

## **Response to Public Comments Draft Right to Breathe: East Oakland Community Air Quality Justice Plan**

On November 3, 2025, the Air District and the East Oakland Community Steering Committee released the *Draft Right to Breathe: East Oakland Community Air Quality Justice Plan*. The public comment period extended for four weeks from November 3 to December 7, 2025. A public Open House was held on November 13, 2025, at Youth UpRising.

The following document provides responses to public comments. A total of 11 members of the public commented on the Draft Plan including individuals, representatives of local non-profits, international think tanks, local businesses and the Port of Oakland. An additional 119 members of the public commented on behalf of the Stop Oakland Airport Expansion Coalition, focused on opposing the Oakland San Francisco Bay Airport expansion project.

- **Attachment 1** contains a response to comments, including documenting changes to the Draft Plan to reflect public feedback. The attachment begins with general comments; the second part contains the comments from the Stop Oakland Airport Expansion Coalition.
- **Attachment 2** contains the copies of all comment letters received.

Throughout this document “Plan” refers to the version of the Community Emissions Reduction Plan that will be voted on by the CSC in February. The “Draft Plan” refers to the version that was out for public comment.

**Attachment 1**

In the table below, the commenter name appears in black font in the first row. Additional comments by the same commenter appear in grey font to easily see comments related to one person.

Name	Organization	Comment	Response
Kimberly Ryan		General - Consider adding chapter numbers in addition to page numbers to assist with tracking while reviewing the document	Comment is respectfully noted.
Kimberly Ryan		Chapter 5 - Figures 5-18 and 5-21: these figures seem to compare similar modeled risks (cancer risk per million) but show two very different results. Understanding the nuanced differences may be difficult for a reader who lacks the expertise to distinguish between the two. Suggest using more detailed or clarifying language in place of the “key local sources” referenced in Figure 5-18 “and the “permitted facilities” in Figure 5-21.	Plan revised as follows: caption for Figure 5-18 was expanded to list all the sources included in the mapped result. A footnote was added to the discussion of Figure 5-21 to make it clear that the map only covers permitted sources (not all modeled sources like Figure 5-18).
Kimberly Ryan		Chapter 7 -Community Concern Statement 4 (page 186): The first statement referring to diesel trucks seems random - is that intentional? If so, suggest tying-in to why the diesel truck traffic is specifically relevant to Oakland Airport activities here.	Plan revised to delete first sentence (clerical error).
Kimberly Ryan		Chapter 7 -The term “health stakeholder” is confusing and one that I have never heard. Following an internet search, nothing popped-up. Suggest adding “public” in front of “health” or using the term “public health officials” if that clarifies the intended usage.	Plan revised to add "public" to "health stakeholder".
Kimberly Ryan		Appendix F-1 - - Consider starting a new page for each of the different facilities in order to facilitate review of the associated community concerns and avoid confusion	Plan revised so that each problem statement now begins on a new page.

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Kimberly Ryan		Appendix F-1 -If possible, create hyperlinks to the associated CERP strategies/actions so that readers can easily move between the documents	Comment is respectfully noted.
Kimberly Ryan		Appendix F-1 - If Argent Materials continues to operate in at least two different locations, as indicated on Figure F-1b, suggest including the address of both facilities in the "Facility & Pollutants Summary", as well as a summary of activities for the 85th Ave site.	Plan revised to edit Appendix F-1 to clarify that Argent Materials is a single facility operating two adjacent yards.
Kimberly Ryan		Appendix F-1 -An additional and primary concern for the Argent Materials property has historically been the expansion of operations with little to no oversight for years due to regulatory delay and inconsiderate land-use policy decisions made by Planning Commission/ City Council. Consider including any associated strategies/actions for agency commitment to faster and more community-oriented decisionmaking and permitting reviews (e.g. C&I Strategy 3).	Plan revised to add actions C&I 3.1 and C&I 3.2 to list of related actions in Appendix F-1.
Charles Reed	E. Oak CERP Co-chair Lifers Leaving a Legacy	Staunch advocate of studying the legitimate health impacts of 'Unaccounted for Surface Source Pollutants' in regards to Illegal Dumpsites and Burned out Abandoned Vehicles. The Air District's responsibility and accountability of mitigating and eliminating ANY and ALL "Emissions negatively impacting the health and quality of life in Communities of Concern".  Air District can no longer ignore the cumulative impacts on air quality that 'Unaccounted For Surface Source Pollutants' have on our health and quality of life. These are polluted emissions that can be mitigated and eliminated through a Focused and Intentional Instant	Plan revised as follows: Chapter 7 Illegal Dumping introduction edited to include issues related to mold and expanded health impacts description.

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		<p>Response and Removal process that protects our already vulnerable communities through the containment of an inevitable air contamination source.</p> <p>I ask that we as a united CSC stand together in the fact that these two cumulative causes of negative health impacts be prioritized in the CERP process as a Public Health and Safety Issue in regards to our CSC Community Emissions draft and our Oakland General Plan.</p>	
Charles Reed	E. Oak CERP Co-chair Lifers Leaving a Legacy	<p>Email attachment 1: Illegal Dumping &amp; Health: New Evidence of Direct Community Impacts</p> <p>Why this matters: (top community concern, evidence shows it directly contributes to harmful pollutant exposure and elevates illegal dumping from a blight issue to a public health priority)</p> <p>Key Health Findings: dumped material often contain or generate mold spores, VOCs, particulate matter from decomposition, chemical residues and toxins. These pollutants can become airborne and spread into residential areas</p> <p>Health Impacts on E. Oakland Residents: increased asthma triggers, respiratory irritation and chronic inflammation, higher exposure risks for children elders and medically vulnerable residents, exacerbation of existing cumulative environmental burdens</p> <p>Environmental Pathways: mold growth on wet or deteriorating materials; VOCs released from broken furniture, paints, adhesives, plastics; contaminated dust</p>	Plan revised as follows: Chapter 7 Illegal Dumping introduction edited to include issues related to mold and expanded health impacts write up.

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		<p>and particulates blowing into homes, stagnant waste attracting pests and pathogens</p> <p>Why this is urgent: E. Oakland is already overburdened by emissions and pollution; illegal dumping amplifies these risks; immediate action can prevent avoidable health harms</p> <p>What we need to do: strengthen removal and clean up times; increase prevention resources, improve enforcement coordination, integrate public health data into dumping strategies; mobilize community and partner agencies</p> <p>Call to action: Illegal dumping must be recognized and addressed as a serious environmental-health threat requiring urgent, coordinated intervention.</p>	
Charles Reed	E. Oak CERP Co-chair Lifers Leaving a Legacy	<p>Attachment 2 Fact Sheet addresses:</p> <p>Illegal Dumping Sites as Unaccounted for Surface Source Pollutants</p> <p>What are unaccounted for Surface Source Pollutants: Illegal dump sites function as unmonitored, unregulated air pollution sources. They are not included in emissions inventories or air quality models, yet they emit: - Mold spores &amp; fine particulate matter (PM2.5 / PM1.5) - Volatile Organic Compounds (VOCs) - Microplastics &amp; toxic dusts - Gases from decomposing waste These emissions occur at ground level, directly where people live, walk, and breathe.</p> <ul style="list-style-type: none"> <li>- How mold grows in illegal dump sites</li> <li>- Why this is an air quality issue</li> </ul>	Plan revised as follows: Chapter 7 Illegal Dumping introduction edited to include issues related to mold and expanded health impacts write up.

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		<ul style="list-style-type: none"> <li>- Health impacts on nearby residents</li> <li>- EJ concerns</li> <li>- Mental health impacts</li> <li>- Harm reduction: the power of community-led clean up</li> </ul> <p>Key message: Illegal dump sites are unaccounted-for surface source pollutants. They pollute the air, threaten respiratory health, and disproportionately harm communities of color. Community-led cleanup is an essential harm reduction tool.</p>	
Patrick Messac		<p>The Plan does not yet function as an emissions reduction plan. It describes conditions but does not require results at the sources responsible for the most significant harm. The comments below identify where the Plan should be strengthened to produce measurable public health outcomes.</p> <p>1. Measurable air quality and health outcome targets</p> <p>The Plan lacks quantifiable emission reduction targets, baseline years, or timelines in either Chapter 7 or Chapter 9. Without defined objectives, the public cannot evaluate whether conditions are improving. Other AB 617 communities have adopted enforceable performance standards. For example, the West Oakland Community Action Plan established numeric targets for diesel particulate, PM 2.5, and cancer risk in Chapter 4, identified a baseline year, and set 2025 and 2030 goals. It also modeled pollution levels with and without implementation in Chapter 6 and established a tracking framework in Chapter 8. East Oakland should meet the same standard. Chapter 9 should be revised to include specific targets for reductions in PM2.5,</p>	<p>Each Community Emissions Reduction Plan is unique due to its community-scale context, sources of emissions, and community direction. For East Oakland, we have included emissions forecasts for 2031 and 2036 in Appendix D that reflect the impact of known regulations, anticipated growth, etc. In five years, the Air District and East Oakland Community Steering Committee will evaluate actual progress for 2031. This will include information on quantifiable emissions reductions for plan actions for which such calculations can be made. Additionally, the five-year milestone report will include an update to the Community Description which includes the socio-economic/demographic and health data.</p>

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Patrick Messac		<p>diesel particulate matter, and toxic air contaminants; identification of a baseline year; interim and long-term target years; annual public reporting; and inclusion of health indicators such as asthma-related emergency room visits and hospitalizations</p> <p>2. Prioritize stationary sources responsible for the most significant exposure</p> <p>The emissions inventory shows that just 11 permitted facilities account for 98% of PM 2.5 emissions from the permitted source sector. Permitted sources are also the primary emitters of mercury, dioxins and furans, and hydrogen sulfide in the community</p> <p>Chapter 5 identifies major contributors, including: Davis Street Transfer Station; Miller Milling Company; Peet’s Coffee and Tea</p> <p>The Plan also identifies facilities identified by the community in Appendix F-1, including: AB&amp;I Foundry (now Prologis redevelopment); Argent Materials; Crematorium on 98th Avenue (SE Combined Services of California); Sterling Environmental</p> <p>These facilities represent the types of operations that should be designated as Priority Facilities for immediate action. Chapter 7 should be revised to explicitly identify high-risk facilities and focus regulatory action on those sources first. Without prioritization, resources will be diluted across actions that do not materially reduce risk.</p>	<p>The Commercial &amp; Industrial (C&amp;I) actions are focused on reducing emissions from facilities of concern. For example:</p> <ul style="list-style-type: none"> <li>- C&amp;I Strategy 1 is focused on fugitive dust, which may help mitigate emissions at Davis Street Transfer Station and Argent Materials.</li> <li>- C&amp;I Strategy 2 is focused on evaluating and reducing toxic air contaminant emissions. While the Air District Rule 11-18 facilities in East Oakland are considered Phase II, Action C&amp;I 2.1 is intended to prioritize implementation.</li> <li>- C&amp;I Strategies 3 and 8 would reduce emissions through enhanced permitting and compliance programs.</li> </ul>

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Patrick Messac		<p>3. Enforcement defined by meaningful deterrence, not paperwork</p> <p>Chapter 6 reviews past enforcement activity but establishes no forward-looking commitments. A Notice of Violation alone does not reduce exposure. The analysis of East Oakland NOVs excluded consideration of whether the NOVs included a financial penalty and the amount of that penalty.</p> <p>Meaningful enforcement must include financial penalties that deter repeat behavior, cease and desist orders for ongoing harm, mandatory compliance deadlines, permit restrictions when necessary, and escalation for chronic violators.</p> <p>The Plan itself describes a case where enforcement produced outcomes. AB&amp;I Foundry emitted hexavalent chromium until CARB and the District secured a \$2.5M settlement, and the facility ceased operations. This is what effective enforcement looks like.</p> <p>Chapter 6 should include inspection frequency commitments, penalty thresholds, compliance timelines, and escalation standards. Without these elements, enforcement remains discretionary in practice.</p>	<p>Action C&amp;E 7.1 Targeted Inspection Program is being developed to enhance enforcement in overburdened communities. The action contains elements of baseline frequency, which in effect are elevated further by a facility being within an AB617 community and further uplifted by being a facility of community concern.</p>
Patrick Messac		<p>4. Required controls at high-polluting facilities</p> <p>Chapter 7 identifies industrial risk, but does not require the installation of modern control technology at the facilities driving emissions.</p>	<p>The Air District cannot require a facility to install Best Available Retrofit Control Technology (BARCT) or equivalent controls unless there's a requirement in existing rules or a new command and control rule. For example, planned amendments to Air District Rules 6-1,</p>

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		<p>Facilities responsible for disproportionate burdens should be required to install Best Available Retrofit Control Technology or equivalent controls on a defined timeline. The Plan should specify which classes of facilities are subject to this requirement and how compliance will be enforced.</p>	<p>6-4 and 6-6 addressing emissions from fugitive dust sources and metal recycling facilities would introduce new requirements for applicable sites. This would also be the case for sites applicable to an Indirect Source Rule when adopted. Existing BARCT requirements would be evaluated in the permitting process and enforced through inspections.</p>
<p>Patrick Messac</p>		<p>5. Authority and transparency The Plan lists implementing partners but does not distinguish which actions the Air District controls and which rely on other agencies.</p> <p>Chapter 7 should classify each strategy by authority so the public can see where regulatory responsibility lies.</p> <p>All permits for East Oakland facilities should also be posted online in one searchable system. Accountability is not possible without access to operating conditions, emission limits, and compliance history.</p>	<p>Plan revised to add a new action: C&amp;I 3.3 Develop a Tool for Accountability and Transparency. This new action will leverage a mapping platform to compile information related to permitting, violations, inspections, etc. that will be available to the public.</p>
<p>Martin Stratte (Bill Crotinger)</p>	<p>Argent Materials, CSC member</p>	<p>On September 4, 2025, I submitted comments on the July 2025 draft “East Oakland Community Emissions Reduction Plan” (CERP). My comments were submitted to the CERP co-leads: the Air District and Communities for a Better Environment (CBE). My comments identified multiple inaccuracies and mischaracterizations regarding the operations of Argent Materials, Inc. (Argent). I asked for these statements to be corrected or otherwise revised prior to publication of a final draft. Upon reviewing the November 2025 version of the plan, I am disappointed to see that none of my comments were addressed in the revised plan currently available for public review</p>	<p>Changes were previously made to the Public Review Draft Plan to clarify that Argent received two NOV’s, with each NOV containing two violations – for a total of four violations (replaced "NOV" with "violations").</p>

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Martin Stratte (Bill Crotinger)	Argent Materials, CSC member	In chapter 6: Enforcement Overview & Findings, the Plan incorrectly lists Argent as having received two NOV's in 2022 and two NOV's in 2023, and on that basis identifies Argent as the second biggest "offender" for the period of 2021 to 2024.1 This is incorrect. Argent was issued one NOV for its 8300 Baldwin site on November 16, 2022, and one NOV for its 8501 San Leandro site on July 26, 2023. Please edit Page 2 of Appendix E to reference only two NOV's total.	Changes were previously made to the Public Review Draft Plan to clarify that Argent received two NOV's, with each NOV containing two violations – for a total of four violations (replaced "NOV" with "violations").
Martin Stratte (Bill Crotinger)	Argent Materials, CSC member	In chapter 5: Air Quality Overview, Argent is characterized as a "facility of concern" for PM exposure from fugitive dust. The Plan provides no justification for this characterization. The Plan names 11 facilities that account for 98% of local PM 2.5 emissions. Argent is not included on the list. Please remove Argent as a "facility of concern" as its listing is unjustified and unsubstantiated.	Argent was mentioned in the Plan due to concerns raised by the community. For example, Table 5-1 lists Argent among concerns identified by community members, and a footnote on page 146 references community concerns about Argent raised at CSC Meeting #10 on July 23, 2023.
Martin Stratte (Bill Crotinger)	Argent Materials, CSC member	In chapter 5: Air Quality Overview, Argent is characterized as a facility of concern for toxic exposure from toxic emissions. However, Argent is not listed as a top 10 emitter of toxic air emissions for cancer-related toxic emissions or chronic-related toxic emissions. The Plan provides no justification for why Argent would be identified as a facility of concern. Please remove Argent as a "facility of concern" for toxic emissions as its listing is unjustified and unsubstantiated	Argent was mentioned in the Plan due to concerns raised by the community. For example, Table 5-1 lists Argent among concerns identified by community members, and a footnote on page 146 references community concerns about Argent raised at CSC Meeting #10 held on July 23, 2023.
Martin Stratte (Bill Crotinger)	Argent Materials, CSC member	In Appendix F-1, Argent is listed as one of four facilities for which CBE developed "Problem Statements."5 Characterizing Argent as a "problem" appears to be based on the misstatements noted above and is inappropriate. Please remove Argent as a "facility of concern" in the Problem Statements of Appendix F-1 as its listing is unjustified and unsubstantiated.	Argent is a facility of concern to the E. Oakland community (which is what Appendix F-1 documents).

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<p>Martin Stratte (Bill Crotinger)</p>	<p>Argent Materials, CSC member</p>	<p>Enclosed is an overview of our community involvement.</p> <ul style="list-style-type: none"> <li>- In East Oakland, our team contributes daily to the neighborhood by cleaning up illegally dumped trash along more than three miles of nearby streets. We support and donate to over a dozen local nonprofits, host holiday giveaways throughout the year, and prioritize local hiring - more than 10% of our workforce are returning family members, reflecting our investment in long-term community relationships</li> <li>- Argent is the only carbon neutral concrete, asphalt, and aggregate recycler in the U.S. Achieved through the use of electric equipment, conversion to renewable diesel, and purchase of carbon free electricity from East Bay Community Energy, etc.</li> </ul>	<p>Comment is respectfully noted.</p>
<p>Maurissa Brown</p>	<p>Greenlining Institute</p>	<p>We would welcome the opportunity to work together with you as the plan moves toward finalization and implementation. Please count on us as a partner committed to helping ensure the CERP's success and bringing cleaner air and environmental justice to Oakland</p>	<p>Comment is respectfully noted.</p>
<p>Maurissa Brown</p>	<p>Greenlining Institute</p>	<p>The ISR policy package should build on the South Coast Air Quality Management District Rule 2305, or the WAIRE program, to be more health-protective. We would like to see the ISR policy package be more health-protective than Rule 2305. We also recommend careful consideration for the mitigation fee for use to fund further zero emission transportation programs and restorative justice actions in East Oakland</p>	<p>The Air District plans to publish a concept paper outlining potential Indirect Source Rule (ISR) approaches, including health-focused design concepts that emphasize particulate matter (PM) and localized impacts, which may differ from the NOx-focused WAIRE Program, and may also discuss the role of mitigation fees as a potential compliance option.</p>
<p>Maurissa Brown</p>	<p>Greenlining Institute</p>	<p>We also urge the Air District to take early action to support Assembly Bill 914 (Garcia), Air Pollution: Indirect Sources, in the upcoming legislative cycle,</p>	<p>The Air District is supporting this effort, but it is unclear if this bill will pass. As such, currently</p>

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		<p>which would strengthen statewide efforts to regulate indirect sources and provide much-needed protections for communities most impacted by freight and goods-movement pollution. Aligning regional action with statewide policy will ensure a more comprehensive and effective approach.</p>	<p>the Air District is developing tools for local control.</p>
<p>Maurissa Brown</p>	<p>Greenlining Institute</p>	<p>urge the Air District to continue to oppose anti-ISR bills in the future</p>	<p>Comment is respectfully noted.</p>
<p>Maurissa Brown</p>	<p>Greenlining Institute</p>	<p>re: "T&amp;M Strategy 1. Address Trucking Near Neighborhoods..." We strongly recommend deeper collaboration with regional Caltrans leadership to ensure that no new general-purpose lanes are funded or advanced. We recommend feedback to the City of Oakland Department of Transportation (OakDOT) be in alignment with Greenlining’s previously run 2024 bill Assembly Bill 2535 (Bonta), Trade Corridor Enhancement Program, which originally aimed to prohibit the allocation of state transportation funds to highway projects that add general-purpose lanes or expand highway capacity in communities facing significant pollution impacts as evidenced by CalEnviroScreen</p>	<p>Comment is respectfully noted. Caltrans does not have any general-purpose lane additions planned for the study area.</p>
<p>Maurissa Brown</p>	<p>Greenlining Institute</p>	<p>re: "T&amp;M Strategy 1. Address Trucking Near Neighborhoods..." We strongly support OakDOT engaging with the Community Steering Committee (CSC) to get feedback on truck routing. There should be stronger language in the CERP that commits to truck re-routing. We recommend adding a “Truck Re-routing Study” as a separate, individual action within this section. This study could be similar to the Truck Re-route Study that occurred in South Fresno. Truck routes must be updated to better reduce truck idling and</p>	<p>Comment is respectfully noted. The City of Oakland is currently undergoing <a href="#">Phase 2 of its General Plan Update</a>, which focuses on its Land Use and Transportation Element. AB 98 (2024) requires agencies to update their circulation elements to include truck routes and requires, among other elements, identification of truck parking and appropriate idling facility locations. In alignment with the Phase 2 General Plan Update and its guiding principles, which includes equity and environmental</p>

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		prevent truck routes from cutting through residential areas	justice, OakDOT staff will work with the Planning and Building Department, as well as Economic and Workforce Development, the Port of Oakland, and community stakeholders to update and advance a proposed route to Council no later than January 1, 2028, as now required by State law. Additional truck studies, including but not limited to re-routing and mitigation, will be advanced as needed to implement the adopted general plan.
Maurissa Brown	Greenlining Institute	We appreciate the strong language in Action T&M 3.4 to provide grants for owners of older heavy-duty diesel trucks, buses, and off-road equipment...we recommend the District use the 2026 AB 617 funds to execute this action in order to make it even more near-term and urgent, as well as coordinate with CARB’s incentive programs for medium-heavy duty and off-road equipment	Comment is respectfully noted. The Air District has multiple funding sources secured to support this action.
Maurissa Brown	Greenlining Institute	Additionally, we recommend the CERP Strategy 3 metrics should include the number of vehicles and types of vehicle replaced. This data is useful for identifying the impact of incentive dollars	Plan revised to add a new metric: "Number of Projects Completed."
Maurissa Brown	Greenlining Institute	T&M 4.1 Study Impacts of I-580 Truck Ban - To ensure this work is done with the depth and collaboration it deserves, we urge the Air District to also ensure that a partner on this analysis within Caltrans, is the Caltrans Office of Racial Equity & Tribal Affairs, as well as to the Interagency Equity Advisory Committee (EAC). Based on the Interstate 580 Truck Access Study website, it does not seem like the Caltrans Office of Racial Equity & Tribal Affairs or the EAC are a study partner for the project. Their leadership, assistance, and frameworks can help evaluate historic harm, identify	Comment is respectfully noted (and comment was forwarded to Caltrans).

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		disproportionate impacts, and guide just and community-centered solutions.	
Maurissa Brown	Greenlining Institute	T&M 4.2 Consider Racial Equity in Future Decision-making Related to the I-580 Truck Ban - We find that within the CERP action there is not clear, strong language to actually execute the forthcoming recommendations for restorative justice. Execution of the forthcoming recommendations should be included as an individual, separate action.	Plan revised to add new action: T&M 4.3 Implement Findings from Racial Equity Assessment. This action calls for the implementation of findings from the Historical Disparities and Root Causes Memo (action T&M 4.2).
Nikita Pavlenko	International Council on Clean Transportation (ICCT)	Implement comprehensive air quality monitoring at Oakland Airport. Transparent pollutant measurements will enable East Oakland communities and policymakers to monitor existing pollutant levels, improve transparency for affected communities, and allow BAAQMD to track progress towards air quality goals.	The Draft Plan includes multiple air monitoring efforts, including the East Oakland air monitoring project (action PH 3.1 led by the Air District) and for the Port to install fenceline air monitoring at the airport (action T&M 7.4). The Air District looks forward to consulting with the Port on their approach for fenceline monitoring.
Nikita Pavlenko	International Council on Clean Transportation (ICCT)	Accelerate zero-emission ground support equipment deployment. Recent research demonstrates that ground support equipment (GSE) can be electrified without disruption to existing operations or significant increase in fleet size, making this timeline both feasible and effective for reducing local air pollutants.	Comment is respectfully noted (comment is addressed by action T&M 6.2 Electric Ground Support Equipment).
Nikita Pavlenko	International Council on Clean Transportation (ICCT)	Phase out leaded aviation gasoline before 2030 through STC reimbursements, infrastructure investments, and financial incentives. With approximately 120 kg of lead emitted annually near the airport and prevailing winds dispersing emissions toward East Oakland where children face elevated blood lead exposure risks, rapid adoption of certified unleaded alternatives like G100UL is both urgent and achievable ahead of the 2031 statewide deadline	Comment is respectfully noted (comment is addressed by action T&M 6.5 Accelerate Phase-out of Leaded Aviation Gas).

