



December 16, 2023

Re: Oakland Port DEIR Letter: San Francisco Bay PSR

San Francisco Bay Area Physicians for Social Responsibility finds this Port of Oakland Draft Environmental Impact Report inadequate because it does not fully address the current health consequences and potential future health consequences of the proposed expansion to accommodate large cargo ships.

Foremost, this Draft EIR does not sufficiently address the current truck and rail traffic burden nor the potential increase of this traffic in and out of the Port through the adjacent West Oakland community. In addition to the current air pollution from traffic related to the Port, the Report neglects the potential increased air pollution from the proposed expansion.

West Oakland already suffers disproportionate and excessive fossil fuel emissions and is one of the most pollution-burdened locations in California¹, with elevated levels of diesel particulate matter, fine particulate matter (PM2.5), and toxic air contaminants due to the activity within, and truck and train transportation in and out of the port. The health associations with PM2.5 and diesel emissions are well known and include increased asthma², chronic lung disease³, lung cancer^{4,5}, heart attack and stroke⁶, cognitive decline⁷, premature deliveries⁸ and low birth weights⁹, and developmental delay¹⁰ and autism spectrum disorder¹¹.

West Oakland residents are 99% more likely to have asthma and 96% more likely to be born with low birth weight compared to other people in the state.¹² Half of new childhood asthma cases in West Oakland—a community that is 70% people of color—are due to traffic-related air pollution, compared to about 20% of new childhood asthma cases in the nearby more affluent communities.¹³

¹ [CARB California Air Protection Program Communities](#) , [Cal. Health & Safety Code, § 44391.2\(c\)](#)

² [The Links Between Air Pollution and Childhood Asthma](#), US EPA

³ [Wang Q, Liu S. 2023. The Effects and Pathogenesis of PM2.5 and Its Components on Chronic Obstructive Pulmonary Disease. *Int J Chorn Obstruct Pulmon Dis*](#)

⁴ [West Oakland Community Action Plan, Owning Our Air, BAAQMD and West Oakland Environmental Indicators Project \(Figure 5-4\)](#)

⁵ [Summary: Diesel Particulate Matter Health Impacts](#), CARB

⁶ [Air Pollution and Cardiovascular Disease Basics](#), US EPA

⁷ [Abolhasani E, et al. 2023. Air Pollution and Incidence of Dementia. *Neurology*](#)

⁸ [Costello JM, et al. 2022. Residential particulate matter, proximity to major roads, traffic density and traffic volume as risk factors for preterm birth in California. *Paediatr Perinat Epidemiol*](#)

⁹ [Lee J, et al. 2022. The Association between Ambient PM2.5 and Low Birth Weight in California. *Int J Environ Res Public Health*](#)

¹⁰ [Ha S. 2020. Air pollution and neurological development in children. *Developmental Medicine & Child Neurology*](#)

¹¹ [Cheng-Kuan, et al. 2021. Association between exposure to ambient particulate matters and risks of autism spectrum disorder in children: a systematic review and exposure-response meta-analysis. *Env Res Letter*](#)

¹² CalEnviroScreen data, cited in [Rob Bonta Attorney General letter to the Army Corps of Engineers May 2022](#) (page 3)

¹³ [Environmental Defense Fund analysis using local health and hyperlocal air data](#), March 31, 2021

While the Oakland Port has electrified some equipment, it has fallen behind other California ports that have executed more ambitious electrification goals. Much of the port equipment, trains and most drayage trucks are still diesel. Moving too slowly on electrification, while simultaneously expanding Port operations, would push greater health and environmental impacts onto the shoulders of the already overburdened frontline West Oakland community.

In conclusion, this Draft EIR is deficient in addressing the current health consequences of Port operations and potential future consequences from the proposed expansion. This report needs to be amended to describe the full range of current sources of air pollution related to the Port, the potential increase in air pollution burden to the West Oakland community and surrounding communities, and the substantial potential health consequences.

Sincerely,

A handwritten signature in black ink that reads "Robert M. Gould, MD". The signature is written in a cursive style with a large, stylized initial "R".

Robert M. Gould, MD
President
San Francisco Bay Physicians for Social Responsibility