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**Sent:** Monday, October 16, 2023 1:17 PM

**To:** [TermDev@portoakland.com](mailto:TermDev@portoakland.com)

**Subject:** Public comment regarding Oakland Airport Terminal Modernization & Development

Hi,

I am writing to submit a public comment regarding the Oakland Airport Terminal Modernization & Development DEIR.

**I strongly the proposed project in the DEIR and find that the assumptions that it makes about growth are deeply flawed. A different alternative must be provided that considers a mode shift to rail which capping air travel at today's levels. Rail is a mode of transportation which is COMPLETELY IGNORED by this DEIR. A true "no project" alternative that places a cap on growth of air travel cannot be found in this DEIR. Furthermore, the apparently pre-ordained airport expansion proposal will directly lead to growth in air travel, which in turn leads to growth in greenhouse gasses, which in turn directly contributes to the climate crisis.**

**\*\*\*\* FLAWED GROWTH ASSUMPTIONS \*\*\*\***

The first problem this DEIR makes is that it assumes growth in air travel will be the same no matter whether the preferred option or the "no project" alternative is chosen. This is obviously a flawed assumption that defies common sense. Why WOULDN'T air travel grow even more if an entire new terminal building is constructed?

- There's a concept known as "induced demand." Or in other words: "if you build it, they will come." This project is exhibit A for inducing demand. By building greater numbers of terminal gates, it will create a market for accelerating the growth of the airport. Passengers might wish to avoid an airport with overly-congested terminals or bussing to remote hardstands. To contrast, they're more likely to prefer a shiny new terminal building with perfect gates. Soon, there would be a desire for building even more airport facilities to grow even more. (Undoubtedly, there would again be a flawed DEIR with a "no project" alternative that somehow still assumes identical growth!)
- The "hardstands" alternative is also actually still a GROWTH and EXPANSION project. Appendix D proposes an expansion that involves reconfiguring the existing terminal buildings to bus passengers to remote hardstands in order to accommodate a forecasted increase in air travel.
- The project proposal ignores the possibility that if the proposed new buildings are outgrown, they could in turn *also* be used in a bussing & remote hardstand configuration for additional capacity above & beyond what the "no project" alternative would have provided.

For example, let's take a simple, hypothetical small airport with one 5-gate terminal that can accommodate 30 flights per day. A "no project" alternative enables only a limited amount of growth from the existing buildings.

1. The starting capacity is 30 flights per day, as stated.

2. Maybe it grows to 40 flights per day and becomes overly congested. Similar to how a congested freeway discourages further passenger vehicle trips, passenger dissatisfaction prevents further growth of air travel.
3. In order to grow capacity, a bussing system to remote hard stands is configured, similar to what is proposed in the “use hardstands” alternative. Let’s suppose that now the existing 5-gate terminal building can now serve 60 flights per day. This is now the maximum of what the existing terminal building can serve. In reality, passenger dissatisfaction might still lead to lower levels of flights than this.

To contrast, our hypothetical airport could grow far more if it followed a plan similar to the proposed option in the DEIR:

1. The starting capacity is 30 flights per day, as stated, out of the single 5-gate terminal.
2. In order to grow capacity, a new 5-gate terminal building is constructed, so that there are now two 5-gate terminals, for a total of 10 gates. Let’s suppose this can also serve 60 flights per day very comfortably.
3. The travel volume now can increase to 80 flights per day with a similar comfort level seen in #2 in the previous scenario. Clearly, this level of growth isn’t possible without constructing a new terminal building.
4. The airport wishes to expand AGAIN. The previous construction of the second terminal building means that the “bussing to remote hardstands” option has not yet been tapped. The airport now chooses to bus passengers to remote hardstands from BOTH terminal buildings, thus enabling service of 120 flights per day – far beyond what would have been possible had the second terminal building not been constructed!

While the exact numbers are hypothetical, and my sense of scale may be a little off here, I believe the general principles still apply to a large airport like Oakland. Common sense suggests building new terminal buildings will increase capacity for a given level of service and further enable even more growth at reduced levels of service.

Thus, in summary, there are several problems here:

- **The “no project” option ignores the concepts of induced demand, and inexplicably assumes that growth will happen all the same. It furthermore ignores the negative environmental impacts of that growth.**
- The “use hardstands” alternative is still a growth option that involves bussing to remote hardstands. The environmental impacts of this bussing project and its growth must also be fully considered.
- **Building a new terminal building means there is still the option of bussing to remote hardstands and/or overcrowding that new terminal in the future, which unlocks even further growth beyond what the “no project” option would enable.**
- **There is not a “no air travel growth” option presented in this DEIR.** That would be the TRUE “no project” option, but it’s not found in this DEIR at all. Instead, air travel growth is assumed as a given that must be accommodated. This is not actually the case; as far as I know, there is no legal obligation to grow the airport and expand capacity in any way, whether by building a new terminal or by further utilizing the existing terminals, such as setting up busses and remote hardstands or simply overcrowding the terminals that exist.

