October 16, 2023



Ms. Colleen Liang Port of Oakland Environmental Programs and Planning Division 530 Water Street Oakland, Cal. 94607 cliang@portoakland.com, TermDev@portoakland.com

RE: Oakland International Airport Terminal Modernization and Development Project (SCH No. 2021050164)

Dear Ms. Liang,

Thank you for the opportunity to comment on the Oakland International Airport Terminal Modernization and Development Project. We are happy to see the Port's continued interest in investing in our local infrastructure. However, we do have comments on the Draft Environmental Impact Report. The cultural resource mitigations are woefully insufficient, and the impact of adding 16 gates to the airport is unmitigated.

## The Cultural Mitigations Are Insufficient and Inadequate. Restore the Oakland Airport Inn to Celebrate Oakland's Aviation Heritage.

The DEIR proposes, as mitigations for destruction of the largely intact Terminal 1, only HABS documentation and interpretive signage (p. 15-16 DEIR). Though photography and signage are welcomed, they do not mitigate the loss of one of the first Jet Age terminals, one that still "retains integrity of location, design, materials, workmanship, setting, feeling and association to convey its significance" (p. 22 Cultural Resources Inventory and Evaluation Report).

Sufficient mitigation requires not only photos and signage, but also healing already damaged historic airport fabric to make the airport culturally whole. The Oakland Airport Inn, at 9465 Earhart Road, is the obvious example. This Inn is a part of North Field (Oakland Landmark #33), where many pioneering events took place, such as the beginning of Amelia Earhart's round the world journey.

The Inn itself is the world's first airport hotel, highly significant, but has major structural problems. Proper mitigation of the loss of Terminal 1 must include restoration of the Oakland Airport Inn at North Field to the Secretary of Interior's Standards. Doing so would be a true mitigation to the loss of Terminal 1 and a chance for the Port of Oakland to honor and celebrate its history on the world stage.

We do understand that the Inn structure is not in the currently-defined project area, and thus the project area should be expanded to include this resource.

Climate Impacts Are Unmitigated. Mitigate with Great Transit, Unleaded Fuel, and East Oakland Investments.

We understand that the addition of 16 gates entails no mitigations regarding impacts of Greenhouse Gas Emissions. The DEIR states inaccurately that "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" (DEIR 3-7.12). Adding 16 more gates will cause more emissions, since there will be increased airport capacity and thus plane, auto, and truck traffic. In response, we demand the following mitigations to alleviate the impacts from increased pollution:

Mitigation 1: Provide first class transit connections to create a "Complete Airport."

- a. Require an improved connection between BART and both terminals with strong signage and real time information that does not require the traveler to go outside or cross traffic lanes.
- b. Require a first class indoor and climate-controlled bus stop for AC Transit at the airport next to the BART station. Include electronic real time arrival information.
- c. Require fully separated Class 1 bicycle path to the airport that connects to the Bay Trail and East Bay Greenway with free indoor 24/7 accessible long term bicycle parking at the airport.
- d. Require work with BART/AC Transit/Clipper to provide free transit service to arriving and departing passengers to encourage public transportation use to the airport.
- e. Require that the airport adopt a policy requiring that transit/biking be the easiest way (not just the right way) to get to and from the airport.

**Mitigation 2:** Disallow leaded fuel at Oakland Airport, including the general aviation airport. Leaded fuel from general aviation plans causes harm to Oakland's communities in East Oakland. Require the airport to stop providing leaded fuel to general aviation aircraft, similar to Santa Clara's airport. See <a href="https://news.santaclaracounty.gov/reid-hillview-airport-airborne-lead-study-evergreen-news">https://news.santaclaracounty.gov/reid-hillview-airport-airborne-lead-study-evergreen-news</a> for more details.

Mitigation 3: East Oakland Resilience

- a. Restore wetlands near the project site to mitigate sea level rise.
- b. Plant trees, create new parks, storm water retention planters on streets, etc., in East Oakland to mitigate impacts to air quality and climate change caused by the airport.

Thank you for considering our comments. Please include us in any further notices, announcements, discussions, deliberations, or documents related to this project, at info@oaklandheritage.org. Please contact Daniel Levy at dlouislevy@gmail.com if you would like to discuss these comments.

We support the Stop OAK Expansion Coalition in their efforts to stem the impacts of greenhouse gases.

Sincerely,

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Mary Harper, President

cc: Mayor Sheng Thao, Port Executive Director Danny Wan