

January 31, 2022

Via E-Mail

Ms. Joan Zatopek
Aviation Planning and Development
Manager, Port of Oakland
Oakland International Airport

Re: OAK Terminal Development Project

Dear Joan:

We submit this letter on behalf of the Citizens League for Airport Safety and Serenity (“CLASS”), whose main mission is to protect the 3,000 Community of Harbor Bay Isle households from excessive aviation noise originating from the Oakland Airport (“OAK”). As you know, CLASS submitted comments on the Notice of Preparation (“NOP”) for the Terminal Development Project (“Terminal Project” or “Project”) a few months ago. Those comments requested greater detail in the Project description and a thorough evaluation of environmental impacts, particularly for consistency with applicable plans, air quality, greenhouse gas emissions, noise, safety and other issues.

We appreciate OAK staff’s cooperation in supplying documents in response to our Public Records Act (“PRA”) requests. In reviewing the response documents, CLASS has additional concerns that have arisen since we submitted comments on the NOP. This letter explains CLASS’s additional concerns and identifies specific project features that OAK should include and evaluate as part of an informative and comprehensive DEIR.

The Proposed Project Must Be Consistent with Oakland International Airport’s (OAK) Master Plan

The OAK Master Plan, published in 2006 provides long-term (20-year) guidance for land-use at the airport. OAK Master Plan at 1. The Master Plan was prepared in accordance with the Federal Aviation Administration (FAA) Advisory Circular (AC) No.150/5070-6A regarding Airport Master Plans. Id. The FAA guidance specifies that: “The goal of a master plan is to provide the framework needed to guide future airport

development that will cost-effectively satisfy aviation demand, while considering potential environmental and socioeconomic impacts.” FAA AC150/5070-6B at p.2.

OAK invested a substantial amount of time and resources in the Master Plan process. Several years were spent developing a vision for future development at the airport, modeling various scenarios, engaging with stakeholders, and evaluating the feasibility of the Plan. OAK must now follow its own Master Plan and include the features identified within it as necessary for smooth operations at the airport.

The OAK Master Plan was developed with the assumption that future development plans would include construction of a “new taxiway parallel to and east of Taxiway B”. Master Plan at 3,4, 43, 54-58, 69, 130. This is because when analyzing potential delays on all runways to identify congested areas, OAK concluded that a new taxiway parallel to Taxiway B is the best way to alleviate congestion from anticipated delays on Runway 11-29. Id. at 72. The Master Plan states that “[B]ased on measured taxi distances and estimated taxi times, as well as the airfield simulation described above, it was demonstrated that a taxiway parallel to Taxiway B on South Field (e.g., between Taxiways T and B2) would resolve most of the Taxiway B congestion and head-to-head taxi issues.” Master Plan at 4, 72. In fact, the Master Plan assumed construction of the new taxiway parallel to Taxiway B for purposes of simulation modeling to simulate all of the studied development concepts and includes the parallel taxiway as one of the recommendations moving forward. Id. at 3, 4, 70, 133, and 134.

Avoiding additional delays is critical to minimizing taxi time and to maximizing compliance with voluntary noise abatement procedures, which require corporate jets and large turboprops, landing and parking at the North Field, to depart from Runway 30 (taxiing from North Field to South Field southbound on Taxiway B). Without the addition of a taxiway parallel to Taxiway B, adding traffic from the proposed 17 new gates is likely to cause delay and discourage the use of Runway 30 by North Field jets. Moreover, any Project features that could increase departures from the North Field would also pose safety concerns for adjacent communities. As such, the Project description needs to include features that support use of the longest (safest) runway at OAK, which is Runway 30. To this end, the EIR should include the addition of a taxiway parallel to Taxiway B as well as other means of further reducing taxiing times and delays in order to maximize compliance with the noise abatement procedures in place at OAK and to ensure public safety.

In addition, the Master Plan included an Airfield and Airspace Simulation Report that concluded that a parallel Taxiway B would be required to efficiently utilize the gates at a new terminal and that it would be the most effective way to avoid congestion and

delays. Master Plan, Appendix I - SIMMOD Simulation Airfield and Airspace Simulation Report, January 6, 2006, at 29 and 30. We expect that an updated simulation and analysis using OAK's current forecast and projections would return a similar result. Such an analysis will help the public and decisionmakers understand how the forecasted increase in flights and corresponding departure delays at OAK would be managed.

In summary, the Master Plan included extensive modeling and analysis of various possible airport configurations to evaluate potential airport plans designed to result in a safe, efficient airport. The Master Plan concluded that a new parallel Taxiway B would be needed to alleviate congestion. The Master Plan also specifies that "[T]his taxiway would also be *required* to support a new terminal in this vicinity, if such a terminal is proposed and approved." Master Plan at 72; emphasis added. Therefore, implementation of a new taxiway parallel to Taxiway B is critical as a feature of the proposed Terminal Development Project and the DEIR must include a new parallel Taxiway B per the Master Plan.

New cargo facilities should be limited to replacement of relocated facilities per the Master Plan.

The OAK Master Plan specifies that one of the key assumptions used in the airfield simulation model used to identify future improvements is that future development under the Master Plan would not include new cargo. Master Plan at 69 ["Air cargo and general aviation aircraft would taxi to/from and park at existing air cargo and general aviation facilities, as appropriate, except for the relocated cargo building described above (i.e., no new air cargo or general aviation facilities are assumed)...]. Thus, the Master Plan makes clear that development of the new terminal area would include relocating cargo facilities, but not an expansion of cargo operations.

From our review of the PRA response documents, we are concerned that the OAK Terminal Project might do more than just replace existing cargo facilities. In an email from UPS to OAK staff, T. Foote provides E. Lillie with UPS' 5-10 year requirements for aircraft and employee parking, vehicle storage, and facility size. Email from T. Foote, UPS representative to E. Lillie, OAK representative dated August 6, 2019. The email specifies that UPS current OAK facility is 48,000 square feet, but that UPS would like their new facility to be up to twice as large (between 70,000 and 100,000 square feet). Attached as Appendix A. In addition, OAK prepared several draft concept plans of the relocated cargo facility that show substantially larger facilities. See, Concept Plans for Cargo/Ground Service Equipment Facilities, attached as Appendix B. Please ensure that the Project description evaluated in the DEIR includes only replacement facilities consistent with the Master Plan. Building new, expanded facilities to

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enable/accommodate substantial growth in UPS operations would be inconsistent with the OAK Master Plan.

Conclusion

As you know, implementation of the noise abatement procedures as outlined in the Settlement Agreement between OAK, CLASS, KJOB, and the City of Alameda are critical to protecting Alameda residents, particularly residents of Harbor Bay Isle, from excessive overflights and related safety concerns and aircraft noise. CLASS wants to work with OAK to ensure that the proposed Terminal Development Project will maximize, not undermine, compliance with the critical noise abatement procedure that calls for North Field based jets to request departure from the South Field. The new taxiway parallel to Taxiway B must be part of the Terminal Development Project to ensure consistency with the Master Plan and avoid an increase in noncompliance with the noise abatement procedures and in overflights and noise events in Alameda neighborhoods. Similarly, consistent with the Master Plan, the Terminal Development Project should only include replacement cargo facilities, not expanded facilities to enable/accommodate substantial growth in UPS operations. CLASS would appreciate the opportunity to discuss these issues with you.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



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