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Nikita Pavlenko	International Council on Clean Transportation (ICCT)	Expand the Transportation and Mobile Source strategy to address aircraft landing and takeoff emissions through an Indirect Source Rule and operational measures. Aircraft operations account for 71-99% of airport emissions depending on the pollutant (including 87% of NOx and 75% of PM2.5), making it challenging to achieve substantial air quality improvements without addressing these emissions. There are multiple technologies and changes in practice that can be deployed to reduce aircraft engine emissions, such as blending lower-aromatic fuels, zeroemission or single-engine taxiing, and the use of learn burn engines.	The Air District is currently looking at indirect emissions due to warehouses, similar to the South Coast Warehouse Actions and Investments to Reduce Emissions (WAIRE) Rule. Other magnet sources may be considered following this rule development effort.
Nikita Pavlenko	International Council on Clean Transportation (ICCT)	In addition to adding a mitigation measure for T&M Strategy 6, we also propose the following strategy metrics be adopted to measure progress: 1) Set annual emission reduction goals for air pollutants and track progress towards achieving those quantitative targets. 2) Report annual progress relative to the national and state ambient air quality standards (NAAQS and CAAQS) requirements. This would involve reporting current levels of each pollutant’s concentration over the relevant time average in East Oakland, the national requirement, and the California state requirement. 3) Quantify and report contribution of each implemented measure to reducing pollutant concentrations.	Each Community Emissions Reduction Plan is unique due to its community-scale context, sources of emissions, and community direction. For East Oakland, we have included emissions forecast for 2031 and 2036 in Appendix D that reflect the impact of known regulations, anticipated growth, etc. In five years, the Air District will evaluate actual progress for 2031. This will include information on quantifiable emissions reductions for plan actions for which such calculations can be made. Additionally, the five-year milestone report will include an update to the Community Description which includes the socio-economic/demographic and health data.  This plan is focused on localized sources of air pollution and exposure concerns that aren’t the sole driver of compliance with the National Ambient Air Quality Standards (NAAQS) and

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			<p>California Ambient Air Quality Standards (CAAQS). The CERP uses emissions and emissions-related metrics to track progress since the concentrations of different pollutants in East Oakland are affected by not only changes in local emissions, but also by changes in meteorology and contributions to air pollution from outside the East Oakland AB 617 community boundary or even outside the Bay Area. As noted in Chapter 5, the air monitoring data at the East Oakland monitoring site currently show air pollution concentrations below the level of the NAAQS and CAAQS, and the locations that currently drive compliance considerations for the NAAQS and CAAQS are outside the East Oakland AB 617 community boundary. The Air District will continue to report on trends of the measured concentration of air pollutants at the East Oakland monitoring site and other locations using context of these health-based standards and other metrics as part of the Air District’s broader efforts to improve data accessibility.</p>
Adele Watts	CBE	<p>To facilitate strong participation and build trust in East Oakland, it is crucial to conduct early education and outreach to build literacy on air quality issues, recognizing that community cannot identify issues and participate without access to information on air quality issues and Air District procedures. To that end, we recommend scheduling workshops and meetings in collaboration with trusted local organizations, at accessible locations and times in East Oakland, and with a strong emphasis on language access and justice</p>	<p>The Draft Plan development process included community education to the Community Steering Committee (CSC) as part of the community outreach. All CSC meetings included interpretation, translation, community-friendly location, accessible hours, food and stipends for CSC members (For more information see Draft Plan Chapter 2). Community education and awareness will continue in implementation</p>

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		<p>(including outreach, education, and proceedings). Board meetings should also be more accessible to community members for Board members to be fully informed.</p>	<p>through public CSC meetings and outreach (see Chapter 9 for more details on implementation).</p>
Adele Watts	CBE	<p>C&amp;I 1.1: Rule Amendments to Address Fugitive Dust                      CBE strongly supports timely amendments to Regulation 6 to address fugitive dust emissions. CBE urges the Air District to adopt the most progressive dust control options available, including the whitepaper recommendations to require, among other things, minimum moisture content and stabilization testing of stockpiles. Facilities in East Oakland often purport to follow moisture content requirements despite continual community observations that stockpiles are leading to fugitive dust and track-out (e.g. Argent Materials). We also urge the Air District to consider the impact of fugitive dust on unhoused people near facilities, and to incorporate health protective measures and outreach and noticing procedures that include unhoused people’s needs.</p>	<p>The "impact of fugitive dust on unhoused people" is not currently something within the scope of the current rule amendments for Air District Rule 6-1 or 6-6. While not within the scope of the rule amendment, it is possible that with the increased requirements for fugitive dust, that this health concern to this specific population would be alleviated.</p> <p>Separate from the Air District’s fugitive dust rules, when conducting a health risk assessment on stationary sources, our engineering division evaluates the acute impacts from toxic air contaminants on unhoused people.</p>
Adele Watts	CBE	<p>C&amp;I 1.3: Review and Comment on California Environmental Quality Act (CEQA) Analysis of Proposed Projects                      CBE strongly supports this action and thanks the Air District for its early implementation, as providing notice of CEQA projects in East Oakland CERP boundaries provided CBE the opportunity to review and notice community of an upcoming metal scrap facility expansion. From the perspective of community lawyers, the Air District’s expert comments on major CEQA projects is invaluable. Under CEQA guidelines and case law, expert agencies are afforded a higher deference than impacted community members.</p>	<p>We appreciate your comments on the proposed rulemaking to streamline the implementation of Air District Rule 11-18. The Air District will respond to those comments in the final rulemaking package.</p>

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		<p>Without expert comments, particularly on issues of methodology and cumulative health risks, community and organizations have few options to understand and challenge highly consequential projects.</p>	
Adele Watts	CBE	<p>C&amp;I 2.2 Rule Amendments to Improve Implementation of Rule 11-18                      While CBE supports improving Rule 11-18 implementation, we have several concerns about proposed changes, as detailed in a comment letter submitted by Kaitlin Alcontin on October 10, 2025, to Rule Development. Amendments should ensure that Health Risk Assessments are conducted by neutral parties, ensure that overburdened communities are still prioritized for early action, and include foreseeable emissions beyond “routine” emissions that underestimate real emissions.</p>	<p>While the Air District Rule 11-18 facilities in East Oakland are considered phase II, action C&amp;I 2.1 is intended to prioritize implementation, underlining the Air District’s commitment to ensuring that overburdened communities are still prioritized for early action.</p>
Adele Watts	CBE	<p>C&amp;I 3.4 Reduce Industrial Pollution on Unhealthy Air Quality Days                      CBE strongly supports this action and appreciates the Air District’s collaboration to address this longstanding community concern. Going back at least five years, CBE members have raised concerns that commercial and industrial sources are contributing emissions on poor air quality days in East Oakland (e.g. Spare the Air days and wildfire smoke events). Community observed industrial sources increasing their operations on severe air quality days, presumably hoping to hide the added pollution in the wildfire smoke in 2020. An unhealthy air quality day is more frequent and more impactful to health in East Oakland than in less polluted communities given the existing pollution and health burdens. While Spare the Air Day is an excellent communication tool, community feels that industrial</p>	<p>Comment is respectfully noted.</p>

Name	Organization	Comment	Response
		sources, not just individuals, should be required to curb emissions. As wildfire events increase due to the climate crisis, it is becoming increasingly urgent to improve emergency air quality event procedures. We look forward to continued discussion on this matter.	
Adele Watts	CBE	<p>C&amp;I 4.1 Evaluate Opportunities to Reduce Localized Emissions and Address Impacts from BUGs</p> <p>CBE strongly supports timely attention to the issue of diesel back-up generators, particularly given the alarming national growth of data centers that frequently rely on toxic diesel generators. Additionally, the City of Oakland is updating the Oakland General Plan, and early information on the land use element suggests a turn towards sectors that may rely on generators in East Oakland.</p>	Comment is respectfully noted. Action C&I 4.1 time frame currently noted as Medium Term (2-3 years).
Adele Watts	CBE	<p>PH 1.1 Develop Methods for Understanding Cumulative Impacts</p> <p>CBE strongly supports this action as there is an urgent need for scientific methodology, regulation, and the law to more accurately reflect the real health burdens in environmental justice communities. This methodology would improve all aspects of the Air District’s work. CEQA guidelines currently require project sponsors to assess and disclose the health impacts of emissions. However, the most used current methodology is severely lacking and prevents decisionmakers and the public from being fully informed about impacts as required by CEQA. Cumulative impacts methodology must account for the full scope of project emissions (CAPs and TACs), local background air quality conditions, and community-specific health risks (unlike the EIR prepared for the Oakland Airport Expansion that only assessed TACs)</p>	Comment is respectfully noted.

Name	Organization	Comment	Response
Adele Watts	CBE	<p>T&amp;M 1.1: Indirect Source Policy Package. CBE thanks the Air District for their work on Indirect Source Rule. While the state was forced to roll back critical truck emission standards that long promised to reduce deadly diesel pollution in environmental justice communities, Air Districts retain clear authority to regulate indirect sources. CBE suggests early education and outreach in communities impacted by indirect source pollution magnets to inform rule concepts and allow balanced participation in the rulemaking process. As Air District staff heard at the CBE East Oakland community workshop on the CERP, residents are deeply concerned with diesel truck pollution and want to know what the Air District can do.</p>	<p>The Air District will engage communities during the rule development process and can continue to collaborate with the Community Steering Committee during the process.</p>
Adele Watts	CBE	<p>T&amp;M Strategy 6: Emission Reductions at the Oakland International Airport. CBE appreciates the Air District's thoughtful engagement on issues related to the airport in the CERP process and understands the Port has most local authority. CBE strongly encourages the Air District to proactively engage in opportunities to reduce airport emissions. The Oakland Airport is one of the single largest pollution sources in the Bay Area, with 2019 airport-related NOx emissions exceeding the NOx emissions of the Chevron Richmond Refinery, and reducing airport emissions will be critical to reaching air quality and climate goals throughout the region. CBE urges the Air District to consider health risk assessments or other health-protective considerations of cumulative impacts prior to granting any permits related to ongoing or expanded airport operations.</p>	<p>Comment is respectfully noted.</p>
Jacob Klein	Industrious Labs and Earthjustice	<p>Industrial heating processes, like those from burning methane gas in industrial boilers, produce nitrous oxide (NOx), particulate matter 2.5 (PM 2.5), volatile organic</p>	<p>Amendments to Air District Rule 9-7 are not currently scheduled on the Air District's 5-year work plan.</p>

Name	Organization	Comment	Response
		<p>compounds (VOCs), and other air pollutants that contribute to the health disparities that East Oakland residents experience.</p> <p>Currently, BAAD regulates emissions from industrial boilers, steam generators, and process heaters above 2 MM BTU per hour through Regulation 9 Rule 7. Unfortunately, the rule has not been updated since 2011, allowing boilers to continue emitting health-harming pollutants. A strengthened Rule 9-7 with a zero emissions standard would address these emissions, reducing the air pollution burden that East Oakland faces.</p> <p>Currently, the CERP only makes passing mention of Rule 9-7, leaving a key opportunity on the table. According to Industrious Labs analysis of Rule 9-7 permitted facilities data, 16 facilities operate 44 industrial boilers emitting nearly 18 tons of NOx, 1.4 tons of PM 2.5, and 1.7 tons of VOCs in East Oakland. Therefore, strengthening the rule would be consistent with the CERP’s goals.</p> <p>Including additional language in the CERP for a zero-emission update to Rule 9-7 would also address two of the facilities that “Right to Breathe” identified as key facilities of concern: Peet’s Coffee and Tea and Gallagher &amp; Burk. While both facilities also have emissions from sources other than boilers, strengthening Rule 9-7 would help alleviate the burden from these key facilities. Other industrial facilities in the East Oakland region would also be implicated,</p>	

Name	Organization	Comment	Response
Jacob Klein	Industrious Labs and Earthjustice	<p>contributing to the cumulative benefits of a stronger Rule 9-7.</p> <p>Public Health, PH 1.1, A methodology that takes into account the full ecosystem of air pollution levels and the specific health risks that communities face must be developed to better compare how communities like East Oakland differ from non-environmental justice communities, with pollution burdens having situational disparities. By advancing Rule 11-18 to build cumulative impacts into the health risk methodology, BAAD can address air quality issues more holistically. Furthermore, as part of amending Rule 11-18, meeting health risk assessments and risk reduction strategies should require kickstarting other rule updates and amendments.</p>	Comment is respectfully noted.
Colleen Liang	Port of Oakland	<p>As described previously in the Port of Oakland’s (Port) letter dated June 11, 2025, adjacent communities are a valuable partner to the Port in advancing zero-emission operations at the Port. The Port values engaging with the CSC as a non-voting member and participating in the process in the development of the strategies in the CERP</p> <p>The Port appreciated the opportunity to meet in June 25, 2025 and July 7, 2025 to discuss the draft strategies related to the Port, describe the limitations of the Port’s authority, and discuss past, ongoing, and future initiatives in advancing zero emission airport operations. The Port will continue to engage and dialogue with CSC members on the proposed strategies.</p> <p>Please note that Oakland San Francisco Bay Airport</p>	Plan revised to update reference to airport, per the Port of Oakland's comment.

Name	Organization	Comment	Response
		<p>name change was approved by the Port of Board Commissioners at a July 2025 Board meeting. All references to Oakland International Airport in the final draft of the Right to Breathe: East Oakland Community Air Quality Justice Plan should be revised to Oakland San Francisco Bay Airport.</p>	
<p>Njeri McGee-Tyner</p>	<p>CSC member</p>	<p>Love the urban greening maps are well illustrated.</p> <p>Ch. 7 - UGW 1.2 Funding sources are important to support urban greening workforce pathways and educational career pathways.</p> <p>UGW 2.2 Urban Greening funding - prefer this be changed to short term</p> <p>Glad to see the needle has moved in this focus area. looking forward to these actions rolling out the most.</p>	<p>Comment is respectfully noted.</p>
<p>Sky</p>		<p>High fees on dumping at waste management definitely encourages dumping!                      Enforcement of illegal dumping? Much worse crimes will go unpunished in Oakland. I feel encouraging people/companies to dump in proper locations would help more. More surveillance feels like a human rights violation on par with living next to a trash pile. No hate. Thank you for your hard work</p>	<p>Comment is respectfully noted.</p>

Name	Organization	Comment	Response
Nate Miley	Supervisor, District 4 Alameda County Board of Supervisors	<p>Concerned about inaccuracies in the Final Draft Right to Breathe and concerned that criteria used to identify “facilities of concern” are not being applied consistently in the Plan.</p> <p>One example is in Chapter 5: Air Quality Overview where Argent Materials is characterized as a “Facility of Concern” for toxic exposure from toxic emission, despite not listed among the top ten emitters of toxic air contaminants in East Oakland. The inclusion is based on community testimony during CSC meetings, rather than on quantitative emissions or exposure metrics. This designation is then carried forward into Appendix F-1, where Argent Materials is included among four facilities for which CBE developed a Problem Statement, with the justification for inclusion being their status as a “Facility of Concern.</p> <p>This circular reasoning is concerning and creates the appearance that the conclusions of the CERP are not being driven by empirical analysis. This approach raises concern about the integrity of the CSC’s work and the CERP as a whole, and about whether the resulting recommendations are adequately supported by the evidence.</p>	Comment is respectfully noted.

Name	Organization	Comment	Response
<b>Stop OAK Expansion Comments</b>			
See below	Stop Oak Airport Expansion Coalition	<p>The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Note: The Air District also has no authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.</p>	<p><b>Stop OAK Expansion Response 1</b></p> <p>The Air District maintains regulatory authority over stationary sources of air pollution, while the California Air Resources Board (CARB) is responsible for emissions from mobile sources, except where federal law preempts CARB's jurisdiction. Although aircraft emissions fall outside the Air District's regulatory authority, the Plan addresses their associated impacts. Air quality impacts from airports have been extensively studied and documented through multiple air monitoring efforts, with findings summarized in Plan Chapter 5, <i>Air Quality Overview</i>.</p> <p>To further reduce emissions from the airport, the Plan includes several targeted actions, detailed in Chapter 7, <i>Strategy 6: Emission Reductions at Oakland San Francisco Bay Airport</i>.</p> <p>To further reduce emissions from Oakland Airport, the Plan incorporates a series of targeted actions designed to address sources of air pollution associated with airport operations. Details of these measures are detailed in Plan Chapter 7, <i>Strategy 6: Emission Reductions at Oakland San Francisco Bay Airport</i></p>

Name	Organization	Comment	Response
<p><b>Names:</b> Gregory Stevens, Kay Guinane, Beth Weinberg, Carol Hirth, Brandon Svec, Scott Hochberg, Irene Hilgers, John Carrese, Martin Horwitz, Eric Pash, Jean Tepperman, Alvaro Ramos, Laura Bernstein, Marcia Flannery, Ron Kamangar, Charles Bret, Leah Redwood, Laura Gibbons, Leane Grossman, No Name No Name, Jordan Jackson, AJ Cho, Ariella Granett, Nishanga Bliss, Flora Tso, Leana Zang-Rosetti, Piper No Name, Tamara Haw, Margaret Steppe, Rena Pallof, Matt Courter, Karen Beck, Dan Ouellet, Meggie Kang, Cate Leger, Joan Starr, M Kathleen Archambeau, Scott Roth, Martha Booz, Yuan Xu, Andrew Jordan, Martin Horwitz, Carol Schaffer, Suzanne Baker, Collin Shea Casey, Karen and Keith Miller, Linda Jordan, Karen Kirschling, Eric Pash, Leah Redwood, Sandra Kwak, Susan No Name, AJ Cho, Kathleen Richards, Barbara Benzwi, Marcia Edelen, Esther Lerman, Carol Kuelper, Jeff White, Leana Zhang-Rosetti, Janet Stromberg, Mary Gamson, David Baca, Rashid Patch, Ruby Macdonald, Laura Leipzig, Connie Cronin, Becca Schonberg, Melissa Mandel, Marjory Keenan, Patrice Haan, Jane Maxwell, Judith Smith, Dr. Tony Marks-Block, Jackie Feazell, No Name No Name, Gregory Fite, Susan Harris, Susanne La Faver, Jean Tepperman, Greg Hom, No Name No Name, Anita Watkins, Deborah Jung, Nima Sherpa, Liam Hroziencik, Kristen Okorn, Mary Flanagan, Julia Dashe, Dee Dee Kramer, Jim Wilson, Claire Broome, Ben Keller, Ellen McClure, Eileen Chieco, Victor Chieco, Margaret Steppe, Rafael Gonzalez, Katherine Dillon, Lynne Baker, Beth Weinberg, Lynne Powe, Alfreda Wright, Heather MacLeod, No Name No Name, Marion Grau, Frances Aubrey, Janice Cecil, Christopher Lutz, Veronica Oberholzer, Berta Gelbr, Stephanie Prugel, David Gassman, Stephen Ongerth, Ara Bicakci, Margaret O'Halloran, Jo Heilman, Christopher Lish, Aaron Reaven, Ann Harvey</p>			

Name	Organization	Comment	Response
See below	Stop Oak Airport Expansion Coalition	A larger grid of pollution monitors is needed, including fenceline monitors. This monitoring should be initiated now, as the Community Steering Committee (CSC) prefers, to provide a baseline of data for future comparison and modeling. Include ultrafine particles and hourly fluctuations to indicate peak levels of pollution.	<p><b>Stop OAK Expansion Response 2</b></p> <p>Air quality impacts from airports have been researched and documented in numerous air monitoring studies, findings from which are highlighted in Chapter 5 <i>Air Quality Overview</i>. The Air District notes the interest in ultrafine particles (UFP) monitoring, given that aircraft are a source of UFP. However, additional UFP monitoring is unlikely to provide actionable information related to the proposed airport expansion as UFP is not a regulated pollutant and there are no health-based thresholds for UFP.</p> <p><i>Transportation and Mobile Sources Action 7.4</i> includes fenceline monitoring to be installed and operated by the Port of Oakland (Port), which the Air District can consult with the Port on. This monitoring was agreed to as part of a Settlement Agreement between the Port and the City of Alameda.</p>
<p><b>Names:</b> Gregory Stevens, Kay Guinane, Beth Weinberg, Carol Hirth, Brandon Svec, Scott Hochberg, Irene Hilgers, John Carrese, Martin Horwitz, Eric Pash, Jean Tepperman, Alvaro Ramos, Laura Bernstein, Marcia Flannery, Ron Kamangar, Charles Bret, Leah Redwood, Laura Gibbons, Leane Grossman, No Name No Name, Jordan Jackson, AJ Cho, Ariella Granett, Nishanga Bliss, Flora Tso, Leana Zang-Rosetti, Piper No Name, Tamara Haw, Margaret Steppe, Rena Pallof, Matt Courter, Karen Beck, Dan Ouellet, Meggie Kang, Cate Leger, Joan Starr, M Kathleen Archambeau, Scott Roth, Martha Booz, Yuan Xu, Andrew Jordan, Martin Horwitz, Carol Schaffer, Suzanne Baker, Collin Shea Casey, Karen and Keith Miller, Linda Jordan, Karen Kirschling, Eric Pash, Leah Redwood, Sandra Kwak, Susan No name, AJ Cho, Kathleen Richards, Barbara Benzwi, Marcia Edelen, Esther Lerman, Carol Kuelper, Jeff White, Leana Zhang-Rosetti, Janet Stromberg, Mary Gamson, David Baca, Rashid Patch, Ruby Macdonald, Laura Leipzig, Connie Cronin, Becca Schonberg, Melissa Mandel, Marjory Keenan, Patrice Haan, Jane Maxwell, Judith Smith, Dr. Tony Marks-Block, Jackie Feazell, No Name No Name, Gregory Fite, Susan Harris, Susanne La Faver, Jean Tepperman, Greg Hom, No Name No name, Anita Watkins, Deborah Jung, Nima Sherpa, Liam Hroziencik, Kristen Okorn, Mary Flanagan, Julia Dashe, Dee Dee Kramer, Jim</p>			

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<p>Wilson, Claire Broome, Ben Keller, Ellen McClure, Eileen Chieco, Victor Chieco, Margaret Steppe, Rafael Gonzalez, Katherine Dillon, Lynne Baker, Beth Weinberg, Lynne Powe, Alfreda Wright, Heather MacLeod, No Name No name, Marion Grau, Frances Aubrey, Janice Cecil, Christopher Lutz, Veronica Oberholzer, Berta Gelbr, Stephanie Prugel, David Gassman, Stephen Ongerth, Ara Bicakci, Margaret O'Halloran, Jo Heilman, Christopher Lish, Aaron Reaven, Ann Harvey</p>			
<p>See below</p>	<p>Stop Oak Airport Expansion Coalition</p>	<p>The report should call for any plans for expanding operations or facilities at the establishments listed in the East Oakland Air Monitoring Project, including the Oakland airport, (Section 3.2) that would increase pollution to be suspended until the health impacts on East Oakland residents are better understood. A specific Health Impact Assessment (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.</p>	<p><b>Stop OAK Expansion Response 3</b></p> <p>The Air District appreciates the interest in the East Oakland air monitoring project and looks forward to discussing findings from this air monitoring project with the East Oakland community. As noted in the Plan, the Air District, CBE, and UC Berkeley are conducting an air monitoring project in East Oakland, referred to in <i>Public Health Action 3.1</i> and <i>Transportation and Mobile Sources Action 7.3</i>. One component of this project is to use the Air District’s air monitoring van to measure concentrations of key pollutants including multiple VOCs, PM, UFP, black carbon, NOx, and CO. This monitoring is focused on pollution sources prioritized by community, one of which is the airport. The resulting data will be leveraged to the extent possible to help inform air quality issues that may be related to the airport, and we review past research on this topic to help inform our data assessments. While mobile monitoring will provide measurements of multiple key pollutants in many locations in East Oakland, the short snapshots of data do not provide information to estimate health risks. A second component of the East Oakland air monitoring project is deployment of a PM2.5 sensor network, which</p>

Name	Organization	Comment	Response
			<p>is making hourly and even sub-hourly real-time PM2.5 data available in more locations in East Oakland. Both components of this project were previously scoped and are already underway, and this project is funded in part by a U.S. EPA grant that ends in June 2026. Data and findings from the East Oakland air monitoring project will be made publicly available for other uses. However, conducting health impact assessments for the airport expansion or for other facilities or operations falls outside the scope of the East Oakland air monitoring project.</p>
<p><b>Names:</b> Gregory Stevens, Kay Guinane, Beth Weinberg, Carol Hirth, Brandon Svec, Scott Hochberg, Irene Hilgers, John Carrese, Martin Horwitz, Eric Pash, Jean Tepperman, Alvaro Ramos, Laura Bernstein, Marcia Flannery, Ron Kamangar, Charles Bret, Leah Redwood, Laura Gibbons, Leane Grossman, No Name No Name, Jordan Jackson, AJ Cho, Ariella Granett, Nishanga Bliss, Flora Tso, Leana Zang-Rosetti, Piper No Name, Tamara Haw, Margaret Steppe, Rena Pallof, Matt Courter, Karen Beck, Dan Ouellet, Meggie Kang, Cate Leger, Joan Starr, M Kathleen Archambeau, Scott Roth, Martha Booz, Yuan Xu, Andrew Jordan, Martin Horwitz, Carol Schaffer, Suzanne Baker, Collin Shea Casey, Karen and Keith Miller, Linda Jordan, Karen Kirschling, Eric Pash, Leah Redwood, Sandra Kwak, Susan No name, AJ Cho, Kathleen Richards, Barbara Benzwi, Marcia Edelen, Esther Lerman, Carol Kuelper, Jeff White, Leana Zhang-Rosetti, Janet Stromberg, Mary Gamson, David Baca, Rashid Patch, Ruby Macdonald, Laura Leipzig, Connie Cronin, Becca Schonberg, Melissa Mandel, Marjory Keenan, Patrice Haan, Jane Maxwell, Judith Q. Smith, Dr. Tony Marks-Block, Jackie Feazell, No Name No Name, Gregory Fite, Susan Harris, Susanne La Faver, Jean Tepperman, Greg Hom, No Name No name, Anita Watkins, Deborah Jung, Nima Sherpa, Liam Hroziencik, Kristen Okorn, Mary Flanagan, Julia Dashe, Dee Dee Kramer, Jim Wilson, Claire Broome, Ben Keller, Ellen McClure, Eileen Chieco, Victor Chieco, Margaret Steppe, Rafael Gonzalez, Katherine Dillon, Lynne Baker, Beth Weinberg, Lynne Powe, Alfreda Wright, Heather MacLeod, No Name No name, Marion Grau, Frances Aubrey, Janice Cecil, Christopher Lutz, Veronica Oberholzer, Berta Gelbr, Stephanie Prugel, David Gassman, Stephen Ongerth, Ara Bicakci, Margaret O'Halloran, Jo Heilman, Christopher Lish, Aaron Reaven, Ann Harvey</p>			

Name	Organization	Comment	Response
Aaron Reaven	Stop Oak Airport Expansion Coalition	Transportation and Mobile Environment – Oakland International Airport (pg 108). Add a concluding paragraph stating, <b><i>“Given the air quality impacts of the airport, prior to any expansion of the facility, a comprehensive Health Impact Assessment should be conducted. Both the City of Oakland and the Port of Oakland have authority to require such a pause and a study–See Chapter 9.”</i></b>	See response <b>Stop OAK Expansion Response 1</b> and <b>Response 3.</b>
Aaron Reaven, Stop OAK Admin	Stop Oak Airport Expansion Coalition	Built Environment– add as action BE 3.7 (Pg. 145): <b><i>“Pause expansion of the airport, which will attract additional aircraft daily thus necessarily bringing increased NOx, SOx, PM 2.5 and PM 0.1 ultrafine particles to homes and to gathering places of vulnerable populations, until the airport performs a Health Impact Assessment and recirculates a revised FEIR for the Modernization and Development Project with a plan for full mitigation of the increased air pollution its development will cause.”</i></b> Lead: Port of Oakland Timeframe: Medium term (2-3 years)	See response <b>Stop OAK Expansion Response 1</b> and <b>Response 3.</b>
Aaron Reaven, Stop OAK Admin	Stop Oak Airport Expansion Coalition	Public Health– add as action 3.5 (Pg. 171): <b><i>“Any plans for expansion of operations or facilities at the establishments listed in the East Oakland Air Monitoring Project Section (3.2) that would increase pollution should be suspended until such time as a thorough assessment is conducted of the potential impact on the health of East Oakland residents. Such health impact assessments shall include accounting for the well-documented pre-existing health inequities in East Oakland communities.”</i></b>	See response <b>Stop OAK Expansion Response 2.</b>

Name	Organization	Comment	Response
Aaron Reaven, Stop OAK Admin	Stop Oak Airport Expansion Coalition	T&M 6.1 (Pg. 187) To this section’s description of the Port Emissions Reduction Plan, add the following: <b><i>“The Port of Oakland will pause the Modernization and Development Plan, which would increase emissions, until after it performs a Health Impact Assessment, incorporates data from that assessment into the project EIR, and recirculates the EIR.”</i></b>	See response <b>Stop OAK Expansion Response 1</b> and <b>Response 3</b> .
Aaron Reaven, Stop OAK Admin	Stop Oak Airport Expansion Coalition	Transportation & Mobility–T&M 7.3 (Pg. 189) – add specifics designated below in bold italics: The East Oakland Air Monitoring Project (see PH 3.1) will include exploratory measurements of volatile organic compounds (VOCs) and particulate matter (PM) (including ultrafine particles (UFPs), a key aviation-related pollutant) around specific facilities and air quality concerns identified and prioritized by community members. Oakland International Airport is one of the identified facilities. <b><i>Communities for a Better Environment (CBE) has partnered with the University of California, Berkeley and the Bay Area Air District to greatly improve the numbers and distribution of pollution sensors in East Oakland. The new sensor grid shall operate with hourly resolution to identify peak concentrations of pollutants, and operate for at least a year.</i></b> Using information collected from this project, the Air District will analyze and evaluate data and summarize and report findings with attention to occurrences of unusually high levels of different pollutants, including UFPs, that may be associated with airport-related emissions. <b><i>Findings from the overall project are expected to inform a specific Health Impact Analysis, improve efforts to reduce pollution emissions, and reveal any need for</i></b>	See response <b>Stop OAK Expansion Response 2</b> .

