

March 1st, 2019

William Gilchrist
Director, Planning and Building Department
City of Oakland
250 Frank H. Ogawa Plaza, Suite 3315
Oakland, CA 94612

RE: Preliminary Draft Downtown Oakland Specific Plan

Dear Director Gilchrist:

Thank you for the opportunity to comment on the Downtown Oakland Specific Plan Alternatives Report. This is the third such letter that SPUR has submitted as the draft of the plan has progressed. We feel that the Specific Plan is an impressive piece of work and appreciate its comprehensive nature. In general, the plan is well organized, covers a wide-range of issues and is generally well communicated. We are very pleased that the plan acknowledges both the regional significance of Oakland's downtown while also laying out a robust plan to support equity goals so that downtown can maintain and build upon what makes this place so special in the first place: the people that live, work and visit this important area.

What follows are a series of suggested improvements that we think will help this plan fully realize a vision and strategy for downtown Oakland to become a downtown for everyone.

Vision

The draft plan has the potential to be more forward looking, visionary and ambitious. In our 2015 Report, *A Downtown for Everyone*, SPUR noted that downtown Oakland is poised to take on a more important role in the region — but the future is not guaranteed. This vision should build on what makes Oakland special, embracing the city's diversity and creativity that make Oakland a national destination. To help ensure that downtown Oakland fully realizes its potential we proposed a number of big ideas for the future. We are pleased to see that the draft Specific Plan Alternatives Report included one of them: reimagining the I-980 right of way as a multimodal transportation corridor that opens up publicly owned land to other uses and reconnects West Oakland to downtown. We would encourage the Planning Department to also explore two additional big ideas, which are as follows.

1. Begin planning for a second Transbay rail tunnel that serves downtown, connects through Howard Terminal and converts a portion of the terminal site into a hub for major regional transportation networks. The plan should embrace the fact that downtown Oakland is a critical regional center and as such it will need to make space to accommodate a great

Transbay station and a thriving surrounding area. How or if Oakland embraces this vision will not only affect people in Oakland but also the entire region as Oakland is the center of the region's rail network.

2. Bury the railroad tracks and Highway I-880 underground along the Oakland waterfront. This move would not only better reconnect Oakland to its waterfront and improve the quality of place in Jack London but also vastly improve the speed and quality of the Amtrak rail service that must currently slow down significantly to make it through congested areas. This transformative move would also open up new possibilities for a city that has borne the negative impacts of freeway building, urban renewal and other planning policies in the 20th century.

Land Use

We are pleased that the plan contemplates an amount of future residential and employment growth that is similar, if not more ambitious, than what we called for in our *Downtown for Everyone* report. Adding a sufficient intensity of housing and jobs in this area is critical to support the city's economic development goals and to address Oakland's structural deficit. We do have a set of suggestions for improvement:

1. The current maps make it difficult to understand the land use changes that are being proposed. We feel the plan could do a better job of illustrating the impacts of the changes contemplated in the plan. It would be helpful to include a series of maps (at the same scale and orientation) that show where development intensity is proposed to increase and where it is proposed to decrease. While we appreciated the inclusion of the development program calculations on page 287, it is difficult to discern this information spatially from the existing materials. We also note that the development program graphic on page 288 is a different orientation from the other maps in the plan, making it difficult to tie this information to the other information provided. It would also be helpful to include a map that shows the relationship between the intensity of proposed uses and the existing transit network.
2. We are encouraged by the idea of making great new places in downtown Oakland, like Victory Court. However, the current drawings included in the plan don't convey all that is possible in these places or serve to inspire action. We encourage staff to work with consultants to develop images that will better show the texture of the places and how people will interact in the place.

We have specific comments on office uses, housing and the density bonus scheme, which may be found below.

Office Space

SPUR believes that downtown Oakland can and should accommodate at least 50,000 more jobs and become a more significant commercial employment center. We are pleased that the plan calls for roughly 55,000 jobs in the plan area. However, we are concerned that the current draft of the plan does not reserve enough sites for office development and as a result may not realize its job goals over time. Though the plan calls for over 17 million square feet of office space, only around 2 million of that space is actually reserved for office uses. The remaining space is slated to be built in areas zoned for mixed use, which could lead to a slate of buildings that are predominantly residential, foreclosing the opportunity to develop a sufficient amount of office in one of the most transit rich locations in the entire region. We recommend that the city work with consultants to determine how many sites should be reserved for office to meet a necessary minimum target for office development (such as 10 million square feet). In particular, the staff should identify and reserve for office the parcels that can accommodate larger floorplates (at least 20,000 square foot). The staff should specifically local large floorplate sites closest to the BART stations and the Broadway corridor should also be prioritized for office.

