

Sky Posse Palo Alto

October 15, 2023

Port of Oakland
Environmental Programs and Planning Division Colleen Liang
530 Water Street, Oakland, CA 94607
Submitted via email to: termdev@portoakland.com

Re: Oakland International Airport Terminal Modernization and Development Project Draft EIR

Dear Ms Liang,

We are MidPeninsula residents, affected by both OAK arrivals (PIRAT) and departure flights (CNDEL), and we are concerned that the OAK's Draft EIR does not include impacts to our communities. In addition, OAK's Draft EIR employs the highly controversial FAA 65 DNL threshold criteria which promotes noise analysis that is disconnected from the real impacts of airport noise on citizens. The FAA's NEPA aviation noise threshold standard is not backed by reasonable assumptions and is currently under agency review.

In 2020, we submitted [our concerns](#) during SJC's Draft EIR. The FAA has since released the Neighborhood Environmental Survey results showing that a substantially higher percentage of people are highly annoyed over the entire range of aircraft noise levels starting at 50 DNL. The FAA received 4000+ comments in 2021, including from the [Oakland Noise Forum](#), and this year 7000+ comments explaining how the FAA's criteria and practices are not accounting for health impacts or for locations not just adjacent to the airport. Please see our comment [here](#), and a joint letter from [six MidPen cities](#) about noise farther away from the airport.

OAK's [Noise modeling](#) is, unfortunately, using the FAA's antiquated policies. **We respectfully request the Port of Oakland go beyond the FAA's outdated policies and add a supplemental analysis to address the OAK operations affecting the MidPeninsula, in particular operations taking place between 10 PM and 7 AM.** We strongly encourage Oakland to invest in noise analysis that, instead of "hiding" noise with DNL or the 65 threshold, will adopt the [GAO recommendations](#) for additional metrics to understand PIRAT, CNDEL and any Performance Based Navigation (PBN) operations that could negatively impact the MidPeninsula.

It is also time for Bay Area airports to coordinate as regards environmental concerns. We question OAK's [forecast](#) and the assumptions that have informed the FAA's Nextgen business case without considering the challenges from congested airspace and the increase in pollution. A report would be welcome with a view of the joint forecasts for OAK, SFO, and SJC and we would like to see a commitment to have coordination to eliminate night time noise.

Thank you,

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CC: Palo Alto City Council city.council@cityofpaloalto.org