Name	Organization	Comment	Response
		<p><b><i>additional information. Expansion of the airport should be paused until these findings are analyzed and discussed.</i></b></p>	
<p>Aaron Reaven</p>	<p>Stop Oak Airport Expansion Coalition</p>	<p>Transportation &amp; Mobility T&amp;M 7.4 – (Pgs. 189-199): This focus area action states, “The Port of Oakland shall install fence line air quality monitor(s) no later than <b>one year after the opening of the new terminal</b> as described in the 2024 Oakland International Airport Terminal Modernization and Development Project Final Environmental Impact Report. . .” This assumes that the Airport expansion will be implemented. But there are currently three lawsuits challenging the FEIR, and, as noted above, the City and the Port still have to make decisions about whether to proceed with the project. It’s also important to understand that the FEIR projected significant increases in flights, but these have not materialized. In fact, total passengers using the airport have declined recently and have not reached pre-Covid levels as shown in the graph below. <b><i>Reference to the “opening of the new terminal” should be deleted from this report.</i></b></p>	<p>See response <b>Stop OAK Expansion Response 1.</b></p>
<p>Aaron Reaven</p>	<p>Stop Oak Airport Expansion Coalition</p>	<p>T&amp;M 7.4 (Pgs. 189-190): This action recommends delaying fenceline air quality monitoring. Since emissions from the Airport have already been identified as a problem, there is no excuse for waiting. The report notes that the “CSC prefers” not waiting. This action item should be modified to read <b><i>“Fenceline air quality monitoring that includes hourly sampling for VOCs, fine PM and Ultra-Fine PM should be installed immediately.” (see PH 3.1)</i></b></p>	<p>See response <b>Stop OAK Expansion Response 2.</b></p>

Name	Organization	Comment	Response
Aaron Reaven	Stop Oak Airport Expansion Coalition	Chapter 9 Implementation and Reporting – Government Collaboration and Agency roles – City of Oakland pg 208. add: <b><i>“The City of Oakland, through its General Plan, has the authority to rule that the airport expansion can only proceed if it shows that air quality in East Oakland will not be further damaged.”</i></b> This would be consistent with the Environmental Justice Element of the General Plan.	See response <b>Stop OAK Expansion Response 1.</b>
Aaron Reaven, Stop OAK Admin	Stop Oak Airport Expansion Coalition	Chapter 9 Implementation and Reporting – Government Collaboration and Agency roles – Port of Oakland pg 209. Add sentence: <b><i>“Notwithstanding the findings of the Environmental Impact Report pursuant to the airport expansion, the Port should pause the project to better determine the health impacts on East Oakland Residents as well as other considerations.”</i></b>	See response <b>Stop OAK Expansion Response 1</b> and <b>Response 3.</b>
Aaron Reaven	Stop Oak Airport Expansion Coalition	Technical Concern 1) Noise Pollution. Add this to Appendix D regarding noise measurement thresholds, relating to SFO: <b><i>Although noise is mentioned as a community concern (Pg. 178), there are no action items to address this issue. A starting point would be to collect data recognizing that 65 decibels Day-Night average Level (DNL) is an outdated standard. The FAA’s continued reliance on the 65 DNL threshold is no longer defensible for evaluating the noise impacts of airport expansion projects such as those proposed at Oakland Airport. The FAA’s own 2021 Neighborhood Environmental Survey (NES) demonstrated that substantial community annoyance occurs well below 65 DNL, with its regression model indicating an equivalent response near 46 DNL. Despite this, both the FAA and the Port of Oakland have continued to</i></b>	<p>The concern is related to noise due to truck idling. Several actions in the Plan could help reduce idling:</p> <p>Action T&amp;M 1.3 involves better managing trucks in East Oakland, which could include changes to reduce idling;</p> <p>Action T&amp;M 1.5 is designed to identify locations to install no idling signs; and</p> <p>Action T&amp;M 3.4 will offer grants to owners of heavy-duty diesel trucks to help eliminate harmful diesel engine idling.</p>

Name	Organization	Comment	Response
		<p><b><i>apply the 65 DNL threshold in reaching findings of no significant impact. This approach disregards the FAA’s own scientific record and fails to meet NEPA’s requirement for using the best available information. Noise data and methods need to reflect actual community response to aircraft noise.</i></b></p>	<p>Also, as noted on page 108 of the Plan, since 2010, the Federal Aviation Administration (FAA) has been leading the Continuous Lower Energy, Emissions (CLEE), and Noise (CLEEN) Program with U.S. EPA and engine manufacturers to develop aircraft engines that are quieter, more fuel efficient and lower emitting.</p>
<p>Aaron Reaven, Stop OAK Admin</p>	<p>Stop Oak Airport Expansion Coalition</p>	<p>Technical Concern 2) Ultra-fine Particles Considerations: Suggestion for Appendix D regarding air monitoring methodology regarding ultra-fine particles (UFP). From <a href="#">this study</a> of the Seattle-Tacoma Airport (Sea-Tac), we see that UFP are particularly associated with landing airplanes, and that they are much more widely dispersed than UFP from roadways. The air monitoring efforts of the Air District should follow methods described in this study.</p>	<p>As noted in the Plan, the Air District, CBE, and UC Berkeley are conducting an air monitoring project in East Oakland, referred to in <i>Public Health Action 3.1</i> and <i>Transportation and Mobile Sources Action 7.3</i>. One component of this project is to use the Air District’s air monitoring van to measure concentrations of key pollutants including multiple VOCs, PM, UFP, black carbon, NOx, and CO. This monitoring is focused on pollution sources prioritized by community, one of which is the airport. Data collected from the East Oakland air monitoring project will be leveraged to the extent possible to help inform air quality issues that may be related to the airport. The Air District reviews and considers existing scientific research and data analysis methodologies to inform our data assessments.</p>
<p>Aaron Reaven, Stop OAK Admin</p>	<p>Stop Oak Airport Expansion Coalition</p>	<p>Technical Concern 3) Pollution Inventory Accuracy: The Emissions Inventories listed in Tables 5-7 (Pg.92), 5-8 (Pg.94), and 5-10 (Pg. 111) are based almost exclusively on modelling using AERMOD. The projections presented represent annual amounts. These results should be confirmed with local monitoring before</p>	<p>Regarding the Emissions Inventory: the three tables cited by the commenter do summarize emissions inventory data, but the inventory was not developed using AERMOD and cannot be directly compared to monitoring data. AERMOD is a dispersion model that combines</p>

Name	Organization	Comment	Response
		<p>large-scale industrial changes (like the expansion of the airport) are approved. <b>Hourly data</b> is needed to reveal emission spikes that may exceed National Ambient Air Quality Standards. The data for East Oakland in figures 5-3, 5-4, and 5-6 come from a single monitor. Having one monitor limits the confidence in these data. The Bay Area Air District admits that East Oakland is in many ways an air quality “data desert.”(1) Communities for a Better Environment has partnered with the University of California, Berkeley and the Bay Area Air District Air District to greatly improve the numbers and distribution of pollution sensors in East Oakland. The data from these sensors is needed ASAP to establish a credible baseline of community air quality before predicting or curtailing future pollution. The sensors should be sensitive to all classes of particulate matter, NOx, SOx and VOCs and operate for at least a year. The data from this study would inform a Health Impact Assessment to enhance our understanding of the current emissions and improve future projections. 1.</p> <p><a href="https://www.baaqmd.gov/~/media/files/technical-services/east-oakland-monitoring-project/eo_amp_sensor_network_monitoring_plan-pdf.pdf?rev=9aaeca8a11a24f7485bfb0d74e05448e&amp;sc_lang=en">https://www.baaqmd.gov/~/media/files/technical-services/east-oakland-monitoring-project/eo_amp_sensor_network_monitoring_plan-pdf.pdf?rev=9aaeca8a11a24f7485bfb0d74e05448e&amp;sc_lang=en</a></p>	<p>emissions data with meteorological data and other inputs to simulate pollutant concentrations from specific sources. The Air District did apply AERMOD for selected sources, but even then, it is difficult to make comparisons with monitoring data, which reflects impacts from all sources, not just those modeled in AERMOD.</p> <p>Regarding the second part of the comment, starting with "The data for East Oakland in figures 5-3, 5-4, and 5-6...", the response is as follows: The data for East Oakland shown in Figures 5-3, 5-4, and 5-6 are from the Air District’s Oakland – East multipollutant monitoring site. Data from the Air District’s monitoring sites are validated according to rigorous quality control and quality assurance requirements from the U.S. EPA to ensure that the air quality data are consistent and accurate, providing high confidence in the collected data. As noted in the Plan, the Air District, CBE, and UC Berkeley are conducting an air monitoring project in East Oakland, referred to in Action PH 3.1 and <i>Transportation and Mobile Sources Action T&amp;M 7.3</i>, to provide more types of air monitoring data in more places. One component of this project is to use the Air District’s air monitoring van to measure concentrations of key pollutants including multiple VOCs, PM, UFP, black carbon, NOx, and CO. This monitoring is focused on pollution sources prioritized by community. While</p>

Name	Organization	Comment	Response
			<p>mobile monitoring will provide measurements of multiple key pollutants in many locations in East Oakland, the short snapshots of data do not provide information to estimate health risks. A second component of the East Oakland air monitoring project is deployment of a PM2.5 sensor network, which is making hourly and even sub-hourly real-time PM2.5 data available in more locations in East Oakland. Both components of this project were previously scoped and are already underway, and this project is funded in part by a U.S. EPA grant that ends in June 2026. Data and findings from the East Oakland air monitoring project will be made publicly available for other uses.</p>
Paul English	Public	<p>However, I urge you to reject this plan as insufficient to protect the public health of those living in East Oakland, as the plan does not document the health impacts of the Oakland Airport expansion. As you note in the report, the Oakland airport is the “largest contributor[s] to NOx emissions in East Oakland at 36%, and aircraft is the largest sulfur oxides (SOx) source in the community at 80%.” Although you propose two strategies: “Strategy 6. Emission Reductions at the Oakland International Airport” and “Strategy 7. Collaboration With and Accountability to Community on Airport Impacts,” both of these strategies will fail to adequately address the increased pollution from building a new terminal and new gates. Strategy 6, which “may” include electrification of airport ground support equipment and leaded aviation gas, sounds weak and lacks any enforcement mechanism. Strategy 7, which</p>	<p>See response <b>Stop OAK Expansion Response 1</b> and <b>Response 3</b>.</p>

Name	Organization	Comment	Response
		<p>requires the Port of Oakland to install air monitoring equipment “no later than one year after the opening of the new terminal,” will only document the increase in air pollution after the fact. The questions which this report fails to address include, “how many new cases of asthma and cardiovascular disease will occur due to the airport expansion?” and “what are the external social costs in public health due to the expansion in terms of emergency department visits, missed school days, and medication costs?” These questions could be answered by conducting a thorough Health Impactment Assessment, which has already been recommended by the Alameda County Health Department. Such an assessment is necessary for the community to understand the complete burden on public health of the airport expansion, and should be a strategy proposed in the Plan.</p>	
<p>Jack Fleck</p>	<p>350 East Bay and Stop OAK Airport Expansion Coalition</p>	<p>Here is specific wording we are suggesting:                      Draft Amendment to the AB617 Community Steering Committee                      “Right to Breathe: East Oakland Community Air Quality Justice Plan” report                      From the Stop OAK Expansion Coalition</p> <p>The Community Steering Committee requests that <b>plans for expanding operations</b> or facilities at the establishments listed in the East Oakland Air Monitoring Project (Section 3.2), including the <b>Oakland airport</b>, that would potentially increase air pollution, <b>be suspended until the health impacts on East Oakland residents are better understood through the conduct of a Health Impact Assessment study</b>. Such a Health</p>	<p>See response <b>Stop OAK Expansion Response 1</b> and <b>Response 3</b>.</p>

Name	Organization	Comment	Response
		Impact Assessment (HIA) should include accounting for the well-documented pre-existing health inequities in East Oakland communities.	
Stop OAK Admin	Stop Oak Airport Expansion Coalition	Address health threats from proposed expansion of Oakland San Francisco Bay Airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should compel the City of Oakland to exercise its authority to suspend the Oakland San Francisco Bay Airport expansion if air quality in East Oakland would be further worsened. This action would be consistent with the Environmental Justice Element of its General Plan. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the new terminal will be completed.	See response <b>Stop OAK Expansion Response 1.</b>
Stop OAK Admin	Stop Oak Airport Expansion Coalition	The report should call on the Port of Oakland to perform a comprehensive Health Impact Assessment (HIA) of the airport expansion on East Oakland residents. This assessment would include accounting for the well-documented pre-existing health inequities in East Oakland communities and analyze any cumulative effects of increased pollution on this population. The Alameda County Health Department	The Air District submitted a <a href="#">comment letter</a> on the airport expansion CEQA project, which suggested that the Port of Oakland (Port) implement Environmental Justice principles including evaluation of cumulative impacts, disaggregated by race and that the Port implement all feasible measures to reduce nitrogen oxides (NOx) for construction.

Name	Organization	Comment	Response
		has called on the port to perform this same assessment.	A project-level HIA is outside the scope of a Community Emissions Reduction Plan.
Stop OAK Admin	Stop Oak Airport Expansion Coalition	The Air Quality Justice Plan should recommend suspension of all activity related to expanding operations and facilities listed in the Monitoring Project until a Health Impact Assessment (HIA) is completed. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.	See response <b>Stop OAK Expansion Response 2.</b>
Stop OAK Admin	Stop Oak Airport Expansion Coalition	Increase and geographically expand the number of pollution monitors including airport fenceline monitors. Initiate monitoring ASAP, as the Community Steering Committee (CSC) prefers. Such monitoring is needed now to provide baseline data for future comparison and modeling. Include ultrafine particles and measure hourly fluctuations over the course of at least one year to indicate peak levels of pollution and seasonal variations.	See response <b>Stop OAK Expansion Response 2.</b>
Stop OAK Admin	Stop Oak Airport Expansion Coalition	Adopt monitoring methodology for ultra-fine particles based on airport, not roadway, studies. In Appendix D regarding air monitoring methodology for ultra-fine particles (UFP): From a study of the Seattle-Tacoma Airport (Sea-Tac), UFP are particularly associated with landing airplanes, and are much more widely dispersed than UFP from roadways. This is because descending jets fly lower, and for longer periods of time, compared to takeoffs. The air monitoring efforts of the Air District should follow methods described in this study.	Data collected from the East Oakland air monitoring project will be leveraged to the extent possible to help inform air quality issues that may be related to the airport. The Air District reviews and considers existing scientific research and data analysis methodologies to inform our data assessments.

Name	Organization	Comment	Response
Stop OAK Admin	Stop Oak Airport Expansion Coalition	<p>Use updated threshold on annoyance to address noise pollution in report. Although noise is mentioned as a community concern (Pg. 178), there are no action items to address this issue. A starting point would be to collect data recognizing that 65 decibels Day-Night average Level (DNL) is an outdated standard. The FAA’s continued reliance on the 65 DNL threshold is no longer defensible for evaluating the noise impacts of airport expansion projects such as those proposed at Oakland San Francisco Bay Airport. The FAA’s own 2021 Neighborhood Environmental Survey (NES) demonstrated that substantial community annoyance occurs well below 65 DNL, with its regression model indicating an equivalent response near 46 DNL. Despite this, both the FAA and the Port of Oakland have continued to apply the 65 DNL threshold in reaching findings of no significant impact. This approach disregards the FAA’s own scientific record and fails to meet NEPA’s requirement for using the best available information. Noise data and methods need to reflect actual community response to aircraft noise. Add this threshold to capture noise pollution and annoyance to Appendix D.</p>	<p>The concern is related to noise due to truck idling. Several actions in the Draft Plan could help reduce idling:</p> <p>Action T&amp;M 1.3 involves better managing trucks in East Oakland, which could include changes to reduce idling;</p> <p>Action T&amp;M 1.5 is designed to identify locations to install no idling signs; and</p> <p>Action T&amp;M 3.4 will offer grants to owners of heavy-duty diesel trucks to help eliminate harmful diesel engine idling.</p> <p>Also, as noted on page 108 of the Plan, Since 2010, the Federal Aviation Administration (FAA) has been leading the Continuous Lower Energy, Emissions (CLEE), and Noise (CLEEN) Program with U.S. EPA and engine manufacturers to develop aircraft engines that are quieter, more fuel efficient and lower emitting.</p>

**Attachment 2** Redacted Comment Letters

**From:** [Aaron Reaven](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Saturday, November 15, 2025 12:01:53 PM

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Dear Bay Area Air District Planning Department,

I write to urge you to incorporate the following three points into your [Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan](#).

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Note: The Air District also has no authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.
2. A larger grid of pollution monitors is needed, including fenceline monitors. This monitoring should be initiated now, as the Community Steering Committee (CSC) prefers, to provide a baseline of data for future comparison and modeling. Include ultrafine particles and hourly fluctuations to indicate peak levels of pollution.
3. The report should call for any plans for expanding operations or facilities at the establishments listed in the East Oakland Air Monitoring Project, including the Oakland airport, (Section 3.2) that would increase pollution to be suspended until the health impacts on East Oakland residents are better understood. A specific Health Impact Assessment(HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

There are numerous locations in the report where these points should be included. A number

of these locations are identified [in this document](#).

I appreciate the effort that the Air District and Community Steering Committee have put into this report. I look forward to continuing to work with you to improve air quality in Oakland and the health of adjoining communities.

Respectfully submitted,  
Aaron Reaven

**From:** [AJ cho](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 8:39:18 PM

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Bay Area Air District,

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Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

AJ  
California

**From:** [Ariella Granett](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 9:17:05 PM

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Bay Area Air District,

Dear Bay Area Air District Planning Department,

I'm concerned that all efforts to reduce emissions will be negated by an increase in flights at OAK airport with the planned expansion. Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1) The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Note: The Air District also has no authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Ariella  
California

**From:** [Alvaro Ramos](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 12:44:00 PM

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Alvaro  
California

**From:** [Brandon Svec](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 9:33:29 AM

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Brandon  
California

**From:** [Beth Weinberger](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 9:18:47 AM

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Dear Bay Area Air District Planning Department,  
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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Beth  
California

**From:** Charles Bret  
**To:** BAAQMD Planning  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 3:59:41 PM

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

While East Oakland has the most serious problem, we in the City of Alameda are similarly

impacted. Not only is OAK physically located here, therefore we have more overflights with attended noise and air pollution. This is an unneeded expansion when most major airlines have left, a hopeful "if we build it they will come", regardless of consequences for the people. Definitely a NO!!!!

Respectfully submitted,  
Charles A. Bret, Alameda

Charles  
California

**From:** [Carol Hirth](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 9:20:01 AM

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Respectfully submitted,

Carol  
California

**From:** [Eric Pash](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 10:48:07 AM

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Respectfully submitted,

Eric  
Pennsylvania

**From:** [Gregory Stevens](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 9:12:33 AM

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Bay Area Air District,

Dear Bay Area Air District Planning Department,  
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Respectfully submitted,

Gregory  
California

**From:** [Irene Hilgers](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 10:18:51 AM

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Respectfully submitted,

Irene  
California

**From:** [John Carrese](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
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Respectfully submitted,

John  
California

**From:** [Jordan Jackson](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 7:42:35 PM

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Respectfully submitted,

Jordan  
California

**From:** [Jean Tepperman](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 12:43:42 PM

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Respectfully submitted,

Jean  
California

**From:** [Kay Guinane](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 9:13:19 AM

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Respectfully submitted,

Key  
California

**From:** [Laura Bernstein](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 1:47:13 PM

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Respectfully submitted,

Laura  
California

**From:** [Laura Gibbons](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 6:08:33 PM

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Laura  
Washington

**From:** [Leanne GROSSMAN](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 6:51:59 PM

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Respectfully submitted,

Leanne  
California

**From:** [Leah Redwood](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 5:25:46 PM

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Respectfully submitted,

Leah  
California

**From:** [REDACTED]  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 7:23:43 PM

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Respectfully submitted,

California

**From:** [Marcia ? Flannery](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 2:35:42 PM

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Respectfully submitted,

Marcia ?  
California

**From:** [Martin Horwitz](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 10:46:27 AM

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Respectfully submitted,

Martin  
California

**From:** [REDACTED]  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 6:02:31 PM

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Bay Area Air District,

Dear Bay Area Air District Planning Department,

you will see by my address that I don't live in Oakland but our daughter lives quite close to the airport, and we have concerns about the air she breathes.

Please incorporate the following three points into your Public Review Draft "Right to Breathe: East Oakland Community Air Quality Justice Plan."

- 1) the report needs to address the threat to the health of East Oakland residents from the proposed expansion of the Oakland airport.
- 2) A larger grid of pollution monitors is needed, including fenceline monitors. This monitoring should be initiated now, as the Community Steering Committee (CSC) prefers, to provide a baseline of data for future comparison and modeling. Include ultrafine particles and hourly fluctuations to indicate peak levels of pollution.
- 3) The report should include the well-documented pre-existing health inequities in East Oakland.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward decisions which do not further degredate Oakland's air quality, particularly the health of the adjoining communities.

Respectfully submitted,

California



**From:** [Ron Kamangar](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 3:27:57 PM

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Bay Area Air District,

Dear Bay Area Air District Planning Department,  
Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1) The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Note: The Air District also has no authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

2) A larger grid of pollution monitors is needed, including fenceline monitors. This monitoring should be initiated now, as the Community Steering Committee (CSC) prefers, to provide a baseline of data for future comparison and modeling. Include ultrafine particles and hourly fluctuations to indicate peak levels of pollution.

3) The report should call for any plans for expanding operations or facilities at the establishments listed in the East Oakland Air Monitoring Project, including the Oakland airport, (Section 3.2) that would increase pollution to be suspended until the health impacts on East Oakland residents are better understood. A specific Health Impact Assessment(HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Ron  
California

**From:** [Scott Hochberg](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, November 18, 2025 10:14:27 AM

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Bay Area Air District,

Dear Bay Area Air District Planning Department,  
Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1) The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Note: The Air District also has no authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

2) A larger grid of pollution monitors is needed, including fenceline monitors. This monitoring should be initiated now, as the Community Steering Committee (CSC) prefers, to provide a baseline of data for future comparison and modeling. Include ultrafine particles and hourly fluctuations to indicate peak levels of pollution.

3) The report should call for any plans for expanding operations or facilities at the establishments listed in the East Oakland Air Monitoring Project, including the Oakland airport, (Section 3.2) that would increase pollution to be suspended until the health impacts on East Oakland residents are better understood. A specific Health Impact Assessment(HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Scott  
California

**From:** [Flora Tso](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Wednesday, November 19, 2025 9:08:13 PM

---

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Bay Area Air District,

Dear Bay Area Air District Planning Department,  
Please incorporate the following three points into your Public Review Draft Right to Breathe:  
East Oakland Community Air Quality Justice Plan.

Additionally, with changes in weather patterns, there is noticeable gas fumes when planes are landing from the North going Southward. Not only is there noise, but those gas fumes are extremely concentrated. There is a noticeable difference even without monitors, which only speaks to the amount of pollution that Alameda Bay Farm residence experience. One time I walked out the front door to walk my dog in the afternoon, and the smell was so strong it did not dissipate until I had finished walking around the block--which takes 20 minutes to do!

1) The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Note: The Air District also has no authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

2) A larger grid of pollution monitors is needed, including fenceline monitors. This monitoring should be initiated now, as the Community Steering Committee (CSC) prefers, to provide a baseline of data for future comparison and modeling. Include ultrafine particles and hourly fluctuations to indicate peak levels of pollution.

3) The report should call for any plans for expanding operations or facilities at the establishments listed in the East Oakland Air Monitoring Project, including the Oakland airport, (Section 3.2) that would increase pollution to be suspended until the health impacts on East Oakland residents are better understood. A specific Health Impact Assessment(HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Flora  
California

**From:** [Kimberly Ryan](#)  
**To:** [BAAQMD Planning](#)  
**Cc:** [Adele Watts](#); [Carly Cabral](#)  
**Subject:** EO CERP Public Comments - K.Ryan  
**Date:** Wednesday, November 19, 2025 1:45:24 PM  
**Attachments:** [EO CERP Public Comment KRyan.pdf](#)

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon, and thank you for the opportunity to submit public comment on the Bay Area Air District's East Oakland Draft Community Emissions Reduction Plan.

Please find my attached comments for consideration.

Additionally, sending a well-deserved kudos to the Air District and CBE teams and to the CSC for all the hard work in getting the project to this point. Well done!

Kim

**Kimberly Ryan** (she/her)  
Environmental Scientist & Advocate

*Let the path become where I choose to walk, and not otherwise established - Mary Oliver*

### General

- Consider adding chapter numbers in addition to page numbers to assist with tracking while reviewing the document

### Chapter 5

- Figures 5-18 and 5-21: these figures seem to compare similar modeled risks (cancer risk per million) but show two very different results. Understanding the nuanced differences may be difficult for a reader who lacks the expertise to distinguish between the two. Suggest using more detailed or clarifying language in place of the “key local sources” referenced in Figure 5-18 “and the “permitted facilities” in Figure 5-21.
- Community Concern Statement 4 (page 186): The first statement referring to diesel trucks seems random - is that intentional? If so, suggest tying-in to why the diesel truck traffic is specifically relevant to Oakland Airport activities here.
  - The term “health stakeholder” is confusing and one that I have never heard. Following an internet search, nothing popped-up. Suggest adding “public” in front of “health” or using the term “public health officials” if that clarifies the intended usage.

-

### Appendix F-1

- - Consider starting a new page for each of the different facilities in order to facilitate review of the associated community concerns and avoid confusion
- - If possible, create hyperlinks to the associated CERP strategies/actions so that readers can easily move between the documents
- - If Argent Materials continues to operate in at least two different locations, as indicated on Figure F-1b, suggest including the address of both facilities in the "Facility & Pollutants Summary", as well as a summary of activities for the 85th Ave site.
- An additional and primary concern for the Argent Materials property has historically been the expansion of operations with little to no oversight for years due to regulatory delay and inconsiderate land-use policy decisions made by Planning Commission/ City Council. Consider including any associated strategies/actions for agency commitment to faster and more community-oriented decisionmaking and permitting reviews (e.g. C&I Strategy 3).

**From:** [Leana Zang-Rosetti](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Thursday, November 20, 2025 7:22:49 AM

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Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1) The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Note: The Air District also has no authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

2) A larger grid of pollution monitors is needed, including fenceline monitors. This monitoring should be initiated now, as the Community Steering Committee (CSC) prefers, to provide a baseline of data for future comparison and modeling. Include ultrafine particles and hourly fluctuations to indicate peak levels of pollution.

