

April 27th, 2021

City of Oakland Bureau of Planning
ATTN: Peterson Vollmann
Planner IV, City of Oakland Bureau of Planning
250 Frank H. Ogawa Plaza, Suite 2214
Oakland, CA 94612

SUBMITTED ELECTRONICALLY

**RE: Case File Number: ER18--016 | Oakland Waterfront Ballpark District Project Draft
Environmental Impact Review Comments**

To Whom It May Concern:

This letter is in response to the Draft Environmental Impact Report (EIR) for the Oakland Waterfront Ballpark District Project, Case File Number: ER18--016.

SPUR is an urban policy nonprofit with offices in San Francisco, San José and Oakland and thousands of members across the region. Through research, education and advocacy, SPUR works to create an equitable, sustainable and prosperous region. We bring people together from across the political spectrum to develop solutions to the big problems cities face. SPUR is recognized as a leading civic planning organization and respected for our independent and holistic approach to urban issues.

SPUR believes that the proposed Oakland Waterfront Ballpark at Howard Terminal has the potential to be a physically and economically significant project for Oakland. It can also be a catalyst for long desired transportation and circulation investments both locally and regionally, connecting Downtown to the Oakland waterfront, securing regional rail infrastructure in Oakland, and improving freight and passenger rail safety through Jack London Square.

It must also be acknowledged that the project location is complex. Howard Terminal is at the nexus of multiple competing uses including port operations, freight rail, passenger rail, industrial, commercial and residential housing. The site is also at the center of contemplated large-scale infrastructure investments, including a possible second transbay crossing and Oakland transit hub. Adjacent to West Oakland and in close proximity to Chinatown -- communities vulnerable to residential and economic displacement -- the chosen location emphasizes the need for equity-centered, inclusive and exhaustive engagement and

mitigation to ensure the project brings shared prosperity and beneficial outcomes for all.¹ This confluence requires that the project sponsor and lead agency have a clear vision and scope, commitment to current and future Oakland residents, and cross-sector alignment to ensure success.

To that end, SPUR believes the Oakland Waterfront Ballpark Project (“Project”) should consider the following to ensure the EIR adequately addresses the complexity of this project:

- **Prioritize port operations, efficiency and growth.** While the EIR acknowledges periods of time when Howard Terminal will be completely blocked at grade due to an immobile freight train, observed to be up to 87 minutes, the document does not adequately account for current port operations at Howard Terminal and projected growth. The analysis does not appear to assume change to current freight rail traffic, which is incongruent with economic projections for shipping and maritime activities at the Port of Oakland.² The Port of Oakland is a crucial job center for the East Bay and an integral operation for commerce and shipping logistics on the West Coast. Ensuring the Project and EIR properly account for adverse impacts on Port operations and growth is critical.
- **Prioritize pedestrian and rail safety by including a pedestrian bridge crossing at either Martin Luther King, Jr. Way or Market Street to accommodate ballpark patrons approaching the stadium from West Oakland.** The vast majority of ballpark attendees, commercial patrons, and residents of the proposed project will need to cross the Union Pacific rail located directly in front of Howard Terminal, with circulation directed to Market Street and Martin Luther King, Jr. Way primarily. Pedestrian safety with grade crossings has been shown to be dangerous and difficult to manage in post-game scenarios, as evidenced by Petco Park in San Diego and Levi’s Stadium in Santa Clara.³ An alternative for fully grade separated pedestrian crossing for patrons arriving from the approach at either Martin Luther King, Jr. Way or Market Street should be included in the analysis. At grade improvements at these intersections should proceed, with the pedestrian bridge providing an alternative route, particularly in post-game scenarios where there is a freight train crossing or train splitting that blocks the intersection.
- **Enhance bicycle and pedestrian access to the Project by including a bicycle and pedestrian bridge on the water side in the analysis.** The EIR currently notes existing plans for such a bridge, but does not include this transportation improvement as a part of the Project analysis. This improvement will encourage patrons arriving to the stadium from the island to reduce vehicle miles traveled and allow for sustainable modes of transportation, crucial for the Project and GHG

¹ Oakland Race and Equity Baseline Indicators Report, October 2019, https://cao-94612.s3.amazonaws.com/documents/FINAL_Baseline-Report.pdf

² 2019-2050 Bay Area Seaport Forecast, April 2020, Page 75, <https://www.bcdc.ca.gov/seaport/2019-2050-Bay-Area-Seaport-Forecast-Draft.pdf>

³ Cal Amtrak Wants Safer Ballpark Plan, April 2021, <https://sf.streetsblog.org/2021/04/20/cal-amtrak-wants-safer-ballpark-plan/>

reduction goals.