By simply choosing not to add more daily flights, supply & demand will cause prices to increase on existing flights, and more passengers will choose to travel via alternate methods that are more environmentally friendly, such as rail or passenger vehicle. Natural market forces will prioritize passengers and flights where other modes of transport are truly not an option, such as overseas destinations or the most time-urgent travel.

**\*\*\*\* THE WORST ENVIRONMENTAL IMPACTS ARE IGNORED \*\*\*\***

**The second major problem in this DEIR is that it ignores the worst environmental impacts which contribute to the ongoing global climate crisis.** Air travel is well known for emissions of large quantities of greenhouse gasses. **Instead of considering the impact of these gasses, the DEIR instead focuses on trivial things like having a white roof to reduce the heat island effect, or having more energy-efficient HVAC systems.** This is lipstick on a pig and honestly an insult to the public's intelligence!!! While these things are important, none of it really matters compared to the sheer scale of the direct aircraft engine emissions, which the DEIR doesn't even attempt to fully quantify. What good is an LED lightbulb when there are millions of gallons of fuel burned by the additional aircraft that will utilize the new terminal? Again, the DEIR defies common sense.

**The DEIR only quantifies "aircraft emissions below mixing level", or in other words: taxi, takeoff, and landing emissions only. So, when the plane is at cruising altitude, does it stop emitting greenhouse gasses? Of course not!** The DEIR instead just waves its hands and doesn't even attempt to quantify this, further stating that they can't do anything about it anyway because FAA. Some ineffective unquantified platitudes about sustainable aviation fuel linking to a press release promising 10% SAF usage in some distant future year is not going to be effective in preventing further damage to the climate. The urgency of our climate crisis demands better. The Port of Oakland needs to take responsibility for their role in it, and actually quantify it.

**THE DEIR MUST QUANTIFY AT LEAST A PORTION OF THE IMPACT OF AIRCRAFT EMISSIONS AT CRUISING ALTITUDE AS WELL.** For example, emissions from the flights of departing aircraft should be fully counted (with arriving aircraft emissions being attributed to the remote departure airport). We can't simply pretend they don't happen! And as noted in the previous section, **THE IMPACT OF THESE INCREASED GREENHOUSE GASSES MUST BE COMPARED VS A TRUE "NO GROWTH" ALTERNATIVE (which doesn't currently exist in the DEIR).**

**If the Port of Oakland truly has no authority to mandate true net-zero passenger flights on new or existing flights, INCLUDING ALL OPERATIONS AT CRUISING ALTITUDE, then both the Port of Oakland and the City of Oakland needs to take a stand and insist on no further growth in air travel until this situation changes. Any further growth in air travel MUST be truly NET ZERO.** Mixing in 10% of sustainable aviation fuel is not going to do the job. Only true net zero and renewable options such as 100% electrified flights powered by renewable energy may be considered for additional flights out of the airport. Any other option will be further devastating to this region, state, and entire planet.

**\*\*\*\* THE BEST ALTERNATIVE IS IGNORED: HIGH-SPEED RAIL \*\*\*\***

At this point in the argument, many proponents of fossil fuel-based infrastructure might suggest that the alternative must be that we go back to living as cave people with sticks and stones. This isn't true, and there are still alternative ways we can travel in a more environmentally-friendly way. Other countries in Europe have recognized the problems caused by air travel, and are moving to ban air travel in favor of railroads. **We should similarly seek to mode shift some of the Oakland air travel from air to rail. By doing so, it will free up additional airport capacity from the existing terminals that can then be used for additional flights to destinations that cannot be reached by rail, such as overseas and international destinations.**

**Unfortunately, the DEIR does not mention the word "railroad", "train", "rail", or other similar terms even once, let alone consider it as an alternative,** despite considering more outlandish options like building a new airport and closing OAK entirely.

The United States in fact has a long history of passenger rail travel, and fortunately, the State of California is leading the country in modernizing passenger rail infrastructure. Consider the following facts:

- 90% of Oakland flights serve destinations that are also currently served by Amtrak.
- **46% of flights serve destinations that will be directly served by future high-speed rail service from California High-Speed Rail as well as Brightline West.** Another 10% go to destinations whose rail travel time will be shortened by new high-speed rail segments.
- The DEIR proposes adding 16 new gates to the existing 29 gates, for a total of 45 gates. This works out so that 36% of the post-expansion gates are new additions.

**With 46% being higher than 36%, these numbers prove that if all the short flights to regional destinations in Southern California and Nevada were mode-shifted to high-speed rail, it would free up so much airport capacity that it would be the equivalent of building the proposed new airport terminal!** And the upcoming high-speed rail system will have the capacity: when fully constructed, it could serve up to 7,560 passengers per hour – enough to handle every current and forecasted passenger at OAK. Consider that a single train holds up to 900 passengers, the same as several airplanes used for intrastate travel! We were told that CA HSR would be an alternative to spending billions of dollars on highway and airport expansions. So, why are we apparently doing both? **We need to commit to rail, and stop with the airport and highway expansions in this state.**

Of course, the high-speed rail network is still being constructed. A viable transition plan might therefore look something like the following:

1. The Port of Oakland imposes a cap on daily departures and arrivals to stem further growth, and the unmitigatable problems it brings such as increased greenhouse gasses.
2. Rather than adding new flights, Amtrak adds new train service. For example, **rather than adding a new flight to Los Angeles, an additional daily train on the San Joaquins route is added.** These existing train routes are in fact quite popular, and often sell out, so additional rail capacity will be needed and can be added as an alternative to adding new flights.
3. Per the 2022 CA HSR business plan, existing segments of California Amtrak service will be gradually replaced by high-speed rail. For example, today's Oakland to Los Angeles Amtrak service would immediately benefit from the CA HSR Initial Operating Segment by shortening the portion of the itinerary traveling through the Central Valley.