3) The report should call for any plans for expanding operations or facilities at the establishments listed in the East Oakland Air Monitoring Project, including the Oakland airport, (Section 3.2) that would increase pollution to be suspended until the health impacts on East Oakland residents are better understood. A specific Health Impact Assessment(HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Leana

California

**From:** [Nishanga Bliss](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** A Mother's East Oakland CERP Public Comments  
**Date:** Wednesday, November 19, 2025 6:37:41 AM

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

I live near the shoreline and OAK flight path, and I'm very concerned about environmental and health impacts of the proposed airport expansion. Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1) The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Note: The Air District also has no authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Nishanga

California

**From:** [Paul English](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP public comments  
**Date:** Friday, November 21, 2025 1:11:29 PM  
**Attachments:** [public comment PE.docx](#)

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Dear BAAQMD:  
Please find attached a public comment on the East Oakland CERP.

thank you,  
Paul English

11/21/2025

RE: East Oakland CERP Public Comments

Dear Community Steering Committee, Air District Board of Directors, and California Air Resources Board:

Thank you for the opportunity to review the public review draft of the East Oakland Community Air Quality Justice Plan (November 2025). I applaud the CSC and BAAQMD staff for preparing a comprehensive analysis of the existing air quality emissions sources and impacts, and the current state of public health in the East Oakland area.

However, I urge you to **reject** this plan as insufficient to protect the public health of those living in East Oakland, as the plan does not document the health impacts of the Oakland Airport expansion. As you note in the report, the Oakland airport is the “largest contributor[s] to NO<sub>x</sub> emissions in East Oakland at 36%, and aircraft is the largest sulfur oxides (SO<sub>x</sub>) source in the community at 80%.” Although you propose two strategies: “Strategy 6. Emission Reductions at the Oakland International Airport” and “Strategy 7. Collaboration With and Accountability to Community on Airport Impacts,” both of these strategies will fail to adequately address the increased pollution from building a new terminal and new gates. Strategy 6, which “may” include electrification of airport ground support equipment and leaded aviation gas, sounds weak and lacks any enforcement mechanism. Strategy 7, which requires the Port of Oakland to install air monitoring equipment “no later than one year after the opening of the new terminal,” will only document the increase in air pollution after the fact.

The questions which this report fails to address include, “how many new cases of asthma and cardiovascular disease will occur due to the airport expansion?” and “what are the external social costs in public health due to the expansion in terms of emergency department visits, missed school days, and medication costs?” These questions could be answered by conducting a thorough Health Impact Assessment, which has already been recommended by the Alameda County Health Department. Such an assessment is necessary for the community to understand the complete burden on public health of the airport expansion, and should be a strategy proposed in the Plan.

I am a retired environmental epidemiologist with 20 years experience in the CA Department of Public Health and was the principal investigator of the Imperial County Community Air

Paul English, PhD, MPH [REDACTED] [REDACTED]

Monitoring Project (English, et al 2017). This project was the inspiration for AB 617, as stated by the co-author of the legislation, Eduardo Garcia (D-Coachella). As such, I have extensive knowledge of the intent of this legislation, and believe that, in the spirit of the bill, the scoping plan should include evaluating near future impacts. Again, I urge you to reject this plan until it properly addresses the public health impacts of the proposed airport expansion.

Respectfully yours,



Paul B. English, PhD, MPH

English PB, Olmedo L, Bejarano E, Lugo H, Murillo E, Seto E, Wong M, King G, Wilkie A, Meltzer D, Carvlin G, Jerrett M, Northcross A. The Imperial County Community Air Monitoring Network: A Model for Community-based Environmental Monitoring for Public Health Action. *Environ Health Perspect.* 2017 Jul 31;125(7):074501. doi: 10.1289/EHP1772. PMID: 28886604; PMCID: PMC5744720.

**From:** [Tamara Haw](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Saturday, November 22, 2025 2:28:41 PM

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Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

2. A larger grid of pollution monitors, including fenceline monitors, is needed now, as the Community Steering Committee (CSC) prefers, to provide baseline data for future comparison and modeling. Include ultrafine particles and measure hourly fluctuations over the course of at least one year to indicate peak levels of pollution and seasonal variations.

3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,  
Tamara Haw

Tamara  
California



**Fw: follow up to meeting Nov 13; request for CSC agenda item [EO AB 617 related]**

**Date** Mon 12/1/2025 8:51 AM

**To** BAAQMD Planning <planning@baaqmd.gov>

**Alicia Parker**

**Principal Planner**

Bay Area Air District

375 Beale St., Suite 600, San Francisco, CA 94105

Teams: 1 415-749-5039

[www.BAAQMD.gov](http://www.BAAQMD.gov)



**Sent:** Monday, November 24, 2025 7:31 AM

**Subject:** Re: follow up to meeting Nov 13; request for CSC agenda item [EO AB 617 related]

Thanks. Most of the public coming in that I have seen are from the Stop OAK coalition.

**Wendy Goodfriend** (she/her)

**Director, Planning and Climate Protection**

Bay Area Air District

375 Beale St., Suite 600, San Francisco, CA 94105

Phone: 415-308-6518

[www.BAAQMD.gov](http://www.BAAQMD.gov)



**Sent:** Friday, November 21, 2025 6:17 PM

**Subject:** FW: follow up to meeting Nov 13; request for CSC agenda item [EO AB 617 related]

Sharing as I just received this. Scroll to the bottom I believe John Fleck who attended the CSC meeting (11/13) sent a follow up communication to Arsenio on 11/17. And Arsenio responded today see message copied below.

-Diana

---

[Redacted]  
**Sent:** Friday, November 21, 2025 6:11 PM

[Redacted]  
**Subject:** Re: follow up to meeting Nov 13; request for CSC agenda item

Apologies for the delayed response. Thanks again for attending the meeting.

As I mentioned during our discussion, the CSC meetings are currently focused on drafting the Community Emission Reduction Plan. We need to get the plan completed.

It's my understanding that you would like the CERP to reflect the request you shared below. To ensure your concern is considered, please submit your comments by emailing [planning@baaqmd.gov](mailto:planning@baaqmd.gov) with the subject line: **East Oakland CERP Public Comments**.

All comments must be submitted by December 7, 2025, at 11:59 PM. If you have additional questions, please email [ab617info@baaqmd.gov](mailto:ab617info@baaqmd.gov).

Warmly,

Arsenio

---

[Redacted]  
**Sent:** Friday, November 21, 2025 4:07:59 PM

[Redacted]  
**Subject:** Re: follow up to meeting Nov 13; request for CSC agenda item

[Redacted]

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Arsenio,

This is a nudge to see if you are able to put this item on the CSC agenda?

We think it's important for people in East Oakland to know if the airport expansion will worsen their air quality.

Please let us know what you think.

Thanks for your assistance,

Jack Lucero Fleck  
350 East Bay and Stop OAK Airport Expansion Coalition  
(also a resident of the AB617 CERP Community Boundary)

PS: Here is specific wording we are suggesting:

Draft Amendment to the AB617 Community Steering Committee  
"Right to Breathe: East Oakland Community Air Quality Justice Plan" report  
From the Stop OAK Expansion Coalition

*The Community Steering Committee requests that plans for expanding operations or facilities at the establishments listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, that would potentially increase air pollution, be suspended until the health impacts on East Oakland residents are better understood through the conduct of a Health Impact Assessment study. Such a Health Impact Assessment (HIA) should include accounting for the well-documented pre-existing health inequities in East Oakland communities.*

On Mon, Nov 17, 2025 at 2:06 PM Jack Lucero Fleck [REDACTED]

Thank you Mr. Charles! We really appreciate your support and encouragement!

We agree that ultimately, Mr. Fine and the Air District board need to take responsibility for ultrafine particles and health impacts. To encourage them, we feel it would be very helpful if the East Oakland AB 617 CSC added its voice to our request for a Health Impact Assessment of the airport expansion.

My understanding is that Arsenio can put this on the CSC agenda. So, Arsenio, can you do this?

Thanks again,

--Jack

On Mon, Nov 17, 2025 at 1:36 PM Charles Reed [REDACTED]

Thank you Mr. Fleck for your passionate advocacy for the health, safety, and quality of life in our East Oakland Community.

As a Community Co-chair it is my responsibility to share with you who I think would be the appropriate people within the agency who could support your concerns. I would suggest that you and The Stop Oak Expansion Group reach out to BAAD Director Phil Fine [REDACTED] and the BAAD Board of Directors with your concerns of the ultra-fine air particles associated with the Airport Expansion (Ambient Air Quality is BAAD's jurisdiction).

From my experience, if the Board of Directors doesn't hear about your issues of concern from you, no one else is going to tell them. So use this moment in time to deluge the BAAD

Directors and the BAAD Board of Directors with both individual Letters of Concern and Community based organizations letters of Concerns that outline your fears.

I am happy to assist your right to have your voices heard, so please feel free to call on me when needed.

Sincerely; Mr. Charles Founding Director Lifers Leaving A Legacy/ Co-chair East Oakland CERP

On Mon, Nov 17, 2025 at 8:01 AM Jack Lucero Fleck [REDACTED]

Hello Arsenio,

It was very nice to meet you at the AB617 workshop on November 13. We very much appreciate your work.

We discussed the idea of bringing an item to the CSC recommending that the AB617 report be amended to add a request that the Port conduct a Health Impact Assessment of the proposed airport expansion before moving forward on that project.

As you probably know, the Port's EIR did a Human Health Risk Assessment, conducted not by a public health agency but by an engineering firm, which is a less comprehensive study. The Health Risk Assessment did not consider existing health conditions in East Oakland and how air pollution from increased air traffic might worsen those health conditions. It also did not look at Ultrafine Particle air pollution, which is known to be a significant health problem in communities near airports, including being associated with high rates of asthma.

The Alameda County Health Department requested, in bold type, that a Health Impact Assessment be conducted, in their [Public Comment letter response to the Port's Draft EIR](#) which references both Ultrafine Particle air pollution and existing health conditions in East Oakland, e.g. the fact that East Oakland residents have the highest rates of asthma hospitalizations in all of Alameda County. Remarkably, the Port ignored the County Health Department's request, and published the FEIR without the Health Impact Assessment study that they requested.

We ask you to add a proposal to add such an amendment to the AB617 report to the next CSC agenda. Here is some sample language for such an amendment.

*The CSC requests that plans for expanding operations or facilities at the establishments listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, that would potentially increase air pollution, be suspended until the health impacts on East Oakland residents are better understood through the conduct of a Health Impact Assessment study. Such a Health Impact Assessment (HIA) should include accounting for the well-documented pre-existing health inequities in East Oakland communities.*

We understand that you are concerned that the CSC is behind on the AB617 timetable, but we don't think this item will take much time. From the conversations I had with CSC members at the workshop, I think it will be a fairly non-controversial request—of course the community would like to be assured that the proposed airport expansion would not negatively impact their health through worsened air quality. This request would only add a few sentences to the SB 617 report.

Thanks again for your work!

Jack Lucero Fleck  
350 East Bay and Stop OAK Airport Expansion Coalition

Cc: Lin Griffith  
Mr. Charles Reed  
Carly Cabral – [REDACTED]

--

Mr. Charles Founding Director of Lifers Leaving A Legacy , where WE BELIEVE that the Power to change belongs to those who BELIEVE that they can!  
If you're interested in learning more about Lifers Leaving A Legacy: [www.liferlegacy.org](http://www.liferlegacy.org)

[REDACTED]



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## East Oakland CERP Public Comments

---

From Margaret Steppe [REDACTED]

Date Sun 11/23/2025 11:58 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

2. A larger grid of pollution monitors, including fenceline monitors, is needed now, as the Community Steering Committee (CSC) prefers, to provide baseline data for future comparison and modeling. Include ultrafine particles and measure hourly fluctuations over the course of at least one year to indicate peak levels of pollution and seasonal variations.

3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,  
Margaret Steppe

Margaret  
California



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## East Oakland CERP Public Comments

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From AJ cho [REDACTED]

Date Mon 11/24/2025 11:10 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

2. A larger grid of pollution monitors, including fenceline monitors, is needed now, as the Community Steering Committee (CSC) prefers, to provide baseline data for future comparison and modeling. Include ultrafine particles and measure hourly fluctuations over the course of at least one year to indicate peak levels of pollution and seasonal variations.

3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

AJ

California



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## East Oakland CERP Public Comments

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From Ann Harvey [REDACTED]

Date Mon 11/24/2025 8:21 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

I appreciate the great effort that the Air District and Community Steering Committee have put into this report. I ask you to please also consider incorporating the following three points related to the potential expansion of the Oakland airport into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The threat to the health of East Oakland residents from the proposed expansion of the Oakland airport.

There is an implicit argument that the study can't address emissions from OAK-based flights. However, the report can and I hope will: (1) explain that the reason flight emissions are omitted from the analysis is that the Air District has no authority to control emissions from flights and (2) call on the Port NOT to expand the airport before completion of a thorough Health Impact Assessment of the proposed expansion. The County Department of Public Health strongly urged the Port to commission a HIA and incorporated it into the Environmental Impact Report, but the Port did not do so.

The Human Health Risk Assessment (HHRA) appended to the EIR is a constrained analysis of likely increases in a specific list of Toxic Air Contaminants for which quantitative dose-response data is available. It does not analyze the impacts of increases in other harmful air pollutants (for example, NOx or ozone) or noise, and critically it does not take into account pre-existing health disparities in East Oakland which can magnify negative health impacts.

As the EPA explains (<https://www.epa.gov/healthresearch/health-impact-assessments>):

"Health Impact Assessment (HIA) is a decision-support tool being utilized by EPA to promote sustainable and healthy communities. The foundation of a healthy community is strongest when built upon a decision-making process that balances environmental, social, and economic factors to promote the health and well-being of its members. HIA is a tool designed to investigate how a proposed program, project, policy, or plan may impact health and well-being and inform decision-makers of these potential outcomes before the decision is made.

"HIAs:

- determine the potential effects of a proposed decision on the health of a population and the distribution of those effects within the population;
- consider input from stakeholders, including those impacted by the decision;
- use different types of qualitative and quantitative evidence and analytical methods;
- are flexible based on available time and resources; and
- provide evidence and recommendations to decision-makers in a timely manner.

"HIAs consider the full range of potential impacts of the proposed decision — both positive and negative — on health and those factors known to directly and indirectly affect human health (known as health determinants). HIAs provide recommendations for maximizing the potential positive health impacts and minimizing and/or avoiding the potential negative health impacts of the decision. In addition to promoting human health considerations, HIAs also encourage democracy, health equity, a comprehensive approach to individual and community health, and sustainability in decision-making."

This is clearly a very different endeavor from the HHRA.

2. A larger grid of airport-related pollution monitors to provide baseline data in operation for at least a year before any potential OAK expansion project begins.

These should include fence-line, non-down-wind, and down-wind monitors, should include ultrafine particle measurements, and should measure hourly as well as seasonal fluctuations to provide baseline data for future comparison and modeling.

3. The suspension of any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. The Community Steering Committee requests that this suspension apply to all establishments listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

Respectfully submitted,

Ann  
California



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## East Oakland CERP Public Comments

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From andrew jordan [REDACTED]

Date Mon 11/24/2025 9:52 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

2. A larger grid of pollution monitors, including fenceline monitors, is needed now, as the Community Steering Committee (CSC) prefers, to provide baseline data for future comparison and modeling. Include ultrafine particles and measure hourly fluctuations over the course of at least one year to indicate peak levels of pollution and seasonal variations.

3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

andrew  
California



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## East Oakland CERP Public Comments

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From Collin Shea Casey [REDACTED]

Date Mon 11/24/2025 11:21 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

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3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Collin Shea  
California



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## East Oakland CERP Public Comments

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**From** Cate Leger [REDACTED]  
via email.actionnetwork.org  
**Date** Mon 11/24/2025 8:40 AM  
**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,  
Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.
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3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Cate  
California



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## East Oakland CERP Public Comments

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From carol schaffer [REDACTED]

Date Mon 11/24/2025 10:40 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

carol

California



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## East Oakland CERP Public Comments

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From Dan Ouellet [REDACTED]

Date Mon 11/24/2025 8:32 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

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3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Dan

California



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**East Oakland CERP Public Comments**

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**From** Eric Pash [REDACTED]  
via email.actionnetwork.org  
**Date** Mon 11/24/2025 2:31 PM  
**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,  
Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.
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3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Eric  
Pennsylvania



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## East Oakland CERP Public Comments

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From Jack Fleck [REDACTED]

Date Mon 11/24/2025 10:19 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Jack

California



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## East Oakland CERP Public Comments

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From Joan Starr [REDACTED]

Date Mon 11/24/2025 8:44 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Joan

California



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## East Oakland CERP Public Comments

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**From** M Kathleen Archambeau [REDACTED]  
**Date** Mon 11/24/2025 8:52 AM  
**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,  
M. Kathleen Archambeau

M Kathleen  
California



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## East Oakland CERP Public Comments

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From Karen Beck [REDACTED]

Date Mon 11/24/2025 8:30 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Karen

California



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## East Oakland CERP Public Comments

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From Karen Kirschling [REDACTED]

Date Mon 11/24/2025 1:37 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Karen

California



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## East Oakland CERP Public Comments

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From Karen and Keith Miller [REDACTED]

Date Mon 11/24/2025 12:19 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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the health of the adjoining communities.

Respectfully submitted,

Karen and Keith  
California



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## East Oakland CERP Public Comments

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From Linda Jordan [REDACTED]

Date Mon 11/24/2025 12:49 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Linda

California



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## East Oakland CERP Public Comments

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From Leah Redwood [REDACTED]

Date Mon 11/24/2025 3:39 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

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the health of the adjoining communities.

Respectfully submitted,

Leah

California



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## East Oakland CERP Public Comments

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**From** Martha Booz [REDACTED]  
via email.actionnetwork.org  
**Date** Mon 11/24/2025 9:03 AM  
**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,  
Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Martha  
California



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## East Oakland CERP Public Comments

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From Matt Courter [REDACTED]

Date Mon 11/24/2025 8:27 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

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the health of the adjoining communities.

Respectfully submitted

,

Matt

Washington



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## East Oakland CERP Public Comments

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From Martin Horwitz [REDACTED]

Date Mon 11/24/2025 10:28 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

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the health of the adjoining communities.

Respectfully submitted,

Martin

California



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## East Oakland CERP Public Comments

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From Meggie Kang [REDACTED]

Date Mon 11/24/2025 8:32 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

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the health of the adjoining communities.

Respectfully submitted,

Meggie  
California



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**East Oakland CERP Public Comments**

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**From** Rena Palloff [REDACTED]**Date** Mon 11/24/2025 8:23 AM**To** BAAQMD Planning <planning@baaqmd.gov>

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the health of the adjoining communities.

Respectfully submitted,

Rena

California



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## East Oakland CERP Public Comments

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From Suzanne Baker [REDACTED]

Date Mon 11/24/2025 10:46 AM

To BAAQMD Planning <planning@baaqmd.gov>

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the health of the adjoining communities.

Respectfully submitted,

Suzanne  
California



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**East Oakland CERP Public Comments**

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**From** Scott Roth [REDACTED]  
via email.actionnetwork.org  
**Date** Mon 11/24/2025 9:02 AM  
**To** BAAQMD Planning <planning@baaqmd.gov>

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Respectfully submitted,

Scott  
California



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## East Oakland CERP Public Comments

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**From** [REDACTED]  
**Date** Mon 11/24/2025 4:02 PM  
**To** BAAQMD Planning <planning@baaqmd.gov>

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the health of the adjoining communities.

Respectfully submitted,

California



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**East Oakland CERP Public Comments**

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**From** [REDACTED]  
**Date** Mon 11/24/2025 7:21 PM  
**To** BAAQMD Planning <planning@baaqmd.gov>

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Respectfully submitted,

California



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## East Oakland CERP Public Comments

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From Yuan Xu [REDACTED]

Date Mon 11/24/2025 9:14 AM

To BAAQMD Planning <planning@baaqmd.gov>

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Bay Area Air District,

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the health of the adjoining communities.

Respectfully submitted,  
Yuan Xu



Yuan  
California



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## East Oakland CERP Public Comments

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From Ann Brook [REDACTED]

Date Tue 11/25/2025 10:25 AM

To BAAQMD Planning <planning@baaqmd.gov>

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Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

2. A larger grid of pollution monitors, including fenceline monitors, is needed now, as the Community Steering Committee (CSC) prefers, to provide baseline data for future comparison and modeling. Include ultrafine particles and measure hourly fluctuations over the course of at least one year to indicate peak levels of pollution and seasonal variations.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Ann

California



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## East Oakland CERP Public Comments

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From Anita Watkins [REDACTED]

Date Tue 11/25/2025 5:41 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities. PLEASE take the health and well-being of your neighbors into consideration when making these plans.

Respectfully submitted,

Anita

California



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**East Oakland CERP Public Comments**

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**From** Barbara Benzwi [REDACTED]  
via email.actionnetwork.org  
**Date** Tue 11/25/2025 8:11 AM  
**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Barbara  
California



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**East Oakland CERP Public Comments**

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**From** Becca Schonberg [REDACTED]**Date** Tue 11/25/2025 9:31 AM**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

It is so important that we protect the quality of our air and do whatever we can locally to stop burning fossil fuels. We cannot afford to wait or put this issue off.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Becca  
California



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**East Oakland CERP Public Comments**

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**From** Connie Cronin [REDACTED]  
via email.actionnetwork.org  
**Date** Tue 11/25/2025 9:26 AM  
**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Connie  
California



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## East Oakland CERP Public Comments

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From Carol Kuelper [REDACTED]

Date Tue 11/25/2025 8:15 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Carol

California



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## East Oakland CERP Public Comments

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From David Baca [REDACTED]

Date Tue 11/25/2025 8:40 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

David

California



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**Protect East Oakland's Air Quality-- East Oakland CERP Public Comments**

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**From** Deborah Jung [REDACTED]**Date** Tue 11/25/2025 5:58 PM**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Deborah  
California



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## East Oakland CERP Public Comments

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From Esther Lerman [REDACTED]

Date Tue 11/25/2025 8:15 AM

To BAAQMD Planning <planning@baaqmd.gov>

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Esther

California



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## East Oakland CERP Public Comments

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From Gregory Fite [REDACTED]

Date Tue 11/25/2025 12:44 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Gregory  
California



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## East Oakland CERP Public Comments

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From Greg Horn [REDACTED]

Date Tue 11/25/2025 3:43 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,  
Greg Hom, Oakland resident

Greg  
California



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## East Oakland CERP Public Comments

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From Julia Dashe [REDACTED]

Date Tue 11/25/2025 8:47 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Julia

California



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## East Oakland CERP Public Comments

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From Jackie Fezell [REDACTED]

Date Tue 11/25/2025 12:05 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

I'd like to add that I've always preferred flying out of Oakland because it felt manageable and gave the actual exciting pleasure travel gives exactly because it was smallish. I very much noticed the difference when I had to use San Francisco instead.

Respectfully submitted,

Jackie  
California



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## East Oakland CERP Public Comments

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**From** Jane Maxwell [REDACTED]  
via email.actionnetwork.org  
**Date** Tue 11/25/2025 10:11 AM  
**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Jane  
California



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## East Oakland CERP Public Comments

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From Judith Smith [REDACTED]

Date Tue 11/25/2025 10:26 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

2. A larger grid of pollution monitors, including fenceline monitors, is needed now, as the Community Steering Committee (CSC) prefers, to provide baseline data for future comparison and modeling. Include ultrafine particles and measure hourly fluctuations over the course of at least one year to indicate peak levels of pollution and seasonal variations.

3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Judith

California



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## East Oakland CERP Public Comments

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From Janet Stromberg [REDACTED]

Date Tue 11/25/2025 8:33 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

As an engineer at the Bay Area Air Quality Management District for 25 years, I worked collaboratively with engineers, planners, attorneys, scientists, meteorologists, and other technical experts, as well as hundreds of applicants for projects large and small. The Air District is the only regional entity positioned to ensure that all the health and environmental impacts of significant projects are evaluated thoroughly. Air District staff have the capacity, expertise and responsibility to hold applicants accountable. I have every expectation Air District staff will step up to meet its obligation. If that doesn't happen, the public will rightfully insist that Air District Board take ownership of this effort and make sure the work is done to the people's satisfaction.

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.
2. A larger grid of pollution monitors, including fenceline monitors, is needed now, as the Community Steering Committee (CSC) prefers, to provide baseline data for future comparison and modeling. Include ultrafine particles and measure hourly fluctuations over the course of at least one year to indicate peak levels of pollution and seasonal variations.
3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans

for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Janet  
California



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## East Oakland CERP Public Comments

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From Jean Tepperman [REDACTED]

Date Tue 11/25/2025 3:40 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Jean

California



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## East Oakland CERP Public Comments

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From Jeff White [REDACTED]

Date Tue 11/25/2025 8:20 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,  
Jeff White

Jeff  
California



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## East Oakland CERP Public Comments

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From Kristen Okorn [REDACTED]

Date Tue 11/25/2025 6:10 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Kristen  
California



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## East Oakland CERP Public Comments

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From Kathleen Richards [REDACTED]

Date Tue 11/25/2025 8:05 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Kathleen  
California



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## East Oakland CERP Public Comments

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From Liam Hroziencik [REDACTED]

Date Tue 11/25/2025 6:00 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Liam

California



## East Oakland CERP Public Comments

From Laura Leipzig [REDACTED]

Date Tue 11/25/2025 9:17 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

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3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Laura

California



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## East Oakland CERP Public Comments

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From Leana Zang-Rosetti [REDACTED]

Date Tue 11/25/2025 8:23 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

2. A larger grid of pollution monitors, including fenceline monitors, is needed now, as the Community Steering Committee (CSC) prefers, to provide baseline data for future comparison and modeling. Include ultrafine particles and measure hourly fluctuations over the course of at least one year to indicate peak levels of pollution and seasonal variations.

3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Leana

California



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**East Oakland CERP - Public Comments**

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**From** Marcia Edelen [REDACTED]**Date** Tue 11/25/2025 8:13 AM**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

I'm writing to request that you add the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights; the report should call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) As is, the report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport.

2. A larger grid of pollution monitors, including fenceline monitors, is needed now, as the Community Steering Committee (CSC) prefers, to provide baseline data for future comparison and modeling. Include ultrafine particles and measure hourly fluctuations over the course of at least one year to indicate peak levels of pollution and seasonal variations.

3. Until the health impacts on East Oakland residents are better understood, any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, any plans for expanding operations or facilities that would potentially increase air pollution should be suspended.

A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Marcia  
California



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**East Oakland CERP Public Comments**

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**From** Mary Flanagan [REDACTED]**Date** Tue 11/25/2025 7:47 PM**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Mary

California



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## East Oakland CERP Public Comments

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From Mary Gamson [REDACTED]

Date Tue 11/25/2025 8:37 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Mary

California



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## East Oakland CERP Public Comments

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From Marjory Keenan [REDACTED]

Date Tue 11/25/2025 9:44 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Marjory  
California



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## We Need to Breathe-East Oakland CERP Public Comments

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From Melissa Mandel [REDACTED]

Date Tue 11/25/2025 9:31 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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I appreciate the effort that the Air District and Community Steering Committee have put into this report. I fully expect you and support your work to improve air quality in Oakland and the health

of the adjoining communities.

