



Via Electronic Filing with the California Air Resources Board
06/24/2022

RE: California Air Resources Board (CARB) Draft 2022 Climate Change Scoping Plan Update

Dear Chair Randolph and Members of the California Air Resources Board,

Stop OAK Expansion Coalition is a grassroots organization of 50 supporting partner organizations¹ that recently formed after the Port of Oakland announced the intention of adding a terminal with 17 new gates to the current capacity of Oakland International Airport².

We are concerned about the increase of air pollution and greenhouse gas emissions expected with the increase in flights. So we commend the stated intention in the California Air Resources Board (CARB) Draft 2022 Climate Change Scoping Plan Update of prioritizing equity and health for minority and low-income communities. The CalEnviroScreen ranking of East Oakland, which is adjacent to the airport, identifies it as just such a priority community. Enlarging the airport capacity for the benefit of the privileged people who can afford to fly increases inequity. And the much higher prevalence of PM2.5 air pollution in airport-adjacent communities predicts an inequitable increase in asthma and other health problems.

Increased flights also entail increased emissions of greenhouse gasses. In the near term, green hydrogen fuel, adequate battery storage, and appropriate biomass sources for sustainable airline fuel are all problematic. It is doubtful that commercial airlines, while set on ambitious growth, will be able to reduce emissions significantly before 2045 which comes too late to avoid extreme climate breakdown. Passenger aviation accounts for 11% of SF Bay Area³ greenhouse gas (GHG) emissions (2019), but represents an even larger share of global warming contribution due to high altitude effects⁴. Adding terminal gates will certainly increase greenhouse gas emissions, making it more difficult to reach California targets.

We urge CARB and other decision makers to

- decarbonize the aviation industry.
- reduce flights to a minimum.
- avoid over reliance on untested technological solutions such as carbon capture and alternative fuels.

¹ <https://www.stopoakexpansion.org/partners>

² <https://www.oaklandairport.com/terminaldevelopment/>

³ <https://theicct.org/sites/default/files/publications/Aviation-CO2-US-feb2021.pdf>

⁴ <https://www.sciencedirect.com/science/article/pii/S1352231020305689?via%3Dihub>



- properly tax jet fuel and airplane tickets to make lower carbon modes of travel more competitive thereby reducing pollution and emissions. California's excise tax on jet fuel, at only \$0.02 per gallon, is one of the lowest in the country among states that have such a tax.⁵ And even more concerning, the largest users of fuel—airlines—are exempt from this tax altogether⁶.
- incentivize the shifting of short- and middle-haul flights to rail. Currently 4 of the top 10 destinations of the Oakland airport are in Southern California which will be served by California High Speed Rail.
- levy a frequent flyer tax⁷ to ensure the biggest polluters pay their fair share, and not pass the burden on to those who hardly fly at all.

We appreciate your work on environmental justice and climate and share your desire to see drastic emissions reductions from the airline industry. We urge you to consider strengthening this important bill so that it can have the greatest impact.

Sincerely,

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⁵ <https://www.eia.gov/petroleum/marketing/monthly/xls/aviationtaxes.xls>

⁶ <https://www.cdtfa.ca.gov/taxes-and-fees/aircraft-jet-fuel-faq.htm>

⁷ <https://neweconomics.org/2021/07/a-frequent-flyer-levy>