as four, five and six years. Please confirm. For example, page 3-10 of the Draft Protocol for the HHRA indicates a four-year construction schedule. If the actual duration is six years, the HHRA will have significantly understated potential health risks.

While not described in the EIR, one could foresee heavier use of the north field, which could result in both additional noise and emission impacts during runway maintenance at the south field and would be a major impact to the community during construction of the Project. Similarly, landside Project components could disrupt passenger and employee travel patterns for several years and should therefore be described and analyzed in a revised and recirculated DEIR.

Air Emissions Related to Foreseeable Remediation Activities Are Improperly Omitted from the DEIR

As noted in DEIR Section 3.8.2.1 contaminants detected in soil and/or groundwater on Airport property include petroleum hydrocarbons (aviation fuel, diesel, gasoline, oil and grease), VOCs, metals, and PFAS. As such, construction activities associated with the Project may disturb contaminated soil and groundwater. The DEIR proposes that a Phase II environmental site assessment (ESA) would be conducted prior to construction to assess contaminants of concern in soil, soil gas, and groundwater, as appropriate, within the detailed study area. In areas where new buildings are planned, vapor intrusion pathways would be assessed. If the contamination encountered during the Phase II ESA is sufficient to exceed applicable regulatory thresholds, cleanup of contaminated sites, including the implementation of engineering controls if appropriate, would be completed before or during construction in the contaminated location but prior to site development.

The DEIR also punts to the preparation of a future Site Management Plan for grading and construction within the contaminated areas but fails to include any performance standards (or the SMP itself) to ensure the protection of human health related to demolition, utility installation/repair, soil excavation, drilling, grading/filling activities, stockpile generation, soil management, loading, and transportation.

The DEIR therefore appears to defer any meaningful analysis – even at a programmatic level – of the air quality and human health risks associated with cleanup efforts required as part of the Project. The DEIR must reflect a good faith effort at disclosing these potential impacts to the extent they are reasonably foreseeable and caused by the Project. As proposed, the DEIR improperly defers this analysis. (See DEIR, pp. 3.8-20 thru -22.)

Specifically, the number and types of equipment needed in the remediation efforts and resulting direct and indirect emissions associated with these remediation activities, are not included in the DEIR. This is a significant oversight as that task would be expected to involve the removal of significant volumes of contaminated soil and the importation of clean fill. Such soil would be expected to contain numerous toxic chemicals including, but not limited to: hexavalent chromium arsenic, beryllium, cadmium, and lead. The DEIR's less-than-significant impact finding is not supported by substantial evidence.

VI. Human Health Risk Assessment

No toxic air contaminant (TAC) emission calculations are included in this document. Our comments are based on the “results” presented herein.

The DEIR concludes that there are no significant impacts that would disproportionately affect children’s health or safety. The document fails to provide adequate data to support that conclusion. The HHRA contained in the document departs significantly from California guidance as to how a health risk analysis is to be conducted without any explanation.

Specifically, page 2 of the 2015 California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program, Risk Assessment Guidelines, Guidance Manual for Preparation of Health Risk Assessments, February 2015, cited herein as one of the sources for how the HRA was conducted, requires evaluating residency periods of “nine, thirty, and seventy years (70)” of residential exposure to toxic air contaminants.

The HHRA included in the DEIR assumed a **maximum of 30 years of exposure** for adults and an unjustified assumption that children would live at home for 9 years of 12 years only. Why was radical departure from state guidance made? It is unclear where the children would reside after that.

Obviously, assuming 30 years of exposure versus following California HRA guideline methodology of 70 years, results in a significant under reporting of potential health impacts. The decision to reduce residency times by more than half results in an extremely misleading and disingenuous underreporting of human health risks.

In one place, the document indicates that the HHRA modeling protocol was *submitted* to BAAQMD and in another place it states that it was *reviewed* by BAAQMD. Given the fact that this protocol does not follow California HRA guidance, was its methodology *approved* by BAAQMD? If so, please provide written documentation from the District.

The HHRA was predicated on the assumption that diesel emissions (and aircraft exhaust) will decrease significantly in the future, thus leading to a better air quality situation for toxic air contaminants than the current emission levels. The document does not include emission calculations of TACs and any source or sources they came from. The DEIR conclusions are therefore not supported by substantial evidence.

The Technical Support Document for Cancer Potency Factors (OEHHA, 2009), moreover, recommends a tenfold early-in-life potency factor adjustment for the third trimester and ages zero to less than two, and a threefold adjustment factor for ages two to less than sixteen. Was this done? If not, potential health impacts to children are significantly under reported.

Significant diesel reductions are also not explained. CARB's EMFAC2021 model which is used to calculate emissions from on-road vehicles and trucks (including heavy-duty diesel trucks) provides lists of all makes and models of cars and diesel-powered trucks on the road in California. A significant diesel fleet is expected in 2028 and out to 2038. Please provide the rationale for assuming the significant reduction in diesel exhaust from this project despite an increase of over 242,000 tons of cargo (to be delivered by truck) as well as other potential diesel equipment at the airport.

Why is there an assumption that construction activities will only overlap with airport operations for two of the five six construction years? The airport would be expected to operate throughout all construction activities. This assumption significantly understates actual emissions and human health risks as well.

The 2019 PM10 baseline is 11 tons per year [Table 3.3-6, page 3.3-20]. Stated PM10 emissions increase by almost 69% by 2038 to 15.92 tons per year [Table 3.3-10, page 3.3-29]. How does this significant increase in PM10 (presumably much of it diesel exhaust), result in a negative health risk assessment in the future?

The document states that diesel exhaust will actually decrease with the project and with a significant increase in cargo and passenger travel through the Oakland Airport. Wouldn't that cargo be delivered via diesel trucks? Even natural gas and gasoline powered vehicles emit TACs.

On a formatting note, the document includes footnotes which reference multi-hundred page guidance documents. The footnotes do not indicate where in the document this information came from. It is very difficult to follow the logic of how any of these assumptions were made. In the revised recirculated version of this DEIR, please include sections or page numbers in the footnotes rather than just citing technical guidance documents that are hundreds of pages long and which don't appear to have been followed anyway.

Detailed Concerns Regarding HHRA

Page E-1 states that only aircraft taxiing was included. Why are aircraft exhaust emissions not included in the HHRA? Particularly when construction of the Project will contribute to the existing ongoing and future emissions. This cumulative impact must be assumed and assessed. *The assumption significantly reduces estimated potential human health impacts.*

Page E-4 indicates that exposure to TACs is assumed “almost all days.” Please provide more detail in your recirculated document as to what this means and why it wouldn’t be every day. Maximum daily and lifetime exposures are required in agency HRA guidance documents. *This assumption significantly reduces estimated potential human health impacts.*

Page E-18 mentions a cumulative health risk assessment which examined other large sources of air pollution (Title V sources) near the airport. Where is this analysis? Without knowledge of emissions of significant nearby sources, *this omission significantly reduces estimated potential human health impacts.*

The text on Page E-22 incorrectly references BAAQMD CEQA Guidelines rather than the SCAQMD document cited here. The assumption that construction equipment exhaust stacks are more than 16’ above the ground is unsubstantiated. Please provide references for any and all assumptions. *Inaccurate modeling inputs could potentially significantly reduce the reported potential human health impacts.*

Page E-29 mentions acrolein as being the source of potentially significant health impacts. However, acrolein is often associated with diesel combustion. If diesel combustion is expected to significantly decrease, what is the source of acrolein emissions?

Page E-30 indicates that the peak chronic non-cancer health impacts to workers were “primarily attributable to diesel particulate matter (DPM) (diesel particulate matter) (41%) and crystalline silica from construction dust (43%).” How is this possible when the HHRA is based on the assumption that diesel exhaust significantly decreases in the future (to levels below current emissions) and busiest construction activities are not reported to have caused <2 pounds of dust emissions? [page 3-3.26, Table 3.3-8]

Page E-33 indicates an incremental 8-hour Non-Cancer Hazard Index (HI) of 0.96. Significant risk is defined as 1.0. Engineering standard dictates to round the number up. This document misleadingly rounded this number down and declared no significant health risk.

Detailed Concerns on the Draft Human Health Risk Assessment – Inhalation Pathway Modeling Protocol, dated December 22, 2022

Pages 1-1 – 1-2 of the protocol states that this HHRA “was also developed to be **generally consistent** with Bay Area Air Quality Management District (BAAQMD) health

risk assessment and modeling guidance.” [emphasis added]. What does this mean? What parts of the risk assessment procedures were not followed? The guidance documents are not meant to be a menu from which one picks and chooses which elements to include in a health analysis.

CEQA requires that the decision makers have full and adequate documentation of all potential environmental and human health impacts associated with a proposed project in order to make an informed decision. All agency HRA methodologies should be followed completely in order to provide an accurate representation of potential health impacts.

The footnote on page 3-10 states, “Nine years of exposure represents the central tendency (or average) exposure duration roughly the average time a person lives in one place). **The value is provided as supplemental information.**” [emphasis added] What does this mean?

VII. Greenhouse Gas Emissions (GHGs)

No GHG emission calculations are included in the DEIR.

However, the document reports a monumental increase total carbon dioxide equivalent (CO₂e) of 211,638,105 pounds per year. This results in a significant adverse environmental impact. Most of this increase is attributed to aircraft emissions (below the mixing level) and vehicle trips. This is inconsistent with the findings of no significant air quality impacts for criteria pollutants such as PM₁₀ and no cancer health impacts. The same exhaust expected to result in GHG emissions also results in emissions of PM₁₀ and TACs as well.

As mentioned previously, CEQA documents must disclose impacts to stakeholders and the general public and must include assumptions, inputs and methodologies by which those impacts were calculated. The GHG section of the document includes totals for airport emissions in the baseline of 2019 and for 2028 and 2038. No backup material is provided as to how those emissions were calculated. Please provide this information.

The document finds that GHG emissions will produce a significant adverse environmental impact, yet no mitigation measures are incorporated as required under CEQA. For Greenhouse Gas Impacts, the only mitigation measure proposed reads as follows, “the majority of the Proposed Project’s GHG emission increases would result from market-based demand and related aircraft emissions and the Port does not have

the authority to mitigate air pollutant emissions associated with aircraft operations.”
[page 21]

Again, as mentioned above, this is not a mitigation measure and it ignores the GHG impacts of the Project itself from construction, demolition and related truck trips.

Pages 3.7-9-10 states, “BAAQMD recommends...best management practices (BMPs) for reducing GHG emissions...” and goes on to list 18 recommended measures. The document fails to mention whether any of these measures will be a requirement of this project. BMPs are also not mitigation measures. Will these measures be included and was emission credit already taken for their potential implementation?

Page 3.7-12 states, “Aircraft emissions are not under local control and would occur in the San Francisco Bay Area Air Basin regardless of permitting and construction of the Proposed Project.” CEQA requires that such emissions still be quantified and disclosed in the document. Further, aircraft emissions/traffic would increase as a result of the Port’s expansion project; which is directly under the agency’s control.

Page 3.7-12 states, “As described in Chapter 3.13, Transportation, for VMT, this Draft EIR uses “no net increase in existing VMT per enplanement”. Does this mean no additional vehicle trips to the airport? If so, how would 11 million more people get there? What are the indirect impacts from the Project’s ability to accommodate future additional passengers, including to air quality from additional passenger car trips, shuttles and buses? Also, how would additional cargo be delivered to and picked up from the airport?

Page 3.17-13 states, “Aircraft engines produce GHG emissions during landings and takeoffs, as well as while aircraft are idling and taxiing.”

Pages 3.7-16-17 states, “the Port must prepare a Carbon Management Plan which includes initiatives to further reduce its carbon footprint. Some of the initiatives *may* [emphasis added] include, but are not limited to...” It goes on to list 14 measures. The document fails to confirm whether any of these measures will actually be included as elements of the proposed project. Again, BMPs are not mitigation measures.

Table 3.7-4 provides a summary of potential GHG emission increases associated with the proposed project. GHGs from aircraft emissions increase by approximately 60.5% as a result of the project.

Why aren’t airborne aircraft emissions included in this analysis and document?

If emission increases are this significant for GHGs, a corresponding increase in criteria pollutants would also be expected.

The air quality section indicates minor increases in VOCs, increases in NOx and no other increases in the other criteria pollutants (most notably PM10 and PM2.5). In fact, the human health risk assessment shows diesel emissions decreasing due to project construction and implementation.

Vehicle emissions are ONLY mentioned in the GHG Section. Corresponding criteria pollutant emissions expected from vehicles are not disclosed as part of the Air Quality analysis or the HRA.

VIII. Conflict with or Obstruct an Air Quality Plan

The DEIR states that the proposed project is consistent with the BAAQMD's 2017 Air Quality Plan [page 3.3-31]. A review of the control measures indicates otherwise. For example, please refer to control measures BL-2 - Decarbonize Buildings. It states that the project is consistent with this measure as "the Port is proposing to develop a transition plan to convert natural gas consumption to all-electric building systems. The Proposed Project would not disrupt or hinder this measure." This shows no valid commitment whatsoever nor any detail as to how this would occur. More information needs to be provided.

Another example can be found in Control Measure BL3 - Market-Based Solutions. The Draft EIR finds itself in compliance with this measure by stating the following, "Consistent; the Proposed Project would support market - based approaches for solution to reduce GHG emission with existing buildings, as feasible. The Proposed Project would not disrupt or hinder this measure" [page 3.3-33] Please provide any example of what market-based approaches the project is incorporating as well as why terms such as "as feasible," are necessary if the Port actually intends to comply.

Yet another example can be found in Control Measure BL4 - Urban Heat Island Mitigation where the Draft EIR again deems itself in compliance. The Draft EIR deems itself consistent and states the following, "The Proposed Project would assess the incorporation of cool roofing and cool paving. The Proposed Project would not disrupt or hinder this measure." Assessing something and actually implementing it are two very different concepts. If the Port has chosen to be consistent with the AQP, it should clearly state its intention to install cool roofing and paving. Please provide more information on all of these measures and why there is a clear avoidance of any commitment.

IX. National Environmental Policy Act (NEPA)

It is unclear why a joint Environmental Impact Study (EIS) and EIR (EIS/EIR) was not conducted as the Federal Aviation Administration will also need to take action on the Project. Please provide a timeline for this document as well as rationale for its lack of incorporation.

State CEQA Guidelines Section 15089 (b) - Preparation of a Final EIR. As this letter is submitted on behalf of the City of Alameda, please forward the Final EIR and all proposed responses to the City's comments prior to the hearing on the Project.

X. Summary

The DEIR should be recirculated to address the numerous inadequacies in the Air Quality, Greenhouse Gas and Human Health Risk Assessment sections.

The overall failure of the DEIR to explain how calculations were completed and what input information, emission factors, and assumptions were utilized, does not allow for an accurate third-party review of the document. More importantly, it is vague and misleading with respect to potential human health impacts associated with construction and operational emissions of criteria pollutants and hazardous air pollutants. The omission of an HRA results in a failure to fully disclose potential health impacts to neighbors and nearby communities. This is inconsistent with the requirements and public disclosure intent of CEQA.

CEQA Guidelines, Section 15151 defines the standards for EIR adequacy as, "An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and good faith effort at full disclosure."

A revised DEIR should be prepared and recirculated for public review and comment which includes, at the very least, all back-up calculations and modeling outputs used to complete the air quality calculations, GHG and human health risk assessments. The DEIR must also include feasible mitigation measures to be adequate under CEQA. As proposed, the DEIR falls short of CEQA's requirements.

Thank you in advance for your consideration of these comments.

ENVIRONMENTAL COMPLIANCE SOLUTIONS, INC.



Erin M. Sheehy, LEED AP
President



ERIN M. SHEEHY, LEED AP

Experience Summary

Ms. Sheehy has over 30 years of California Environmental Quality Act (CEQA) and National Environmental Protection Act (NEPA) experience with a specialty in air quality. While serving as an quality specialist at the South Coast Air Quality Management District (SCAQMD), Ms. Sheehy was responsible for the preparation of over 30 CEQA documents which analyzed rules and regulations (as projects) and their impacts on the regulated industry. During the past 30 years she has served as project manager for various CEQA/NEPA documents as well as a third-party technical reviewer of air quality and risk assessment impacts. Environmental Compliance Solutions, Inc. was founded by Ms. Sheehy in May 1995. Ms. Sheehy served as an In-House CEQA/NEPA Project Manager on behalf of the City of Los Angeles – Harbor Department from 2014 – 2021. She also assisted Los Angeles World Airports (LAWA) with CEQA/NEPA documents for the modernization of the airport from 1996 – 2005.