Housing

SPUR strongly supports the creation of new housing in Oakland. We note that the housing creation goal in the Downtown Plan is greater than what we called for in our *Downtown for Everyone* report (29,000 units in the Downtown Plan versus housing for 25,000 new people in *A Downtown for Everyone*). We believe great downtowns should accommodate a mixture of uses, including places for living, working, recreation and more. However, the city may need to rethink its housing target for this plan area if more sites are reserved for office (as we recommended above). To that end, it might be useful to consider housing goals just within the downtown boundaries, but also in areas immediately adjacent to downtown that could support greater housing intensity, but are not suitable for office. One approach is the downtown plan itself could identify the additional housing capacity added in adjacent community plan areas.

An additional idea to consider for creating affordable housing within the downtown is to allow for the building of affordable housing at 75' by right, regardless of the underlying height restrictions. This would potentially make it viable for affordable housing to compete for residential sites and also to build at an intensity that would maximize each site's potential for affordable housing. Such a proposal could also be evaluated for adjacent neighborhoods, using affordable housing impact fees generated in the downtown to support affordable development.

Density Bonus

SPUR has concern about the density bonus scheme contemplated in this plan. While SPUR supports a robust community benefits package as part of this plan, we fear that a density bonus scheme has the potential to deliver the worst of all possible worlds – development that is not of sufficient intensity in the downtown core with no community benefits. This “worst of all possible worlds” could happen in situations where developers chose to not take advantage of the density

bonus (because it is financially disadvantageous to do so and/or because it is more financially feasible to build at lower densities than what is allowed in the plan).

We recommend that the city work with a real estate economist to carefully calibrate the density bonus scheme to ensure that it is financially advantageous to take advantage of the increased height and bulk offered. The financial feasibility of the community benefit requirements is critical because development of sufficient intensity should be encouraged in the downtown core. The economist should analyze the entire “stack” of community benefits being contemplated, including any affordability requirements, to ensure that the community benefits do not encourage developers to not utilize the bonus (or not build at all). The city should also look at other potential incentives to make the density bonus financially feasible, including the use of an EIFD or other mechanisms.

We encourage policymakers to keep an eye on the long run and to understand that the real economic benefit for Oakland lies in ensuring that projects get built so that the increased property tax payments that will come as a result of new development, become reality. It is in the potentially large-scale increase in property tax rolls downtown, rather than in one-time fees and exactions, that the real long-term benefits to Oakland lie.

Streets & Mobility & Parking

In our *Downtown for Everyone* report, SPUR advocated that the Downtown Specific Plan that Oakland should make it easy to get to and around downtown through an expanded transportation network. Downtown Oakland is one of the most transit-accessible parts of the region, yet only 24 percent of downtown employees take transit to and from work. Over time, downtown should strive to increase the share of commuters who take transit, walk or bike to more than 50 percent. To achieve this, we recommend the city create a comprehensive Transit Plan for downtown Oakland. This plan will require coordination between the city and transit operators to redesign the local bus system, build out the East Bay bus and bus rapid transit network, create a world-class biking network, and close or remove some freeway off-ramps to regain land in downtown. It will also be crucial for the city’s new Department of Transportation to create a capital plan to prioritize and identify funding for the many infrastructure projects currently under consideration downtown.

Additionally, this plan should more explicitly think about the future of transportation – including autonomous vehicles, the substantially reduced need for parking for personal autos and what we do with land that becomes available as the need for parking is reduced.

Overall, SPUR feels that the plan presents a host of best practices to encourage sustainable, multimodal transportation options, which is reflected in the quality of the renderings. However, a clear plan should be outlined for the reasonable progression of these goals. Specific policies to consider include the following:

1. Transit Service Improvements

- Include a measurement of travel time on public transit between low-income areas of Oakland and downtown.

2. Bicycle Network Improvements

- The bicycle network is not complete. Too many bicycle lanes just end and bicyclists find themselves on busy streets; on some streets the bike lanes start and then stop. This is not safe and discourages bicycling. Downtown Oakland should have a continuous, complete and predictable bicycle network.
- Consider using the current one-way street network and regular grid of downtown Oakland to benefit cyclists (and pedestrians) by either restricting cars from some streets totally after conversion (e.g., Webster becomes car-free, and Franklin has two-way car traffic), or by dramatically increasing the amount of road space taken up by sidewalks and bike lanes.