Respectfully submitted,

Melissa  
California



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## East Oakland CERP Public Comments

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From

[REDACTED]

Date Tue 11/25/2025 4:03 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

2. A larger grid of pollution monitors, including fenceline monitors, is needed now, as the Community Steering Committee (CSC) prefers, to provide baseline data for future comparison and modeling. Include ultrafine particles and measure hourly fluctuations over the course of at least one year to indicate peak levels of pollution and seasonal variations.

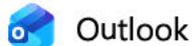
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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

California



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**East Oakland CERP Public Comments**

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**From** Nima Sherpa [REDACTED]  
via email.actionnetwork.org  
**Date** Tue 11/25/2025 6:00 PM  
**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

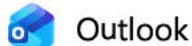
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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,  
Nima Sherpa

Nima  
California



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**East Oakland CERP Public Comments**

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**From** Patrice Haan [REDACTED]**Date** Tue 11/25/2025 9:56 AM**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Patrice  
California



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## East Oakland CERP Public Comments

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**From** Ruby MacDonald [REDACTED]  
via email.actionnetwork.org  
**Date** Tue 11/25/2025 9:03 AM  
**To** BAAQMD Planning <planning@baaqmd.gov>

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Bay Area Air District,

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Respectfully submitted,

Ruby  
California



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## East Oakland CERP Public Comments

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From Rashid Patch [REDACTED]

Date Tue 11/25/2025 8:57 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

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the health of the adjoining communities.

Respectfully submitted,

Rashid  
California



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## East Oakland CERP Public Comments

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From Susan Harris [REDACTED]

Date Tue 11/25/2025 12:47 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

As a (former) Oakland resident of more than 45 years, I am writing to ask you to incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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Respectfully submitted,

Susan  
California



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## East Oakland CERP Public Comments

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From Susanne La Faver [REDACTED]

Date Tue 11/25/2025 3:32 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Susanne  
California



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## East Oakland CERP Public Comments

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**From** Dr. Tony Marks-Block [REDACTED]  
**Date** Tue 11/25/2025 10:36 AM  
**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

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the health of the adjoining communities.

Respectfully submitted,

Dr. Tony  
California



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**East Oakland CERP Public Comments**

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**From** [REDACTED]  
via email.actionnetwork.org  
**Date** Tue 11/25/2025 12:39 PM  
**To** BAAQMD Planning <planning@baaqmd.gov>

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Respectfully submitted,

California



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**East Oakland CERP Public Comments**

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**From** Ben Keller [REDACTED]  
via email.actionnetwork.org  
**Date** Wed 11/26/2025 9:39 AM  
**To** BAAQMD Planning <planning@baaqmd.gov>

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Ben  
California



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## East Oakland CERP Public Comments

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From Claire Broome [REDACTED]

Date Wed 11/26/2025 8:03 AM

To BAAQMD Planning <planning@baaqmd.gov>

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Bay Area Air District,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Claire

California



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## East Oakland CERP Public Comments

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From Dee Dee Kramer [REDACTED]

Date Wed 11/26/2025 7:01 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

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the health of the adjoining communities.

Respectfully submitted,

Dee Dee  
California



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## East Oakland CERP Public Comments

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From Eileen Chieco [REDACTED]

Date Wed 11/26/2025 12:21 PM

To BAAQMD Planning <planning@baaqmd.gov>

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Bay Area Air District,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Eileen

California



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## East Oakland CERP Public Comments

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From Ellen McClure [REDACTED]

Date Wed 11/26/2025 12:03 PM

To BAAQMD Planning <planning@baaqmd.gov>

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3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Ellen

California



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## East Oakland CERP Public Comments

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From Jim Wilson [REDACTED]

Date Wed 11/26/2025 7:42 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,  
Jim Wilson

Jim  
California



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## East Oakland CERP Public Comments

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From Katherine Dillon [REDACTED]

Date Wed 11/26/2025 5:14 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Katherine



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## East Oakland CERP Public Comments

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From Lynne Baker [REDACTED]  
Date Wed 11/26/2025 6:43 PM  
To BAAQMD Planning <planning@baaqmd.gov>  
[REDACTED]

 1 attachment (348 KB)  
Letter of Support-Stop Oakland Airport Expansion-NCN 251126.pdf;

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November 26, 2025

To: [planning@baaqmd.gov](mailto:planning@baaqmd.gov)

From: Napa Climate NOW!/350 Bay Area Group  
Lynne Baker, Co-chair

Subject: East Oakland CERP Public Comments

Dear Bay Area Air District Planning Department,

The Stop Oak Airport Expansion Coalition Steering Committee and the undersigned organizations submit these comments to the **Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan**. Napa Climate NOW! has signed on as an organization for this critical matter.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) **The report should not assume that the Oakland Airport new terminal will be completed.**

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There are numerous locations in the report where these points should be included. See the attached Appendix A that indicates the specific suggestions and specific locations.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Lynne Baker, Co-chair, Napa Climate NOW!/350 Bay Area Group

Addendum included in attached letter.

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*Lynne Baker, RN,MS*



**CONFIDENTIAL OR PRIVILEGED:** This communication contains information intended only for the use of the individuals to whom it is addressed. If you have received this in error, please notify the sender immediately by returning it by reply email and then permanently deleting the communication from your system. Thank you.



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## East Oakland CERP Public Comments

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From Margaret Steppe [REDACTED]

Date Wed 11/26/2025 2:42 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,  
M Steppe

Margaret  
California



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**East Oakland CERP Public Comments**

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**From** Rafael J. González [REDACTED]  
via email.actionnetwork.org  
**Date** Wed 11/26/2025 5:00 PM  
**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department, IT IS URGENT THAT WE HAVE A HEALTH-IMPACT ASSESSMENT EXPANSION IN THE AB617 EAST OAKLAND REPORT.

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.
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Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Rafael J.  
California



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## East Oakland CERP Public Comments

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From Victor Chieco [REDACTED]

Date Wed 11/26/2025 12:26 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Victor

California



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## East Oakland CERP Public Comments

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From Alfreda Wright [REDACTED]

Date Thu 11/27/2025 7:42 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Alfreda  
California



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**East Oakland CERP Public Comments**

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**From** beth weinberger [REDACTED]  
via email.actionnetwork.org  
**Date** Thu 11/27/2025 6:34 AM  
**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

beth  
California



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**East Oakland CERP Public Comments**

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**From** Frances Aubrey [REDACTED]**Date** Thu 11/27/2025 11:51 AM**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Bay Area Air District Planning Department,

The Stop Oak Airport Expansion Coalition Steering Committee and the undersigned organizations submit these comments to the [Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan](#).

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) **The report should not assume that the Oakland Airport new terminal will be completed.**
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away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

There are numerous locations in the report where these points should be included. See the attached Appendix A that indicates the specific suggestions and specific locations.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

***Alameda County Interfaith Climate Action Network***

The Stop OAK Expansion Coalition Steering Committee

350 East Bay

San Francisco Bay Physicians for Social Responsibility

Sunflower Alliance

Xochipilli, Chicano/Latino Men's Circle

**Appendix A:** There are numerous specific locations in the **Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan** where the points outlined in the letter above should be included. Proposed added text is shown in ***bold italics***.

- 1) Transportation and Mobile Environment – Oakland International Airport (pg 108).

Add a concluding paragraph stating, ***“Given the air quality impacts of the airport, prior to any expansion of the facility, a comprehensive Health Impact Assessment should be conducted. Both the City of Oakland and the Port of Oakland have authority to require such a pause and a study—See Chapter 9.”*** (see items 8 & 9 below)

- 2) Built Environment— add as action BE 3.7 (Pg. 145):

***“Pause expansion of the airport, which will attract additional aircraft daily thus necessarily bringing increased NOx, SOx, PM 2.5 and PM 0.1 ultrafine particles to homes and to gathering places of vulnerable populations, until the airport performs a Health Impact Assessment and recirculates a revised FEIR for the Modernization and Development Project with a plan for full mitigation of the increased air pollution its development will cause.”***

Lead: Port of Oakland

Timeframe: Medium term (2-3 years)

## 3) Public Health– add as action 3.5 (Pg. 171):

***“Any plans for expansion of operations or facilities at the establishments listed in the East Oakland Air Monitoring Project Section (3.2) that would increase pollution should be suspended until such time as a thorough assessment is conducted of the potential impact on the health of East Oakland residents. Such health impact assessments shall include accounting for the well-documented pre-existing health inequities in East Oakland communities.”***

## 4) T&amp;M 6.1 (Pg. 187) To this section’s description of the Port Emissions Reduction Plan, add the following:

***“The Port of Oakland will pause the Modernization and Development Plan, which would increase emissions, until after it performs a Health Impact Assessment, incorporates data from that assessment into the project EIR, and recirculates the EIR.”***

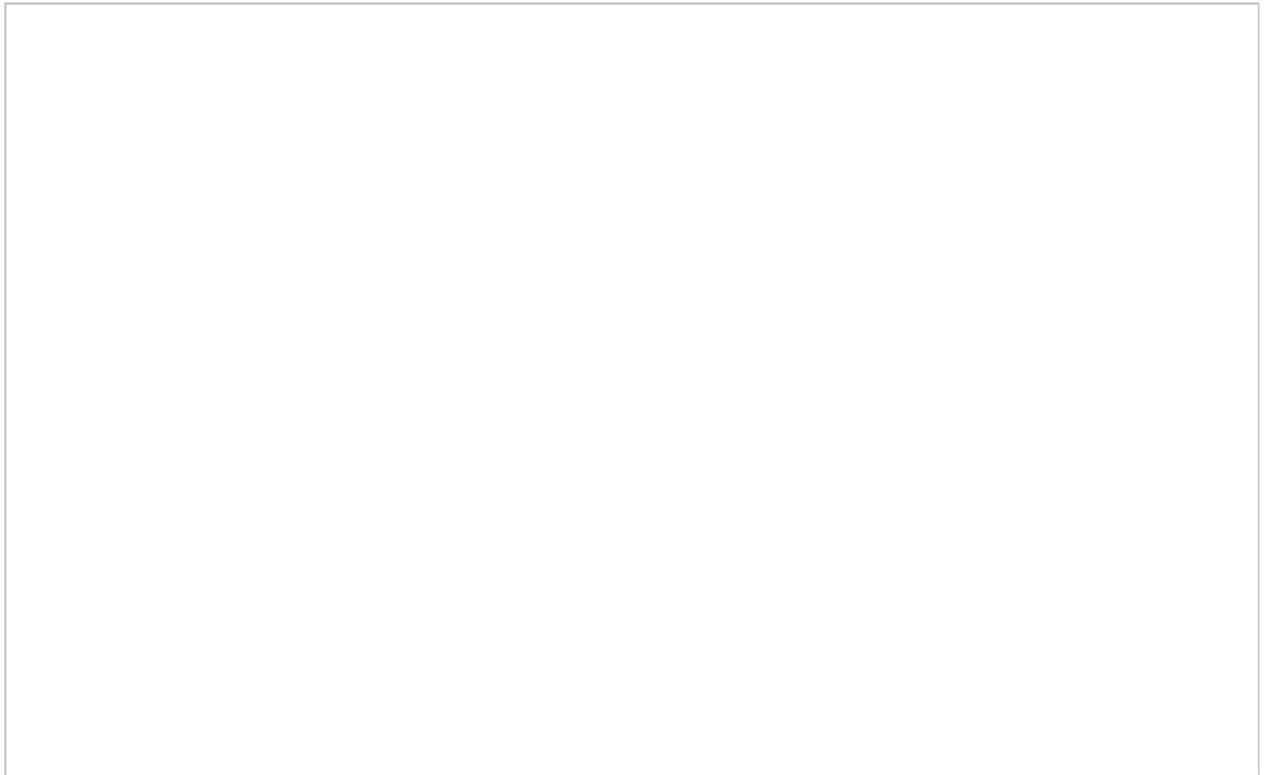
## 5) Transportation &amp; Mobility–T&amp;M 7.3 (Pg. 189) – add specifics designated below in bold italics:

The East Oakland Air Monitoring Project (see PH 3.1) will include exploratory measurements of volatile organic compounds (VOCs) and particulate matter (PM) (including ultrafine particles (UFPs), a key aviation-related pollutant) around specific facilities and air quality concerns identified and prioritized by community members. Oakland International Airport is one of the identified facilities. ***Communities for a Better Environment (CBE) has partnered with the University of California, Berkeley and the Bay Area Air District to greatly improve the numbers and distribution of pollution sensors in East Oakland. The new sensor grid shall operate with hourly resolution to identify peak concentrations of pollutants, and operate for at least a year.*** Using information collected from this project, the Air District will analyze and evaluate data and summarize and report findings with attention to occurrences of unusually high levels of different pollutants, including UFPs, that may be associated with airport-related emissions. ***Findings from the overall project are expected to inform a specific Health Impact Analysis, improve efforts to reduce pollution emissions, and reveal any need for additional information. Expansion of the airport should be paused until these findings are analyzed and discussed.***

## 6) Transportation &amp; Mobility T&amp;M 7.4 – (Pgs. 189-199)

This focus area action states, “The Port of Oakland shall install fence line air quality monitor(s) no later than **one year after the opening of the new terminal** as described in the 2024 Oakland International Airport Terminal Modernization and Development Project Final Environmental Impact Report. . .” This assumes that the Airport expansion will be implemented. But there are currently three lawsuits challenging the FEIR, and, as noted above, the City and the Port still have to make decisions about whether to proceed with the project. It’s also important to understand that the FEIR projected significant increases in flights, but these have not materialized. In fact, total passengers using the airport have declined recently and have not reached pre-Covid levels as shown in the graph below.

***Reference to the “opening of the new terminal” should be deleted from this report.***



7) T&M 7.4 (Pgs. 189-190)

This action recommends delaying fence-line air quality monitoring. Since emissions from the Airport have already been identified as a problem, there is no excuse for waiting. The report notes that the “CSC prefers” not waiting. This action item should be modified to read ***“Fence-line air quality monitoring that includes hourly sampling for VOCs, fine PM and Ultra-Fine PM should be installed immediately.” (see PH 3.1)***

8) Chapter 9 Implementation and Reporting – Government Collaboration and Agency roles – City of Oakland pg 208. add:

***“The City of Oakland, through its General Plan, has the authority to rule that the airport expansion can only proceed if it shows that air quality in East Oakland will not be further damaged.”*** This would be consistent with the Environmental Justice Element of the General Plan.

9) Chapter 9 Implementation and Reporting – Government Collaboration and Agency roles – Port of Oakland pg 209. Add sentence:

***“Notwithstanding the findings of the Environmental Impact Report pursuant to the airport expansion, the Port should pause the project to better determine the health impacts on East Oakland Residents as well as other considerations.”***

– Three additional technical concerns –

1) Noise Pollution

Add this to Appendix D regarding noise measurement thresholds:

***Although noise is mentioned as a community concern (Pg. 178), there are no action items to address this issue. A starting point would be to collect data recognizing that 65 decibels Day-Night average Level (DNL) is an outdated standard. The FAA's continued reliance on the 65 DNL threshold is no longer defensible for evaluating the noise impacts of airport expansion projects such as those proposed at Oakland Airport. The FAA's own 2021 Neighborhood Environmental Survey (NES) demonstrated that substantial community annoyance occurs well below 65 DNL, with its regression model indicating an equivalent response near 46 DNL. Despite this, both the FAA and the Port of Oakland have continued to apply the 65 DNL threshold in reaching findings of no significant impact. This approach disregards the FAA's own scientific record and fails to meet NEPA's requirement for using the best available information. Noise data and methods need to reflect actual community response to aircraft noise.***

## 2) Ultra-fine Particles Considerations

Suggestion for Appendix D regarding air monitoring methodology regarding ultra-fine particles (UFP). From this study of the Seattle-Tacoma Airport (Sea-Tac), we see that UFP are particularly associated with landing airplanes, and that they are much more widely dispersed than UFP from roadways. The air monitoring efforts of the Air District should follow methods described in this study.

### 3. Pollution Inventory Accuracy

The Emissions Inventories listed in Tables 5-7 (Pg.92), 5-8 (Pg.94), and 5-10 (Pg. 111) are based almost exclusively on modelling using AERMOD. The projections presented represent annual amounts. These results should be confirmed with local monitoring before large-scale industrial changes (like the expansion of the airport) are approved. **Hourly data** is needed to reveal emission spikes that may exceed National Ambient Air Quality Standards.

The data for East Oakland in figures 5-3, 5-4, and 5-6 come from a single monitor. Having one monitor limits the confidence in these data. The Bay Area Air District admits that East Oakland is in many ways an air quality “data desert.”(1) Communities for a Better Environment has partnered with the University of California, Berkeley and the Bay Area Air District Air District to greatly improve the numbers and distribution of pollution sensors in East Oakland. The data from these sensors is needed ASAP to establish a credible baseline of community air quality before predicting or curtailing future pollution. The sensors should be sensitive to all classes of particulate matter, NO<sub>x</sub>, SO<sub>x</sub> and VOCs and operate for at least a year. This would capture any variations related to seasonal shifts in temperature and wind

direction. The data from this study would inform a Health Impact Assessment to enhance our understanding of the current emissions and improve future projections.

1. [https://www.baaqmd.gov/~media/files/technical-services/east-oakland-monitoring-project/eo\\_amp\\_sensor\\_network\\_monitoring\\_plan-pdf.pdf?rev=9aaeca8a11a24f7485bfb0d74e05448e&sc\\_lang=en](https://www.baaqmd.gov/~media/files/technical-services/east-oakland-monitoring-project/eo_amp_sensor_network_monitoring_plan-pdf.pdf?rev=9aaeca8a11a24f7485bfb0d74e05448e&sc_lang=en)

END OF APPENDIX A



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## East Oakland CERP Public Comments

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From Heather MacLeod [REDACTED]

Date Thu 11/27/2025 8:35 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Here are my comments about the Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

The report omits flight emission from the analysis - that omission should be made clear in the report. It should also be made clear that 99% of the emissions at airports stem from flights. Just because you don't have the authority to solve that problem, you need to make it clear that you're not solving it, so that somebody somewhere else can attempt to solve it. (and frankly, it sounds kind of fraudulent if you say, "I'm helping solve the problem of air quality - well, one percent of the problem anyway.")

Given that the vast majority of emissions come from flights, the report should call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed.

There is a precedent for Air District reports pointing out issues you can't control - the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.

Furthermore, the report should not assume that the Oakland Airport new terminal will be completed. In fact, maybe you could include a comparison scenario in which the new terminal IS completed, and a scenario in which the terminal is NOT completed, and describe the difference in emissions (even the ones you don't regulate). People deserve to know the difference in emissions that will come from having a new terminal, and even though you can't regulate it, you can inform people of the problem. And you can mention emissions from the construction as well - are you able to include emissions related to concrete, for example?

I appreciate your work - air quality matters!

thank you,

Heather  
California



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## East Oakland CERP Public Comments

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From Janice Cecil [REDACTED]

Date Fri 11/28/2025 10:26 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

2. A larger grid of pollution monitors, including fenceline monitors, is needed now, as the Community Steering Committee (CSC) prefers, to provide baseline data for future comparison and modeling. Include ultrafine particles and measure hourly fluctuations over the course of at least one year to indicate peak levels of pollution and seasonal variations.

3. The Community Steering Committee requests that any establishment listed in the East Oakland Air Monitoring Project (Section 3.2), including the Oakland airport, suspend any plans for expanding operations or facilities that would potentially increase air pollution until the health impacts on East Oakland residents are better understood. A specific Health Impact Analysis (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Janice  
California



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## East Oakland CERP Public Comments

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From [REDACTED]

Date Thu 11/27/2025 9:16 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

California



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## East Oakland CERP Public Comments

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From Lynn Powe [REDACTED]

Date Thu 11/27/2025 7:02 AM

To BAAQMD Planning <planning@baaqmd.gov>

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Bay Area Air District,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,  
Lynn A Powe

Lynn  
California



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## East Oakland CERP Public Comments

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From Marion Grau [REDACTED]

Date Thu 11/27/2025 10:28 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Marion Grau

Marion



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## East Oakland CERP Public Comments

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From Christopher Lutz [REDACTED]

Date Fri 11/28/2025 8:24 PM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

Christopher  
California



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**East Oakland CERP Public Comments**

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**From** Berta Gelber [REDACTED]**Date** Sat 11/29/2025 12:58 PM**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

One final thought, NOISE. Constant, and when commercial lines stop flying in the middle of the night, then FedEx takes over. It's draining for those us who live close to the airport.

Respectfully submitted,

Berta Gelbr

Berta  
California



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**East Oakland CERP Public Comments**

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From Veronica Oberholzer [REDACTED]

Date Sat 11/29/2025 9:27 AM

To BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

To the Bay Area Air District Planning Department,

As a lifelong Oakland resident, I hope you will incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Thank you,

Veronica  
California



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**East Oakland CERP Public Comments**

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**From** Stefanie Pruegel [REDACTED]**Date** Sun 11/30/2025 1:39 PM**To** BAAQMD Planning <planning@baaqmd.gov>

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

I am writing from San Leandro, another community with a high density of already disadvantaged and pollution-burdened residents that will be impacted by a possible expansion of the Oakland airport. My own home is super close to the airport - I hear and smell it often and am concerned about health impacts from plane exhaust and the fact that their health impact to East Oakland and San Leandro residents seem insufficiently assessed or taken into account.

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1. The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port NOT to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

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Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Stefanie  
California

**From:** [Ara Bicalci](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Monday, December 1, 2025 6:03:56 PM

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Ara  
California



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**East Oakland CERP Public Comments**

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**From** David Gassman [REDACTED]**Date** Mon 12/1/2025 3:29 PM**To** BAAQMD Planning <planning@baaqmd.gov>

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Bay Area Air District,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and

the health of the adjoining communities.

Respectfully submitted,

David

California

**From:** [Stephen Ongerth](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Monday, December 1, 2025 3:52:02 PM

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Bay Area Air District,

Dear Bay Area Air District Planning Department,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Thank you very much,

Stephen  
California

**From:** [Margaret O'Halloran](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Tuesday, December 2, 2025 7:46:35 AM

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**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Bay Area Air District,

Dear Bay Area Air District Planning Department,

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We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

Margaret  
California

**From:** [Charles Reed](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** Atten: "East Oakland CERP Public Comments"  
**Date:** Wednesday, December 3, 2025 7:44:02 PM  
**Attachments:** [Illegal Dumping Health Impacts \(1\).pptx](#)  
[Illegal Dumping Fact Sheet \(2\).pdf](#)

You don't often get email from [REDACTED]

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear CSC Members,

As a Co-chair of the East Oakland CERP and a staunch advocate of studying the legitimate health impacts of 'Unaccounted for Surface Source Pollutants' in regards to Illegal Dumpsites and Burned out Abandoned Vehicles; Lifers Leaving A Legacy submits its Public Opinion on The BAAD Air Districts responsibility and accountability of mitigating and eliminating ANY and ALL "Emissions negatively impacting the health and quality of life in Communities of Concern".

While the BAAD Air District claims to absolve itself of Illegal Dumping Emissions and Burned out Vehicles impact on Public Health they can NO Longer ignore the cumulative impacts on Air Quality that these 'Unaccounted For Surface source Pollutants' have on our health and quality of life. These are polluted emissions that can be mitigated and eliminated through a Focused and Intentional Instant Response and Removal process that protects our already vulnerable communities through the containment of an inevitable air contamination source.

I ask that we as a united CSC stand together in the fact that these two cumulative causes of negative health impacts be prioritized in the CERP process as a Public Health and Safety Issue in regards to our CSC Community Emissions draft and our Oakland General Plan.

Sincerely and with ALL respect; Mr. Charles Founding Director Lifers Leaving A Legacy/Co-chair East Oakland CERP

Mr. Charles Founding Director of Lifers Leaving A Legacy , where WE BELIEVE that the Power to change belongs to those who BELIEVE that they can!

If you're interested in learning more about Lifers Leaving A Legacy: [www.liferlegacy.org](http://www.liferlegacy.org)



Burned\_Vehicle\_Health\_Risk\_Presentation.pptx

# Illegal Dumping & Health: New Evidence of Direct Community Impacts

- East Oakland Community Emissions Reduction Plan (CERP)

# Why This Matters

- - Illegal dumping has long been a top community concern.
- - New evidence shows it directly contributes to harmful pollutant exposure.
- - Elevates illegal dumping from a blight issue to a public-health priority.

# Key Health Findings

- - Dumped materials often contain or generate:
  - • Mold spores
  - • Volatile Organic Compounds (VOCs)
  - • Particulate matter from decomposition
  - • Chemical residues and toxins
- - These pollutants can become airborne and spread into residential areas.

# Health Impacts on East Oakland Residents

- - Increased asthma triggers
- - Respiratory irritation and chronic inflammation
- - Higher exposure risks for children, elders, and medically vulnerable residents
- - Exacerbation of existing cumulative environmental burdens

# Environmental Pathways

- - Mold growth on wet or deteriorating materials
- - VOC release from broken furniture, paints, adhesives, plastics
- - Contaminated dust and particulates blowing into homes
- - Stagnant waste attracting pests and pathogens

# Why This Is Urgent

- - East Oakland is already overburdened by emissions and pollution.
- - Illegal dumping amplifies these risks.
- - Immediate action can prevent avoidable health harms.

# What We Need to Do

- - Strengthen removal and cleanup timelines
- - Increase prevention resources
- - Improve enforcement coordination
- - Integrate public-health data into dumping strategies
- - Mobilize community partners and agencies

# Call to Action

- Illegal dumping must be recognized and addressed as a serious environmental-health threat requiring urgent, coordinated intervention.

# FACT SHEET

## Illegal Dump Sites as Unaccounted-For Surface Source Pollutants

*Air Quality • Health • Environmental Justice • Harm Reduction*

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### What Are Unaccounted-For Surface Source Pollutants?

Illegal dump sites function as **unmonitored, unregulated air pollution sources**. They are not included in emissions inventories or air quality models, yet they emit: - Mold spores & fine particulate matter (PM2.5 / PM1.5) - Volatile Organic Compounds (VOCs) - Microplastics & toxic dusts - Gases from decomposing waste

These emissions occur **at ground level**, directly where people live, walk, and breathe.

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### How Mold Grows in Illegal Dump Sites

Trash left outdoors for weeks or months goes through **wet-dry-wet cycles**, creating ideal conditions for mold growth on: - Mattresses, carpets, furniture - Food waste & yard debris - Cardboard, textiles, paper

As mold dries, breaks, and fragments, it releases **fine particles small enough to enter deep into the lungs**.

---

### Why This Is an Air Quality Issue

- Mold fragments fall into the **PM2.5 and PM1.x range**.
- These particles stay airborne longer and travel farther.
- VOCs from decaying trash add to the toxic load.
- None of this is captured by traditional air monitoring networks.

Illegal dumps are **active emission sources**, not just trash problems.

---

### Health Impacts on Nearby Residents

Exposure to mold spores, particulates, and VOCs from illegal dump sites increases the risk of: - Asthma attacks and ER visits - Chronic coughing and bronchitis - Wheezing, shortness of breath - Worsened COPD - Eye, nose, and throat irritation

Children, elders, and people with asthma face the **highest risks**.