ECS is proud to include: Los Angeles World Airports (LAWA), San Diego County Regional Airport, USAir, the Port of Los Angeles, Anheuser-Busch, Mizkan America (Bertolli), the United States Department of Defense, Boeing, the Port of Long Beach, Waste Management, Love's Travel Stops, Occidental Petroleum, Phillips 66, Northrop Grumman, Rust-Oleum, and Western States Petroleum Association among our many clients.

Credentials

Smith College, B.A. Economics 1988

Dartmouth College, Twelve College Exchange Program, 1986-1987

University of California Riverside, Certificate in Hazardous Materials Management, 1990

University of California, Los Angeles - Anderson School of Business Administration, Entrepreneurial MBA, 1999.

Key Airport and CEQA/NEPA Projects

Client Name: Confidential

Ms. Sheehy provided third-party technical review and comment on the air quality and health risk assessment sections of the *Bob Hope "Hollywood Burbank" Airport Proposed Replacement Terminal Project Draft EIS*. Sections reviewed for adequacy included, but are not limited to: construction-related emissions, operational emissions, toxic air contaminant (TAC) emissions, human health risk assessment, and proposed mitigation measures. Relevant technical appendices were reviewed and compared to impacts outlined in the draft document. Findings were summarized into a very detailed, comprehensive comment letter presented to the Lead Agency during the public comment period.

Client Name: Los Angeles World Airports (LAWA)

Served as Project Manager for completion of sections of air quality, health risk assessments and sustainability sections of the following CEQA/NEPA documents for various airport projects.

- FEIR/FEIS for the LAWA Master Plan Modernization Project;
- Mitigation Monitoring and Reporting Program (MMRP) for LAWA's Master Plan;
- LAWA Community Benefits Agreement – Mitigation Measure Analysis;
- FEIR/FEIS for LAWA Specific Plan Amendment Study and Health Risk Assessment;
- EIR for LAWA's South Airfield Improvement Project; and
- EIR for LAWA's Crossfield Taxiway Project (CFTP)

Client Name: LAWA

Responsible for assessing more than 100 mitigation measures as part of the CEQA Mitigation Monitoring and Reporting Program and Community Benefits Agreement.

Client Name: LAWA

ECS prepared a comprehensive matrix of all available grant opportunities currently available for equipment used at Los Angeles International Airport. This matrix included a brief summary of grant opportunities currently available for private companies located in the South Coast Air Basin. Monies can typically be used to off-set the cost of diesel retrofits and equipment replacements. Grant programs that were available through the SCAQMD, CARB, and the EPA were summarized. Data will be sorted by: type of equipment covered, governing agency, agency contact persons, amount of money available, and grant application deadlines.

Client Name: San Diego County Regional Airport Authority Mitigation Monitoring and Reporting Program

ECS worked on the air quality mitigation measures section of the EIR/EIS for the San Diego International Airport. Measures include diesel reduction technologies such as: switching to LNG and CNG fueled trucks and vehicles; use of alternative fueled generators and off-peak delivery trips. ECS reviewed and ranked over 40 mitigation measures as part of this task. Measures were researched and ranked based on costs.

Client Name: Confidential

As part of this project, we reviewed the CEQA document prepared for a proposed expansion at the *Camarillo Airport*. As part of this project, particular attention was given to the technical appendices for Air Pollution and Greenhouse Gas Modeling. As part of our review, we researched whether or not appropriate and accurate emission factors were utilized for the analysis. This construction-related emissions as well as operational emissions from aircraft engines during taxis, take offs, and landings, and other mobile equipment used at the airport.

Client Name: Port of Los Angeles

In-house CEQA/NEPA project managers for the following projects;

- American President Lines Container Terminal (APL);
- Everport Container Terminal EIR/EIS;
- Avalon and Freis Mitigated Negative Declaration;
- International Longshore Warehouse Union (ILWU) Expansion Negative Declaration;
- SA Recycling;
- VOPAK Marine Oil Terminal MOTEMS Project;
- Shell Oil Company Marine Oil Terminal MOTEMS Project;

- Avalon Freight Services Relocation Mitigated Negative Declaration;
- Los Angeles Harbor Grain Relocation Negative Declaration;
- AltaSea Research Center Addendum;
- Space X Mitigated Negative Declaration; and
- Matson Berth 206 – 209 Container Terminal Reuse Project EIR/EIS.

Client Name: USAir, Inc.

ECS successfully negotiated with the SCAQMD on behalf of USAir, Inc. to eliminate many of the reporting requirements facing them as part of the NOx RECLAIM program by re-permitting many NOx sources as “permit units” rather than major or large sources. ECS also represented USAir at its RECLAIM audit and at the SCAQMD site inspection.



TARA TISOPULOS

Experience Summary

Ms. Tisopulos has over 29 years of experience in air quality analyses (CEQA/NEPA documentation), environmental compliance, and sustainability reporting. Ms. Tisopulos served as an air quality specialist in the CEQA division at SCAQMD for over 10 years. Responsibilities included analysis for the EIR for the Air Quality Management Plan which included greenhouse gas control measures. She prepared numerous CEQA documents on various SCAQMD regulatory actions. Ms. Tisopulos was also the reviewer of dozens of Lead Agency CEQA/NEPA documents for which the SCAQMD was the Responsible or Commenting Agency.

Since joining ECS, Ms. Tisopulos has authored numerous CEQA/NEPA documents including several on behalf of the Port of Los Angeles. She has also assisted with numerous Los Angeles World Airports (LAWA) and SCAQMD CEQA/NEPA documents. She completed third-party technical review for other airport projects.

Ms. Tisopulos served as an in-house CEQA/NEPA project manager at the Port of Los Angeles since from 2014-2021. Duties include preparation of CEQA/NEPA documentation for Port projects.

Credentials

B.A., English and Journalism, University of Southern California, 1991.

M.A., Mass Communications, California State University – Fullerton, 1995.

Key Projects

Client Name: Los Angeles World Airports (LAWA)

Assisted with preparation of CEQA/NEPA document for modernization of Los Angeles International Airport, on behalf of LAWA. Projects included: evaluation of air quality impacts from construction, evaluation of potential mitigation measures and their associated costs and response to public comments. Specific LAWA CEQA/NEPA documents include:

- FEIR/FEIS for the LAWA Master Plan Modernization Project;
- Mitigation Monitoring and Reporting Program (MMRP) LAWA Master Plan;
- LAWA Community Benefits Agreement – Mitigation Measure Analysis;
- FEIR/FEIS for Specific Plan Amendment Study and Health Risk Assessment;
- EIR for LAWA’s South Airfield Improvement Project; and

- EIR for LAWA's Crossfield Taxiway Project (CFTP)

Client Name: LAWA

Ms. Tisopulos served as Project Manager and successfully completed an extensive prioritization of emission reduction strategies and sustainability measures which were used to document the while preparing air quality and environmental justice portions of the Environmental Impact Report (EIR) and Environmental Impact Statement (EIS) for the Modernization of Los Angeles International Airport. ECS completed all construction-related air quality analyses for the EIR and EIS and Supplemental EIR prepared for Los Angeles World Airport's LAX project. The project included hundreds of pages of spreadsheet calculations broken out by each day of a 15-year construction buildout. Off-road engine factors along with SCAQMD CEQA Handbook data was used to complete the analyses.

Client Name: Confidential

Ms. Tisopulos provided third-party technical review and comment on the air quality and health risk assessment sections of the Bob Hope "Hollywood Burbank" Proposed Replacement Terminal Project Draft EIS. Relevant technical appendices were reviewed and compared to impacts outlined in the draft document. Findings were summarized into a very detailed, comprehensive comment letter presented to the Lead Agency during the public comment period.

Client Name: Port of Los Angeles

As a CEQA Project Manager, she prepared and successfully certified the Negative Declaration for SA Recycling's Crane Replacement and Electrification Project. The Los Angeles Harbor Department (Port of Los Angeles) was the Lead Agency.

Other POLA CEQA/NEPA projects managed include, but are not limited to:

- Everport Container Terminal EIR/EIS;
- Avalon and Freis Mitigated Negative Declaration;
- International Longshore Warehouse Union (ILWU) Expansion Negative Declaration;
- Avalon Freight Services Relocation Mitigated Negative Declaration;
- Los Angeles Harbor Grain Relocation Negative Declaration; and
- AltaSea's Research Center Addendum.

Client Name: Los Angeles County Metropolitan Transportation Agency (Metro)

Project Manager for Sustainability/Green Energy Study for Los Angeles County Metropolitan Transportation Agency's (Metro's) proposed High Desert Corridor (HDC). The HDC is a proposed multipurpose transportation link between State Route (SR)-14 in Los Angeles County and SR-18 in San Bernardino County. The report aimed at determining which of the potential HDC infrastructure projects were most likely going to get funded through carbon market mechanisms; and how can the sale of carbon credits (e.g., Low Carbon Fuel Standard credits) be used to attract Public/Private partnerships and similar structure investors. Sustainable projects researched included: solar highways, methane digesters, microturbines, and wind energy.

Project Manager for Port of Los Angeles Sustainability Goals Plan. Project included analysis and research of 150 sustainability requirements. Measures include requirements for project

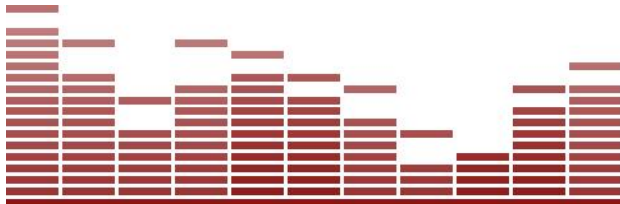
planning, design and construction. The measures will be required of future construction contractors.

Client Name: Orange County Transportation Authority

Ms. Tisopulos assisted Orange County Transportation Authority (OCTA) from 2013-2018 with the contract for On-Going Air Quality Planning and Monitoring. This project involved attending all SCAG Transportation Conformity Working Group (TCWG) meetings as well attending SCAQMD Air Quality Management Plan (AQMP) meetings, Governing Board meetings, legislative committee meetings, CARB Rulemaking Hearings, CARB Board Meetings and other relevant agency meetings whose policies are of critical interest to OCTA.

Ms. Tisopulos prepared a matrix of air quality control measures and proposed environmental regulations including those to reduce hazardous air pollutants (HAPs). Specific additional project assignments included preparing emission calculations for all criteria pollutants and greenhouse gas emissions from a fleet of diesel buses vs. CNG vs. electric buses and the associated cost-effectiveness of each scenario. ECS created an interactive spreadsheet for OCTA staff which allows the user to plug in actual bus data to determine return on investment projections.

ATTACHMENT B



JOHN C. FREYTAG, P.E., INCE Bd. Cert.
FREYTAG & ASSOCIATES LLC

2169 LOGGIA, NEWPORT BEACH, CA 92660

T: 949.500.1853

E: JACK@FREYTAGLLC.COM

W: FREYTAGLLC.COM

City of Alameda
ATTN: Jen Ott, Alameda City Manager
2263 Santa Clara Avenue
Alameda, CA 94501
e: manager@alamedaca.gov

13 October 2023

**Subject: Noise Assessment Review of Draft Environmental Impact Report:
Oakland International Airport Modernization and Development Project**

Dear Mrs. Ott,

This letter provides a review of the noise sections of the “OAKLAND INTERNATIONAL AIRPORT TERMINAL MODERNIZATION AND DEVELOPMENT PROJECT, Draft Environmental Impact Report” (the DEIR). While the document presents detailed forecasts and technical information, it is inadequate in several regards:

- Lacks coordination with the FAA and Airport management,
- Uses dated forecasts and misses an important noise study,
- Denies induced air traffic growth and attendant increase in noise exposure to Airport neighbors,
- Inadequately assesses the effects of aircraft noise on Airport neighbors, and

Coordination

The Port of Oakland as the lead agency would be helped by serving the demands of the National Environmental Policy Act (NEPA) on which the FAA bases compliance as guardian of airport grants. The DEIR appears to lack coordination with the FAA, Regional Airport District Office (ADO).

As a mitigation measure, coordination and correspondence between the Airport and the surrounding communities is important. The Port of Oakland, as the OAK manager, has responsibility for noise mitigation. However, no such responsibility or mention of coordination is found in the DEIR.

Forecasts

The DEIR omits an updated OAK Noise Study, 14 CFR, Part 150, which would have shown noise contours and help establish land use for the affected cities adjacent to the Airport. The entire eastern shoreline is affected by traffic on the main air-carrier RWY 12/30.

In DEIR Appendix I, Noise Model Inputs, a November 2021 HMMH Technical Memorandum describes how and why certain modeling tools and processes were used to comply with CEQA and NEPA requirements. HMMH used forecasts from another OAK vendor to track data from the OAK’s ANOMS (noise tracking and reporting) system. These forecasts were used for the AEDT (FAA airport noise and air quality computer model) track projections of impacts on land in near vicinity (6 NM), and for DEIR

Figures 2-20. Since the ANOMS data was for calendar year 2019, the forecasts are dated and questionable.

The HMMH Memorandum states, “The set of flight tracks reflects existing operations following RNAV departures and some Required Navigational Performance (RNP) arrival procedures”. This is incorrect. The backbones show how radar vectoring of OAK traffic is done, placing noise and air quality impacts on other adjacent, west cities, across the Bay.

Expanded hours of operational impacts, 0100 – 0200, have plagued San Francisco for years and are noted in Chapter 6, Forecast Methodology, Assumptions and Results. This chapter also notes that the backbone of their analysis was operational data (current and forecast) from Southwest Airlines (WN). While Southwest is the major operational carrier in the Bay regional airports, they are very flexible in route and market changes, and are therefore speculative for future forecasting. The Terminal Area Forecast (TAF) is the FAA standard used as a basis for planning and budgeting for airport improvements. These data were also updated in July 2023, though results are speculative. FY 2021 was the most current of any TAF data.

Forecast noise exposure values and contours are the product of air traffic volume forecasts and predicted noise emissions of individual aircraft types. Forecasts assume reduced future noise emissions from the retirement of older noisier aircraft with newer quieter aircraft. For the past several decades there has been a constant noise reduction in newer aircraft from quieter turbofan aircraft engines resulting from larger diameter drive fans. The larger fans produce more power, use less fuel, and are quieter due to the higher bypass ratio. However, this consistent noise reduction may be reaching a limit due to the physical size limitation in mounting turbofan engines to the airframe. This limitation led to the unfortunate modifications of the Boeing 737 MAX aircraft.

Growth Inducing Impact

The Executive Summary expresses the theme throughout the EIR, “The OAK aviation activity projected in these forecasts would occur regardless of whether the Proposed Project is implemented.” This is directly contradicted in the opening sentence to “5.3 GROWTH-INDUCING IMPACTS”, “This section discusses the ways in which the Proposed Project could foster economic or population growth. Growth-inducing impacts are caused by those characteristics of a project that tend to foster or encourage population and/or economic growth.” It is not clear how the DEIR would foster economic growth solely by terminal expansion and renovation without increased aircraft activity. The modernization project is specifically designed to promote increased passenger and freight aircraft travel to and from OAK.

