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October 16, 2023

Colleen Liang
Port of Oakland Environmental Programs and Planning Division
530 Water St., Oakland CA 94607

RE: Comments on the Port's Oakland International Airport Terminal Modernization and Development Project Draft Environmental Impact Report

Dear Colleen Liang:

On behalf of the Alameda County Public Health Department (ACPHD), we are submitting the following comments based on our review of the Oakland Airport Expansion Draft Environmental Impact Report (Draft EIR). The vision of ACPHD is that everyone in Alameda County no matter who they are, where they live, how much money they make, or the color of their skin, leads a healthy, fulfilling and productive life. ACPHD has a longstanding commitment to partnering with community stakeholders, regulatory agencies, the City and the Port to achieve health equity in Oakland.

ACPHD appreciates the opportunity to comment specifically on the Draft EIR with regard to its analysis of the project's air quality impacts and the likely connection to health consequences. Many studies have examined the significant effects of airports on the health of people who live, work, and play nearby because of exposure to air and noise pollution associated with aircraft, ground-side operations, and traffic. Given these likely population health concerns and the scale and complexity of the airport expansion project, **we recommend that the EIR include a comprehensive analysis of the public health impacts of the Proposed Project, such as through a Health Impact Assessment.**

Health Impact Assessment (HIA) is a recognized and well-defined process to evaluate the potential health implications of a policy or decision. HIAs typically look at who is most likely to be affected, explore whether the positive or negative impacts affect certain groups of people more than others, and consider health holistically, including broader social, economic, and environmental influences. HIAs can provide evidence-based recommendations to enhance predicted positive health impacts and minimize or mitigate negative ones. A comprehensive and systematic evaluation of the Proposed Project's impacts on human health and the distribution of those effects within the population is especially critical as part of CEQA requirements for EIRs to adequately inform the public about health and safety impacts, including to "reasonably describe the nature and magnitude of the adverse effect" and show a "reasonable effort to put into a meaningful context" any conclusions about significant impacts.¹

ACPHD is particularly concerned with pursuing further study of these specific areas of the Draft EIR:

3.3 AIR QUALITY

Air pollution disproportionately impacts low-income communities of color. East Oakland is a predominantly low-income, Hispanic/Latino and African American/Black community located in the airport's vicinity. This community already experiences high levels of pollution from highways and industrial facilities, creating a disproportionate burden of illness associated with pollution. East Oakland residents have the highest rates of asthma hospitalization in the county. From 2018-2020, there were 936.6 asthma hospitalizations and Emergency Department visits per 100,000 for adults in East Oakland, and 1256.1 per 100,000 for children.ⁱⁱ This is more than three times higher than the overall Alameda County rate. Cancer, heart disease, stroke, and chronic lower respiratory disease are among the top 10 causes of death in East Oakland and together account for 43.4% of all deaths. These diseases are associated with—but not solely attributable to— air pollution, and East Oakland residents are dying from them at higher rates than residents countywide. Life expectancy in some census tracts of East Oakland is 12 years less than life expectancy in tracts with the highest life expectancy in the county.ⁱⁱⁱ

The Draft EIR finds that cancer risk and chronic non-cancer human health hazards from emissions of the Proposed Project construction and operation would be less than significant at residential locations. However, numerous studies of airport emissions from around the world indicate that air quality near major airports can be significantly affected by emissions from air mobile sources. One 2014 study measured particle number (PN) concentrations downwind from Los Angeles International Airport and found that LAX emissions adversely impacted air quality much further than reported in previous airport studies, increasing PN concentrations four-fold as far as 10 miles downwind.^{iv} Another 2018-2019 study of SEA-TAC found that communities underneath and downwind within 10 miles of jets landing at the airport are exposed to a type of ultrafine particle pollution that is distinctly associated with aircraft.^v A health risk assessment conducted in 1993 for the U.S. Environmental Protection Agency reported that aircraft engines are responsible for approximately 10.5 percent of the cancer cases within a defined geographic location (approximately 16 square miles) surrounding Chicago's Midway Airport.^{vi}

The Draft EIR does find that chronic non-cancer human health hazards would be considered significant at on-Airport worker locations during incremental operations of the Proposed Project. The Draft EIR concludes that this impact would be potentially significant and unavoidable, due to the cause resulting from aircraft operations which the Port does not regulate. However, the EIR should include a more adequate discussion specifying the nature and magnitude of these significant impacts, such as: how many workers are at risk for which chronic health impacts, and at what concentrations of pollutants are symptoms triggered.

3.7 GREENHOUSE GAS EMISSIONS

The Draft EIR finds the increase to GHG emissions potentially significant and unavoidable, but concludes that the cause will result from market-based demand and related aircraft operations, which the Port does not regulate. Climate change contributes to a range of health impacts globally, including more illness and death from extreme heat, poor air quality, and vector-borne disease; more injury and illness arising from flooding of homes and businesses; impacts on mental health; and indirect impacts arising from weather-related loss of core services such as electricity, transportation, and communication. While market-based demand may drive airport expansion needs, it must be acknowledged that expansion will directly lead to increases in GHG emissions and that these are only unavoidable within the context of pursuing expansion.