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## Environmental Justice Concerns

Illegal dumping is disproportionately concentrated in **Black, Latino, and Indigenous neighborhoods**, which already experience: - Higher PM2.5 exposure - Higher asthma rates and hospitalizations - Fewer air quality monitors

Dump sites add **another uncounted pollutant source** on top of existing inequalities.

---

## Mental Health Impacts

Living near illegal dumping is linked to: - Stress, anxiety, and community fatigue - Feelings of abandonment and neglect - Lower overall quality of life

Environmental conditions shape mental well-being as much as physical health.

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## Harm Reduction: The Power of Community-Led Cleanup

**Immediate cleanup before mold matures is a harm reduction strategy.**

Community-supported cleanup: - Eliminates the source before spores and toxins become airborne - Reduces PM2.5 and VOC exposure - Prevents long-term contamination - Restores community pride and safety

**Faster cleanup = lower exposure = healthier neighborhoods.**

---

## Key Message

**Illegal dump sites are unaccounted-for surface source pollutants.**

They pollute the air, threaten respiratory health, and disproportionately harm communities of color.

**Community-led cleanup is an essential harm reduction tool.**

**From:** [Patrick Messac](#)  
**To:** [BAAQMD Planning](#)  
**Cc:** [Sejal Babaria](#); [Margaret Gordon](#); [Gabrielle Sloane Law](#)  
**Subject:** East Oakland CERP Feedback  
**Date:** Thursday, December 4, 2025 10:34:06 PM

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Dear Air District Planning Team,

Thank you for the opportunity to provide feedback on the draft [Right to Breathe East Oakland Community Air Quality Justice Plan](#).

The community process documented in Chapter 2 and the Vision and Principles in Chapter 3 reflect meaningful resident collaboration and leadership. The emissions inventory and dispersion modeling in Chapter 5 provide a strong technical foundation. The Plan clearly documents the cumulative burdens facing East Oakland communities. Thank you for contextualizing the crisis facing East Oakland through the lens of frontline residents.

As written, however, the Plan does not yet function as an emissions reduction plan. It describes conditions but does not require results at the sources responsible for the most significant harm. The comments below identify where the Plan should be strengthened to produce measurable public health outcomes.

### **1. Measurable air quality and health outcome targets**

The Plan lacks quantifiable emission reduction targets, baseline years, or timelines in either Chapter 7 or Chapter 9. Without defined objectives, the public cannot evaluate whether conditions are improving.

Other AB 617 communities have adopted enforceable performance standards. For example, the [West Oakland Community Action Plan](#) established numeric targets for diesel particulate, PM 2.5, and cancer risk in Chapter 4, identified a baseline year, and set 2025 and 2030 goals. It also modeled pollution levels with and without implementation in Chapter 6 and established a tracking framework in Chapter 8.

East Oakland should meet the same standard.

Chapter 9 should be revised to include specific targets for reductions in PM2.5, diesel particulate matter, and toxic air contaminants; identification of a baseline year; interim and long-term target years; annual public reporting; and inclusion of health indicators such as asthma-related emergency room visits and hospitalizations.

### **2. Prioritize stationary sources responsible for the most significant exposure**

The emissions inventory shows that just 11 permitted facilities account for 98% of PM 2.5 emissions from the permitted source sector. Permitted sources are also the primary emitters of mercury, dioxins and furans, and hydrogen sulfide in the community

Chapter 5 identifies major contributors, including:

- Davis Street Transfer Station
- Miller Milling Company
- Peet's Coffee and Tea

The Plan also identifies facilities identified by the community in Appendix F-1, including:

- AB&I Foundry (now Prologis redevelopment)
- Argent Materials
- Crematorium on 98th Avenue (SE Combined Services of California)
- Sterling Environmental

These facilities represent the types of operations that should be designated as Priority Facilities for immediate action. Chapter 7 should be revised to explicitly identify high-risk facilities and focus regulatory action on those sources first. Without prioritization, resources will be diluted across actions that do not materially reduce risk.

### **3. Enforcement defined by meaningful deterrence, not paperwork**

Chapter 6 reviews past enforcement activity but establishes no forward-looking commitments. A Notice of Violation alone does not reduce exposure. The analysis of East Oakland NOV's excluded consideration of whether the NOV's included a financial penalty and the amount of that penalty.

Meaningful enforcement must include financial penalties that deter repeat behavior, cease and desist orders for ongoing harm, mandatory compliance deadlines, permit restrictions when necessary, and escalation for chronic violators.

The Plan itself describes a case where enforcement produced outcomes. AB&I Foundry emitted hexavalent chromium until CARB and the District secured a \$2.5M settlement, and the facility ceased operations. This is what effective enforcement looks like.

Chapter 6 should include inspection frequency commitments, penalty thresholds, compliance timelines, and escalation standards. Without these elements, enforcement remains discretionary in practice.

### **4. Required controls at high-polluting facilities**

Chapter 7 identifies industrial risk, but does not require the installation of modern control technology at the facilities driving emissions.

Facilities responsible for disproportionate burdens should be required to install Best Available Retrofit Control Technology or equivalent controls on a defined timeline. The Plan should specify which classes of facilities are subject to this requirement and how compliance will be enforced.

## **5. Authority and transparency**

The Plan lists implementing partners but does not distinguish which actions the Air District controls and which rely on other agencies.

Chapter 7 should classify each strategy by authority so the public can see where regulatory responsibility lies.

All permits for East Oakland facilities should also be posted online in one searchable system. Accountability is not possible without access to operating conditions, emission limits, and compliance history.

This Plan reflects real community work and strong technical analysis. To function as an emissions reduction plan, it must include numeric targets, prioritization of major sources, enforceable consequences, technology mandates where needed, and clarity regarding authority. Without these changes, the Plan will describe harm more effectively than it reduces it.

With gratitude,

Patrick

**From:** [Maurissa Brown](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Friday, December 5, 2025 3:24:56 PM  
**Attachments:** [The Greenlining Institute East Oakland Community Emissions Reduction Plan \(CERP\) Public Comments.pdf](#)

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Hello,

Please find The Greenlining Institute's public comments on the East Oakland CERP attached.

Please confirm the receipt of this submission. Thank you.

Warmly,



**Maurissa Brown**  
Transportation Equity Senior Program Manager  
Email [REDACTED]  
Pronouns: she, her, hers  
[REDACTED]

LEARN MORE: [GREENLINING THE BLOCK CALLS TO END THE LEGACY OF REDLINING & SYSTEMATIC DISINVESTMENT IN OUR COMMUNITIES!](#)

December 5, 2025

**Bay Area Air Quality Management District**

375 Beale Street  
Suite 600  
San Francisco, CA 94105

**Re: East Oakland Community Emissions Reduction Plan (CERP) Public Comments**

Dear BAAQMD and Communities for a Better Environment,

Thank you both for your tireless work on the draft East Oakland Community Emissions Reduction Plan. It is inspiring to see public agency commitment and community-led action coming together to address long-standing air quality and environmental justice issues in East Oakland. The public review draft clearly reflects deep efforts to listen to community concerns, document emissions sources, and propose meaningful strategies to improve air quality and health outcomes.

We strongly believe that meaningful change requires ongoing collaboration, and we would welcome the opportunity to work together with you as the plan moves toward finalization and implementation. Please count on us as a partner committed to helping ensure the CERP's success and bringing cleaner air and environmental justice to Oakland.

Founded in 1993, Greenlining is committed to building a just economy that is inclusive, cooperative, sustainable, participatory, fair, and healthy. We work towards a future where communities of color can build wealth, live in healthy places filled with economic opportunity, and are ready to meet the challenges posed by climate change.

Here is a summary of general recommendations for the Air District and specific recommendations for the CERP within this letter:

1. The ISR policy package should build on the South Coast Air Quality Management District Rule 2305, or the WAIRE program, to be more health-protective.
2. Take early action to support Assembly Bill 914 (Garcia) in the 2026 legislative cycle. Oppose any future anti-ISR bills.
3. Ensure that no new general-purpose lanes, or any project that would expand the physical footprint of a highway, are funded or advanced in East Oakland.
4. Add stronger language in the CERP that commits to truck re-routing. Add a "Truck Re-routing Study" as a separate, individual action.
5. Use current, or soon appropriated funding, to start incentivizing owners of older heavy-duty diesel trucks, buses, and off-road equipment to transition to zero emission solutions.

6. Metrics for “Strategy 3. Transition to Zero Emission Vehicles and Related Funding” should include: number of vehicles and types of vehicle replaced.
7. Ensure the Caltrans Office of Racial Equity & Tribal Affairs, and potentially the Interagency Equity Advisory Committee (EAC), are a study partner on the Interstate 580 Truck Access Study.
8. Include execution of the forthcoming recommendations from I-580 Truck Access Study as an individual, separate action.

The summary of recommendations are expanded, below:

### **Strategy 1. Address Trucking Near Neighborhoods through Proactive Truck Management and Enforcement**

#### Action T&M 1.1 Indirect Source Policy Package

We strongly support the Indirect Source (Magnet Source) Policy Package as a key strategy. Studying the feasibility of a Bay Area wide approach to address the cumulative impacts of large warehouses and other magnet facilities is an essential step toward reducing diesel pollution and protecting the health of frontline communities.

We recommend that BAAQMD structure the ISR policy package to build on and go even further than the South Coast Air Quality Management District Rule 2305, adopted in 2021. Rule 2305 requires owners and operators of large warehouses to reduce emissions by choosing from a menu of compliance options, such as installing or using zero-emission charging infrastructure, installing and using onsite solar panels, and visits from zero-emission trucks. Owners and operators may also develop a custom compliance plan or pay a mitigation fee.<sup>1</sup> We would like to see the ISR policy package be more health-protective than Rule 2305. We also recommend careful consideration for the mitigation fee for use to fund further zero emission transportation programs and restorative justice actions in East Oakland.

We also urge the Air District to take early action to support Assembly Bill 914 (Garcia), Air Pollution: Indirect Sources,<sup>2</sup> in the upcoming legislative cycle, which would strengthen statewide efforts to regulate indirect sources and provide much-needed protections for communities most impacted by freight and goods-movement pollution. Aligning regional action with statewide policy will ensure a more comprehensive and effective approach.

We thank BAAQMD for its opposition to Senate Bill 34 (Richardson), Mobile Sources: Ports of Long Beach and Los Angeles, a bill that would have undermined California’s ability to adopt

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<sup>1</sup>South Coast Air Quality Management District, “Rule 2305. Warehouse Indirect Source Rule – Warehouse Actions And Investments To Reduce Emissions (Waire) Program,” accessed December 2025, <https://www.aqmd.gov/docs/default-source/rule-book/reg-xxiii/r2305.pdf>

<sup>2</sup> California Air Resources Board, “2025 – Assembly Bill 914 (Garcia, Robert), Air Pollution: Indirect Sources (2-Year),” accessed December 2025, <https://ww2.arb.ca.gov/2025-assembly-bill-914-garcia-robert-air-pollution-indirect-sources-2-year>

stronger air quality rules and protect vulnerable communities, and we urge the Air District to continue to oppose anti-ISR bills in the future.

#### Action T&M 1.3 Truck Management Update

We strongly recommend deeper collaboration with regional Caltrans leadership to ensure that no new general-purpose lanes are funded or advanced; East Oaklanders are already facing high cumulative pollution burdens. We recommend feedback to the City of Oakland Department of Transportation (OakDOT) be in alignment with Greenlining's previously run 2024 bill Assembly Bill 2535 (Bonta), Trade Corridor Enhancement Program,<sup>3</sup> which originally aimed to prohibit the allocation of state transportation funds to highway projects that add general-purpose lanes or expand highway capacity in communities facing significant pollution impacts as evidenced by CalEnviroScreen.

We strongly support OakDOT engaging with the Community Steering Committee (CSC) to get feedback on truck routing and other management strategies in East Oakland, and also, we believe there should be stronger language in the CERP that commits to truck re-routing. We recommend adding a "Truck Re-routing Study" as a separate, individual action within this section. This study could be similar to the Truck Re-route Study that occurred in South Fresno.<sup>4</sup> Truck routes must be updated to better reduce truck idling and prevent truck routes from cutting through residential areas.

### **Strategy 3. Transition to Zero Emission Vehicles and Related Funding**

#### Action T&M 3.4 Replacement of Heavy-Duty Vehicles and Equipment:

We appreciate the strong language in Action T&M 3.4 to provide grants for owners of older heavy-duty diesel trucks, buses, and off-road equipment. Greenlining has advocated for the replacement of older, high-polluting diesel trucks from California's roads, and targeted retirement of heavy-duty diesel trucks after 13 years of service rather than the current 18-year threshold.

As the Air District continues to look for that "10 million over 5 years" multi-year funding to advance this action, we recommend the District use the 2026 AB 617 funds to execute this action in order to make it even more near-term and urgent, as well as coordinate with CARB's incentive programs for medium-heavy duty and off-road equipment.

Additionally, we recommend the CERP Strategy 3 metrics should include the number of vehicles and types of vehicle replaced. This data is useful for identifying the impact of incentive dollars.

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<sup>3</sup> LegiScan, "Bill Text: CA AB2535 | 2023-2024 | Regular Session | Introduced," accessed December 2025, <https://legiscan.com/CA/text/AB2535/id/2927266>

<sup>4</sup> City of Fresno, "South Central Fresno AB617 Community Truck Reroute Study and related Health Assessment," accessed December 2025, <https://www.fresno.gov/publicworks/south-central-truck-re-route-study/>

## **Strategy 4. Restorative Justice Guides Decisions about the Future of the I-580 Truck Ban**

### T&M 4.1 Study Impacts of I-580 Truck Ban

We strongly support the commitment to study the impacts of the I-580 truck ban and to consider future decision-making grounded in racial equity. To ensure this work is done with the depth and collaboration it deserves, we urge the Air District to also ensure that a partner on this analysis within Caltrans, is the Caltrans Office of Racial Equity & Tribal Affairs, as well as to the Interagency Equity Advisory Committee (EAC).<sup>5</sup> Based on the Interstate 580 Truck Access Study website,<sup>6</sup> it does not seem like the Caltrans Office of Racial Equity & Tribal Affairs or the EAC are a study partner for the project. Their leadership, assistance, and frameworks can help evaluate historic harm, identify disproportionate impacts, and guide just and community-centered solutions.

### T&M 4.2 Consider Racial Equity in Future Decision-making Related to the I-580 Truck Ban

We are excited about this action, and that the recommendations for restorative policy will be based on the Memo findings and engagement with impacted communities, including the East Oakland CSC. Although, we find that within the CERP action there is not clear, strong language to actually *execute* the forthcoming recommendations for restorative justice. Execution of the forthcoming recommendations should be included as an individual, separate action.

## **Conclusion**

Thank you again for your leadership and care. Greenlining is happy to serve as a resource and partner as these efforts move forward.

Sincerely,

Maurissa Brown  
**Transportation Equity Senior Program Manager**

**Email:** [REDACTED]  
**Pronouns:** she/her

---

<sup>5</sup> California Transportation Commission, "Interagency Equity Advisory Committee," accessed December 2025, <https://catc.ca.gov/programs/interagency-equity-advisory-committee>

<sup>6</sup> Caltrans, "Interstate 580 Truck Access Study," accessed December 2025, <https://dot.ca.gov/caltrans-near-me/district-4/d4-projects/d4-580-truck-access-study>

**From:** [Stratte, Martin](#)  
**To:** [BAAQMD Planning](#)  
**Cc:** [Bill Crotinger](#); [Joe Capriola](#); [Peter Knuth](#); [Aneesh Rana](#); [REDACTED]; [Anna Lee](#)  
**Subject:** East Oakland CERP Public Comments - Letter from Argent Materials [December 5, 2025]  
**Date:** Friday, December 5, 2025 4:18:19 PM  
**Attachments:** [East Oakland CERP Public Comments - Letter from Argent Materials \[12.5.25\].pdf](#)

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Please place a copy of the attached letter in the administrative record for the matter referenced above.

Your confirmation of receipt is greatly appreciated.

Thank you.



**Martin Stratte**

Partner



Hunton Andrews Kurth LLP



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December 5, 2025

Bay Area Air District  
375 Beale Street, Suite 600  
San Francisco, CA 94105  
[planning@baaqmd.gov](mailto:planning@baaqmd.gov)

Re: East Oakland CERP Public Comments

To Whom It May Concern:

Please place a copy of this letter in the administrative record for the above referenced matter.

On September 4, 2025, I submitted comments on the July 2025 draft “East Oakland Community Emissions Reduction Plan” (CERP). My comments were submitted to the CERP co-leads: the Air District and Communities for a Better Environment (CBE). My comments identified multiple inaccuracies and mischaracterizations regarding the operations of Argent Materials, Inc. (Argent). I asked for these statements to be corrected or otherwise revised prior to publication of a final draft. Upon reviewing the November 2025 version of the plan, I am disappointed to see that none of my comments were addressed in the revised plan currently available for public review.

On behalf of Argent Materials, I again request that the following inaccuracies and mischaracterizations be revised:

- In chapter 6: Enforcement Overview & Findings, the Plan incorrectly lists Argent as having received two NOV’s in 2022 and two NOV’s in 2023, and on that basis identifies Argent as the second biggest “offender” for the period of 2021 to 2024.<sup>1</sup> This is incorrect. Argent was issued one NOV for its 8300 Baldwin site on November 16, 2022, and one NOV for its 8501 San Leandro site on July 26, 2023. Please edit Page 2 of Appendix E to reference only two NOV’s total.
- In chapter 5: Air Quality Overview, Argent is characterized as a “facility of concern” for PM exposure from fugitive dust.<sup>2</sup> The Plan provides no justification for this characterization. The Plan names 11 facilities that account for 98% of local PM 2.5

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<sup>1</sup> Plan at 123.

<sup>2</sup> Plan at 67.



emissions.<sup>3</sup> Argent is not included on the list. Please remove Argent as a “facility of concern” as its listing is unjustified and unsubstantiated.

- In chapter 5: Air Quality Overview, Argent is characterized as a facility of concern for toxic exposure from toxic emissions.<sup>4</sup> However, Argent is not listed as a top 10 emitter of toxic air emissions for cancer-related toxic emissions or chronic-related toxic emissions. The Plan provides no justification for why Argent would be identified as a facility of concern. Please remove Argent as a “facility of concern” for toxic emissions as its listing is unjustified and unsubstantiated.
- In Appendix F-1, Argent is listed as one of four facilities for which CBE developed “Problem Statements.”<sup>5</sup> Characterizing Argent as a “problem” appears to be based on the misstatements noted above and is inappropriate. Please remove Argent as a “facility of concern” in the Problem Statements of Appendix F-1 as its listing is unjustified and unsubstantiated.

Argent is a proud member of the East Oakland Community. Enclosed is an overview of our community involvement.

Thank you for your attention to this matter. Please feel free to email me at [REDACTED] or call me at [REDACTED] if you would like to discuss this further.

Sincerely,

*Bill Crotinger*

William Crotinger  
Member, Community Steering Committee  
President, Argent Materials

cc: Community Steering Committee

Enclosure

---

<sup>3</sup> Plan at 97.

<sup>4</sup> Plan at 67.

<sup>5</sup> Appendix E-2 at 1, 4.

As context for our operations and ongoing commitment to responsible practices, Argent would like to highlight our longstanding focus on sustainability and community engagement. For over a decade, Argent has relentlessly pursued innovation in our practices, transforming our fleet and internal processes to achieve carbon neutrality and re-imagining our business to prioritize both environmental and community impact.

In East Oakland, our team contributes daily to the neighborhood by cleaning up illegally dumped trash along more than three miles of nearby streets. We support and donate to over a dozen local nonprofits, host holiday giveaways throughout the year, and prioritize local hiring - more than 10% of our workforce are returning family members, reflecting our investment in long-term community relationships.

As a unique recycler, we process end-of-life concrete and asphalt from Oakland and the East Bay locally, returning 99.998% of materials to the community for reuse. By recycling Oakland materials in Oakland, we help eliminate nearly 15 million truck miles from East Bay roads, significantly reducing emissions and roadway impacts. These efforts are part of our broader commitment to a "Green Industrial Revolution," grounded in the goal of maximizing positive impacts while minimizing environmental harm.

Argent continues to implement operational improvements to minimize emissions, fugitive dust, and track out that set the industry standard. For example, a clean interface design has been incorporated at the Site allowing trucks to offload material into the processing area without entering it. The clean interface keeps customer truck tires clean by not allowing them to come into contact with facility operations keeping trucks on clean, paved haul roads. This helps prevent tire contamination and reduces the potential for particulate emissions, supporting more efficient and cleaner site operations.

Below is a summary of how Argent Materials helps the community:

- Argent is the only carbon neutral concrete, asphalt, and aggregate recycler in the U.S.
  - Achieved through the use of electric equipment, conversion to renewable diesel, and purchase of carbon free electricity from East Bay Community Energy
- Argent's operations support AB2953, which requires local agencies to use recycled aggregate materials in the repair and construction of roadways reducing costs and greenhouse gases. Argent is one of the few local sources of recycled aggregate.
- Recycled aggregate production in the Bay Area reduces vehicle miles traveled by providing materials locally. Currently a large amount of construction aggregate used in the Bay Area comes from Canada.
- Argent's operations also support BAAQMD Best Management Practices for Construction Related GHG Emissions measures:<sup>1</sup>
  - Recycle or salvage nonhazardous construction and demolition debris, with a goal of recycling at least 15% more by weight than the diversion requirement in Title 24.
  - Use locally sourced or recycled materials for construction materials (goal of at least 20% based on costs for building materials and based on volume for roadway, parking lot, sidewalk and curb materials).

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<sup>1</sup> BAAQMD. 2023. CEQA Air Quality Guidelines. Chapter 6, Table 6-1. Available online at: [https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-6-project-climate-impacts\\_final-pdf.pdf?rev=ce3ba3fe9d39448f9c15bbabd8c36c7f&sc\\_lang=en](https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-6-project-climate-impacts_final-pdf.pdf?rev=ce3ba3fe9d39448f9c15bbabd8c36c7f&sc_lang=en).

- Argent's San Leandro Street site produces high quality aggregates locally in an emission free wash plant
- Argent hires local, minority, and returning family members.
- Argent organizes neighborhood clean ups and has picked up 5 million pounds of trash in the neighborhood using its own labor and equipment.
- Argent provides opportunities to community members to serve their court mandated community service hours.
- Argent unilaterally repaved the adjacent city street.
- Argent is very involved in the neighborhood, participating in neighborhood groups, SPCA events and cleanup activities of illegally dumped trash.
- Argent is an innovator in this market, creating clean high quality recycled products and redefining aggregate facility operations to reduce roadway dust.
- Argent will provide the dust cake produced from its wash plant's filter press to green tech business who will use the product to make carbon negative concrete aggregate.
- Argent is a leader in clean tech, such that Caterpillar chose Argent to test their first fully electric loader at our yard.

**From:** [Nikita Pavlenko](#)  
**To:** [BAAQMD Planning](#)  
**Cc:** [Jayant Mukhopadhaya](#)  
**Subject:** ICCT Comments on East Oakland Community Emissions Reduction Plan  
**Date:** Friday, December 5, 2025 12:26:53 PM  
**Attachments:** [image001\[52\].png](#)  
[image002.png](#)  
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Hello,

The International Council on Clean Transportation (ICCT) welcomes the opportunity to comment on the Proposal to provide input on the Bay Area Air Quality Management District's (BAAQMD) East Oakland Community Emissions Reduction Plan (CERP). The ICCT is an independent non-profit organization founded to provide unbiased technical and scientific analysis to environmental regulators. The ICCT works to improve policies to reduce air pollution and greenhouse gases from road, marine, and air transportation, in order to benefit public health and mitigate climate change.

ICCT's aviation program conducts research on the potential technological and policy routes for aviation decarbonization, including efficiency standards, non-CO<sub>2</sub> emissions, and alternative fuels. The ICCT co-leads The Real Urban Emissions (TRUE) Initiative, to use real-world vehicle data and remote sensing to inform policy makers, manufacturers, and consumers of the real impact of vehicle emissions on air quality. ICCT has developed multiple analyses of the air pollution and health related impacts of road, aviation and maritime emissions across multiple jurisdictions.

We thank the BAAQMD for the opportunity to comment on this important initiative. The attached comments below offer several technical observations and recommendations for the BAAQMD to consider for its CERP for East Oakland. Please feel free to reach out to me or my colleague Jayant (CC'd) if you have any questions.

Kind Regards,

Nik

**Nikita Pavlenko (he/him)**  
Program Director, Aviation and Fuels  
[REDACTED]

**icct**

THE INTERNATIONAL COUNCIL  
ON CLEAN TRANSPORTATION





THE INTERNATIONAL COUNCIL ON CLEAN TRANSPORTATION

International Council on Clean Transportation consultation response on the  
**Bay Area Air Quality Management District's  
East Oakland Community Emissions Reduction Plan**

December 5th, 2025

The International Council on Clean Transportation (ICCT) welcomes the opportunity to comment on the Proposal to provide input on the Bay Area Air Quality Management District's (BAAQMD) East Oakland Community Emissions Reduction Plan (CERP). The ICCT is an independent non-profit organization founded to provide unbiased technical and scientific analysis to environmental regulators. The ICCT works to improve policies to reduce air pollution and greenhouse gases from road, marine, and air transportation, in order to benefit public health and mitigate climate change.

ICCT's aviation program conducts research on the potential technological and policy routes for aviation decarbonization, including efficiency standards, non-CO<sub>2</sub> emissions, and alternative fuels. The ICCT co-leads The Real Urban Emissions (TRUE) Initiative, to use real-world vehicle data and remote sensing to inform policy makers, manufacturers, and consumers of the real impact of vehicle emissions on air quality. ICCT has developed multiple analyses of the air pollution and health related impacts of road, aviation and maritime emissions across multiple jurisdictions.

We thank the BAAQMD for the opportunity to comment on this important initiative. The comments below offer several technical observations and recommendations for the BAAQMD to consider for its CERP for East Oakland. Staff may contact Nikita Pavlenko [REDACTED] or Jayant Mukhopadhaya [REDACTED] with any questions.

Nikita Pavlenko  
Fuels and Aviation Program Director  
International Council on Clean Transportation

## Summary of Comments

The International Council on Clean Transportation (ICCT) commends the BAAQMD on their draft of the East Oakland CERP. The document provides a detailed description of the East Oakland community, their air quality concerns, and the six focus areas for strategy development. Of the six focus areas, our comments focus on two areas, the **Public Health and Community Wellness (PH)** and **Transportation and Mobile Sources (T&M)**, specifically as they relate to aircraft emissions. Based on our review of the strategies and recommendations offered in the report, we make the following recommendations:

- **Implement comprehensive air quality monitoring at Oakland Airport.** Transparent pollutant measurements will enable East Oakland communities and policymakers to monitor existing pollutant levels, improve transparency for affected communities, and allow BAAQMD to track progress towards air quality goals.
- **Accelerate zero-emission ground support equipment deployment.** Recent research demonstrates that ground support equipment (GSE) can be electrified without disruption to existing operations or significant increase in fleet size, making this timeline both feasible and effective for reducing local air pollutants.
- **Phase out leaded aviation gasoline before 2030 through STC reimbursements, infrastructure investments, and financial incentives.** With approximately 120 kg of lead emitted annually near the airport and prevailing winds dispersing emissions toward East Oakland where children face elevated blood lead exposure risks, rapid adoption of certified unleaded alternatives like G100UL is both urgent and achievable ahead of the 2031 statewide deadline.
- **Expand the Transportation and Mobile Source strategy to address aircraft landing and takeoff emissions through an Indirect Source Rule and operational measures.** Aircraft operations account for 71-99% of airport emissions depending on the pollutant (including 87% of NO<sub>x</sub> and 75% of PM<sub>2.5</sub>), making it challenging to achieve substantial air quality improvements without addressing these emissions. There are multiple technologies and changes in practice that can be deployed to reduce aircraft engine emissions, such as blending lower-aromatic fuels, zero-emission or single-engine taxiing, and the use of learn burn engines.