Supplemental Metrics

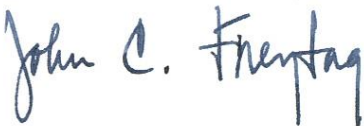
All noise assessments throughout the DEIR, except sleep interference, are solely in terms of the Community Noise Equivalent Level metric (CNEL) with noise effects taken from the 1978 Environmental Protection Agency “Levels Document”. This is surprising in that the firm preparing all noise sections of the DEIR, HMMH Inc., also authored the landmark 447-page document for the FAA, “Analysis of the Neighborhood Environmental Survey, January 2021”. The HMMH report produced an updated and nationally representative assessment of civil aircraft noise-dose response, updating more than 40 years of prior assumptions. The primary result of the analysis is that noise annoyance in terms of CNEL (or the very similar DNL) is substantially greater than that used in the various dated criteria cited in the DEIR. HMMH has also been instrumental in recommending supplemental noise metrics (i.e., beyond CNEL and DNL) to assess aircraft noise annoyance. The metrics typically used in planning documents at all government levels and in recent aircraft noise analyses are:

- Sound Exposure Level (SEL), a measure of duration and magnitude of a single noise event.
- Equivalent Sound Level (Leq), the average noise level over a specified period.
- Time Above (TA), the amount of time a single noise event exceeds a specified noise level.
- Number of Events (NA), the number of events above a specified noise level during a specified period.

These supplemental metrics should be used appropriately for the various noise impacts discussed. For instance, noise impact for schools should not be assessed in terms of the day/eve/night 24-hour average CNEL noise metric, but rather in terms of Leq over the school hours. Additionally, a TA descriptor would be helpful to determine the total amount of time that aircraft noise masks (i.e., drowns out) classroom speech. The noise effects on learning may also consider NA to determine the number of interruptions over a specified time.

It is unfortunate that sleep interference is not mentioned in the body of the DEIR, only in Appendix M. The assessment method, predicting relatively few awakenings, is novel and still under evaluation. The World Health Organization (WHO) states, "Nighttime noise levels above 55 dB result in increased risk of heart attacks; and levels above 45 dB result in increased risk of hypertension, and this can lead to hypertensive strokes and dementia." Sleep interference is an important issue in damaging worker health and productivity, and should be addressed comprehensively in the body of the DEIR.

Yours truly,

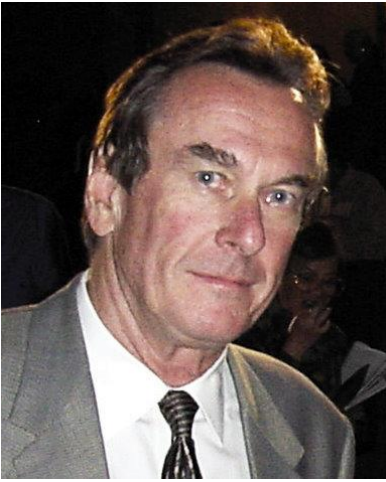
A handwritten signature in blue ink that reads "John C. Freytag". The signature is written in a cursive, flowing style.

John C. Freytag, PE, INCE Bd. Cert.

Freytag & Associates, LLC

President

JOHN C. FREYTAG, P.E., FREYTAG & ASSOCIATES, LLC



Experience

Freytag & Assoc., LLC, 2009-Present
HMMH, 2007-2009
C.M. Salter & Associates, 1986-2007
Bechtel Group, 1976-1986

Education

M.S., Engineering, Stanford University,
Palo Alto, CA, 1976
B.S.M.E., Arizona State University,
Tempe, AZ, 1972
Graduate Business Studies, Golden
Gate University, San Francisco, CA,
1980

Affiliations

Registered Professional Engineer, CA
Board Certified Member, Institute of
Noise Control Engineering, 1989-
present
Executive Member, Airport Consultants
Council, 1998-2007
American Institute of Architects, Affiliate
Member, 1988-2007
Editorial Advisory Board Member,
Airport Noise Report, 1999-2007
Senior Member, American Institute of
Aeronautics and Astronautics, 1995-
2007
Transportation Research Board,
Aviation Noise Subcommittee, 1994-
present
Member, Acoustical Society of America,
1985-present
Member, American Institute of Physics,
1985-present
American National Standards Institute
(ANSI), Standards Committee: Draft
ANSI S12.62, "Acoustics – Estimation of
outdoor sound propagation by
calculation", 2003-2007
Freytag & Associates, LLC is a
California Certified Disabled Veteran
Business Enterprise (DVBE)

Jack Freytag founded Freytag & Associates, LLC to provide expert consulting services in specific areas of acoustics using affiliated experts throughout the U.S. Previously he also managed the southern California office of Harris Miller Miller & Hanson. For HMMH he was responsible for sound insulation projects for Los Angeles International Airport and supports other ongoing sound insulation projects in southern California and around the country.

Mr. Freytag has over 25 years of experience as an acoustical consultant and noise expert. His background includes expert witness in both state and federal courts, management of more than 40 FAA-sponsored sound insulation projects, management of environmental and community noise assessments, aero-acoustic research for NASA, management of several hundred architectural acoustics design projects, engineering of large industrial facilities, digital signal processing, and project management and engineering management of high technology business ventures. He has been a licensed pilot since 1966.

As a Director at Charles M. Salter Associates, Inc. for 20 years, he has served as expert witness, and was program manager responsible for business development and project management for acoustical consulting projects in aviation. He managed noise studies for civil and military airport clients, cities and counties, noise-impacted residents, land use litigation cases, and crash hazard potential studies. He also acquired and managed the Audio Forensic Center, a wholly-owned subsidiary company specializing in denoising (for dialog recovery), gunshot analyses and authentication of audio and video recordings. He has been an expert witness on cases involving audio recordings, environmental noise, and audibility. He has also been the acoustical expert for the Discovery Channel programs.

From 1976 to 1986 Mr. Freytag held a variety of positions at The Bechtel Group as noise control engineer, venture capital analyst, manager of a 62-member CAD organization, project engineer for a large synthetic fuel project in New Zealand, and executive assistant to the vice-president of Bechtel's 3,600-member petroleum division.

From 1974 to 1976 Mr. Freytag conducted experimental and theoretical aero-acoustics research at NASA-Ames Research Center for his graduate research work at Stanford University.

Representative Projects (with former employers)

Airport Projects

- Managed noise mitigation studies for NextGen/Metroplex impact for the City of Palo Alto, the City of Sunnyvale, and the District of Columbia involving noise measurement, modeling, complaint and monitoring assessments, and noise mitigation recommendations. 2017.
- Longmont/Vance Brand Airport, CO – Citizens for Quiet Skies, et al. v. Mile-Hi Skydiving Center, expert witness for the defense. 2015.
- Other Airport sound insulation projects (40+). Project Manager responsible for technical design and sound insulation performance for 100,000+ homes impacted by airport noise at airports throughout the U.S. (1990-2009).

- Transportation Research Board, National Academies, ACRP Project 02-51, "Evaluating Methods for Determining Interior Noise Levels Used in Airport Sound Insulation Programs." 2015.
- Transportation Research Board, National Academies, author Chpt. 4, Acoustical Engineering, ACRP Report 89, "Guidelines for Airport Sound Insulation Programs".
- Minneapolis et. al. v Metropolitan Airports Commission, aircraft noise surveys and assessment leading to \$128M settlement for clients (the largest noise settlement in history).
- Alameda v. Oakland International Airport, noise assessment and report for the plaintiff against the Airport's environmental impact report. Freytag was cited favorably in the State Supreme Court decision. Oakland, CA.
- Computer noise modeling for Moffett Field Airport, CA; Boise Airport, ID; Mather Airfield, CA; Cuyahoga County Airport, OH; and Naval Air Station, Lemoore, CA.
- Chico Airport, CA, crash hazard potential study.
- City of Henderson, NV, evaluation of potential noise impact from Henderson Airport on proposed shopping center.
- Sacramento County, crash hazard potential study for proposed hospital site.

Client Quote or Project Highlight

Regarding the Discovery Channel 'Death of Diana' audio simulation of the crash in the Paris tunnel:

"I expected this to work well, but not this well."

Television Programs

- Discovery Channel, Unsolved History:
 "The Boston Massacre" (2001)
 "Death of Princess Diana" (2003)
 "JFK – Beyond the Magic Bullet" (2005)

Representative Publications and Presentations

- Jack Freytag & Paul Schomer, *Minneapolis, et al vs. The Metropolitan Airports Commission*, ACOUSTICS TODAY, October 2009.
- J. C. Freytag and E. M. Reindel, *Noise Level Reduction Measurement Methods for Sound-Insulated Structures*, NOISE-CON 2008, Dearborn.
- J. C. Freytag and Paul D. Schomer, *Minneapolis et al. v Metropolitan Airports Commission*, N.O.I.S.E. Summer Conference, Dulles, VA.
- J. C. Freytag and E. M. Reindel, *Noise level reduction measurement methods for sound-insulated structures*, TRB Summer Meeting, Key West, FL.
- J. C. Freytag and Paul D. Schomer, *Assessing the relative noise contributions from independent time-varying sources*, Noise-Con 2007, Reno, NV.
- J. C. Freytag and Paul D. Schomer, *What is "Quietude" in an Urban Area?* INTER-NOISE 2007, Istanbul, Turkey.
- J. C. Freytag, D. R. Begault and C. A. Peltier, *The Acoustics of Gunfire*, INTER-NOISE 2006, Honolulu, HI.
- J. C. Freytag, *Noise Insulation Performance of Buildings near Airports: Measurement Issues and Perspectives*, NOISE-CON 2004, Baltimore.
- J. C. Freytag, *Retrofit Sound Insulation: The Morning After*, INTER- NOISE 2002, Dearborn, MI.
- J. C. Freytag, *The Airport Noise Paradox: DNL Drops While Problem Grows*, Noise-Con 2001, Portland, ME.
- J. C. Freytag (co-author), *ACOUSTICS: Architecture, Engineering, the Environment*. (1998, William Stout Publisher).



DENNIS HUGHES

HUGHES AV ASSOCIATES

10 Alicante, Coto de Caza, CA 92679-4149 | 949.636.4677 |

Consultant Summary

Possesses extensive experience in providing in excess of forty years of focused insight pertaining to:

- Air Traffic Operations / Procedures
- Airport Operations
- Aviation
- Environmental (EA, EIS) / Noise Issues (part 150 Study)

Dennis is a pro-active professional with diverse experience and responsibilities encompassing information technology, statistical analysis, finance, legal and airport operations. Skilled in assessing requirements, determining priorities, implementing course of action and making adjustments for peak efficiency. Maintains a record of achievement, dependability and integrity.

Key Strengths Include:

- Over 30 years of progressive responsibilities with the FAA.
- Specialist in Consulting for Cities, Counties, and communities.
- Strategically plans project directions with management systems that produce the most effective and efficient performance levels.

Employment History and Experience

PRESIDENT - HUGHES AV Associates, Inc. - Coto de Caza, CA

Dennis Hughes founded Hughes AV Associates, to provide expert and comprehensive consulting services to clients regarding a variety of aviation related issues, including airport expansion, noise abatement, air traffic procedures, operational improvements, capacity enhancement and environmental impacts. Individually assess each project and incorporate all factors including historical statistics, estimated projections, complex computer models as well as local and national laws. (2001 – Present)

Research Associate / Subject Matter Expert (SME), Freytag & Associates LLC – Airplane Noise (NextGen) Impacts for the District of Columbia (DC), Department of Energy & Environment, Grant: DCA Airplane Noise Assessment

Ramifications of the Washington DC Metroplex Project (OAPM) placed more low altitude arrival and departure flows of traffic over the District of Columbia. Additionally, the Ronald Reagan Washington National Airport (DCA) participated in a Federal Air Regulation (FAR) Part 150 study for airport Noise Compatibility Planning (NCP), completing the study in 2008, which further displaced departure tracks to the east. (2016- Present)

Research Associate / Subject Matter Expert (SME), Freytag & Associates LLC – Airplane Noise (NextGen) Impacts for the City of Sunnyvale, CA

Ramifications of the Nor Cal Metroplex Project (OAPM) placed more than four arrival and departure flows of traffic over the primary City. (2016 – Present)

Education

University of San Francisco

San Francisco, CA
Applied Economics

Awards

Special Achievement Award

1992, 1994, 1995
Exceptional Rating
1993, 1994, 1995

Federal Executive Board

Outstanding Accomplishment
Award, Greater Los Angeles
Team, 1999

Southern California Task Force

The Federal Aviation
Administration Southern
California Task Force was
recognized for exemplary
service to people. The Task
Force Measurably improved the
quality of life for residents of
Southern California by reducing
the effect of aircraft noise and
over flight while ensuring the
integrity of the nation's air
traffic control system. (1999)

U.S. Department of Transportation, FAA Administrator's Certificate of Commendation

1999

DENNIS HUGHES

HUGHES AV ASSOCIATES

Accomplishments

Increased operational efficiency for Las Vegas McCarran International Airport resulting in user operational cost savings of more than \$6 million.

Successfully realigned airspace for Denver/Salt Lake/Albuquerque ARTCC's to alleviate undue air traffic restrictions. Increased operational functionality for major western states' airports through a comprehensive airspace design methodology that captured the inefficiencies throughout the system and capitalized on the available, but unused, capacity at the various air traffic control facilities. (1998 to 2001)

Clearance

SECRET

Reference available upon request

Research Associate / Subject Matter Expert (SME), Freytag & Associates LLC – Airplane Noise Assessment & Mitigation Project for the City of Palo Alto, CA

Ramifications of the Nor Cal Metroplex Project (OAPM) placed more than four arrival and departure flows of traffic over the primary City and adjacent noise sensitive residential areas. This concept appeared to be systemic throughout the "project study area."

Low-altitude RADAR vectoring increased due to inefficiencies associated with RNAV procedures and their operational aspects.

Historically the FAA has not considered any noise below a day-night average sound level (DNL) of 60 dB, to be of any impact.

However, in July 2015 the FAA revised its noise impact policy with FAA Order 1050.1F, "Environmental Impacts." This revision was possible from our examination of the National Offload Program (NOP) files received, familiarization and testing of the new FAA computer noise model, the Aviation Environmental Design Tool (AEDT).

Congressional, "Select Committee," meetings were formed and conducted over an eight month period. The Contract support to the Committee was as Subject Matter Expert, which was utilized contract support in order to support their efforts in understanding and correcting operational deficiencies relative to procedural impacts of the Nor Cal Metroplex Project (OAPM) NextGen procedural changes.

Several prototype alternatives were developed all within FAA criteria and compliance, FAA Order 7100.41, as to offer relief of noise impacts in the City and to promote change to an impacted residential environment.

At the completion of the project a comprehensive project report was prepared describing the project and presenting graphic outputs describing flight tracks, noise exposure and the changes in each over the two periods assessed in the study.

Sr. Operations Research Specialist, Advanced Management Technology. (AMT)

Contract services to the Federal Aviation Administration (FAA) providing support and technical assistance to Performance Based Navigation (PBN) / Required Navigation Performance (RNP) Program Office of the FAA in the development and implementation of the Area Navigation (RNAV) Standard Instrument Departure (SID), and RNAV Standard Terminal Arrival (STAR) in the Western Terminal Service Area. This also includes the development of RNAV T and Q Routings, and RNAV/RNP Global Positioning System (GPS) Instrument Approach Procedures (IAP's) in the National Airspace System (NAS) / Next Generation Air Transportation System (NextGen).

The Area Navigation (RNAV)/Required Navigation Performance (RNP) Group provides guidance for and expedites the development of performance-based navigation (PBN) criteria and standards and implements airspace and procedure improvements. Specifically, the RNAV/RNP Group collaborates with the U.S. and international aviation communities – government and industry – as a leader in developing PBN concepts, technical standards, operator requirements, and implementation processes to enhance safety, increase capacity, improve efficiency, and reduce the environmental impact of aviation. As a leader in developing PBN concepts, technical standards, operator requirements, and

DENNIS HUGHES HUGHES AV ASSOCIATES

implementation processes to enhance safety, increase capacity, improve efficiency, and reduce the environmental impact of aviation.

Regional area of responsibility included Southern California, Arizona and Hawaii. Projects completed include: Honolulu International Airport (HNL) / Hickam AFB, Kahului Airport (PHOGG), Kona International Airport (PHKO), Hilo International Airport (PHTO), Los Angeles International Airport (KLAX), Santa Monica Municipal Airport (KSMO), Bob Hope Airport (KBUR), Van Nuys Airport (KVNY), Long Beach Airport (KLGB), Santa Ana / John Wayne- Orange County Airport (KSNA), San Diego International Airport (KSAN), McClellan-Palomar Airport (CRQ), Ontario International Airport (KONT), Phoenix Sky Harbor International Airport (KPHX), Phoenix - Mesa Gateway (KIWA).