4. Eventually, remaining HSR segments are built, ultimately leading to full HSR service between, SF Bay Area, Los Angeles, and beyond. **Most to all existing flights to these destinations at Oakland can then be eliminated and replaced with flights to more far-flung destinations.**
5. The pace of CA HSR construction seems slow because we have not prioritized it politically. **If we gave it adequate funding and attention, similar to other transportation infrastructure projects, it could be finished much faster if desired.**

**A more detailed analysis and discussion of this option can be found at <https://www.stopoakexpansion.org/trains-v-oak-departures-study>. I am also submitting a copy of that document separately as a public comment to ensure that it is in the public record.**

**\*\*\*\* WHY THIS MATTERS TO ME \*\*\*\***

I will end with why this matters to me on a personal level. My wife and I enjoy hiking and backpacking in many of America's beautiful and natural places. Unfortunately, the places we visit keep getting degraded and destroyed due to factors partially attributable to climate change:

- We backpacked a few nights in Lassen Volcanic National Park in 2018. Everywhere we went burned in high intensity fire as part of the 2021 Dixie fire.
- We had the opportunity to backpack once in Big Basin State Park in 2020. Everything in the park promptly burned to the ground as part of the 2020 CZU fire complex.
- After having the privilege of hiking twice in Redwood Canyon at Sequoia National Park in 2020, the area promptly burned in the 2021 KNP fire complex. In fact, the National Park Service states that 13 to 19 % of the world's large sequoias perished in the 2020 and 2021 fires! These are irreplaceable losses to the world, and this rate is not sustainable. <https://www.nps.gov/articles/000/wildfires-kill-unprecedented-numbers-of-large-sequoia-trees.htm>
- Two separate wildfires in Big Bend National Park subsequently burned some of our favorite areas after we recently visited, including historic structures and some of the nicest higher elevation areas of the park.
- Most recently, we were literally chased by a wildfire just last month in the RAINFOREST in Olympic National Park that blew up out of nowhere while on a multi-day backpacking expedition. This region has abnormally had less than half of the normal rainfall so far this year, per a park ranger. After a day of watching the fire front only a few miles away from our trail in a massive plume of smoke, we actually had a firefighting helicopter land near our campsite and ask us for assistance in posting trail closure in the valley below us – the very trail we had been hiking earlier that day (!!!).

While fires have always been part of these ecosystems, the rate at which these areas are burning is unprecedented and has dramatically increased in recent years. Climate change plays a huge role in this increase in fire activity, and the Oakland Airport expansion project would directly contribute to further increases in fire activity.

And there are non-fire related impacts:

- The Sierra Nevada mountains have the most adorable rodents that live at high elevation, known as pikas. We love to see them on our trips. Unfortunately, despite being located in protected

federal wilderness, they are dying out due to climate change. During the summer, pikas gather food to store for the winter. However, if it gets too hot, it must rest more frequently, and it might not have enough food stored by winter. Unfortunately, this is exactly what is happening, and studies show that pikas have already been extirpated from lower-elevation areas in the Sierra Nevada where they once roamed.

- We have also been privileged to snorkel and view coral reefs in places like Hawaii and Florida on a couple of occasions, such as Hawaii in 2015. Unfortunately, these are destined for destruction as part of climate change due to bleaching. In fact, family members who more recently traveled to the same Hawaii reefs in 2023 reported that the reefs were already significantly degraded beyond what we had seen in 2015.

Finally, the very place I rent from and live near the beach in Alameda is under threat from sea level rise. People sometimes ask if I consider buying property in Alameda. I respond if they like to play musical chairs – who wants to be stuck with the property at the end? Sea level rise will ultimately inundate parts of the city, if not the entire city.

### **I AM SICK AND TIRED OF WATCHING THE PLACES I LOVE GET DESTROYED FROM CLIMATE CHANGE.**

Please, I ask the Port of Oakland to do the ONLY RIGHT AND MORAL THING and STOP this expansion, because the additional greenhouse gasses is only going to make all the above problems WORSE! What good is an airport if the destinations are being actively degraded destroyed by climate change?

### **\*\*\*\* CONCLUSION \*\*\*\***

If nothing else to take from this public comment, please take this: **take a hard stand against further growth of greenhouse gas emissions, including aircraft at cruising altitude.** There are other alternatives you haven't considered, and our future depends on it!

James Johnston

Citizen living in the City of Alameda