

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 & 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 & 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.</p> <ul style="list-style-type: none"> - How mold grows in illegal dump sites - Why this is an air quality issue 	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"> - Health impacts on nearby residents - EJ concerns - Mental health impacts - Harm reduction: the power of community-led clean up <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&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 & Industrial (C&I) actions are focused on reducing emissions from facilities of concern. For example:</p> <ul style="list-style-type: none"> - C&I Strategy 1 is focused on fugitive dust, which may help mitigate emissions at Davis Street Transfer Station and Argent Materials. - C&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&I 2.1 is intended to prioritize implementation. - C&I Strategies 3 and 8 would reduce emissions through enhanced permitting and compliance programs.

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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&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&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&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"> - 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 - 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. 	<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&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&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 Phase 2 of its General Plan Update, 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&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&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&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&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&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&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&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&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 & 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
Stop OAK Expansion Comments			
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>Stop OAK Expansion Response 1</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>Names: 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>Stop OAK Expansion Response 2</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>Names: 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>Stop OAK Expansion Response 3</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>Names: 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, <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>	See response Stop OAK Expansion Response 1 and Response 3.
Aaron Reaven, Stop OAK Admin	Stop Oak Airport Expansion Coalition	Built Environment– add as action BE 3.7 (Pg. 145): <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> Lead: Port of Oakland Timeframe: Medium term (2-3 years)	See response Stop OAK Expansion Response 1 and Response 3.
Aaron Reaven, Stop OAK Admin	Stop Oak Airport Expansion Coalition	Public Health– add as action 3.5 (Pg. 171): <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>	See response Stop OAK Expansion Response 2.

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: <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>	See response Stop OAK Expansion Response 1 and Response 3 .
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. <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> 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. <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>	See response Stop OAK Expansion Response 2 .

Name	Organization	Comment	Response
		<p><i>additional information. Expansion of the airport should be paused until these findings are analyzed and discussed.</i></p>	
<p>Aaron Reaven</p>	<p>Stop Oak Airport Expansion Coalition</p>	<p>Transportation & Mobility T&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. <i>Reference to the “opening of the new terminal” should be deleted from this report.</i></p>	<p>See response Stop OAK Expansion Response 1.</p>
<p>Aaron Reaven</p>	<p>Stop Oak Airport Expansion Coalition</p>	<p>T&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 <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></p>	<p>See response Stop OAK Expansion Response 2.</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: <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> This would be consistent with the Environmental Justice Element of the General Plan.	See response Stop OAK Expansion Response 1.
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: <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>	See response Stop OAK Expansion Response 1 and Response 3.
Aaron Reaven	Stop Oak Airport Expansion Coalition	Technical Concern 1) Noise Pollution. Add this to Appendix D regarding noise measurement thresholds, relating to SFO: <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>	<p>The concern is related to noise due to truck idling. Several actions in the Plan could help reduce idling:</p> <p>Action T&M 1.3 involves better managing trucks in East Oakland, which could include changes to reduce idling;</p> <p>Action T&M 1.5 is designed to identify locations to install no idling signs; and</p> <p>Action T&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><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></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 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.</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>

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		<p>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, 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>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</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&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>

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			<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 Stop OAK Expansion Response 1 and Response 3.</p>

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		<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 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.</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 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</p>	<p>See response Stop OAK Expansion Response 1 and Response 3.</p>

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		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 Stop OAK Expansion Response 1.
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 comment letter 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.

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		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 Stop OAK Expansion Response 2.
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 Stop OAK Expansion Response 2.
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.

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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&M 1.3 involves better managing trucks in East Oakland, which could include changes to reduce idling;</p> <p>Action T&M 1.5 is designed to identify locations to install no idling signs; and</p> <p>Action T&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