Support of the aviation community – FAA and Industry – as PBN contract support for the PHOENIX SKY HARBOR AIRPORT (PHX) in developing procedures (STAR's /SID's), maintaining technical standards, operator requirements and implementation process to enhance safety, increase capacity, improve efficiency, and reduce the environmental impact of aviation. Additionally, reducing ATC workload, and producing an annual fuel cost saving of over \$150M, to the user's. (2008 – 2013)

MANAGER - FAA Western-Pacific Region Airspace Project Office - San Diego, CA

Performed overall management, training and supervision for all airspace Spear headed projects within the FAA Western-Pacific Region. Served as a key liaison and mediator with officials from the airlines, Congressional representatives and cities/counties. Managed, all airspace and procedural interactions with other FAA regional offices

ASSISTANT AIR TRAFFIC MANAGER - Long Beach, CA

Managed air traffic operations in a tower facility, averaging 50 or more instrument operations per hour. Collaborated with FAA facilities, and civil/military organizations to negotiate, and/or coordinate work related changes affecting the facility. (1998)

AIR TRAFFIC MANAGER - Carlsbad, CA

Managed air traffic operations in excess of 250,000 per year. Provided air traffic oversight for airport certification. Implemented training courses for new air traffic personnel. Overhauled organizational procedures and facilitated problem solving expansion meetings. (1996 to 1998)

ASSISTANT MANAGER FOR QUALITY ASSURANCE - San Diego, CA

Established and maintained the Quality Assurance Program for the busiest terminal radar approach control facility in the world, Southern California TRACON. (1994 to 1996)

ATTACHMENT C

TRANSPORTATION PLANNING UNIT

City of Alameda

To : Jennifer Ott, City Manager

From: Allen Tai, Acting Planning, Building and Transportation Director

Date: October 13, 2023

RE: OAK Terminal Modernization Draft EIR Transportation Analysis Review

The City's Transportation Planning Unit (TPU) was asked to review the Transportation chapter of the OAK Terminal Modernization Draft Environment Impact Report (DEIR), including Appendix N, and provides the following comments:

1. Consistency with Adopted Plans. The transportation analysis does not reference or discuss consistency with any adopted City of Alameda transportation plans – Alameda 2040 General Plan Mobility Element (2021), Vision Zero Action Plan (2021), and Transportation Choices Plan (2018). CEQA requires the transportation analysis to document compliance with adopted programs, plans, ordinances or policies addressing the circulation systems, including transit, roadway, bicycle, and pedestrian facilities, affected by the Project. The Project proposes a new 2,000-space public parking lot facility, the Maitland Lot on Ron Cowan Parkway near Harbor Bay Parkway, within close proximity of Alameda city limits. The location of the parking lot is expected to generate vehicular traffic through local Alameda streets, to which the City of Alameda has adopted General Plan and various transportation plans and policies. However, discussion of consistency of these local plans are entirely missing from the DEIR.
2. VMT Methodology. The Transportation Chapter's vehicle miles travelled (VMT) methodology is flawed because it focuses on comparing two derivatives (ratios) from the data rather than analyzing impacts from the actual increase in vehicles miles travelled. The chapter provides a VMT analysis based on a custom methodology that appears inadequate to identify the true magnitude of the transportation impacts from a doubling of passengers between 2019 and 2038. The analysis describes the same methodology used in at one other airport, which compares a ratio between anticipated daily VMT and enplanements (VMT per Enplanement). The analysis notes that a comparison of the ratio from the 2019 baseline and 2038 projection results in a decrease in this ratio over time and therefore dismisses the need for further analysis.

We find this methodology flawed because it is relying on a comparison of the ratio between VMT and enplanements. While the ratio decreases from 46.4 VMT/Enplanement in 2019 to 42.5 in 2038 (Table 3.13-15), the actual corresponding

increase in enplanements would increase by 83% from 16,516 enplanements in 2019 to 30,273 in 2038. This increase corresponds with an overall increase in 515,335 vehicle miles travelled, or a 69% increase in VMT from 2019 numbers.

The DEIR's approach in comparing the ratios between two sets of numbers (enplanements and VMT) involves simply comparing the relationship or proportion between the numbers rather than analyzing the impact of their absolute values. So while the ratio between two numbers shows an overall decrease, the actual project VMT generation has increased by over half a million miles. This is not acknowledged in the DEIR.

Furthermore, even if we assume the comparison of VMT per Enplanement and daily VMT is valid methodology, no threshold of significance was applied toward evaluating the baseline and Project ratios. Given the doubling of passengers and enplanements over time, one would expect a need to establish a threshold for significance for a decrease in VMT per Enplanement that factors the magnitude of growth in the number of passengers. For example, LAX established a 10-15% threshold for a decrease in VMT per Enplanement given anticipated significant growth in enplanements over the project.

Finally, the DEIR inexplicably disregards this VMT methodology when analyzing the Project's cumulative transportation impacts. (DEIR, p. 5-20.) Despite acknowledging that Project construction and operation will coincide with several other nearby VMT-generating projects (DEIR, Table 5-1), the DEIR merely states that "[a] review of intersection vehicle operations at the seven signalized intersections located closest to OAK found that all intersections would operate at level of service (LOS) C or better with the Proposed Project for 2019 and 2028 conditions. In 2038, two intersections were found to operate at LOS E without the Proposed Project...All intersections would continue to operate at LOS E or better in 2038 with the Proposed Project indicating none would be over capacity." (DEIR, p. 5-20.)

LOS, however, is no longer the standard for assessing transportation impacts, which the DEIR concedes. (DEIR, p. 3.13-1 [explaining that SB 743 eliminated LOS to measure traffic congestion as a basis for determining significant impacts].) The DEIR fails to explain why it used different thresholds of significance to analyze Project-level (VMT) and cumulative (LOS) transportation impacts. As a result, the City cannot adequately ascertain the degree to which the Project will cumulatively impact the City's surrounding streets and thoroughfares, thereby precluding informed decisionmaking.

3. Transportation Demand Management (TDM). The DEIR fails to incorporate any discussion of the benefits of a TDM program on further reducing VMT. The lack of a comprehensive analysis or discussion regarding the benefits associated with a TDM program in terms of further reducing VMT is a major omission in the DEIR. It is imperative to address this omission and highlight the potential advantages that a TDM program could bring to the overall airport environment.

First and foremost, a TDM program is specifically designed to encourage alternative modes of transportation and reduce reliance on single-occupancy vehicles. By promoting options such as carpooling, vanpooling, public transit, cycling, and walking, a TDM program can effectively decrease the number of vehicles on the road, consequently minimizing traffic congestion and cutting down on greenhouse gas emissions. However, the DEIR fails to recognize and acknowledge the potential reduction in VMT that could be achieved through the implementation of such a program.

Furthermore, it is the City's experience that a well-executed TDM program can have several additional benefits. It can enhance accessibility to transportation options for underserved communities getting to and from the airport and contribute to improved air quality as fewer cars on the road mean reduced emissions from vehicle exhaust. These benefits should have been thoroughly examined and discussed within the DEIR to provide a comprehensive understanding of the potential benefits in reducing VMT and traffic impacts. The DEIR must at a minimum analyze how TDM program commonly included in other airport projects could be feasible mitigation measures to reduce VMT. The City further believes incorporating specific TDM measures such as rideshare, incentives and commuter benefits, parking pricing studies, and annual monitoring and reporting, etc. are effective measures at reducing VMT.

4. Safety. The DEIR contains no measures to improve or enhance traffic safety or to encourage transit use. Despite acknowledging various regional, county and local transportation policies on traffic safety for pedestrian and bicyclist and encouraging transit use, the DEIR contains no specific project measures to implement those goals other than to ensure that an existing sidewalk and bike path on John Glenn Drive is uninterrupted during construction. We see numerous opportunities to improve safety. These may include additional warning signage, flashing beacons, crosswalks, signage and striping along the cycle track on Ron Cowan Parkway, which can be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists.
5. Maitland Lot. The Project proposes a new 2,075-space public parking lot facility, the Maitland lot, on Ron Cowan Parkway near Harbor Bay Parkway, within close proximity of Alameda city limits. The location of the parking lot is expected to generate vehicular traffic through local Alameda streets, to which the City of Alameda has adopted General Plan and various transportation plans and policies. The City believes the DEIR must be revised to study in detail specific environmental issues including, but not limited to, the following:
 - a. Ingress/Egress: The configuration of the Maitland lot implies a single point of ingress/egress from Ron Cowan Parkway, which presents a major concern for traffic congestion at the point of access. The DEIR must study the impact of a 2,000-space lot at this location and its impact on nearby roadways and

intersections, including intersection turning movements, signal warrants, and overall impacts to roadway operation, emergency access and safety.

- b. Design Measures: The analysis for this parking lot should include evaluation of project measures that include visual indication from signage and road design features and as driveway/lane widths, landscaping, street furniture, and other design elements to ensure ingress and egress is safe.
 - c. Air Quality: Increased vehicular traffic to and from the parking lot can lead to increased carbon emissions and air pollution. This can contribute to local air quality concerns and contribute to climate change.
 - d. Noise pollution: Large parking lots can generate significant noise pollution, especially during peak airport traffic times. This can impact nearby residents and wildlife.
 - e. Light pollution: Satellite parking lots often require lighting for safety and security purposes. Excessive lighting can lead to light pollution, disrupting natural wildlife behavior and interfering with astronomical observations.
 - f. Heat island effect: Paved surfaces in parking lots can absorb and retain heat, contributing to the urban heat island effect. This can increase ambient temperatures in the area and impact local microclimates.
 - g. Public transportation integration: The DEIR is silent on the integration of existing transportation systems, such as buses, shuttles, or rail services, to and from the airport. These measures must be analyzed to evaluate their effectiveness in reducing private vehicle usage.
6. Construction Traffic. The DEIR must describe and analyze the impacts of construction traffic on Alameda roadways, including by identifying foreseeable haul routes. For this project, transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, may require the use of local and regional Alameda roadways and right-of-way permits from the City of Alameda. The DEIR must identify all the reasonably foreseeable direct and indirect construction related impacts and mitigate significant impacts to the extent feasible. Requiring truck trips to be scheduled during off-peak commute periods, for example, should be considered to mitigate the significant air quality impacts of the Project. The DEIR is inadequate as proposed.

If you have any questions, please contact Allen Tai at atai@alamedaca.gov or 510-747-6888. Please also provide me with all future public notices issued for the Project, including by email.

Sincerely,

/ S /

Allen Tai, AICP

ATTACHMENT D

PUBLIC COMMENT LETTERS RECEIVED BY THE CITY OF ALAMEDA

I can only attribute the lack of a railroad option to either (generously) ignorance by port leaders and consultants in a country where we've seemingly forgotten that passenger railroad service is still a technology that exists, or at worst, *outright malice by an agency and industry that wants to selfishly expand its own aviation interests at the expense of what makes sense from a broader public common sense perspective.*

While full buildout of CA HSR is many years away, we can still make passenger capacity improvements in the interim:

1. **Add additional Amtrak service beyond the limited but popular services that already exist.** This could be done immediately on the existing routes by adding additional daily trains. Segments of this service can be gradually transitioned to high-speed rail, which is what the CA HSR business plan proposes, and is also how it works in other countries upgrading existing routes to HSR. As new segments of HSR are built, travel time on existing Amtrak routes will be improved by utilizing HSR. I personally regularly travel on Amtrak to Los Angeles, and almost without exception every train seems to be completely filled and sold out.
2. **Accelerate the build-out of CA HSR by allocating additional funding to it, and see what other trade-offs we can make to accelerate the construction of the existing segments: make it a priority!** China built a whole high speed rail network with thousands of miles during the decades of time we've been dithering on a single rail line in California.
 1. Streetsblog recently held a panel discussion with Boris Lipkin, the Northern California Regional Director of the California High-Speed Rail Authority, and Eric Eidlin, Station Planning Manager for the City of San Jose, on the subject of what it would take to *completely build CA HSR in the next 5 years.* <https://cal.streetsblog.org/2023/08/18/can-californias-high-speed-rail-be-built-faster> --- the short of it is that it's purely a set of political decisions and priorities that is dragging this out. We simply need to demand that our leaders make it a priority.

This whole rail alternative is what is completely missing from the EIR. They considered outlandish options like relocating the airport or building a new airport elsewhere in the region, but the word "train" or "rail" doesn't appear anywhere in the EIR!!! I guess because the real customer base of the Port of Oakland – airlines and fossil fuel companies -- would lose a lot of business to that option, so they conveniently ignore it?

Best regards,

James Johnston

Hi, my name is James Johnston and I live in Alameda near South Shore. There are a couple of points to this letter that I'd like to see added:

First, California is building High Speed Rail. We also have existing Amtrak service that could be expanded. This is an alternative that is completely ignored by the EIR. 90% of the flights departing Oakland go to destinations that are currently served by Amtrak! And 46% of them go to destinations that will be served by California High Speed Rail and Brightline West, electrically powered by renewable energy. That means that high speed rail will be equivalent in capacity to building this airport expansion. So we don't need to expand!! You can read a detailed analysis of this on the Stop OAK coalition website. But the EIR does not mention high-speed rail even once! Even though the Port of Oakland is not involved with building high speed rail, common sense says that we can't ignore it.

Instead of adding a flight to Los Angeles, let's add another Amtrak train. They sell out regularly as it is.

The second problem is that the EIR totally ignores and does not count the emissions of aircraft at cruising altitude, and considers it to be out of scope. It only looks at emissions during taxi, takeoff, and landing. Yet, common sense says that cruising is where the vast majority of emissions will occur! The EIR says they don't have control over the aircraft emissions and they are unavoidable. Really?!? **THEY CAN CHOOSE NOT TO EXPAND.** That's how they could control it. But by saying the air traffic will grow at the same rate by **NOT** expanding - an obvious lie that defies common sense - they can then use this **LIE** to say that "expansion won't affect growth of greenhouse gasses" and then reach their pre-ordained pro-airplane conclusion. **THAT IS ABSURD!**

I am a renter here in Alameda, and family sometimes asks me: have you ever thought about buying in Alameda? Yes, I have, but I have a lot of concerns about it. I ask them: do you like playing musical chairs? Because anyone owning oceanfront property right now is playing musical chairs with the property values, and property owners are ultimately going to lose when the property goes underwater, literally. Plus, I love this city and would really hate to see it suffer from sea level rise.

I just got back last week from a 2 week trip backpacking in Olympic National Park. We were literally chased by a wildfire that I found out later came within a quarter mile of our campsite from an earlier night. Firefighters actually flew in by helicopter to ask us to help them close a trail - the very trail we just hiked in on. Other locations in Big Basin and Sequoia National Park and Lassen National Park that we backpacked and hiked in have also burned. It feels like **EVERYWHERE WE GO IS EVENTUALLY BURNED. HELP US STOP THE CLIMATE CARNAGE!!**

From: Donna Cala <calafamily@comcast.net>

Sent: Wednesday, October 4, 2023 8:31 AM

To: Marilyn Ezzy Ashcraft; Tony Daysog; Trish Spencer; Tracy Jensen; Malia Vella

Subject: [EXTERNAL] Delay feedback date on airport expansion

As a Bay Farm resident constantly shutting my windows and doors to quiet airport traffic noise, I ask that you do all you can to ask to extend the deadline past 10/16 to respond with technical info and concerns.

Unless you already know that the expansion will not change the quality of life for Alamedans and our wildlife, including noise pollution and fuel pollution, this seems the only reasonable approach.

Thank you,
Donna Cala

Sent from my iPhone

:

From: "James Johnston (mail)" <mail@codenest.com>
Date: October 4, 2023 at 12:43:37 AM CDT
To: CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>, City Clerk <CLERK@alamedaca.gov>
Subject: [EXTERNAL] Public comment related to airport expansion

Hi,

Under the bar below is a longer version of the public comment I gave verbally the evening of Oct 3, 2023 regarding agenda item 7-A, the airport expansion.