We provide additional information and justification for each of these recommendations below. ICCT is also developing more detailed analysis of local air quality impacts of aviation to supplement our recent global aviation emissions inventory and aircraft local impact footprint tool and are grateful for the opportunity to support BAAQMD in its efforts to reduce emissions in East Oakland.<sup>1</sup>

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<sup>1</sup> Sitompul, Daniel, and Dan Rutherford. "AIRLIFT - Aircraft Local Impact Footprint Tool." November 6, 2025. <https://theicct.org/airlift-aircraft-local-impact-footprint-tool-nov25/>.

## Implement Comprehensive Air Quality Monitoring and Transparency

Increased data collection and transparency as detailed in PH Strategies 3 and T&M Strategy 7, is necessary to develop effective emissions reductions measures. These elements, in combination with tangible emissions reduction measures at the airport (T&M Strategy 6), can facilitate effective action to reduce the air pollution burden faced by the East Oakland residents and to improve air quality in the community. The ICCT supports the proposals (PH 3.1-3.4) to take more measurements of air pollutants at major facilities posing air quality concerns, including at Oakland International Airport, and to make this data transparent and publicly accessible. This will enable communities and policymakers to monitor and report existing pollutant levels and to collaboratively define mitigation strategies.

Measurement of pollutant concentrations is an important first step to take inventory of the airport's emissions and how they are affecting local air quality. Likewise, we are also supportive of measures T&M 7.3 and 7.4 to evaluate local air quality impacts using experimental data and install fence line air quality monitoring at the airport.

## Deploy Zero-Emission Airport Ground Support Equipment

Concerning measures to reduce emissions at Oakland Airport (T&M Strategy 6), electrification of ground support equipment (T&M 6.2) and regulation to require zero-emissions ground operations (T&M 6.6) are important steps to reduce emissions of local air pollutants at the airport. In 2019, GSE at Oakland International Airport emitted 451 tons of carbon monoxide, 53 tons of NO<sub>x</sub>, 8.2 tons of reactive organic gases (ROG), and 3 tons of particulate matter.<sup>2</sup> Recent research on the electrification of ground support equipment (GSE) suggests that they can be electrified without disruption to existing operations or significant increase in fleet size.<sup>3</sup> Some examples of existing commercial technologies include electric baggage tractors, cargo tugs, and belt loaders. The National Renewable Energy Laboratory (NREL) has published a fact sheet including common GSE with numerous electric variants available in the US and the relevant manufacturers.<sup>4</sup>

As part of the HERON project in the European Union, hybrid-electric aircraft tugs called the Taxibot, are being tested across several airports (JFK, AMS, CDG, DEL, BRU). These can

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<sup>2</sup> Port of Oakland. San Francisco Bay Oakland International Airport Terminal Modernization and Development Project Final Environmental Impact Report. 2024. [https://www.iflyoak.com/wp-content/uploads/2024/10/241017\\_FEIR\\_OAK-Terminal-Development.pdf](https://www.iflyoak.com/wp-content/uploads/2024/10/241017_FEIR_OAK-Terminal-Development.pdf).

<sup>3</sup> Timmermans, Koen, Paul Roling, Gautham Ram Chandra Mouli, and Bilge Atasoy. "The Impact of Transitioning to Electric Ground Support Equipment on the Fleet Capacity and Energy Demand at Airports." *Case Studies on Transport Policy* 21 (September 2025): 101498. <https://doi.org/10.1016/j.cstp.2025.101498>.

<sup>4</sup> Johnson, Caley. 2017. "Electric Ground Support Equipment at Airports." NREL. <https://research-hub.nrel.gov/en/publications/electric-ground-support-equipment-at-airports/>.

provide significant reductions in fuel burn, engine emissions, and noise, as they reduce or eliminates the need for the aircraft engine to be operation during the taxi phase. The product is expected to be expanded to include widebody aircraft, as well as a fully electric option.<sup>5</sup>As such the T&M 6.2's goal to support and drive the transition of fossil-fueled GSE to electric GSE where available by 2030 is well-supported.

## Accelerate the Phase Out Leaded Aviation Gasoline

We support T&M 6.5's goal to accelerate the phase out of leaded aviation gasoline (Avgas). The most commonly used Avgas in the US is the 100LL grade which emits 2.12 grams of lead per gallon of fuel burned.<sup>6</sup> While Oakland airport primarily services larger aircraft using kerosene, it also serves a small number of smaller, piston-powered aircraft fueled by avgas. In 2021, approximately 120 kilograms of lead were emitted from LTO operations of piston-powered aircraft at the airport.<sup>7</sup> Children living within 1000 meters of an airport that uses leaded avgas have shown higher blood lead levels than children living further away.<sup>8</sup> The Center for Disease Control (CDC) maintains that even low levels of lead in blood can be harmful.<sup>9</sup> While the Oakland airport is a large area, the smaller runways of the Oakland airport that are used by general aviation aircraft that burn avgas are closer to the East Oakland community. Additionally, the prevailing wind direction at the airport, as noted by Appendix D of the CERP, is from the west and west-northwest, is likely to disperse the impact of the lead emissions further into the East Oakland community.<sup>10</sup>

While the Federal government has confirmed that leaded avgas poses a risk to human health, the FAA's Eliminate Aviation Gasoline Lead Emissions" (EAGLE) program has made halting progress due to a combination of cost concerns and uncertainty about which competing fuel to use absent ASTM certification.<sup>11</sup> The Federal Aviation Administration has already certified multiple grades of unleaded avgas for use in piston engines.<sup>12</sup> One of

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<sup>5</sup> Taxibots spool up as project HERON winds down. Airbus.2025.

<https://www.airbus.com/en/newsroom/stories/2025-07-taxibots-spool-up-as-project-heron-winds-down>

<sup>6</sup> Yang, Wenli. PM Speciation Profiles for Piston-Engine Aircraft (Running Aviation Gasoline). December 12, 2019. <https://ww2.arb.ca.gov/sites/default/files/2021-06/PM%20Speciation%20Profiles%20for%20Piston.pdf>.

<sup>7</sup> U.S. Environmental Protection Agency, 2021 NEI Point Facility Summary. <https://www.epa.gov/air-emissions-inventories/2021-air-emissions-data>

<sup>8</sup> Miranda, Marie Lynn, Rebecca Anthopolos, and Douglas Hastings. "A Geospatial Analysis of the Effects of Aviation Gasoline on Childhood Blood Lead Levels." *Environmental Health Perspectives* 119, no. 10 (2011): 1513-16. <https://doi.org/10.1289/ehp.1003231>.

<sup>9</sup> CDC. "Preventing Childhood Lead Poisoning." *Childhood Lead Poisoning Prevention*, January 31, 2025. <https://www.cdc.gov/lead-prevention/prevention/index.html>.

<sup>10</sup> Zahran, Sammy, Christopher Keyes, and Bruce Lanphear. "Leaded Aviation Gasoline Exposure Risk and Child Blood Lead Levels." *PNAS Nexus* 2, no. 1 (2023). <https://doi.org/10.1093/pnasnexus/pgac285>.

<sup>11</sup> "Slowly But Surely, GA Moves To Unleaded Avgas | Aviation Week Network." Accessed December 3, 2025. <https://aviationweek.com/business-aviation/safety-ops-regulation/slowly-surely-ga-moves-unleaded-avgas>.

<sup>12</sup> Federal Aviation Administration (FAA). "Building an Unleaded Future by 2030." Accessed December 2, 2025. <https://www.faa.gov/unleaded>.

these, the G100UL, has been certified for use in all piston aircraft in use in the US and is even available at a nearby general aviation airport, Reid-Hillview Airport.<sup>13</sup> Other California airports such as Long Beach airport have begun to offer unleaded UL94 fuel as well as incentives to pump G100LL; further, Long Beach airport has implemented a fuel flow fee waiver and its airport subsidizes Supplemental Type Certificate (STC) purchases for aircraft to utilize G100UL fuel.<sup>14</sup> This suggests that the phase out of leaded avgas at Oakland airport can indeed be achieved before the planned statewide ban in 2031.<sup>15</sup> We therefore recommend that the Port of Oakland consider offering reimbursements for STC’s in the near-term, invest in compatible fueling infrastructure, and consider further incentives to support the uptake of leaded avgas alternatives before 2030.

## Reducing Emissions from Aircraft Operations

With respect to T&M Strategy 6, we recommend expanding the scope of the emissions reduction plan. While the current approach in T&M Strategy 6 focuses on ground support equipment, ground access equipment, and leaded avgas, this strategy does not address the biggest source of air pollution at the Oakland airport, fuel burned during aircraft landing and takeoff (LTO) cycles. In the Port of Oakland’s environmental review of the terminal modernization plan at Oakland airport, 2019 emissions from Oakland International Airport’s aircraft LTO operations, ground support equipment, and stationary source emissions are reported.<sup>16</sup> These are presented in Table 1. Across all measured air pollutants, Carbon monoxide (CO), Reactive Organic Gases (ROG), Nitrogen oxides (NOx), Sulfur dioxide (SO<sub>2</sub>), and particulate matter (PM10 and PM2.5), emissions from aircraft operations make up the majority of emissions attributable to the airport’s activity. Aircraft NOx emissions, which lead to the formation of ground-level ozone, are of particular concern in California, given the steep cuts needed to meet 2015 federal ozone standards.

Table 1: Breakdown of emissions at Oakland International Airport by pollutant and source in 2019

| Pollutant | Share of emissions from aircraft activity | Share of emissions from GSE and stationary sources |
|-----------|-------------------------------------------|----------------------------------------------------|
| CO        | 71%                                       | 29%                                                |
| ROG       | 92%                                       | 8%                                                 |
| NOx       | 93%                                       | 7%                                                 |

<sup>13</sup> General Aviation Modifications Inc (GAMI). “G100UL Availability Map.” Accessed December 2, 2025.

<https://g100ul.com>.

<sup>14</sup> <https://www.longbeach.gov/lgb/news/3-28-25-long-beach-airport-subsidizes-more-than-3000-gallons-of-unleaded-aviation-fuel/>

<sup>15</sup> California. “Bill Text - SB 1193 Airports: Leaded Aviation Gasoline.” Accessed December 2, 2025.

[https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202320240SB1193](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202320240SB1193).

<sup>16</sup> Port of Oakland. San Francisco Bay Oakland International Airport Terminal Modernization and Development Project Final Environmental Impact Report. 2024. [https://www.iflyoak.com/wp-content/uploads/2024/10/241017\\_FEIR\\_OAK-Terminal-Development.pdf](https://www.iflyoak.com/wp-content/uploads/2024/10/241017_FEIR_OAK-Terminal-Development.pdf).

|                 |     |     |
|-----------------|-----|-----|
| SO <sub>2</sub> | 99% | 1%  |
| PM10            | 79% | 21% |
| PM2.5           | 80% | 20% |

While emissions reductions from airport ground and stationary sources are valid priorities, large-scale improvements in criteria air pollutant concentrations will only be possible with aircraft LTO emissions reductions. Emissions from commercial aircraft taxiing across the state already exceeds statewide bus emissions (including all school, coach, and city buses). This, along with other LTO-phase emissions, will continue to increase in future years, particularly as the airport expands, in contrast to the projected decrease in bus emissions over that same time period.<sup>17</sup>

One potential long-term strategy for achieving reductions in emissions from an aircraft's LTO operations could be through an Indirect Source Rule (ISR). In T&M Strategy 1, an Indirect Source Rule Policy Package is proposed as a measure (T&M 1.1) to address the local air quality impacts of large warehouses that draw traffic from heavy-duty vehicles. An ISR would hold warehouses responsible for meeting certain emissions standards due to the mobile source pollution coming from it. Similarly, an airport is the hub for aviation activity. Therefore, we recommend the BAAQMD explore the feasibility of using an ISR to regulate emissions from aircraft LTO cycles.

In addition to adding a mitigation measure for T&M Strategy 6, we also propose the following strategy metrics be adopted to measure progress:

- 1) Set annual emission reduction goals for air pollutants and track progress towards achieving those quantitative targets.
- 2) Report annual progress relative to the national and state ambient air quality standards (NAAQS and CAAQS) requirements. This would involve reporting current levels of each pollutant's concentration over the relevant time average in East Oakland, the national requirement, and the California state requirement.
- 3) Quantify and report contribution of each implemented measure to reducing pollutant concentrations.

There are numerous technologies available to reduce aircraft engine emissions that the Oakland Airport can potentially deploy for maximum air quality benefits. Operational tactics like zero-emission taxiing, single-engine taxiing, and reduced APU use can reduce NOx emissions on the ground during the taxi phase. Improving fuel composition to reduce aromatics and sulfur content can reduce emissions throughout the LTO cycle. While the CERP notes that sustainable aviation fuel (SAF) can make a significant impact on GHG and local air quality emissions, the current and projected volumes of SAF are unlikely to make a significant contribution in the near to medium term. Quarterly LCFS data suggests that

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<sup>17</sup> California Air Resources Board (CARB). Commercial Aircraft Taxiing Emissions. n.d. <https://ww2.arb.ca.gov/sites/default/files/2025-07/AircraftTaxiing-FS-Final.pdf>.

California is on track to consume approximately 100 million gallons of SAF's in 2025—significant progress towards the state's voluntary 2035 goal of 200 million gallons.<sup>18</sup> However, this comprises a relatively small share of the state's overall jet kerosene consumption. At low blend percentages, SAF can only provide minimal air quality improvements, as the majority of the fossil jet fuel will still have high levels of aromatics and sulfur. As an interim measure, additional hydrotreating of fossil jet fuel can help to reduce aromatic content from the non-SAF share of fuel and eliminate sulfur, providing significant reductions in PM and SOx emissions.<sup>19</sup> Additionally, the deployment of advanced engine technologies, such as lean burn combustors, can reduce both NOx and particulate matter emissions during the LTO cycle.

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<sup>18</sup> “Low Carbon Fuel Standard Reporting Tool Quarterly Summaries | California Air Resources Board.” Accessed December 4, 2025. <https://ww2.arb.ca.gov/resources/documents/low-carbon-fuel-standard-reporting-tool-quarterly-summaries>.

<sup>19</sup> Kumar, Supraja. 2025. “Cloudy with a Chance of Soot: The Role of Fuel Composition in Aviation’s Non-CO2 Impact.” *ICCT Staff Blog*, October 6. <https://theicct.org/role-of-fuel-composition-in-aviations-non-co2-impact-sept25/>.

**From:** [Adele Watts She/Her](#)  
**To:** [BAAQMD Planning](#)  
**Cc:** [Carly Cabral They/He/She](#); [Sarah Chen Small](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Sunday, December 7, 2025 1:47:54 PM  
**Attachments:** [Outlook-iwvevcrk.png](#)  
[FINAL\\_CBE EO CERP Comment Letter 12-7-2025 .pdf](#)

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Hello,

On behalf of Communities for a Better Environment, I am submitting the attached public comment letter regarding the draft East Oakland CERP. As a co-leading community-based organizations in this process, we appreciate the opportunity to provide feedback and to help ensure that the final plan reflects the priorities and lived experiences of East Oakland residents most impacted by air pollution.

Thank you for your continued partnership and commitment to environmental justice in East Oakland.

Best,

Adele Watts, (she/her/hers)  
NorCal Program Co-Director (East Oakland)  
Communities for a Better Environment  
and CBE Action, a project of Tides Advocacy



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December 5, 2025

Bay Area Air Quality Management District  
375 Beale Street  
Suite 600  
San Francisco, CA 94105

*Submitted via email to [planning@baaqmd.gov](mailto:planning@baaqmd.gov)*

**Subject:** East Oakland CERP Public Comments

To Whom it May Concern,

Communities for a Better Environment (“CBE”) writes to submit comments on the East Oakland Draft Community Emission Reduction Plan (“CERP”). Our work is deeply rooted in the lived experiences, priorities and expertise of East Oakland residents who bear the disproportionate environmental and public health burdens. We submit these comments with the shared goal of strengthening the plan so that it truly responds to community-identified needs, advances environmental justice and delivers tangible, measurable improvements in air quality and quality of life for the East Oakland community. We thank the air district for its continued partnership and for the opportunity to help guide the development of a CERP that reflects the priorities and vision of East Oakland residents. Our below comments include recommendations for further strengthening actions to reduce the disproportionate pollution burden in East Oakland, as well as insight to support the implementation.

Link to CERP draft:

<https://www.baaqmd.gov/~media/files/ab617-community-health/east-oakland/east-oakland-cerp/public-review-draft-plan-pdf.pdf?rev=cfb24df74c0e44deb861a2d3707dce46>

Recommendations for Community Engagement in Implementation

CBE supports the strong emphasis on proactive community engagement throughout the CERP. To facilitate strong participation and build trust in East Oakland, it is crucial to conduct early education and outreach to build literacy on air quality issues, recognizing that community cannot identify issues and participate without access to information on air quality issues and Air District procedures. To that end, we recommend scheduling workshops and meetings in collaboration with trusted local organizations, at accessible locations and times in East Oakland, and with a strong emphasis on language access and justice (including outreach, education, and proceedings). Board meetings should also be more accessible to community members for Board members to be fully informed.

**Commercial and Industrial (C&I)**

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C&I 1.1: Rule Amendments to Address Fugitive Dust

CBE strongly supports timely amendments to Regulation 6 to address fugitive dust emissions. CBE urges the Air District to adopt the most progressive dust control options available, including the whitepaper recommendations to require, among other things, minimum moisture content and stabilization testing of stockpiles. Facilities in East Oakland often purport to follow moisture content requirements despite continual community observations that stockpiles are leading to fugitive dust and track-out (e.g. Argent Materials). We also urge the Air District to consider the impact of fugitive dust on unhoused people near facilities, and to incorporate health protective measures and outreach and noticing procedures that include unhoused people’s needs.

C&I 1.3: Review and Comment on California Environmental Quality Act (CEQA) Analysis of Proposed Projects

CBE strongly supports this action and thanks the Air District for its early implementation, as providing notice of CEQA projects in East Oakland CERP boundaries provided CBE the opportunity to review and notice community of an upcoming metal scrap facility expansion. From the perspective of community lawyers, the Air District’s expert comments on major CEQA projects is invaluable. Under CEQA guidelines and case law, expert agencies are afforded a higher deference than impacted community members. Without expert comments, particularly on issues of methodology and cumulative health risks, community and organizations have few options to understand and challenge highly consequential projects.

C&I 2.2 Rule Amendments to Improve Implementation of Rule 11-18

While CBE supports improving Rule 11-18 implementation, we have several concerns about proposed changes, as detailed in a comment letter submitted by Kaitlin Alcontin on October 10, 2025, to Rule Development. Amendments should ensure that Health Risk Assessments are conducted by neutral parties, ensure that overburdened communities are still prioritized for early action, and include foreseeable emissions beyond “routine” emissions that underestimate real emissions.

C&I 3.4 Reduce Industrial Pollution on Unhealthy Air Quality Days

CBE strongly supports this action and appreciates the Air District’s collaboration to address this longstanding community concern. Going back at least five years, CBE members have raised concerns that commercial and industrial sources are contributing emissions on poor air quality days in East Oakland (e.g. Spare the Air days and wildfire smoke events). Community observed industrial sources increasing their operations on severe air quality days, presumably hoping to hide the added pollution in the wildfire smoke in 2020. An unhealthy air quality day is more frequent and more impactful to health in East Oakland than in less polluted communities

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given the existing pollution and health burdens. While Spare the Air Day is an excellent communication tool, community feels that industrial sources, not just individuals, should be required to curb emissions. As wildfire events increase due to the climate crisis, it is becoming increasingly urgent to improve emergency air quality event procedures. We look forward to continued discussion on this matter.

C&I 4.1 Evaluate Opportunities to Reduce Localized Emissions and Address Impacts from BUGs

CBE strongly supports timely attention to the issue of diesel back-up generators, particularly given the alarming national growth of data centers that frequently rely on toxic diesel generators. Additionally, the City of Oakland is updating the Oakland General Plan, and early information on the land use element suggests a turn towards sectors that may rely on generators in East Oakland.

**Public Health (PH)**

PH 1.1 Develop Methods for Understanding Cumulative Impacts

CBE strongly supports this action as there is an urgent need for scientific methodology, regulation, and the law to more accurately reflect the real health burdens in environmental justice communities. This methodology would improve all aspects of the Air District’s work. CEQA guidelines currently require project sponsors to assess and disclose the health impacts of emissions. However, the most used current methodology is severely lacking and prevents decisionmakers and the public from being fully informed about impacts as required by CEQA.

Take for example the proposed Oakland Airport Expansion Project environmental impact report (“EIR”), which relied on a health risk assessment (“HRA”) that only included toxic air contaminants (“TACs”, completely excluded criteria air pollutants (“CAPs”) (despite disclosing significant raw criteria pollutant emissions, including a 63% increase in NOx emissions)<sup>1</sup>, and only modeled impacts based on generic “sensitive receptors.” Based on this HRA, the Port claimed the massive project would have no health impacts on neighboring communities that are already in the 99<sup>th</sup> percentile of asthma hospital visits and have life expectancies up to 15 years shorter than the healthiest parts of Alameda County. Not only does this mislead the public and decisionmakers of potentially deadly project impacts, but it also absolved the project sponsor of the legal obligation under CEQA to mitigate project impacts. Cumulative impacts methodology must account for the full scope of project emissions (CAPs and TACs), local background air quality conditions, and community-specific health risks. This work is critical to protecting

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<sup>1</sup> Port of Oakland, *Oakland International Airport Terminal Modernization and Development Project Draft Environmental Impact Report* (July 2023), Table 3.3-12.



community health, potentially lead to developers funding more mitigation, and overall aid the Air District in reaching its air quality goals.

## **Transportation and Mobile (T&M)**

### T&M 1.1: Indirect Source Policy Package

CBE thanks Dr. Fine and Air District staff for their work to move an urgently needed Indirect Source Rule (“ISR”) forward. In recent months, it has become increasingly clear that Air Districts must use all available tools to protect community health against a rising wave of federal attacks on the Clean Air Act. While the state was forced to roll back critical truck emission standards that long promised to reduce deadly diesel pollution in environmental justice communities, Air Districts retain clear authority to regulate indirect sources. CBE suggests early education and outreach in communities impacted by indirect source pollution magnets to inform rule concepts and allow balanced participation in the rulemaking process. As Air District staff heard at the CBE East Oakland community workshop on the CERP, residents are deeply concerned with diesel truck pollution and want to know what the Air District can do.

### T&M Strategy 6: Emission Reductions at the Oakland International Airport

CBE appreciates the Air District’s thoughtful engagement on airport issues through the CERP process. While the Port ultimately has the most local authority over airport operations, we strongly encourage the Air District to proactively engage in opportunities to reduce airport emissions as much as possible. The Oakland Airport is one of the single largest pollution sources in the Bay Area, with 2019 airport-related NOx emissions exceeding the NOx emissions of the Chevron Richmond Refinery,<sup>2</sup> and reducing airport emissions will be critical to reaching air quality and climate goals throughout the region.

As discussed above, the airport has significant cumulative impacts that are not fully captured under existing regulations and policies. While the airport is not a Rule 11-18 facility under current rules (the majority of emissions coming from indirect sources such as aircraft, trucks and passenger vehicles, ground support equipment), the combined emissions contributed to a significant portion of East Oakland’s toxicity weighted emissions. CBE urges the Air District to consider health risk assessments or other health-protective considerations of cumulative impacts prior to granting any permits related to ongoing or expanded airport operations.

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<sup>2</sup> CBE & SEIU-USWW, *Pollution for Airline Profit* (September 2024), at 16, [https://www.cbecal.org/wp-content/uploads/2024/09/Final\\_Pollution-for-Airline-Profit-Report\\_English.pdf](https://www.cbecal.org/wp-content/uploads/2024/09/Final_Pollution-for-Airline-Profit-Report_English.pdf).

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CBE appreciates the opportunity to uplift these comments and looks forward to continued collaboration with the Air District. As a co-leading organization, we remain committed to working collaboratively to ensure that implementation is transparent, adequately resourced, and centered on community voices at every stage. With the revisions recommended in this letter, we believe the CERP will be better equipped to deliver real, lasting reductions in pollution and to advance health and equity for the East Oakland community. We look forward to continued dialog and to working together toward a cleaner, healthier and more just East Oakland.

Sincerely,

**Communities for a Better Environment**  
Adele Watts  
NorCal Program Co-Director

[Redacted signature]

[Redacted signature]

[Redacted signature]

[Redacted signature]

**From:** [Chris Lish](#)  
**To:** [BAAQMD Planning](#)  
**Subject:** Improve air quality in Oakland and the health of the adjoining communities --East Oakland CERP Public Comments  
**Date:** Sunday, December 7, 2025 6:54:19 AM

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Sunday, December 7, 2025

Subject: Improve air quality in Oakland and the health of the adjoining communities -- East Oakland CERP Public Comments

Dear Bay Area Air Quality Management District Planning Department,

As you hopefully are aware, East Oakland is one of the most heavily impacted communities in the Bay Area due to longstanding air quality challenges, environmental justice issues, and health inequities. Yet the Port of Oakland has been pushing through plans to expand the Oakland International Airport (OAK) that will increase local pollution and exacerbate health inequities. The Port's inadequate Final Environmental Impact Report for the proposed OAK airport expansion ignored East Oakland pollution inequities by not including a thorough Health Impact Assessment.

I strongly urge the Bay Area Air Quality Management District to rectify this injustice by calling, in the AB617 report, for a thorough Health Impact Assessment of the proposed OAK airport expansion, as the Alameda County Health Department has requested.

Please incorporate the following three points into your Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan.

1) The report fails to address the potential threat to the health of East Oakland residents from the proposed expansion of the Oakland airport. There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, the report should still call on the Port **NOT** to expand the airport until such time as the health impact from increased air pollution from the proposed expansion is analyzed. (Note: The Air District also has no authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the Oakland Airport new terminal will be completed.

2) A larger grid of pollution monitors is needed, including fenceline monitors. This monitoring should be initiated now, as the Community Steering Committee (CSC)

prefers, to provide a baseline of data for future comparison and modeling. Include ultrafine particles and hourly fluctuations to indicate peak levels of pollution.

3) The report should call for any plans for expanding operations or facilities at the establishments listed in the East Oakland Air Monitoring Project, including the Oakland airport, (Section 3.2) that would increase pollution to be suspended until the health impacts on East Oakland residents are better understood. A specific Health Impact Assessment (HIA) would include accounting for the well-documented pre-existing health inequities in East Oakland communities. Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.