In a warming climate, air pollutants are also expected to increase, including from the frequency of wildfires, according to the World Health Organization.^{vii} Heat stress can also increase sensitivity to air pollution. East Oakland, like Oakland overall, has older housing stock with over 35% of housing built in 1939 or earlier; 64% of East Oakland's housing stock was built before 1960, compared to 39% for the county as a whole.^{viii} A majority of East Oakland's residents are also renters (60%), further increasing the likelihood of barriers to accessing protective resources such as weatherization, air purification and cooling.

3.11 NOISE AND VIBRATION

The Draft EIR finds that a substantial increase in aircraft noise and exposure of people residing or working within an Airport Land Use Plan (ALUP) area to excessive noise levels would be less than significant during the Proposed Project operation. The FAA currently adopts a noise threshold of 65 dB DNL (day-night average sound level) as compatible with residential areas. However, problems with this threshold have been identified since 1995, when the National Resources Defense Council found that the 65 dB DNL is based on an averaging of noise that does not account for the loud “single event” noise of aircraft takeoff.

Aviation noise can cause community annoyance, disrupt sleep, adversely affect academic performance of children, and could increase the risk for cardiovascular disease of people living in the vicinity of airports. Aircraft noise exposure at school or at home is associated with children having poorer reading and memory skills, along with increasing evidence suggesting that children exposed to chronic aircraft noise at school have poorer performance on standardized achievement tests.^{ix}

RECOMMENDATIONS

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


To ensure that the EIR process addresses these critical health disparities, and is clear and meaningful to all stakeholders and communities, we recommend the following:

- Establishing a more comprehensive and detailed evaluation of specific health impacts to provide the public and decision makers’ an opportunity for meaningful consideration of the nature and magnitude of increasing airport emissions. This can be accomplished effectively through commissioning a Health Impact Assessment. While the Port does not regulate aviation, the Proposed Project facilitates increased aviation activity that has likely significant population level health consequences.
- Committing to a collaborative public process and consider setting aside funds for ongoing meaningful community engagement, particularly around the impacts of air quality.
- Developing a Community Benefits Agreement with key stakeholders such as community-based, faith-based, grassroots, and civic and labor organizations representing residents and workers most affected by the Proposed Project. Any CBA should be driven by the priorities identified by community stakeholders, along with best practices to protect worker health and safety, improve job quality, and provide mitigations such as funding for HEPA filters in surrounding schools and residential homes and noise abatement strategies such as soundproofing of schools and significantly affected homes.
- Aligning efforts in public engagement and planning for the Proposed Project wherever possible with the AB 617 East Oakland Steering Committee which is developing the East Oakland Community Emissions Reduction Plan, a process begun in 2022 as part of the Community Air Protection Program mandated by Assembly Bill 617.


A “business as usual” approach to this proposed development would lead to burdens on communities that have historically borne the brunt of health, environmental and economic inequity.

ACPHD is dedicated to improving the health of all Alameda County residents and to preventing avoidable health risks. We look forward to engaging further with the Port of Oakland to safeguard communities affected by major airport development. Please reach out to us with any questions or concerns about these comments.

Sincerely,

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Kimi Watkins-Tartt
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ⁱ Cal. Supreme Court *Sierra Club v. County of Fresno*, Case No. S219783 (Dec. 24, 2018),

ⁱⁱ Analysis by Alameda County Healthcare Services Agency, Community Assessment Planning and Evaluation unit of American Community Survey 2018-2020 data

ⁱⁱⁱ Ibid

^{iv} Hudda, N., Gould, T., Hartin, K., Larson, T., Fruin, S., (2014) Emissions from an International Airport Increase Particle Number Concentrations 4-fold at 10 km Downwind. *Environmental Science and Technology*. <https://pubs.acs.org/doi/pdf/10.1021/es5001566>

^v University of Washington Department of Environmental & Occupational Health Sciences. Mobile Observations of Ultrafine Particles: The MOV-UP study report. Seattle; 2019. <https://deohs.washington.edu/mov-up>

^{vi} UCLA CHAT PGY-2 Pediatric Residents, Santa Monica Airport Health Impact Assessment, 2010. <https://www.pewtrusts.org/-/media/assets/2010/02/santamonicaairportfinalhia.pdf>

^{vii} Stackpole Dahl, M. (2021) Climate change makes new recommended air quality levels harder to reach. <https://www.exhaustion.eu/resources/climate-change-makes-new-recommended-air-quality-levels-harder-to-reach>

^{viii} Analysis by Alameda County Healthcare Services Agency, Community Assessment Planning and Evaluation unit of American Community Survey 2018-2020 data

^{ix} Basner, M, Clark, C., Hansell, A., Hileman, J., Janssen, S., Shepherd, K., Sparrow, V. (2017) Aviation Noise Impacts: State of the Science. *Noise & Health*. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5437751/>

^x U.S. Environmental Protection Agency. EJ 2020 Glossary. <https://www.epa.gov/environmentaljustice/ej-2020-glossary>