I did not have time to fully make it personal as to why the climate change aspects matter to me. The last two paragraphs below from my planned verbal comments explain a personal anecdote: we were literally chased by a wildfire on a backpacking trip a couple weeks ago in a *rainforest* that's seen only half the precipitation that it normally gets. This is only the latest event. Numerous other locations we have backpacked and hiked in the last few years have also since been destroyed by fire. *This is not normal, and it's partially attributable to climate change!!!*

And the very survivability of the City of Alameda is at stake. Maybe we won't suffer a wildfire here on the island. But, will we accelerate the drowning of the city underwater just for the short-term gain of a few extra cheap airplane flights? The experts seem to keep saying that the impacts of climate change is accelerating faster than even some of their worst model estimations. We're slowly committing collective social suicide of this community, which will ultimately be destroyed by the ocean – and the process will happen even faster if this airport is expanded.

We can have our cake and eat it too: we can travel more, and still save the climate. Electric trains are the answer. Funding for airport expansions should instead be directed to expanding rail infrastructure and service. Wasn't that the selling point of high speed rail back in 2008? Spend money building rail instead of airport and interstate expansions? So why are we expanding the airport? We don't have to live in the stone age – we can learn to travel sustainably.

From: Jason G. Su <jasons@berkeley.edu>
Sent: Thursday, October 5, 2023 1:14 AM
To: City Clerk <CLERK@alamedaca.gov>; Lily HO <lilyhe1973@gmail.com>
Subject: [EXTERNAL] Fwd: OAK Expansion + air pollution exposure

Dear Alameda City Clerk,

Below, you'll find the notes I've previously shared with fellow residents regarding our concerns about the environmental impact assessment report for the Oakland Airport Expansion Project.

Best,
Jason

----- Forwarded message -----

From: Jason G. Su <jasons@berkeley.edu>
Date: Thu, Oct 5, 2023 at 1:03 AM
Subject: Re: OAK Expansion + air pollution exposure
To: Ariella Granett <Ariella@stopoakexpansion.org>
Cc: Paul English <paulengl@gmail.com>, Scott Hochberg <shochberg@biologicaldiversity.org>, Heather MacLeod <hmactutor@gmail.com>, David Foecke <davidfoecke@gmail.com>, Lin Griffith <lin@stopoakexpansion.org>

Thanks Paul for your introduction. I appreciate your active engagement regarding the Oakland Airport expansion project. I'm fully committed to working together with you to effectively convey our shared concerns to relevant organizations. Below, you'll find the notes I'd like to share with you:

The environmental impact report has raised significant concerns regarding its assessment of air pollution's impact on residents living in the City of Alameda, especially those residing in Bay Farm. The report relies on data from two regulatory air quality monitoring stations for Nitrogen Oxides (NOx) air pollution: the San Leandro station (located at International Blvd) and the Oakland Lake Merritt station (near I-880). These stations are situated at distances of 4.4 kilometers and 9.0 kilometers, respectively, from the Airport North Field, which raises questions about their representativeness of the actual impact of air traffic.

The issue here is that NOx pollution tends to have a localized impact, with significant effects occurring within a radius of less than 500 meters. The data from these monitoring stations predominantly reflect the effects of local roadway traffic, failing to capture the potential impacts of air traffic. To put it in perspective, a typical Airbus A321 aircraft can produce NOx concentrations exceeding 100 micrograms per cubic meter (ug/m³), equivalent to over 50 parts per billion (ppb). In contrast, roadway NOx levels in the San Francisco Bay region typically remain below 30 ppb. While these levels may seem low, scientific studies, including research from UC Berkeley, suggest that even NOx concentrations below 10 ppb can have adverse health effects.

To demonstrate a genuine commitment to addressing the health impacts of air pollution from air traffic, the Oakland Airport authorities could consider installing air quality monitoring stations on the roofs of Bay Farm Elementary School buildings. These buildings are directly beneath the flight path of departing aircraft from North Field and could provide long-term evidence of the airport's compliance with air pollution regulations.

Moreover, air traffic emissions extend beyond NOx. They also include greenhouse gases like carbon dioxide (CO₂), which contribute significantly to global warming. Additionally, air traffic emits particulate matter, sulfur dioxide, volatile organic compounds, and hazardous air pollutants, all of which have well-documented health implications. The impact of these air pollutants should be included in the environmental impact assessment report.

Another pressing concern is the noise generated by airplanes, particularly during takeoff. The World Health Organization (WHO) recommends an average nocturnal noise level of LAeq, outside 55 decibels as an interim goal when achieving the recommended guideline value of 40 decibels is not feasible in the short term. However, Airbus A321 aircraft generate noise levels ranging from 60-65 decibels (dBA) before takeoff, 80-85 dBA during flight, and 75-80 dBA during landing. During takeoff, noise levels can peak at a disturbing 140 decibels, far exceeding WHO recommendations. Residents' accounts of sleep disruption and discomfort during periods of heavy air traffic are a sobering reminder of the real-life consequences.

In light of these legitimate concerns and the potential harm to both the environment and public health, it is crucial that the OAK airport expansion project undergoes a comprehensive reevaluation and an in-depth review of its environmental impact report. Disregarding these concerns could have lasting and detrimental effects on our community and the environment, and it is incumbent upon us to address them earnestly and responsibly.

Jason G. Su, PhD

Full Researcher & Principal Investigator
School of Public Health
2121 Berkeley Way West, Room 5302
University of California, Berkeley
Berkeley, California 94720-7360

On Wed, Oct 4, 2023 at 1:16 PM Ariella Granett <Ariella@stopoakexpansion.org> wrote:

Thanks Paul! Hi Jason please meet Scott Hochberg attorney at Center For Biological Diversity. He is working on legal DEIR comments and may have some technical questions to ask in the next week about air pollution exposure.

Thanks!
Ariella
510-883-3642

Ariella Granett, Steering Committee Member/ Stop OAK Expansion Coalition

On Wed, Oct 4, 2023, 12:49 PM Paul English <paulengl@gmail.com> wrote:

Hi Ariella, all:

I would like to introduce you to Dr. Jason Su, who is a colleague at UC Berkeley and is an air pollution exposure expert (cc'd). Jason lives on Bay Farm Island and spoke at the Alameda City Council meeting last nite. Jason has some good insights on the air quality part of the dEIR. Jason, would you be able to forward us your comments which you made last nite? Areilla, Jason would be good and is willing to plug into the Stop oak airport exp effort.

The meeting last nite was well attended; about 20 people signed up to speak. Most of the speakers were those from Bay Farm Island, with very strong concerns about noise even under current situations. Many speakers urged the council to write a stronger comment letter to the Port. The only person to speak in favor of the expansion was a rep from the Alameda business association. A realtor even spoke and said the expansion would really affect property values, which was not mentioned in the staff report/draft letter. Trish Spencer talked with me and Jason in the hallway and she said she wasn't impressed with the city staff as not taking the issue seriously enough. A Port representative called in also, and said that the Port was looking forward to working together with everyone, there will be sustainable aviation fuel, port is committed to zero emissions, blah, blah.

Paul

-----Original Message-----

From: Leah Liebler <leahliebler@gmail.com>

Sent: Sunday, October 8, 2023 9:45 PM

To: TermDev@portoakland.com; CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>

Subject: [EXTERNAL] Oppose OAK expansion plan

I oppose the expansion of OAK as it will add more pollution over Alameda. What's going to be done to minimize noise and air pollution?

From: Meggie Kang <kang.megumi@gmail.com>
Sent: Saturday, October 7, 2023 10:26 PM
To: CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Opposition to the Oakland Airport Expansion

October 7, 2023

Dear Alameda City Council Members and Staff,

As a 10-year Bay Farm resident and mother of three young children, I am extremely concerned about the Port of Oakland's plans for expansion. Bay Farm residents are the MOST at risk and affected by this proposal, although Main Island residents will most definitely feel the impacts as well. I listened in and participated at the City Council meeting on 10/3 and was very disappointed by the lack of substance and position in the City's draft response to the Port of Oakland. The City has had 90 days to prepare a detailed response and collect public feedback, and frankly, a one page 6-bullet point letter is unacceptable and lacks the dissent and opposition shared by the City's citizens at the meeting.

As you heard at the City Council meeting this week, the daily interruptions of airplane noise from the commercial jets on the larger, southern runway (that takes off over the Bay) are already disruptive to our daily lives. It's loud, makes you pause conversations until it passes, very consistent throughout the day with planes taking off every couple of minutes during peak hours (as tracked on planefinder.net), rattles the window panes of the house, and starts around 5am (with some occasional aircraft's taking off in the middle of the night) and lasts until after 10pm. You may be thinking that we signed up for this by buying a house near an airport and yes, some impacts are indeed expected. What we did not sign up for is 50% MORE air traffic, particularly from the North Field runway. This runway has aircrafts taking off directly over homes on Bay Farm Island (as they do during repairs of the South runway, which happens occasionally, most recently being a 4 day period in September). I

never would have bought a house here if that was the case - it would certainly not be a desirable neighborhood to live in.

Here are some additional comments and questions I am asking to be addressed:

- First and foremost, the City's response needs to include technical challenges and independent verification by technical experts to determine the impacts (direct and indirect) specifically on the LOCAL area (Bay Farm Island and Main Island of Alameda), not just for the broader East Bay area. For example, take noise and emission measurements for the neighborhoods CLOSEST to the runways instead of 5 miles away, take air pollution measurements that show concentrations not just emissions, complete an extensive health assessment, etc. I am certain that a more *accurate*, localized, technical report would make this project unable to meet FAA noise regulations.
- The City of Alameda has an agreement with the Port of Oakland to not exceed 70dB noise levels on Bay Farm Island yet these limits are exceeded on a regular basis. How is the City currently monitoring these noise levels on Bay Farm Island and who is holding the Port of Oakland accountable to these decades-old agreements? If we are already experiencing noise levels exceeding 70dB in neighborhoods closest to the runways, how does expanding the airport by 50% make any sense?
- More often than not, especially on non-breezy days, it is not uncommon for Bay Farm residents to smell jet fuel in the air. It is an unmistakable smell and concerns me for my children's health. Again, how is the City currently monitoring emissions from the airport (on Bay Farm Island) and who is holding the Port of Oakland accountable for exceeding these limits? More air traffic would mean more days of this!
- Recently, the City shared that it is planning to formally request that the San Francisco Entertainment Commission discontinue the Portola Music Festival next year or move it to an alternative venue due to significant noise impacts to Alameda residents. More air traffic as a result of an airport expansion, would be **significantly** worse on a daily basis than any 3-day music festival. While I appreciate the City's strong stance and action against the Portola Music Festival, I would hope that the City would take an even stronger stance against the airport expansion given the daily and frankly, far worse noise impacts to its residents.
- Financially speaking, imagine the total property value of all the homes on Bay Farm Island taking an estimated 20% hit due to this airport expansion - that would have a huge impact on the City's budget!
- Are we exploring ALL other options to mitigate the noise and air pollution concerns and are we holding the Port of Oakland to do their due diligence on this? For example, insisting commercial jets to use the North Field, changing the flight patterns like the airport already does on stormy days, etc. What about the future of electric aircrafts? Would the Port consider postponing the expansion to take place after electric aircrafts are more ubiquitous and noise and pollution impacts are negligible?

I urge you to represent us, the citizens of Alameda, by doing everything in your power to STRONGLY OPPOSE the Port of Oakland's airport expansion. As elected officials, whom many of us voted for, you have the power to change the outcome of this airport expansion. Demand the protection of ALL Alameda citizens, including those of us on Bay Farm Island. PLEASE take action as if this was going to impact your daily lives and your family's health and well-being. We are counting on you and trust that you will stand up for us!

Thank you for your time and I appreciate your close attention on this important issue.

Sincerely,
Meggie Kang

From: Mark Theiding <mark.theiding@gmail.com>

Sent: Sunday, October 8, 2023 9:39 PM

To: Marilyn Ezzy Ashcraft <MEzzyAshcraft@alamedaca.gov>; Manager Manager <MANAGER@alamedaca.gov>

Subject: [EXTERNAL] Extension re. Oakland Airport Expansion

Dear Jennifer Ott ,City Manager, Honorable Mayor Marlyn Ezzy Ashcraft,

The planned Oakland Airport Expansion will have significant impact on Alameda and as such requires careful planning. Please ensure that the Port is providing an extension to the 10/16 deadline so that the city can conduct a proper analysis of the project. Getting the extension and completing a full review - and making project adjustments if needed - is critical to the well-being of all of us Alameda residents.

Thank you,

Mark Theiding
112 Avington Rd, Alameda, CA 94502
510.816.5273

-----Original Message-----

From: Fran Redstone <franredstone@yahoo.com>
Sent: Wednesday, October 4, 2023 10:23 AM
To: CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Airport expansion

Dear Council Members,

I attended the meeting last evening regarding the airport expansion. I agree that the council needs to write a stronger letter to the powers that be. Residents from Bay Farm Island are very upset with the prospect of the expansion impacting health and quality of life.

I do not live on Bay Farm Island but I too am quite concerned. I bought property in Alameda NOT on Bay Farm Island because my property was Quiet which was very important after living in NY. This expansion will affect me, my family, and my neighbors due to pollution, noise, and other environmental issues.

Please, get the City of Oakland to reconsider this expansion by examining the studies of the impact of long term noise and pollution. In addition, include a strong statement regarding changing and enforcing flight paths so communities are not impacted negatively.

Thank you for your service to the community.

Fran Folkman
18 Redondo Ct.

From: Darlene Yaplee <darlene.yaplee@gmail.com>

Sent: Wednesday, October 4, 2023 10:05 AM

To: CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>

Cc: Darlene E. Yaplee <darlene.yaplee@gmail.com>

Subject: [EXTERNAL] Protect Alameda from noise and health hazards of OAK Airport Expansion

Dear Alameda Council Members,

I am concerned that Oakland airport is planning to add 16 gates to accommodate more flights. Air travel is the most polluting way to travel, and adding these gates will increase noise & health hazards as it speeds global warming. Please protect our community, our health, and the planet. I urge the Port of Oakland to refuse to certify this Draft EIR and halt this harmful Project. The FAA is performing a review of its Civil Aviation Noise Policy. Any environmental evaluation must be updated to reflect updates to the FAA's policy. It must be applied retroactively given the FAA's Neighborhood Environmental Survey showed more people are highly annoyed at every noise level than previously based on the Schultz curve. Or the environmental review must be postponed to apply the future noise policy.

Darlene Yaplee

From: Matt&Kitty <mattandkitty@gmail.com>
Sent: Monday, October 9, 2023 2:43 PM
To: TermDev@portoakland.com; CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Opposition for Oakland Airport Expansion

To the Attention of Port of Oakland and City of Alameda,

I am a deeply concerned resident and homeowner in Alameda, who strongly opposes the proposed expansion of Oakland Airport. This project will greatly impact residents and schools in its vicinity.

With an increase of departing flights and increased usage of the North Field runway that directs aircrafts over all of Bay Farm Island and Main Island, this would mean louder, more frequent noise disturbances and jet fuel released directly over Alameda residents and schools. Neighborhoods closest to the South Field runway already experience an average sound level greater than the FAA regulated 65dB from aircrafts departing from Oakland Airport. Noise and air pollution are of utmost concern, but there are many indirect impacts like decreased property values, environmental/wildlife concerns, and increased vehicle traffic.

Regarding the negative and serious health impacts of aircraft emissions in residential areas, various studies indicate that impacts of aviation emissions remain under examination (Hudda, Durant, Fruin, Durant, 2020). In a study that measured gases, particles, and ultra particles in a residential area in Boston, MA, concentration of all gases and pollutants at the residential area greatly exceeded those measured at regulatory monitored sites. Another systematic review of the impact of commercial aircraft activity identified dangerous and adverse health impacts, including increased rates of premature death, preterm births, decreased lung function, oxidative DNA damage and childhood leukemia. These results show the pressing need to understand the direct impact of air pollutants from the Oakland Airport on Alameda residents.

I am asking that the Port of Oakland and the City of Alameda conduct technical, localized studies that are independently verified that include noise and air quality sensors on Bay Farm Island at ¼ mile increments from each of the existing OAK airport runways. For air quality impacts, concentrations of all gases and pollutants need to be measured and examined. This is entirely missing in the current DEIR. This will allow for more accurate estimated noise and air pollution impacts on the residents most impacted by this expansion.