I appreciate the effort that the Air District and Community Steering Committee have put into this report. I look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,  
Christopher Lish  
San Rafael, CA

**From:** [Jacob Klein](#)  
**To:** [BAAQMD Planning](#)  
**Cc:** [Vanessa Rivas Villanueva](#); [Sarah Chen Small](#)  
**Subject:** East Oakland CERP Public Comments  
**Date:** Sunday, December 7, 2025 1:31:38 PM  
**Attachments:** [East Oakland CERP Public Comments.pdf](#)

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Hi,

Please find attached comments from Industrious Labs and Earthjustice on the East Oakland CERP. Thank you for this opportunity to support and comment on this important work.

Jacob

--



**JACOB KLEIN**

**SENIOR FIELD STRATEGIST**

*They/Them*

[REDACTED]  
[REDACTED]

[www.Industriouslabs.org](http://www.Industriouslabs.org)



Bay Area Air District  
375 Beale Street, Suite 600  
San Francisco, CA 94105  
planning@baaqmd.gov

December 7, 2025

Dear BAAD Planning Staff,

Thank you for the opportunity to comment on "Right to Breathe: East Oakland Community Air Quality Justice Plan," the Community Emissions Reduction Plan (CERP) developed by and for the East Oakland community, including community co-convenor Communities for a Better Environment. East Oakland is a community that experiences historical and ongoing environmental burden and injustice. Community members and residents face worse health outcomes, higher medical bills, and lower life expectancies than more affluent neighboring communities. "Right to Breathe" works to address the disproportionate burden that East Oakland residents face, from individual sources of pollution to the cumulative impacts of many sources.

"Right to Breathe" is an important step to cleaner air, more community agency, and better public health in East Oakland. We look forward to seeing the proposals become a reality. One plan, however, will not be able to address every issue in East Oakland. This community will need continued support and additional measures to cover all the sources of emissions negatively impacting residents and address the cumulative impacts. It is also incumbent upon the Bay Area Air District (BAAD) to act with urgency to meet the CERP's strategies so that people's lives will see substantial and material improvement quickly.

The legacy of industrial zoning and ongoing industrial operations have saddled East Oakland with a variety of harmful emissions sources. Industry is a driver of the economy and creator of jobs, but often still relies on burning fossil fuels for heat and energy. Industrial heating processes, like those from burning methane gas in industrial boilers, produce nitrous oxide (NOx), particulate matter 2.5 (PM 2.5), volatile organic compounds (VOCs), and other air pollutants that contribute to the health disparities that East Oakland residents experience.

Currently, BAAD regulates emissions from industrial boilers, steam generators, and process heaters above 2 MM BTU per hour through Regulation 9 Rule 7. Unfortunately, the rule has not been updated since 2011, allowing boilers to continue emitting health-harming pollutants. A strengthened Rule 9-7 with a zero emissions standard would address these emissions, reducing the air pollution burden that East Oakland faces.

Currently, the CERP only makes passing mention of Rule 9-7, leaving a key opportunity on the table. According to Industrious Labs analysis of Rule 9-7 permitted facilities data, 16 facilities operate 44 industrial boilers emitting nearly 18 tons of NOx, 1.4 tons of PM 2.5, and 1.7 tons of VOCs in East Oakland. Therefore, strengthening the rule would be consistent with the CERP's goals.

Including additional language in the CERP for a zero-emission update to Rule 9-7 would also address two of the facilities that "Right to Breathe" identified as key facilities of concern. In 2023, Peet's Coffee and Tea had 6 units permitted under Rule 9-7 that reported emitting 3 tons of NOx and Gallagher & Burk had 1 unit that emitted approximately 0.5 tons. While both facilities also have emissions from sources other than boilers, strengthening Rule 9-7 would help alleviate the burden from these key facilities. Other industrial facilities in the East Oakland region would also be implicated, contributing to the cumulative benefits of a stronger Rule 9-7.

Under the focus of Public Health, the first strategy (PH 1.1) calls for BAAD to develop methods for understanding cumulative impacts and integrating into rulemaking and other analyses, a critical strategy that must be expedited. Environmental justice communities have long called for greater attention to how cumulative impacts of air pollution burden communities. A methodology that takes into account the full ecosystem of air pollution levels and the specific health risks that communities face must be developed to better compare how communities like East Oakland differ from non-environmental justice communities, with pollution burdens having situational disparities.

By advancing Rule 11-18 to build cumulative impacts into the health risk methodology, BAAD can address air quality issues more holistically. Furthermore, as part of amending Rule 11-18, meeting health risk assessments and risk reduction strategies should require kickstarting other rule updates and amendments.

We appreciate this opportunity to comment on the East Oakland CERP "Right to Breathe." By moving urgently to meet the CERP's calls to action, prioritizing a zero emissions amendment to Rule 9-7, and developing a more equitable health risk methodology, we can begin to address the systemic harm that East Oakland and other environmental justice communities face.

Sincerely,

Jacob Klein, Senior Field Strategist  
Industrious Labs

Vanessa Rivas Villanueva, Senior Policy and Research Analyst  
Earthjustice

**From:** [Stop OAK Admin](#)  
**To:** [BAAQMD Planning](#)  
**Cc:** [REDACTED]; [Lin Griffith](#)  
**Subject:** East Oakland CERP Public Comments.  
**Date:** Sunday, December 7, 2025 7:21:18 AM  
**Attachments:** [CERP comments from Stop OAK expansion.pdf](#)

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Dear Bay Area Air District Planning & Climate Protection Division,

The Stop OAK Airport Expansion Coalition submits the attached comments to the Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan. Also included in these comments the Coalition is submitting proposed text to include in specific sections of the report to address these concerns.

These comments are co-signed by the following organizations:

Alameda County Interfaith Climate Action Network  
350 East Bay  
San Francisco Bay Physicians for Social Responsibility  
Sunflower Alliance  
Xochipilli, Chicano/Latino Men's Circle  
Bay Area-System Change not Climate Change  
Youth Vs. Apocalypse  
Scientist Rebellion Turtle Island

Please confirm you have received the attached letter, and for further information about these comments, please contact [REDACTED]

Sincerely,

Stop OAK Expansion steering committee



Dear Bay Area Air District Planning and Climate Protection Division,

The Stop Oak Airport Expansion Coalition submits these comments to the Public Review Draft Right to Breathe: East Oakland Community Air Quality Justice Plan. Additionally, the Coalition is submitting proposed text below to include in specific sections of the report to address these concerns.

1. **Address health threats from proposed expansion of Oakland San Francisco Bay Airport.** There is an implicit argument that the study can't get involved with emissions from OAK-based flights, even though most airport emissions come from flights, not ground operations. The report should clearly state that flight emissions are omitted from the analysis because the Air District has no authority to control emissions from flights. However, ***the report should compel the City of Oakland to exercise its authority to suspend the Oakland San Francisco Bay Airport expansion if air quality in East Oakland would be further worsened.*** This action would be consistent with the Environmental Justice Element of its General Plan. (Similarly, the Air District may not have direct authority to control illegal dumping, yet the report makes recommendations to the City about how to address that issue.) The report should not assume that the new terminal will be completed.
2. **To facilitate #1 above, the report should call on the Port of Oakland to perform a comprehensive Health Impact Assessment (HIA) of the airport expansion on East Oakland residents.** This assessment would include accounting for the well-documented pre-existing health inequities in East Oakland communities and analyze any cumulative effects of increased pollution on this population. The Alameda County Health Department has called on the port to perform this same assessment.
3. **The Air Quality Justice Plan should recommend suspension of all activity related to expanding operations and facilities listed in the Monitoring Project until a Health Impact Assessment (HIA) is completed.** Similarly, the recent legal agreement between the Port and the City of Alameda, which would divert OAK flights away from Alameda and over East Oakland, should be suspended until such time that the health impacts on East Oakland residents can be analyzed.
4. **Increase and geographically expand the number of pollution monitors including airport fenceline monitors. Initiate monitoring ASAP,** as the Community Steering Committee (CSC) prefers. Such monitoring is needed now to provide baseline data for future comparison and modeling. Include ultrafine particles and measure hourly

fluctuations over the course of at least one year to indicate peak levels of pollution and seasonal variations.

5. **Adopt monitoring methodology for ultra-fine particles based on airport, not roadway, studies.** In Appendix D regarding air monitoring methodology for ultra-fine particles (UFP): From a study of the Seattle-Tacoma Airport (Sea-Tac), UFP are particularly associated with landing airplanes, and are much more widely dispersed than UFP from roadways. This is because descending jets fly lower, and for longer periods of time, compared to takeoffs. The air monitoring efforts of the Air District should follow methods described in this study.
6. **Use updated threshold on annoyance to address noise pollution in report.** Although noise is mentioned as a community concern (Pg. 178), there are no action items to address this issue. A starting point would be to collect data recognizing that 65 decibels Day-Night average Level (DNL) is an outdated standard. The FAA's continued reliance on the 65 DNL threshold is no longer defensible for evaluating the noise impacts of airport expansion projects such as those proposed at Oakland San Francisco Bay Airport. The FAA's own 2021 Neighborhood Environmental Survey (NES) demonstrated that substantial community annoyance occurs well below 65 DNL, with its regression model indicating an equivalent response near 46 DNL. Despite this, both the FAA and the Port of Oakland have continued to apply the 65 DNL threshold in reaching findings of no significant impact. This approach disregards the FAA's own scientific record and fails to meet NEPA's requirement for using the best available information. Noise data and methods need to reflect actual community response to aircraft noise. Add this threshold to capture noise pollution and annoyance to Appendix D.

There are numerous specific locations in the report where these points should be included. A number of these locations are identified below. Proposed added text is shown in bold italics.

- I. Transportation and Mobile Sources – Oakland International Airport (pg 108). Add a concluding paragraph stating:

***“Given the air quality impacts of the airport, prior to any expansion of the facility, a comprehensive Health Impact Assessment should be conducted. Both the City of Oakland and the Port of Oakland have authority to require such a pause and a study—See Chapter 9.”*** (see items 8 & 9 below)

- II. Built Environment— add as action BE 3.7 (Pg. 145):

***“Pause expansion of the airport, which will attract additional aircraft daily thus necessarily bringing increased NOx, SOx, PM 2.5 and PM 0.1 ultrafine particles to homes and to gathering places of vulnerable populations, until the airport performs a Health Impact Assessment and recirculates a revised FEIR for the Modernization and Development Project with a plan for full mitigation of the increased air pollution its development will cause.”***

III. Public Health– add as action 3.5 (Pg. 171):

***“Any plans for expansion of operations or facilities at the establishments listed in the East Oakland Air Monitoring Project Section (3.2) that would increase pollution should be suspended until such time as a thorough assessment is conducted of the potential impact on the health of East Oakland residents. Such health impact assessments shall include accounting for the well-documented pre-existing health inequities in East Oakland communities.”***

IV. Transportation & Mobility T&M 6.1 (Pg. 187) To this section’s description of the Port Emissions Reduction Plan, add the following:

***“The Port of Oakland will pause the Modernization and Development Plan, which would increase emissions, until after it performs a Health Impact Assessment, incorporates data from that assessment into the project EIR, and recirculates the EIR.”***

V. Transportation & Mobility–T&M 7.3 (Pg. 189) – add specifics designated below in bold italics:

The East Oakland Air Monitoring Project (see PH 3.1) will include exploratory measurements of volatile organic compounds (VOCs) and particulate matter (PM) (including ultrafine particles (UFPs), a key aviation-related pollutant) around specific facilities and air quality concerns identified and prioritized by community members. Oakland International Airport is one of the identified facilities. ***Communities for a Better Environment (CBE) has partnered with the University of California, Berkeley and the Bay Area Air District to greatly improve the numbers and distribution of pollution sensors in East Oakland. The new sensor grid shall operate with hourly resolution to identify peak concentrations of pollutants, and operate for at least a year.*** Using information collected from this project, the Air District will analyze and evaluate data and summarize and report findings with attention to occurrences of unusually high levels of different pollutants, including UFPs, that may be associated with airport-related emissions. ***Findings from the overall project are expected to inform a specific Health Impact Assessment, improve efforts to reduce pollution emissions, and reveal any need for additional information. Expansion of the airport should be paused until these findings are analyzed and discussed.***

VI. Transportation & Mobility T&M 7.4 – (Pgs. 189-190)

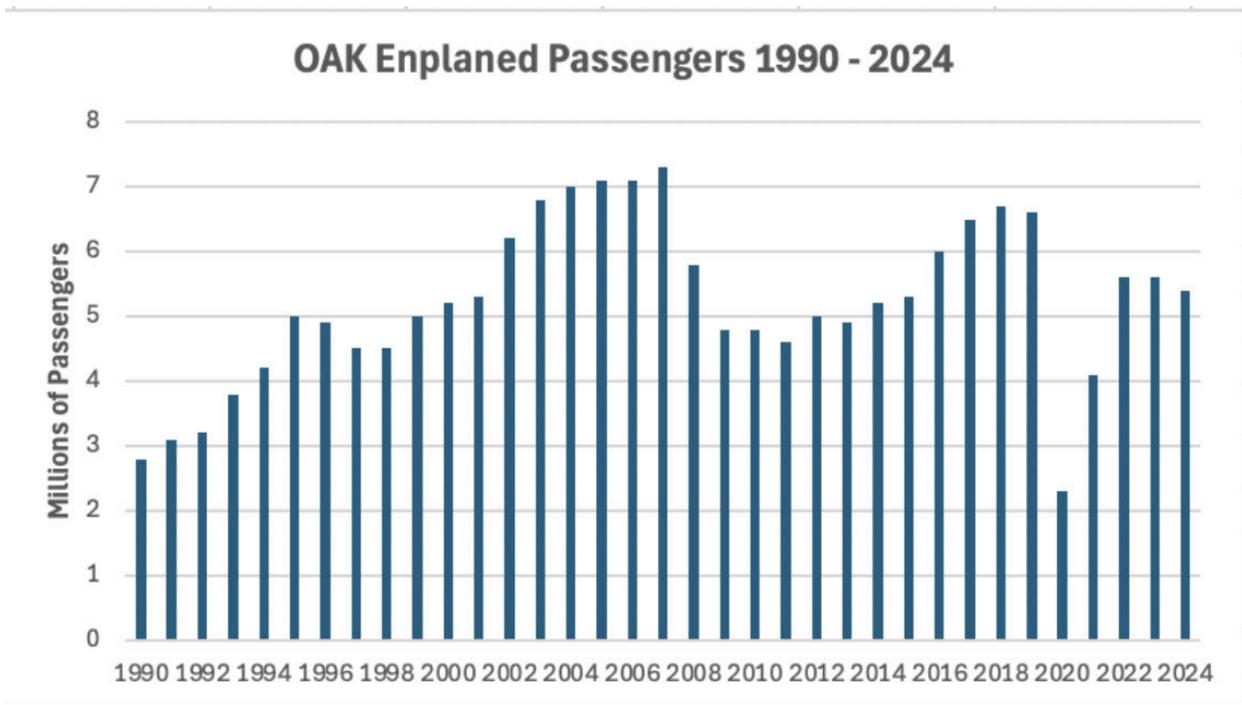
This focus area action states, “The Port of Oakland shall install fence line air quality monitor(s) no later than one year after the opening of the new terminal as described in the 2024 Oakland International Airport Terminal Modernization and Development Project Final Environmental Impact Report . . .”

This section has two problems. One is that the fenceline monitoring should begin immediately, and the other is that the report should not assume the opening of a new terminal.

Regarding the first problem, this action recommends delaying fenceline air quality monitoring. Since emissions from the Airport have already been identified as a problem, there is no excuse

for waiting. The report notes that the “CSC prefers” not waiting. This action item should be modified to read ***“Fenceline air quality monitoring that includes hourly sampling for VOCs, fine PM and Ultra-Fine PM should be installed immediately.”*** (see PH 3.1)

Regarding the second problem, the report should not assume that the Airport expansion will be implemented. There are currently three lawsuits challenging the FEIR, and, as noted above, the City and the Port still have to make decisions about whether to proceed with the project. Regarding the Port’s decision about expanding OAK, it is important to understand that the FEIR projected significant increases in flights, but these have not materialized. In fact, total passengers using the airport have declined recently and have not reached pre-Covid levels as shown in the graph below.



Note 2025 numbers through July show a 19% decrease compared to 2024.

***Reference to “one year after opening of the new terminal” (shown underlined above) should be deleted from this report.***

VII. Chapter 9 Implementation and Reporting – Government Collaboration and Agency roles – City of Oakland pg 208. add:

***“The City of Oakland, through its General Plan, has the authority to rule that the airport expansion can only proceed if it shows that air quality in East Oakland will not be further damaged.”*** This would be consistent with the Environmental Justice Element of the General Plan.

VIII. Chapter 9 Implementation and Reporting – Government Collaboration and Agency roles  
– Port of Oakland pg 209. Add sentence:

***“Notwithstanding the findings of the Environmental Impact Report pursuant to the airport expansion, the Port should pause the project to better determine the health impacts on East Oakland Residents as well as other considerations.”***

– Additional technical considerations –

1. Ultra-fine Particles

Suggestion for Appendix D regarding air monitoring methodology regarding ultra-fine particles (UFP). From [this study of the Seattle-Tacoma Airport](#) (Sea-Tac), we see that UFP are particularly associated with landing airplanes, This is because descending jets fly lower, and for longer periods of time compared to takeoffs. As a result, aircraft UFPs are much more widely dispersed than UFP from roadways. The air monitoring efforts of the Air District should follow methods described in this study. The Sea-Tac study as well as studies from LAX and Chicago Midway were also cited in the comment letter from the Alameda County Health Department.



## 2. Pollution Inventory Accuracy

The Emissions Inventories listed in Tables 5-7 (Pg.92), 5-8 (Pg.94), and 5-10 (Pg. 111) seem to be based almost exclusively on modelling using AERMOD. The projections presented represent annual amounts. These results should be confirmed with local monitoring before large-scale industrial changes (like the expansion of the airport) are approved. Hourly data is needed to reveal emission spikes that may exceed National Ambient Air Quality Standards.

The data for East Oakland in figures 5-3, 5-4, and 5-6 come from a single monitor. Having one monitor limits the confidence in these data. The Bay Area Air District admits that East Oakland is in many ways an air quality “data desert.”(1) Communities for a Better Environment has partnered with the University of California, Berkeley and the Bay Area Air District Air District to greatly improve the numbers and distribution of pollution sensors in East Oakland. The data from these sensors is needed ASAP to establish a credible baseline of community air quality before predicting or curtailing future pollution. The sensors should be sensitive to all classes of particulate matter (including UFP), NOx, SOx and VOCs and operate for at least a year. This would capture any variations related to seasonal shifts in temperature and wind direction. The data from this study would inform a Health Impact Assessment to enhance our understanding of the current emissions and improve future projections.

(1) [https://www.baaqmd.gov/~media/files/technical-services/east-oakland-monitoring-project/eo\\_amp\\_sensor\\_network\\_monitoring\\_plan-pdf.pdf?rev=9aaeca8a11a24f7485bfb0d74e05448e&sc\\_lang=en](https://www.baaqmd.gov/~media/files/technical-services/east-oakland-monitoring-project/eo_amp_sensor_network_monitoring_plan-pdf.pdf?rev=9aaeca8a11a24f7485bfb0d74e05448e&sc_lang=en)

We appreciate the effort that the Air District and Community Steering Committee have put into this report. We look forward to continuing to work with you to improve air quality in Oakland and the health of the adjoining communities.

Respectfully submitted,

The Stop OAK Expansion Coalition Steering Committee

Including the following co-signers:

Alameda County Interfaith Climate Action Network

350 East Bay

San Francisco Bay Physicians for Social Responsibility

Sunflower Alliance

Xochipilli, Chicano/Latino Men's Circle

Bay Area-System Change not Climate Change

Youth Vs. Apocalypse

Scientist Rebellion Turtle Island West



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## AB 617 East Oakland CERP

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**From** Colleen Liang [REDACTED] >

**Date** Mon 12/8/2025 8:24 AM

**To** Alicia Parker [REDACTED] >

**Cc** Joan Zatopek [REDACTED] >; Craig Simon [REDACTED]

 1 attachment (170 KB)

2025.12.07 Port Letterhead AB 617 Final Draft Comments.pdf;

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Alicia,

Please find attached the Port of Oakland's letter regarding the AB 617 East Oakland community emissions reduction plan: Right to Breathe: East Oakland Community Air Quality Justice Plan.

Thanks,  
Colleen

Colleen Liang  
Director of Env Programs and Planning  
Port of Oakland - *Everyone's Port*

[REDACTED]  
[REDACTED] [www.portoakland.com](http://www.portoakland.com)





# PORT OF OAKLAND

December 7, 2025

Alicia Parker  
Bay Area Air Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

Re: AB 617 East Oakland Community Emissions Reduction Plan

Dear Ms. Parker:

Thank you for the opportunity to review the Public Review Draft of the community emissions reduction plan (CERP) - **Right to Breathe: East Oakland Community Air Quality Justice Plan**. As described previously in the Port of Oakland's (Port) letter dated June 11, 2025, adjacent communities are a valuable partner to the Port in advancing zero-emission operations at the Port. The Port values engaging with the CSC as a non-voting member and participating in the process in the development of the strategies in the CERP.

The Port appreciated the opportunity to meet in June 25, 2025 and July 7, 2025 to discuss the draft strategies related to the Port, describe the limitations of the Port's authority, and discuss past, ongoing, and future initiatives in advancing zero emission airport operations. The Port will continue to engage and dialogue with CSC members on the proposed strategies.

Please note that Oakland San Francisco Bay Airport name change was approved by the Port of Board Commissioners at a July 2025 Board meeting. All references to *Oakland International Airport* in the final draft of the **Right to Breathe: East Oakland Community Air Quality Justice Plan** should be revised to *Oakland San Francisco Bay Airport*.

The Port looks forward to working towards a common goal of zero emissions operations at the Oakland San Francisco Bay Airport with CSC and neighboring communities.

Thank you,

Colleen Liang  
Director of Environmental Programs and Planning

Cc: Craig Simon, Director of Aviation  
Joan Zatopek, Aviation Planning and Development Manager



**Public Comment**

East Oakland CERP Public Review Draft

NAME: Njeri McGee-Tyner

COMMENT: Love the Urban Greening maps are well illustrated

CH. 7

UGW Funding sources are important to support Urban Greening workforce pathways and educational career pathways

*Helpful tip: Please include page numbers whenever possible to help us track your input.*

UGW 2.2 Urban Greening Funding (prefer short term)

November 13, 2025

East Oakland CERP Public Review Draft | Public Meeting

Glad to see the needle has moved in this focus Area. Looking forward to these actions rolling out the most.

**Public Comment**

East Oakland CERP Public Review Draft

NAME: SKY <sup>High fees on dumping at waste management ~~is~~ netly encourages dumping!!!</sup>

COMMENT: Enforcement of illegal dumping? much worse!!  
crimes will go on persisted in oakland.  
I feel encouraging people/companies to dump in proper locations would help more. more surveillance  
feels like a ~~big~~ Human Rights violation on par with living next to trash piles. No hate, thank you for

*Helpful tip: Please include page numbers whenever possible to help us track your input.*

your Hard work.

November 13, 2025

East Oakland CERP Public Review Draft | Public Meeting



Re: Final Draft East Oakland Community Emissions Reduction Plan Release!

From Armstrong, Erin, BOS Dist 4 [redacted]

Date Thu 2/5/2026 4:22 PM

To Alicia Parker [redacted] >; Bisseret Martinez, Mona <[redacted]> Hillmon, John <[redacted]>; Houston, Ken [redacted] >; [redacted] >; Pomar, Jasmine [redacted] >; Wells, Ricki <[redacted]>; mwier <[redacted]>; Hathaway, Kristin [redacted] >; Navarro, Sofia [redacted] >; [redacted] >; [redacted] >; Hirshfield-Gold, Shayna <[redacted]>; Rodriquez, Kelsev@DOT [redacted] >; Owen Goetze <[redacted]>; Jenkins, Kevin [redacted] >

Cc Haynes, Khalilha [redacted] >; Diana Perez-Domencich [redacted] >; Anna Lee <[redacted]>; Aneesh Rana <[redacted]>; Karissa White [redacted] >; Yami Henry [redacted] >; Colleen Liang <[redacted]>; Nguyen, Tram, Public Health, OOD <[redacted]>; Moore, Brian@ARB [redacted] >; Manuel Oliva [redacted] >; Henninger, Tona, BOS Dist4 <[redacted]>

1 attachment (981 KB)

NM\_LETTER\_BAAQMD\_CERP-CONCERNS\_2026.02.05.pdf;

**CAUTION:** This email originated from outside of the BAAQMD network. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

Please see the attached letter of concern from Alameda County Supervisor Nate Miley, regarding the Final Draft Plan.

The Supervisor hopes the CSC will have an opportunity to review and address these concerns. He does plan to attend the CHEJ Subcommittee on 3/11 and Board of Directors meeting on 4/1.

Sincerely,

**Erin Armstrong, MBA/MPP | Deputy Chief of Staff**  
 Office of Alameda County Supervisor Nate Miley, District 4  
 Alameda County Board of Supervisors

[redacted signature block]

[redacted footer block]



# Board of Supervisors

Nathan A. Miley  
Supervisor, District 4

Oakland Office

[REDACTED]

Eden Area District Office

[REDACTED]

Pleasanton District Office

[REDACTED]

February 5<sup>th</sup>, 2026

**To:** Bay Area Air Quality Management District  
AB 617 Community Steering Committee

**CC:** Alameda County Supervisor David Haubert, President, District 1  
Alameda County Supervisor Lena Tam, District 3  
Oakland City Council President Kevin Jenkins, President, District 6  
Oakland City Councilmember Ken Houston, District 7

**SUBJECT: Concerns Regarding Accuracy of the East Oakland Community Emissions Reduction Plan (CERP)**

Dear Bay Area Air Quality Management District and Members of the East Oakland Community Steering Committee,

I am concerned about inaccuracies present in the Final Draft Plan for the [Right to Breathe: East Oakland Community Air Quality Justice Plan](#) as presented on the Air District's website, and am concerned that the criteria used to identify "Facilities of Concern" are not being applied consistently with the data presented in the Plan

One example is in *Chapter 5: Air Quality Overview* where Argent Materials is characterized as a "Facility of Concern" for toxic exposure from toxic emission, despite not listed among the top ten emitters of toxic air contaminants in East Oakland. The inclusion is based on community testimony during CSC meetings, rather than on quantitative emissions or exposure metrics. This designation is then carried forward into Appendix F-1, where Argent Materials is included among four facilities for which CBE developed a Problem Statement, with the justification for inclusion being their status as a "Facility of Concern."

This circular reasoning is concerning and creates the appearance that the conclusions of the CERP are not being driven by empirical analysis. This approach raises concern about the integrity of the CSC's work and the CERP as a whole, and about whether the resulting recommendations are adequately supported by the evidence.

I have seen the positive impact that Argent Materials has had on East Oakland, which is why I am particularly concerned that conclusions in the Plan accurately reflect the available data. I have seen their commitment to socially responsible business practices, cleaning and beautifying the neighborhood, and hiring local community members.

I humbly request that the CSC and BAAQMD review the Final Draft Plan for accuracy, and ensure that recommendations are supported by clearly articulated, data-driven criteria that are applied consistently across all facilities.

Sincerely,

Nate Miley  
Supervisor, District 4