3. Pedestrian Network Improvements

- Include a vision for Safe Routes to Schools (SRTS);
- Illustrate how improvements could strengthen pedestrian connections under 880 and across 980.

4. Carpooling & Carsharing

- Designated carpool parking at residential and office developments;
- Promotion of carpool programs such as Waze or Scoop;
- Include carshare services (e.g. Zipcar) in the city's allocation of parking spaces.

5. Transportation Demand Management

Include a comprehensive TDM program to encourage sustainable modes such as transit, biking, walking, carpool, and micro-mobility options for new residents and employees. The plan currently mentions some TDM-related policies. These include:

- Revise city codes to require one long-term bicycle parking space per unit to provide adequate numbers of bicycle parking spaces for new residences (Outcome M-1.4, page 175);
- The plan should include a call to reduce parking maximums from their current 1.25 to 1 to something smaller such as 1:1 or less and to revisit parking maximums over time.

The above outcomes should be presented as part of a cohesive TDM policy that applies to both residential and office developments. Additional TDM measures could include:

- transit subsidies;
- secure bike parking;
- showers and lockers;
- guaranteed ride home program;
- shuttles to BART (depending on the development location);
- public realm improvements.

Economy

SPUR believes that downtown Oakland should function as an economic generator for the whole city and the whole region. We are encouraged that the draft preliminary plan recognizes the regional significance of this area. At the same time, we are also pleased that the Plan aims for Oakland's downtown to be a place that does the following:

- Builds community wealth;
- Provides space to enable job growth for occupations that will employ people across a wide variety of skills;
- Focuses on skills and training for residents so they can participate better in the growing high wage sectors of the economy.

However, we are concerned that some of the proposed actions could have the unintended effect of making job growth and the provision of community benefits more difficult. It is important that the desire for community benefits be balanced with the need for continued economic growth in the downtown.

We would also like to note that the educational gap is one of the main issues exacerbating job and income racial disparities in the plan area and beyond. Reducing the skills gap with the support of programs and non-profit initiatives that are already working well is key, but this should be done in parallel with a long-term city-wide education strategy particularly focused on youth of color.

Finally, multiple objectives in this Plan and Policies will be dependent on partnership and collaborative working, either with potential developers, non-profit organizations, educational institutions and/or employers. The Plan could further emphasize this guiding principle of collaboration and philosophy of 'shared goals' in shaping future decision making, with the objective to maximize partnerships to effectively tackle disparity challenges in ways that are aligned with the community's needs and aspirations.

Urban Design and Public Space

One of SPUR's big ideas in *A Downtown for Everyone* was that the downtown plan should create inviting public spaces and streets as part of an active public realm. To achieve this vision, we recommend that the city strengthen its urban design guidelines for buildings, especially ground

floors, and redesign its streets to be more functional and welcoming for pedestrians, cyclists and transit riders. Thus, we are concerned that the Preliminary Draft Plan does not present a developed urban design vision for the downtown. Such a plan, if present, would include urban design performance standards to ensure that buildings are built with gracious ground floor floor-to-ceiling heights, active uses, and in ways that support walkability

Additionally, we have the following suggestions for improving the public space components of the plan:

- The public space ideas should be much more tightly integrated with the land use agenda;
- There should be a more specific description of the Green Loop, what it would be, what it would look like and what would be required in terms of investment;
- Integrate Webster Green into a broader vision for the place;
- Make the street network diagrams in the Mobility & Accessibility and Community Health section uniform and easier to follow.

Active Ground Floor and Community Serving Uses

We are pleased that the plan is supportive of including active uses on the ground floor. However, we think it is important to emphasize that retail may not be successful on every ground floor throughout the plan area and that retail requirements could result in very uniform types of businesses going in on the ground floor in many locations (such as restaurants). We note that the plan includes the idea of restricting retail, office, bar and/or restaurant street frontages to limit the competition for arts and culture space. We encourage the city to think about which streets within downtown can function as “main streets” and what types of businesses and uses should be retained/attracted to these main streets. These should include community serving businesses and uses, which could be encouraged as part of the density bonus plan.

Thank you for your consideration of our comments. Should you have any questions, please do not hesitate to contact me.

Sincerely,

Robert Ogilvie
Oakland Director

Cc: Oakland Planning Commission
Oakland City Council
SPUR Oakland Board of Directors