I request that the Port of Oakland explore ALL other potential options to mitigate noise and air pollution impacts (require all commercial jets to use the North Field runway, change existing flight patterns, etc.). I also request the City of Alameda take a stronger stance in opposition to the expansion. The current response is disappointingly neutral and lacks the strong dissent of their citizens.

Please extend the October 16 deadline until proper diligence has been done to mitigate immediate and long-term health risks, as well as proper and thorough communication has been made available to all.

Sincerely,
Katherine Aquino-Esparrago

From: Amy Wong <amywong119@gmail.com>
Sent: Monday, October 9, 2023 12:40 PM
To: CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Oppose expansion of Oakland Airport

To Whom It May Concern:

My family and I strongly oppose the expansion of Oakland Airport. It would enormously impact the health of young and old, especially with the increase of asthma and respiratory illness in children. My son has asthma and the impact in air pollution will greatly impact him and the children in the community!

WHO:

The proposed expansion of Oakland Airport would greatly impact those who work or reside near the airport, particularly residents on Bay Farm Island and the East End of Main Island in Alameda.

WHAT:

Oakland Airport is in the planning process of modernizing and constructing a new terminal to increase the number of gates by 50%. With an increase of departing flights and increased usage of the North Field runway that directs aircrafts over all of Bay Farm Island and Main Island, this would mean louder, more frequent noise disturbances and jet fuel released directly over Alameda residents. Neighborhoods closest to the South Field runway *already* experience an average sound level greater than the FAA regulated 65dB from aircrafts departing from Oakland Airport. Noise and air pollution are of utmost concern, but there are many indirect impacts like decreased property values, environmental/wildlife concerns, and increased vehicle traffic.

Regarding the negative and serious health impacts of aircraft emissions in residential areas, various studies indicate that impacts of aviation emissions remains underexamined (Hudda, Durant, Fruin, Durant, 2020). In a study that measured gases, particles, and ultraparticles in a residential area in Boston, MA, concentration of all gases and pollutants at the residential area greatly exceeded those

measured at regulatory monitored sites. Another systematic review of the impact of commercial aircraft activity identified dangerous and adverse health impacts, including increased rates of premature death, pre-term births, decreased lung function, oxidative DNA damage and childhood leukemia. These results show the pressing need to understand the direct impact of air pollutants from the Oakland Airport on Alameda residents.

We are asking that:

- The Port of Oakland and the City of Alameda conduct technical, *localized* studies that are independently verified that include noise and air quality sensors on Bay Farm Island at ¼ mile increments from each of the existing OAK airport runways. For air quality impacts, concentrations of all gases and pollutants need to be measured and examined. This is entirely missing in the current DEIR. This will allow for more accurate estimated noise and air pollution impacts on the residents most impacted by this expansion.
- The Port of Oakland explores ALL other potential options to mitigate noise and air pollution impacts (require all commercial jets to use the North Field runway, change existing flight patterns, etc.)
- The City of Alameda takes a stronger stance in opposition to the expansion. Their current response is disappointingly neutral and lacks the strong dissent of their citizens.

WHEN:

NOW is the time to act because the public review period for the Draft Environmental Impact Report (DEIR) ends on Monday, October 16th at 5PM PST.

Amy Wong & Anthony Lau
180 Ratto Rd
Alameda CA 94502

-----Original Message-----

From: Nina Tang <ntang1218@gmail.com>

Sent: Tuesday, October 10, 2023 7:38 AM

To: TermDev@portoakland.com; CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>

Subject: [EXTERNAL] Opposition to the OAK airport expansion

To the Attention of the Port of Oakland and City of Alameda,

I share many concerns with my Bay Farm Island neighbors, who strongly oppose the proposed expansion of Oakland Airport. This project will greatly impact residents and schools in its vicinity.

With an increase of departing flights and increased usage of the North Field runway that directs aircrafts over all of Bay Farm Island and Main Island, this would mean louder, more frequent noise disturbances and jet fuel released directly over Alameda residents and schools. Neighborhoods closest to the South Field runway already experience an average sound level greater than the FAA regulated 65dB from aircrafts departing from Oakland Airport. Noise and air pollution are of utmost concern, but there are many indirect impacts like decreased property values, environmental/wildlife concerns, and increased vehicle traffic.

Regarding the negative and serious health impacts of aircraft emissions in residential areas, various studies indicate that impacts of aviation emissions remain under examination (Hudda, Durant, Fruin, Durant, 2020). In a study that measured gases, particles, and ultra particles in a residential area in Boston, MA, concentration of all gases and pollutants at the residential area greatly exceeded those measured at regulatory monitored sites. Another systematic review of the impact of commercial aircraft activity identified dangerous and adverse health impacts, including increased rates of premature death, preterm births, decreased lung function, oxidative DNA damage and childhood leukemia. These results show the pressing need to understand the direct impact of air pollutants from the Oakland Airport on Alameda residents.

I am asking that the Port of Oakland and the City of Alameda conduct technical, localized studies that are independently verified that include noise and air quality sensors on Bay Farm Island at ¼ mile increments from each of the existing OAK airport runways. For air quality impacts, concentrations of all gases and pollutants need to be measured and examined.

This is entirely missing in the current DEIR and would allow for more accurate estimated noise and air pollution impacts on the residents most impacted by this expansion.

I request that the Port of Oakland explores ALL other potential options to mitigate noise and air pollution impacts (require all commercial jets to use the North Field runway, change existing flight patterns, etc.). I also request the City of Alameda take a stronger stance in opposition to the expansion. The current response is disappointingly neutral and lacks the strong dissent of their citizens.

Please extend the October 16 deadline until proper due diligence has been done and these air and noise pollution concerns have been addressed to mitigate immediate and long-term health risks.

Sincerely,

Nina Fok-Tang
22 Ratto Rd
Alameda, CA 94502

-----Original Message-----

From: Danny Lam <dlamcpa@aol.com>

Sent: Tuesday, October 10, 2023 8:56 AM

To: TermDev@portoakland.com; CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>

Subject: [EXTERNAL] Opposition to the OAK Airport expansion

To the Attention of the Port of Oakland and City of Alameda,

I share many concerns with my Bay Farm Island neighbors, who strongly oppose the proposed expansion of Oakland Airport. This project will greatly impact residents and schools in its vicinity.

With an increase of departing flights and increased usage of the North Field runway that directs aircrafts over all of Bay Farm Island and Main Island, this would mean louder, more frequent noise disturbances and jet fuel released directly over Alameda residents and schools. Neighborhoods closest to the South Field runway already experience an average sound level greater than the FAA regulated 65dB from aircrafts departing from Oakland Airport. Noise and air pollution are of utmost concern, but there are many indirect impacts like decreased property values, environmental/wildlife concerns, and increased vehicle traffic.

Regarding the negative and serious health impacts of aircraft emissions in residential areas, various studies indicate that impacts of aviation emissions remain under examination (Hudda, Durant, Fruin, Durant, 2020). In a study that measured gases, particles, and ultra particles in a residential area in Boston, MA, concentration of all gases and pollutants at the residential area greatly exceeded those measured at regulatory monitored sites. Another systematic review of the impact of commercial aircraft activity identified dangerous and adverse health impacts, including increased rates of premature death, preterm births, decreased lung function, oxidative DNA damage and childhood leukemia. These results show the pressing need to understand the direct impact of air pollutants from the Oakland Airport on Alameda residents.

I am asking that the Port of Oakland and the City of Alameda conduct technical, localized studies that are independently verified that include noise and air quality sensors on Bay Farm Island at ¼ mile increments from each of the existing OAK airport runways. For air quality impacts, concentrations of all gases and pollutants need to be measured and examined. This is entirely missing in the current DEIR and would allow for more accurate estimated noise and air pollution impacts on the residents most impacted by this expansion.

I request that the Port of Oakland explores ALL other potential options to mitigate noise and air pollution impacts (require all commercial jets to use the North Field runway, change existing flight patterns, etc.). I also request the City of Alameda take a stronger stance in opposition to the expansion. The current response is disappointingly neutral and lacks the strong dissent of their citizens.

Please extend the October 16 deadline until proper due diligence has been done and these air and noise pollution concerns have been addressed to mitigate immediate and long-term health risks.

Sincerely,

Danny Lam
22 Ratto Rd
Alameda, CA 94502

From: Erin Ellinwood <erin.ellinwood@gmail.com>
Sent: Tuesday, October 10, 2023 11:44 AM
To: CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>; TermDev@portoakland.com
Subject: [EXTERNAL] Urgent Action Needed: Addressing Critical Concerns on Oakland Airport Expansion

To the Port of Oakland and the City of Alameda,

I'm writing to inform you about my significant concerns regarding the proposed Oakland Airport expansion and ask you to consider and act on several fronts.

Key Concerns:

- **Increased Noise and Air Pollution:** Expanded flight operations, especially the North Field runway usage, would expose Bay Farm Island and Main Island residents and schools to escalated noise levels and jet fuel emissions. Existing South Field runway proximate neighborhoods already endure an average sound level exceeding the FAA-regulated 65dB.
- **Health and Environmental Risks:** Scientific studies, such as those conducted in residential areas of Boston, MA, underline serious health impacts from aircraft emissions, including premature death, decreased lung function, and childhood leukemia. Moreover, concerns linger regarding property value depreciation, wildlife impact, and boosted vehicular traffic.

Immediate Requests:

- **Comprehensive Local Studies:** Implement technical, localized, and independently verified studies, incorporating noise and air quality sensors at ¼ mile intervals from all OAK airport runways. The analysis should encompass all gases and pollutant concentrations, reflecting on the potential impact on residents. This data is conspicuously absent from the current DEIR.

- **Exploration of Alternative Mitigations:** Please explore and implement alternatives to mitigate noise and pollution impacts, such as mandating all commercial jets to use specific runways and altering flight patterns.
- **Assertive Opposition from the City of Alameda:** I would like to urge the City of Alameda to take a definitive stance against the expansion, reflecting the strong disapproval of its citizens.
- **Extension of Deadline:** Extend the October 16 deadline to ensure thorough due diligence and appropriately address all noise and air pollution concerns, safeguarding against immediate and future health risks.

Your earnest attention to these pressing issues is anticipated and much appreciated.

Sincerely,

Erin Ellinwood

7 Wellfleet
Alameda, CA 94502

From: Felicia <river96025@aol.com>

Sent: Tuesday, October 10, 2023 3:06 PM

To: CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>

Subject: [EXTERNAL] Please do not let Oakland airport expand

Mayor Ashcraft and Council members:

Please do not let Oakland airport expand. Thank you ALL for your tireless help.

Sincerely,

Dr. and Mrs.David Jalen

From: Joanne Wong <joannewong27@gmail.com>
Sent: Tuesday, October 10, 2023 2:13 PM
To: CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Expansion of OAK

WHO:

The proposed expansion of Oakland Airport would greatly impact those who work or reside near the airport, particularly residents on Bay Farm Island and the East End of Main Island in Alameda.

WHAT:

Oakland Airport is in the planning process of modernizing and constructing a new terminal to increase the number of gates by 50%. With an increase of departing flights and increased usage of the North Field runway that directs aircrafts over all of Bay Farm Island and Main Island, this would mean louder, more frequent noise disturbances and jet fuel released directly over Alameda residents. Neighborhoods closest to the South Field runway *already* experience an average sound level greater than the FAA regulated 65dB from aircrafts departing from Oakland Airport. Noise and air pollution are of utmost concern, but there are many indirect impacts like decreased property values, environmental/wildlife concerns, and increased vehicle traffic.

Regarding the negative and serious health impacts of aircraft emissions in residential areas, various studies indicate that impacts of aviation emissions remains underexamined (Hudda, Durant, Fruin, Durant, 2020). In a study that measured gases, particles, and ultraparticles in a residential area in Boston, MA, concentration of all gases and pollutants at the residential area greatly exceeded those measured at regulatory monitored sites. Another systematic review of the impact of commercial aircraft activity identified dangerous and adverse health impacts, including increased rates of premature death, pre-term births, decreased lung function, oxidative DNA damage and childhood leukemia. These results show the pressing need to understand the direct impact of air pollutants from the Oakland Airport on Alameda residents.

We are asking that:

- The Port of Oakland and the City of Alameda conduct technical, *localized* studies that are independently verified that include noise and air quality sensors on Bay Farm Island at ¼

mile increments from each of the existing OAK airport runways. For air quality impacts, concentrations of all gases and pollutants need to be measured and examined. This is entirely missing in the current DEIR. This will allow for more accurate estimated noise and air pollution impacts on the residents most impacted by this expansion.

- The Port of Oakland explores ALL other potential options to mitigate noise and air pollution impacts (require all commercial jets to use the North Field runway, change existing flight patterns, etc.)
- The City of Alameda takes a stronger stance in opposition to the expansion. Their current response is disappointingly neutral and lacks the strong dissent of their citizens.

WHEN:

NOW is the time to act because the public review period for the Draft Environmental Impact Report (DEIR) ends on Monday, October 16th at 5PM PST.

Best,
Joanne

From: Jana Hunt <janamhunt@gmail.com>
Sent: Tuesday, October 10, 2023 12:31 PM
To: CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Opposition to the OAK airport expansion

Subject: Opposition to the OAK airport expansion

To the Attention of the Port of Oakland and City of Alameda,

I share many concerns with my Bay Farm Island neighbors, who strongly oppose the proposed expansion of Oakland Airport. This project will greatly impact residents and schools in its vicinity. With an increase of departing flights and increased usage of the North Field runway that directs aircrafts over all of Bay Farm Island and Main Island, this would mean louder, more frequent noise disturbances and jet fuel released directly over Alameda residents and schools. Neighborhoods closest to the South Field runway already experience an average sound level greater than the FAA regulated 65dB from aircrafts departing from Oakland Airport. Noise and air pollution are of utmost concern, but there are many indirect impacts like decreased property values, environmental/wildlife concerns, and increased vehicle traffic. Regarding the negative and serious health impacts of aircraft emissions in residential areas, various studies indicate that impacts of aviation emissions remain under examination (Hudda, Durant, Fruin, Durant, 2020). In a study that measured gases, particles, and ultra particles in a residential area in Boston, MA, concentration of all gases and pollutants at the residential area greatly exceeded those measured at regulatory monitored sites. Another systematic review of the impact of commercial aircraft activity identified dangerous and adverse health impacts, including increased rates of premature death, preterm births, decreased lung function, oxidative DNA damage and childhood leukemia. These results show the pressing need to understand the direct impact of air pollutants from the Oakland Airport on Alameda residents. I am asking that the Port of Oakland and the City of Alameda conduct technical, localized studies that are independently verified that include noise and air quality sensors on Bay Farm Island at ¼ mile increments from each of the existing OAK airport runways. For air quality impacts, concentrations of all gases and pollutants need to be measured and examined. This is entirely missing in the current DEIR and would allow for more accurate estimated noise and air pollution impacts on the residents most impacted by this expansion. I request that the Port of Oakland explores ALL other potential options to mitigate noise and air pollution impacts (require all commercial jets to use the North Field runway, change existing flight patterns, etc.). I also request the City of Alameda take a stronger stance in opposition to the expansion. The current response is disappointingly neutral and lacks the strong dissent of their citizens. Please extend the October 16

deadline until proper due diligence has been done and these air and noise pollution concerns have been addressed to mitigate immediate and long-term health risks.

Sincerely,

Jana Henderson
1076 Foster Street
Alameda, CA 94502

Jana H. Consulting, LLC

janamhunt.com

[schedule a session now](#)

(510) 332-4273

From: Melissa <melissafine@gmail.com>
Sent: Tuesday, October 10, 2023 3:53 PM
To: TermDev@portoakland.com; CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Oakland Airport Expansion

Oakland Airport is in the planning process of modernizing and constructing a new terminal to increase the number of gates by 50%. With an increase of departing flights and increased usage of the North Field runway that directs aircrafts over all of Bay Farm Island and Main Island, this would mean louder, more frequent noise disturbances and jet fuel released directly over Alameda residents. Neighborhoods closest to the South Field runway already experience an average sound level greater than the FAA regulated 65dB from aircrafts departing from Oakland Airport. Noise and air pollution, of course, are of utmost concern, but there are many indirect impacts like decreased property values, environmental/wildlife concerns, and increased vehicle traffic.

