



Date: August 15, 2023

To: Commissioners, Port of Oakland

From: Jack Lucero Fleck  
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Oakland, CA 94619

Re: 350 Bay Area Comments on EIR for Oakland Airport Terminal Modernization and Development

Thank you for this opportunity to comment on the Draft Environmental Impact Report for the Oakland Airport Terminals Modernization and Development (the EIR) issued July 17, 2023.

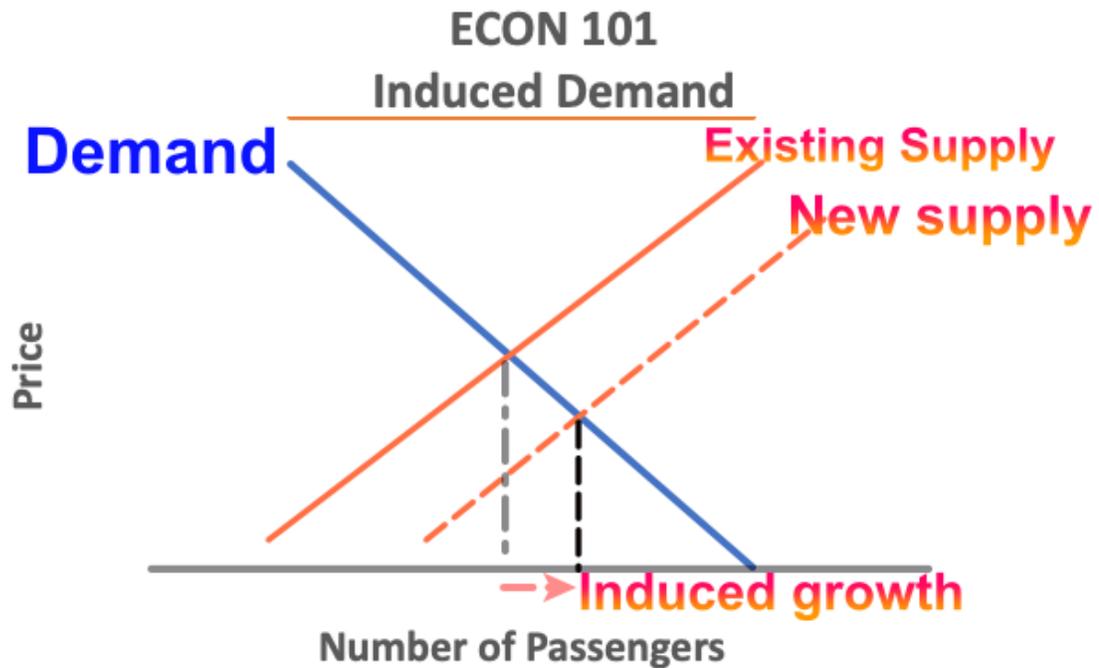
I am writing on behalf of 350 Bay Area, a climate activist group with over 20,000 supporters around the Bay Area.

We strongly disagree with the oft repeated statement (at least 30 times) in the EIR that the improvements (a new terminal and a net of 16 new gates among others) are only intended to “accommodate the market-based demand” and therefore will not stimulate additional air traffic beyond the No Project alternative.

As a registered professional Traffic Engineer and transportation planner, experience shows that widening a roadway or building a new highway not only accommodates existing and projected demand, but also induces additional demand. When I began to study highway engineering in the 1960s, the general principle was that the freeways were built based on existing and projected travel demands and were not intended to promote growth. But we saw vast expansion of suburbs and vehicle miles traveled following freeway construction, whether that was the intended goal or not.

The same principle applies in the case of this airport modernization plan. The EIR states, “Based on projected demand, the number of aircraft operations . . . would increase with or without the Proposed Project. And it states, “ Because the activity levels at the Airport would be the same under the No Project Alternative as for the Proposed Project, environmental impacts associated with aircraft operations would be similar if not identical.”

This assertion flies in the face not only of the past 100 years of transportation experience, but also in the face of basic economics. As shown in the graph below, a new, cheaper supply curve leads to an increase in the total quantity (whether it be traffic on a highway, widgets consumed, or airport passengers). Lower prices lead to more sales.



In other words, the airport modernization will necessarily increase the number of passengers beyond the existing number. This is especially true if there is a new demand curve with more passengers; in that case the addition of the terminal and gates will induce even greater growth.

Indeed that is the real point of the improvements. As quoted in the East Bay Times on July 25, John Albrecht from the Port of Oakland said, “There’s tremendous opportunity for growth and development.”

Interestingly, the EIR claims, “Without any development of a new terminal, the existing terminals, gates, and aprons could accommodate the market-based demand but not at the industry-standard levels of service.” This is quite remarkable since the EIR states that the current terminal was designed for 8 - 10 million passengers (say 9 million) and reached 13 million in 2019. The projection is to reach 17 million in 2028 and 24 million in 2038.

Taking just the 13 million figure, this is about 1.5 times more than the designed capacity. Therefore, if the new terminal is designed to accommodate 24 million, it should be able to handle 36 million at the current airport level of service.

Taking the 24 million design figure proposed in this “modernization’ plan, that is about 2.7 times the nine million design. If the EIR statement that the current terminal could hold 24 million passengers, the new airport could conceivably accommodate  $2.7 \times 24 = 65$  million passengers—a tremendous opportunity for growth indeed!!

The question then arises as to why the EIR doesn't just admit that this is an expansion plan.

The answer is clear. Admitting this is a growth plan would mean that the project would contradict existing City and State policies to reduce greenhouse gases (GHGs). This would require that the conflict be reported as a significant impact. The EIR states, "a significant impact related to GHG emissions would occur if the Proposed Project would:

1. Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment (comparable to State CEQA Guidelines Section 15064.4(b)(1)-(2)), or
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs (same as State CEQA Guidelines Section 15064.4(b)(3)).

The City of Oakland has adopted a Climate Emergency Resolution and has passed an Equitable Climate Action Plan aimed at reaching carbon neutrality by 2045. Any plan to expand the airport operations would conflict with these plans and regulations. Therefore, the EIR is asserting that it is simply "accommodating market-based demand", which would happen even without the improvements.

The Port Commission should not be deceived by this falsehood.

Note that our organization, 350 Bay Area, is strongly in favor of clean energy solutions to climate challenges—e.g. electrification of transportation and heat pumps for buildings to replace gas—in addition to measures to reduce car use such as public transit, bikes and walking. In the case of aviation, no clean energy alternative exists. Therefore, until fossil free flight is possible, we need to support rail and alternatives to air travel, not promote expansion.

Please reject the new terminal and new gates as proposed in the Terminal Modernization and Development plan.

Sincerely,

Jack Lucero Fleck

[350 Bay Area](#)

Co-lead, Transportation committee