



SIERRA CLUB

LOMA PRIETA CHAPTER

SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

January 17, 2020

David Keyon
Environmental Project Manager
Department of Planning, Building and Code Enforcement
City of San Jose
By email: David.Keyon@sanjoseca.gov

Re: EIR for the Amendment to the Airport Master Plan

Dear Mr. Keyon,

Sierra Club, Loma Prieta Chapter, thanks the City of San Jose for the opportunity to review the Draft EIR for the Amendment to the Airport Master Plan for the Norman Y. Mineta San José International Airport (File No. PP18-103). The plan aims to 1) extend the horizon year and demand forecasts from 2027 to 2037; 2) incorporate the set of airfield configuration changes recommended in the Runway IncurSION Mitigation/Design Standards Analysis Study; and 3) update the layout and sizing of various landside facilities to adequately serve the projected 2037 demand.

The Loma Prieta Sierra Club chapter advocates on behalf of sustainable land use practices that could emanate from major development projects. As an environmental organization working towards reducing local greenhouse gas and other emissions, we encourage the development of higher density, mixed-use development near major transit stations so as to sequester carbon and habitats in wetland, grasslands, and woodlands. Our 17,000 members have a strong interest in projects that could improve the environment for us to enjoy and explore.

Please review the following comments related to DEIR analysis of Greenhouse Gas Emissions.

This project proposes to increase greenhouse gases and pollution at a time when the state is facing an existential threat of fires and sea level rise from Climate Change. It is irresponsible to say the least. The plan creates a “significant unavoidable impact” on the environment that could result in carbon emissions equivalent to putting more than 28,000 cars on the road. The expansion project will raise Bay Area emissions 0.15% over 2015 levels according to the Bay Area Air Quality Management District. The project will also increase fine particulate pollution, which can get pulled deep into lungs and exacerbate health impacts in already one of the worst air quality regions in the country. These emissions can be reasonably foreseen and should be addressed with feasible mitigations. We need to take bold steps to ensure our grandchildren have a future.

Additional Feasible Mitigation Measures

1. Frequent free buses to the airport. Regional buses boarding and departure should be heat mapped and routes changed accordingly to accommodate rapid passage through the airport.
2. Restoring large sections of the adjacent Guadalupe River Floodplain with requisite wetlands and woodlands.
3. Finishing a year-round separated bike lane to and through the airport. Currently the adjacent trail is not usable during wet weather and the bike path is disjointed with the airport acting as both a north south and east west bike circulation barrier. The description on page 300 of bicycle access is more vaguely about complete streets rather than immediate free, secure, and safe access to the airport as a means of reducing emissions.
4. Congestion pricing parking after the lots are 50% full and advising prices when passengers check their flights.
5. Gasoline cars should pay much more than electric to offset their operational NOx and construction PM10 emissions (page 343)
6. Work with the state to congestion price adjacent freeways and implement camera actuated speed enforcement to reducing emissions significantly while improving transit as major cities have done around the world.

Carbon Offsets

The emission accounting plays a shell game. It only counts on-the-ground pollution because airplane flights — which account for a huge chunk of emissions for most people who fly — are federally regulated. However, these emissions can be reasonably foreseen and are not phantom to the City of San Jose's Climate Action Plan. They add to emissions threatening life on the planet and the ability to meet the Plan. Aviation is one of the fastest growing sources of greenhouse gas emissions globally. Airline emissions are 2.5% of global emissions an amount equal to Germany's emissions. By 2050 the sector is supposed to triple, an amount equivalent to the emissions of India. San Jose is poorly positioned here with the highest passenger growth among the nation's top 50 airports in the past four years, according to the airport's analysis.

Airline emissions are regulated by the International Civil Aviation Organization (ICAO), rather than UN Climate Change and the Paris Agreement. If San Jose does not take responsibility for the carbon footprint of flights to and from their city these emissions will be left to incinerate the lives of future generations.

ICAO has proposed a market-based approach which gives businesses the flexibility to choose the most economically efficient way to reduce emissions and ultimately saves money for consumers. Emissions reductions can be achieved at a lower cost outside the aviation sector, particularly given the projected growth in air traffic in coming decades. Participation in the ICAO program will be voluntary. The United States, Canada, Mexico, China, Singapore, and 44 European nations have committed to sign up from day one (c2es.org/2016/10/a-new-flight-path-for-reducing-emissions-from-global-aviation/).

The Bay Area is the number one business destination in the world. What you do here will resonate around the world. That's why San Jose should embrace the centerpiece of the ICAO agreement reached October 6, 2016 for a market-based measure that will allow airlines to offset any growth in

their emissions beyond 2020 levels with reductions in other sectors. City of San Jose should work with other cities in the region to adopt the agreement while at the same time implementing it locally by requiring area business and frequent customers to buy offsets for their emissions that can be used to fund the Feasible Mitigations listed above.

Fees

Giving away free pizza does not help people reduce weight. It's irresponsible when airline emissions are increasing to reduce fees for airlines that use cleaner fuels or electric and hybrid ground vehicles as mentioned in the San Francisco Chronicle by Mallory Moench Jan. 14, 2020. For one the cleaner fuel technology is currently a pipe dream and its eventual implementation is no way commensurate with the problem it's seeking to solve. For another the ability to get electric vehicles to scale to make a difference is closer to 400 years, time we do not have. This plan already is a massive subsidy to area business at the expense of the resident's environment. Fees should be increased and based on recovering the cost of the expansion and the need to feasibly mitigate impacts.

Traffic

Traffic to and from the airport expansion is not restricted to the city of San Jose but is drawn from the cities in Santa Clara County. The cumulative impact of emissions and noise needs to be reflected in the analysis. The EIR says that NOx emissions would be exceeded but this only addresses the airport traffic. This traffic is sourced from the region and creates emissions around the region which are not analyzed.

Alternatives

We encourage the City to select a less ambitious Airport expansion plan – if any – and not compromise the health of our people and future of our planet. If the expansion moves forward, the City should develop a plan for phasing parking and gate expansions to avoid over-investment and unnecessary environmental impacts, in case projected increases in air travel don't materialize.

In conclusion, San Jose can't fix global warming by itself. But the City needs to do what is feasible and doable with current technology.

Regards,



Gladwyn d'Souza
Co-Chair, Loma Prieta Chapter, Conservation Committee