Regarding the negative and serious health impacts of aircraft emissions in residential areas, various studies indicate that impacts of aviation emissions remains under examined (Hudda, Durant, Fruin, Durant, 2020). In a study that measured gases, particles, and ultraparticles in a residential area in Boston, MA, concentration of all gases and pollutants at the residential area greatly exceeded those measured at regulatory monitored sites. Another systematic review of the impact of commercial aircraft activity identified dangerous and adverse health impacts, including increased rates of premature death, preterm births, decreased lung function, oxidative DNA damage and childhood leukemia. These results show the pressing need to understand the direct impact of air pollutants from the Oakland Airport on Alameda residents.

We are asking that:

- The Port of Oakland and the City of Alameda conduct technical, localized studies that are independently verified that include noise and air quality sensors on Bay Farm Island at ¼ mile increments from each of the existing OAK airport runways. For air quality impacts, concentrations of all gases and pollutants need to be measured and examined. This is entirely missing in the current DEIR. This will allow for more accurate estimated noise and air pollution impacts on the residents most impacted by this expansion.
- The Port of Oakland explores ALL other potential options to mitigate noise and air pollution impacts (require all commercial jets to use the North Field runway, change existing flight patterns, etc.)
- The City of Alameda takes a stronger stance in opposition to the expansion. Their current response is disappointingly neutral and lacks the strong dissent of their citizens.

Sincerely,
Melissa Anderson
Bay Farm Resident

From: Theresa Tan <tanresa@gmail.com>
Sent: Wednesday, October 11, 2023 10:20 AM
To: CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Opposition to OAK airport expansion

To the Attention of the Port of Oakland and City of Alameda, I share many concerns with my Alameda neighbors, who strongly oppose the proposed expansion of Oakland Airport. This project will greatly and negatively impact residents and schools in its vicinity. With an increase of departing flights and increased usage of the North Field runway that directs aircrafts over all of Bay Farm Island and Main Island, this would mean louder, more frequent noise disturbances and jet fuel released directly over Alameda residents and schools. Neighborhoods closest to the South Field runway already experience an average sound level greater than the FAA regulated 65dB from aircrafts departing from Oakland Airport. Noise and air pollution are of utmost concern, but there are many indirect impacts like decreased property values, environmental/wildlife concerns, and increased vehicle traffic. Regarding the negative and serious health impacts of aircraft emissions in residential areas, various studies indicate that impacts of aviation emissions remain under examination (Hudda, Durant, Fruin, Durant, 2020). In a study that measured gases, particles, and ultra particles in a residential area in Boston, MA, concentration of all gases and pollutants at the residential area greatly exceeded those measured at regulatory monitored sites. Another systematic review of the impact of commercial aircraft activity identified dangerous and adverse health impacts, including increased rates of premature death, preterm births, decreased lung function, oxidative DNA damage and childhood leukemia. These results show the pressing need to understand the direct impact of air pollutants from the Oakland Airport on Alameda residents. I request that the Port of Oakland explores all other potential options to mitigate noise and air pollution impacts (require all commercial jets to use the North Field runway, change existing flight patterns, etc.).

I also request the City of Alameda take a stronger stance in opposition to the expansion. The current response lacks the strong dissent of their citizens. Please do NOT approve the expansion proposal until proper due diligence has been done and these air and noise pollution concerns have been addressed to mitigate immediate and long-term health risks. Sincerely,

Theresa Tan
915 Shorepoint Court
Alameda CA 94501

From: msackerman@gmail.com <msackerman@gmail.com>
Sent: Tuesday, October 10, 2023 10:15 PM
To: Manager Manager <MANAGER@alamedaca.gov>
Subject: [EXTERNAL] In Opposition of Oct 16 Deadline/Airport Expansion

Dear Jennifer Ott, City Manager,

I am very, very concerned about this huge projected Oakland Airport Expansion.

Thank you for asking the Port for an extension to the Oct 16th deadline, but if they resist or say no, it is imperative that you insist.

The City needs more time to have adequate research done. The potential impact to health, safety, and property values is extremely concerning. The current impact when the airport uses the North Field creates deafening noise, disturbs sleep, impacts children, and impacts even pets. Remote work & conversations were continually interrupted during the recent extended use of that runway between Sept 22-25, that included **commercial jet take offs**. This was very eye opening as to the potential impact as my sleep was disturbed both early in the morning by 6am and past midnight, my heart was racing every time the jets flew over, which at some points was every ten minutes, and I had to stop conversation even with the windows closed because it was too loud to continue them until the jet completely passed by. My dog was shaking for those four days & most recently had diarrhea due to stress from the Fleet Week Blue Angels flyovers.

We must have independent airport experts represent the City and its residents, especially for those of us on Bay Farm who will be directly impacted. We are often not even remembered as a part of Alameda and should also have representation on the City Council, but that is another matter. I did find it interesting that at the city council meeting,

once it was noted as to the potential impact to the Main Island, with flight patterns that would go over the West End, that more attention was paid & those facts in particular were noted in the Mayor's and Council's comments.

We need you to protect ALL your Alameda residents.

Thank you,

Natalie Ackerman

Sent from my iPhone

From: Sandy & Loy <loymd@aol.com>
Sent: Tuesday, October 10, 2023 10:04 PM
To: Finance <Finance@alamedaca.gov>
Subject: [EXTERNAL] Fwd: Oakland Airport Expansion

Sent: 10/10/2023 4:52:38 PM Eastern Daylight Time
Subject: Oakland Airport Expansion

Dear Jennifer Ott, City Manager and Honorable Mayor Marilyn Ezzy Ashcraft,

We are writing to present our opposition To the Oakland Ports proposed plan for the Oakland Airport Expansion.

We are out-of-state owners of a presently rented townhouse in Bay Farm. We have received daily phone calls and emails from our tenants, particularly about the unacceptable constant noise. By constant, it was described as being as early as 6 am and continuing until after midnight. Even their 2 dogs were noticeably distressed by this noise.

It is also outrageous to us that such a project could present an October 16 deadline for public comments and further studies on the environmental impact affecting the City of Alameda.

We honestly feel that our property value will definitely be reduced, and Bay Farm will be a ghost town if this project comes to fruition.

We hope you will persist in your efforts to protect the City of Alameda from this most significant incursion into the lives of your residents.

Yours Truly, Sandra R. Galang and Cirilo F. Galang

From: Kristen Pate <kristen.pate@gmail.com>
Sent: Wednesday, October 11, 2023 11:08 AM
To: CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>; TermDev@portoakland.com
Subject: [EXTERNAL] Urgent Action Needed: Addressing Critical Concerns on Oakland Airport Expansion

To the Port of Oakland and the City of Alameda,

I'm writing to inform you about my significant concerns regarding the proposed Oakland Airport expansion and ask you to consider and act on several fronts.

Key Concerns:

- **Increased Noise and Air Pollution:** Expanded flight operations, especially the North Field runway usage, would expose Bay Farm Island and Main Island residents and schools to escalated noise levels and jet fuel emissions. Existing South Field runway proximate neighborhoods already endure an average sound level exceeding the FAA-regulated 65dB.
- **Health and Environmental Risks:** Scientific studies, such as those conducted in residential areas of Boston, MA, underline serious health impacts from aircraft emissions, including premature death, decreased lung function, and childhood leukemia. Moreover, concerns linger regarding property value depreciation, wildlife impact, and boosted vehicular traffic.

Immediate Requests:

- **Comprehensive Local Studies:** Implement technical, localized, and independently verified studies, incorporating noise and air quality sensors at ¼ mile intervals from all OAK airport runways. The analysis should encompass all gases and pollutant concentrations, reflecting on the potential impact on residents. This data is conspicuously absent from the current DEIR.

- **Exploration of Alternative Mitigations:** Please explore and implement alternatives to mitigate noise and pollution impacts, such as mandating all commercial jets to use specific runways and altering flight patterns.
- **Assertive Opposition from the City of Alameda:** I would like to urge the City of Alameda to take a definitive stance against the expansion, reflecting the strong disapproval of its citizens.
- **Extension of Deadline:** Extend the October 16 deadline to ensure thorough due diligence and appropriately address all noise and air pollution concerns, safeguarding against immediate and future health risks.

Your earnest attention to these pressing issues is anticipated and much appreciated.

Sincerely,

Kristen Pate

From: Steve Barrett <stephen.n.barrett@gmail.com>
Sent: Wednesday, October 11, 2023 11:38 AM
To: CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>; TermDev@portoakland.com
Subject: [EXTERNAL] Opposition to the OAK airport expansion

To the Attention of the Port of Oakland and City of Alameda,

I share many concerns with my Bay Farm Island neighbors, who strongly oppose the proposed expansion of Oakland Airport. This project will have major negative impacts on residents and schools in its vicinity.

With an increase of departing flights and increased usage of the North Field runway that directs aircrafts over all of Bay Farm Island and Main Island, this would mean louder, more frequent noise disturbances and jet fuel released directly over Alameda residents and schools. Neighborhoods closest to the South Field runway already experience an average sound level greater than the FAA regulated 65dB for neighborhoods and schools from aircrafts departing from Oakland Airport. Noise and air pollution are of utmost concern, but there are many indirect impacts like decreased property values, environmental/wildlife concerns, and increased vehicle traffic.

Regarding the negative and serious health impacts of aircraft emissions in residential areas, various studies indicate that impacts of aviation emissions remain under examination (Hudda, Durant, Fruin, Durant, 2020). In a study that measured gases, particles, and ultra particles in a residential area in Boston, MA, concentration of all gases and pollutants at the residential area greatly exceeded those measured at regulatory monitored sites. Another systematic review of the impact of commercial aircraft activity identified dangerous and adverse health impacts, including increased rates of premature death, preterm births, decreased lung function, oxidative DNA damage and childhood leukemia. These results show the pressing need to understand the direct impact of air pollutants from the Oakland Airport on Alameda residents.

I am asking that the Port of Oakland and the City of Alameda conduct technical, localized studies that are independently verified that include noise and air quality sensors on Bay Farm Island at ¼ mile increments from each of the existing OAK airport runways. For air quality impacts, concentrations of all gases and pollutants need to be measured and examined. This is entirely missing in the current DEIR and would allow for more accurate estimated noise and air pollution impacts on the residents most impacted by this expansion.

I request that the Port of Oakland explores ALL other potential options to mitigate noise and air pollution impacts (require all commercial jets to use the North Field runway, change existing flight patterns, etc.). I also request the

the City of Alameda take a stronger stance in opposition to the expansion. The current response is disappointingly neutral and lacks the strong dissent of their citizens.

Please ensure proper due diligence is done and our air and noise pollution concerns have been addressed to mitigate immediate and long-term health risks.

Sincerely,
Stephen Barrett
186 Ratto Road, Alameda

FW: [EXTERNAL] Opposition to the OAK airport expansion

Jennifer Ott

Fri 10/13/2023 11:06 AM

To: Allen Tai <ATai@alamedaca.gov>; Celena Chen <cchen@alamedacityattorney.org>;

From: Arielle Crenshaw Gmail <ariellecrenshaw@gmail.com>
Sent: Friday, October 13, 2023 9:47 AM
To: TermDev@portoakland.com; CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Opposition to the OAK airport expansion

To the Attention of the Port of Oakland and City of Alameda,

I share many concerns with my Bay Farm Island neighbors, who strongly oppose the proposed expansion of Oakland Airport. This project will have major negative impacts on residents and schools in its vicinity.

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I am asking that the Port of Oakland and the City of Alameda conduct technical, localized studies that are independently verified that include noise and air quality sensors on Bay Farm Island at ¼ mile increments from each of the existing OAK airport runways. For air quality impacts, concentrations of all gases and pollutants need to be measured and examined. This is entirely missing in the current DEIR and would allow for more accurate estimated noise and air pollution impacts on the residents most impacted by this expansion.

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request the City of Alameda take a stronger stance in opposition to the expansion. The current response is disappointingly neutral and lacks the strong dissent of their citizens.

Please ensure proper due diligence is done and our air and noise pollution concerns have been addressed to mitigate immediate and long-term health risks.

Sincerely,

**Arielle Crenshaw
3107 El Sereno
Alameda, CA 94502**

FW: Opposition to the OAK airport expansion

Jennifer Ott

Wed 10/11/2023 5:19 PM

To: Allen Tai <ATai@alamedaca.gov>; Celena Chen <cchen@alamedacityattorney.org>; Steven Buckley <sbuckley@alamedaca.gov>;

From: Julia Crick <jul0215@hotmail.com>
Sent: Tuesday, October 10, 2023 9:43 PM
To: TermDev@portoakland.com; CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Opposition to the OAK airport expansion

To the Attention of the Port of Oakland and City of Alameda,

I share many concerns with my Bay Farm Island neighbors, who strongly oppose the proposed expansion of Oakland Airport. This project will greatly impact residents and schools in its vicinity.

On a personal level, we moved to Bayfarm last year and purchased our house with the knowledge of the current flight patterns and the fact that our house is .8 miles from the end of the North runway. The private smaller jets that fly from that runway are a nuisance but manageable when it comes to sound and frequency (fact they do not fly early am or late at night and less often). During the recent weekend work on the South runway and commercial jets flew directly over our house, it was insanely loud, very frequent (every 5-10 mins) and a noticeable difference in quality of life both inside and outside the house. Our 3 year old was so affected by the loud take offs he refused to play outside or even go to the park nearby. Not only does this make living on BayFarm a negative experience for our family, the lasting effect of declined property values effect our future. Who will want to live here, how can Alameda support this plan.

With an increase of departing flights and increased usage of the North Field runway that directs aircrafts over all of Bay Farm Island and Main Island, this would mean louder, more frequent noise disturbances and jet fuel released directly over Alameda residents and schools. Neighborhoods closest to the South Field runway already experience an average sound level greater than the FAA regulated 65dB from aircrafts departing from Oakland Airport. Noise and air pollution are of utmost concern, but there are many indirect impacts like decreased property values, environmental/wildlife concerns, and increased vehicle traffic.

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I am asking that the Port of Oakland and the City of Alameda conduct technical, localized studies that are independently verified that include noise and air quality sensors on Bay Farm Island at ¼ mile increments from each of the existing OAK airport runways. For air quality impacts, concentrations of all gases and pollutants need to be measured and examined. This is entirely missing in the current DEIR and would allow for more accurate estimated noise and air pollution impacts on the residents most impacted by this expansion.

I request that the Port of Oakland explores ALL other potential options to mitigate noise and air pollution impacts (require all commercial jets to use the North Field runway, change existing flight patterns, etc.). I also request the City of Alameda take a stronger stance in opposition to the expansion. The current response is disappointingly neutral and lacks the strong dissent of their citizens.

Please extend the October 16 deadline until proper due diligence has been done and these air and noise pollution concerns have been addressed to mitigate immediate and long-term health risks.

Sincerely,
Julia Crick
BayFarm Alameda

FW: [EXTERNAL] Opposition to the OAK airport expansion

Jennifer Ott

Wed 10/11/2023 5:19 PM

To: Allen Tai <ATai@alamedaca.gov>; Celena Chen <cchen@alamedacityattorney.org>; Steven Buckley <sbuckley@alamedaca.gov>;

From: Le Harper <smile4le@yahoo.com>
Sent: Tuesday, October 10, 2023 8:25 PM
To: TermDev@portoakland.com; CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Opposition to the OAK airport expansion

To the Attention of the Port of Oakland and City of Alameda,

I share many concerns with my Bay Farm Island neighbors, who strongly oppose the proposed expansion of Oakland Airport. This project will greatly impact residents and schools in its vicinity.

With an increase of departing flights and increased usage of the North Field runway that directs aircrafts over all of Bay Farm Island and Main Island, this would mean louder, more frequent noise disturbances and jet fuel released directly over Alameda residents and schools. Neighborhoods closest to the South Field runway already experience an average sound level greater than the FAA regulated 65dB from aircrafts departing from Oakland Airport. Noise and air pollution are of utmost concern, but there are many indirect impacts like decreased property values, environmental/wildlife concerns, and increased vehicle traffic.

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I am asking that the Port of Oakland and the City of Alameda conduct technical, localized studies that are independently verified that include noise and air quality sensors on Bay Farm Island at ¼ mile increments from each of the existing OAK airport runways. For air quality impacts, concentrations of all gases and pollutants need to be measured and examined. This is entirely missing in the current DEIR and would allow for more accurate estimated noise and air pollution impacts on the residents most impacted by this expansion.

I request that the Port of Oakland explores ALL other potential options to mitigate noise and air pollution impacts (require all commercial jets to use the North Field runway, change existing flight patterns, etc.). I also request the City of Alameda take a stronger stance in opposition to the expansion. The current response is disappointingly neutral and lacks the strong dissent of their citizens.

Please extend the October 16 deadline until proper due diligence has been done and these air and noise pollution concerns have been addressed to mitigate immediate and long-term health risks.

Sincerely,

Le Harper
15 Ferro Court
Alameda, CA 94502

FW: [EXTERNAL] OAK Expansion

Jennifer Ott

Wed 10/11/2023 5:18 PM

To: Allen Tai <ATai@alamedaca.gov>; Celena Chen <cchen@alamedacityattorney.org>; Steven Buckley <sbuckley@alamedaca.gov>;

From: SARAH-JANE MEASOR <sjballet@earthlink.net>

Sent: Wednesday, October 11, 2023 1:30 AM

To: TermDev@portoakland.com; CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>

Cc: Sarah-Jane Measor <sjballet@earthlink.net>; Michael Lowe <loweballet@yahoo.com>

Subject: [EXTERNAL] OAK Expansion

Opposition to the OAK airport expansion To the Attention of the Port of Oakland and City of Alameda,

I share many concerns with my Bay Farm Island neighbors, who strongly oppose the proposed expansion of Oakland Airport. This project will greatly impact residents and schools in its vicinity. With an increase of departing flights and increased usage of the North Field runway that directs aircrafts over all of Bay Farm Island and Main Island, this would mean louder, more frequent noise disturbances and jet fuel released directly over Alameda residents and schools. Neighborhoods closest to the South Field runway already experience an average sound level greater than the FAA regulated 65dB from aircrafts departing from Oakland Airport. Noise and air pollution are of utmost concern, but there are many indirect impacts like decreased property values, environmental/wildlife concerns, and increased vehicle traffic. Regarding the negative and serious health impacts of aircraft emissions in residential areas, various studies indicate that impacts of aviation emissions remain under examination (Hudda, Durant, Fruin, Durant, 2020). In a study that measured gases, particles, and ultra particles in a residential area in Boston, MA, concentration of all gases and pollutants at the residential area greatly exceeded those measured at regulatory monitored sites. Another systematic review of the impact of commercial aircraft activity identified dangerous and adverse health impacts, including increased rates of premature death, preterm births, decreased lung function, oxidative DNA damage and childhood leukemia. These results show the pressing need to understand the direct impact of air pollutants from the Oakland Airport on Alameda residents. I am asking that the Port of Oakland and the City of Alameda conduct technical, localized studies that are independently verified that include noise and air quality sensors on Bay Farm Island at ¼ mile increments from each of the existing OAK airport runways. For air quality impacts, concentrations of all gases and pollutants need to be measured and examined. This is entirely missing in the current DEIR and would allow for more accurate estimated noise and air pollution impacts on the residents most impacted by this expansion. I request that the Port of Oakland explores ALL other potential options to mitigate noise and air pollution impacts (require all commercial jets to use the North Field runway, change existing flight patterns, etc.). I also request the City of Alameda take a stronger stance in opposition to the expansion. The current response is disappointingly neutral and lacks the strong dissent of their citizens. Please do not approve the expansion proposal until proper due diligence has been done and these air and noise pollution concerns have been addressed to mitigate immediate and long-term health risks.

Sincerely,

Sarah-Jane Measor and Michael Lowe
Residents and Property Owners in Alameda since 1964

Fwd: [EXTERNAL] Opposition to

Jennifer Ott

Thu 10/12/2023 6:55 PM

To: Allen Tai <ATai@alamedaca.gov>; Celena Chen <cchen@alamedacityattorney.org>;

Sent from my iPhone

Begin forwarded message:

From: Sam Crick <samvcrick@gmail.com>
Date: October 12, 2023 at 6:53:42 PM PDT
To: TermDev@portoakland.com, CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Opposition to

To the Attention of the Port of Oakland and City of Alameda,

I share many concerns with my Bay Farm Island neighbors, who strongly oppose the proposed expansion of Oakland Airport. This project will greatly impact residents and schools in its vicinity.

On a personal level, we moved to Bayfarm last year and purchased our house with the knowledge of the current flight patterns and the fact that our house is .8 miles from the end of the North runway. The private smaller jets that fly from that runway are a nuisance but manageable when it comes to sound and frequency (they do not fly early am or late at night and less often). During the recent weekend work on the South runway and commercial jets flew directly over our house, it was insanely loud, very frequent (every 5-10 mins) and a noticeable difference in the quality of life both inside and outside the house. Our 3 year old was so affected by the loud take offs he refused to play outside or even go to the park nearby. Not only does this make living on BayFarm a negative experience for our family, the lasting effect of declined property values effect our future. Who will want to live here, how can Alameda support this plan.

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Sincerely,
Sam Crick

FW: Opposition to the OAK airport expansion

Jennifer Ott

Thu 10/12/2023 5:23 AM

To: Allen Tai <ATai@alamedaca.gov>; Celena Chen <cchen@alamedacityattorney.org>;

FYI

From: Susan Shauf <susanshauf@outlook.com>
Sent: Wednesday, October 11, 2023 8:57 PM
To: TermDev@portoakland.com; CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Opposition to the OAK airport expansion

To the Attention of the Port of Oakland and City of Alameda, I share many concerns with my Bay Farm Island neighbors, who strongly oppose the proposed expansion of Oakland Airport. This project will greatly impact residents and schools in its vicinity.

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Sincerely,

Susan Shauf
1020 Verdermar Drive

10/13/23, 1:09 PM

Mail - ATai@alamedaca.gov

Alameda, CA 94502
(480) 205-9037

FW: [EXTERNAL] Opposition to the Oakland Airport Expansion

Jennifer Ott

Thu 10/12/2023 1:50 PM

To: Allen Tai <ATai@alamedaca.gov>; Celena Chen <cchen@alamedacityattorney.org>; Steven Buckley <sbuckley@alamedaca.gov>;

FYI

From: Catherine Sherrer <cathyserrer80@gmail.com>

Sent: Thursday, October 12, 2023 12:28 PM

To: termdev@oaklandairport.com; CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>

Subject: [EXTERNAL] Opposition to the Oakland Airport Expansion

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I share many concerns with my Bay Farm Island neighbors, who strongly oppose the proposed expansion of Oakland Airport. This project will greatly impact residents and schools in its vicinity. With an increase of departing flights and increased usage of the North Field runway that directs aircrafts over all of Bay Farm Island and Main Island, this would mean louder, more frequent noise disturbances and jet fuel released directly over Alameda residents and schools. Neighborhoods closest to the South Field runway already experience an average sound level greater than the FAA regulated 65dB from aircrafts departing from Oakland Airport. Noise and air pollution are of utmost concern, but there are many indirect impacts like decreased property values, environmental/wildlife concerns, and increased vehicle traffic.

Regarding the negative and serious health impacts of aircraft emissions in residential areas, various studies indicate that impacts of aviation emissions remain under examination (Hudda, Durant, Fruin, Durant, 2020). In a study that measured gases, particles, and ultra particles in a residential area in Boston, MA, concentration of all gases and pollutants at the residential area greatly exceeded those measured at regulatory monitored sites. Another systematic review of the impact of commercial aircraft activity identified dangerous and adverse health impacts, including increased rates of premature death, preterm births, decreased lung function, oxidative DNA damage and childhood leukemia. These results show the pressing need to understand the direct impact of air pollutants from the Oakland Airport on Alameda residents.

I am asking that the Port of Oakland and the City of Alameda conduct technical, localized studies that are independently verified that include noise and air quality sensors on Bay Farm Island at ¼ mile increments from each of the existing OAK airport runways. For air quality impacts, concentrations of all gases and pollutants need to be measured and examined. This is entirely missing in the current DEIR and would allow for more accurate estimated noise and air pollution impacts on the residents most impacted by this expansion.

I request that the Port of Oakland explores ALL other potential options to mitigate noise and air pollution impacts (require all commercial jets to use the North Field runway, change existing flight patterns, etc.). I also request the City of Alameda take a stronger stance in opposition to the expansion. The current response is disappointingly neutral and lacks the strong dissent of their citizens.

Please do not approve the expansion proposal until proper due diligence has been done and these air and noise pollution concerns have been addressed to mitigate immediate and long-term health risks.

Sincerely,
Catherine Sherrer
391 Channing Way, Alameda

10/13/23, 1:11 PM

Mail - ATai@alamedaca.gov

510-882-2413

Sent from my iPhone

Fwd: [EXTERNAL] Protect Alameda from noise and health hazards of OAK Airport Expansion

Jennifer Ott

Thu 10/12/2023 8:31 PM

To: Allen Tai <ATai@alamedaca.gov>; Celena Chen <cchen@alamedacityattorney.org>;

Fyi

Sent from my iPhone

Begin forwarded message:

From: kathy stiles <kstls.prlst@gmail.com>
Date: October 12, 2023 at 7:37:15 PM PDT
To: CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Protect Alameda from noise and health hazards of OAK Airport Expansion

Dear Alameda Council Members,

I am concerned that Oakland airport is planning to add 16 gates to accommodate more flights. Air travel is the most polluting way to travel, and adding these gates will increase noise & health hazards as it speeds global warming. Please protect our community, our health, and the planet and send the strongest possible letter, urging the Port of Oakland to refuse to certify this Draft EIR and halt this harmful Project.

Also it seems that the Draft EIR is being done "in-house", which I think is reasonable to assume will no doubt yield a favorable review. Not sure if this is standard procedure but it seems very wrong.

The redevelopment and expansion of the North Field nine years ago already doubled the number of runways available, essentially creating a second Airport!

Airplane traffic from the North Field currently consists of cargo planes, that now take off directly over the homes of the East End and Bay Farm, along with scores of daily and nightly commercial planes, many of which are commercial passenger planes, in addition to corporate and small plane traffic.

Quiet hours and flight path and height restrictions that were once part of Airport operating procedures are no longer adhered to or have been all together outright eliminated.

The noise from the North Field and the airplanes flying over the East End is beyond horrible! It goes on all day and practically all night, and it should have been deemed unacceptable eight years ago!

The Airport Expansion project I fear, will no doubt result in an large increase in the number of planes taking off from the North Field, and further add to the already nearly intolerable amount and level of noise along with the untold amount of poison being layered on every inch of our city!

More planes flying over the homes of the residents of Alameda and surrounding communities will not only have serious harmful effects on our health and the Earth's, but also greatly harms our overall quality of life.

I urge and plead to you to please do everything possible to reject and stop the OAK Airport Expansion project, to protect our city and our planet and children!

Thank you.

Kathy Stiles
Kstls.prlst@gmail.com

FW: [EXTERNAL] Opposition to the OAK airport expansion

Jennifer Ott

Fri 10/13/2023 10:59 AM

To: Allen Tai <ATai@alamedaca.gov>; Celena Chen <cchen@alamedacityattorney.org>;

From: jejveale@gmail.com <jejveale@gmail.com>
Sent: Thursday, October 12, 2023 9:40 PM
To: termdev@portoakland.com; CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>
Subject: [EXTERNAL] Opposition to the OAK airport expansion

To the Attention of the Port of Oakland and City of Alameda,

I share many concerns with my Bay Farm Island neighbors, who strongly oppose the proposed expansion of Oakland Airport. This project will greatly impact residents and schools in its vicinity. With an increase of departing flights and increased usage of the North Field runway that directs aircrafts over all of Bay Farm Island and Main Island, this would mean louder, more frequent noise disturbances and jet fuel released directly over Alameda residents and schools. Neighborhoods closest to the South Field runway already experience an average sound level greater than the FAA regulated 65dB from aircrafts departing from Oakland Airport. Noise and air pollution are of utmost concern, but there are many indirect impacts like decreased property values, environmental/wildlife concerns, and increased vehicle traffic.

Regarding the negative and serious health impacts of aircraft emissions in residential areas, various studies indicate that impacts of aviation emissions remain under examination (Hudda, Durant, Fruin, Durant, 2020). In a study that measured gases, particles, and ultra particles in a residential area in Boston, MA, concentration of all gases and pollutants at the residential area greatly exceeded those measured at regulatory monitored sites. Another systematic review of the impact of commercial aircraft activity identified dangerous and adverse health impacts, including increased rates of premature death, preterm births, decreased lung function, oxidative DNA damage and childhood leukemia. These results show the pressing need to understand the direct impact of air pollutants from the Oakland Airport on Alameda residents.

I am asking that the Port of Oakland and the City of Alameda conduct technical, localized studies that are independently verified that include noise and air quality sensors on Bay Farm Island at ¼ mile increments from each of the existing OAK airport runways. For air quality impacts, concentrations of all gases and pollutants need to be measured and examined. This is entirely missing in the current DEIR and would allow for more accurate estimated noise and air pollution impacts on the residents most impacted by this expansion.

I request that the Port of Oakland explores ALL other potential options to mitigate noise and air pollution impacts (require all commercial jets to use the North Field runway, change existing flight patterns, etc.). I also request the City of Alameda take a stronger stance in opposition to the expansion. The current response is disappointingly neutral and lacks the strong dissent of their citizens.

Please do not approve the expansion proposal until proper due diligence has been done and these air and noise pollution concerns have been addressed to mitigate immediate and long-term health risks.

Sincerely,

Jane & Gordon Veale
338 Sweet Road, Alameda, CA 94502

FW: [EXTERNAL] Urgent Action Needed: Addressing Critical Concerns on Oakland Airport Expansion

Jennifer Ott

Wed 10/11/2023 4:35 PM

To: Allen Tai <ATai@alamedaca.gov>; Celena Chen <cchen@alamedacityattorney.org>; Steven Buckley <sbuckley@alamedaca.gov>;

fyi

From: Phoebe Yu <pingyu30@hotmail.com>

Sent: Wednesday, October 11, 2023 3:35 PM

To: CityCouncil-List <CITYCOUNCIL-List@alamedaca.gov>; TermDev@portoakland.com

Subject: [EXTERNAL] Urgent Action Needed: Addressing Critical Concerns on Oakland Airport Expansion

To the Port of Oakland and the City of Alameda,

I'm writing to inform you about my significant concerns regarding the proposed Oakland Airport expansion and ask you to consider and act on several fronts.

Key Concerns:

- **Increased Noise and Air Pollution:** Expanded flight operations, especially the North Field runway usage, would expose Bay Farm Island and Main Island residents and schools to escalated noise levels and jet fuel emissions. Existing South Field runway proximate neighborhoods already endure an average sound level exceeding the FAA-regulated 65dB.
- **Health and Environmental Risks:** Scientific studies, such as those conducted in residential areas of Boston, MA, underline serious health impacts from aircraft emissions, including premature death, decreased lung function, and childhood leukemia. Moreover, concerns linger regarding property value depreciation, wildlife impact, and boosted vehicular traffic.

Immediate Requests:

- **Comprehensive Local Studies:** Implement technical, localized, and independently verified studies, incorporating noise and air quality sensors at ¼ mile intervals from all OAK airport runways. The analysis should encompass all gases and pollutant concentrations, reflecting on the potential impact on residents. This data is conspicuously absent from the current DEIR.
- **Exploration of Alternative Mitigations:** Please explore and implement alternatives to mitigate noise and pollution impacts, such as mandating all commercial jets to use specific runways and altering flight patterns.
- **Assertive Opposition from the City of Alameda:** I would like to urge the City of Alameda to take a definitive stance against the expansion, reflecting the strong disapproval of its citizens.
- **Extension of Deadline:** Extend the October 16 deadline to ensure thorough due diligence and appropriately address all noise and air pollution concerns, safeguarding against immediate and future health risks.

Your earnest attention to these pressing issues is anticipated and much appreciated.

Sincerely,

Ping Yu
53 Killybegs Road, Alameda, CA 94502