- **Ensure a full network of high-quality, separated and protected bike lanes from West Oakland BART, Lake Merritt BART, and Downtown BART stations.** The EIR currently discusses several existing plans regarding bicycle improvements and also suggests some additional improvements as a result of the Project. However, it does not appear that the proposed solutions allow for a continuous network of protected bike lanes from the three BART stations to the Project site. The Project and EIR analysis should account for a complete network to encourage and support bicycle travel to the Project, particularly on game days. This modality will reduce congestion and contribute to GHG reduction standards necessary for mitigating sea level rise, which should be of great interest to this project given its location along the Oakland waterfront.⁴
- **Explore new transit modes to serve Howard Terminal, activate Downtown and provide additional or alternative routes.** As a condition of approval, the applicant should analyze, or fund a study of, how additional transit modes such as bus rapid transit, urban circulators, and light rail could serve the Project and bring benefits to the broader City of Oakland. Such complimentary transportation studies should investigate how pedestrian and transit improvements at Howard Terminal can activate more central parts of Downtown and adjacent blocks north of the Project that currently have suboptimal pedestrian concentration. The Project should be required to address any nexuses shown between project and transit mode improvements, particularly in generating capacity for the Project's game day activities.
- **Coordinate proposed Transportation Hub and regional rail planning efforts to assess as a possible location for a multi-modal Oakland Transit Hub and build for rail connection.** Link 21 is currently defining criteria to determine the location of a second transbay crossing, creating opportunity for additional BART stations in Oakland and a regional rail interchange if aligned with the Capitol Corridor. The Project describes a Transportation Hub at 2nd and Clay to accommodate the rerouting of AC Transit service. As a condition of approval, the applicant should fund a more complete master plan for the Transportation Hub analyzing: 1) How it can serve not only the Howard Terminal project, but also surrounding areas including Jack London Square and other nearby blocks south of I-880; 2) complementary TOD land uses; and 3) possibility as a location for an Oakland Transit Hub that connects BART, Capitol Corridor, and AC Transit service. The Transportation Hub should be built in such a way as to accommodate rail in the future and serve the area beyond the development.
- **Consider eliminating new parking as a Project alternative included in the EIR.** The Project is situated at the nexus of many modes of transit, and the current Project considers many

⁴ *San Francisco Bay Shoreline Adaptation Atlas: Working with Nature to Plan for Sea Level Rise Using Operational Landscape Units*, SFEI and SPUR, April 2019, <https://www.spur.org/publications/spur-report/2019-05-02/san-francisco-bay-shoreline-adaptation-atlas>

improvements to enhance connectivity. The EIR proposes the addition of 8,900 new parking spaces, in addition to nearly 13,000 spaces within a mile of the Project. The Project should be designed to make public transit the preferred method for accessing the stadium. Generating this large quantity of new parking greatly diminishes this objective. The EIR should consider how a no-parking alternative could better support the special needs of those that do require car transport, such as handicap and other special shuttle accommodations.

- **Consider the Project as a catalyst for undergrounding rail through Jack London Square and Howard Terminal.** As a condition of approval, the applicant should coordinate and collaborate with Union Pacific, Capitol Corridor, City of Oakland, and other entities on a study of the feasibility for undergrounding freight and passenger rail through Jack London Square and Howard Terminal. Such an effort would resolve grade separation and pedestrian safety issues with crossing the rail, as well as many circulation and connectivity issues at the Project site. Current pedestrian crossing improvements proposed in the EIR should continue, with undergrounding rail as a longer-term vision. Discussions on this potential infrastructure investment and project should begin now, as overall Project feasibility and environmental impact is determined.
- **Clearly state affordable housing goals and consider a proportion of live-work housing for a jobs-housing fit.** The Project does not adequately discuss the development of housing at a range of affordability, nor does it link the opportunity to develop housing to support the employment opportunities projected to be generated. The Project predicts 7,987 new jobs generated as a result of full buildout, and a maximum of 3,000 market rate housing units.⁵ Many of the new jobs generated as a result of the Project will be lower income positions. The Project should consider including a proportion of live-work housing to support overall quality of life and housing security for employees and residents of Oakland.
- **Offset water demand and review all options for water efficiency and savings.** The EIR does not adequately describe plans to offset demand for water in the Project. There is some mention of recycling water from underneath the ballfield for future use; however, there are many more measures to consider that also have precedence in new stadium developments. More than 85% of the water used at Levi's Stadium in Santa Clara is now grey or recycled through the use of dual-plumbing systems and no-flush urinals.⁶
- **Analyze impacts of trash generation as a result of the Project.** The activities at the ballpark will inevitably produce large quantities of trash. While the Project accounts for trash mitigation through trash collection, street sweeping, and stormwater capture, there is no discussion of

⁵ Oakland Waterfront Ballpark Project Draft EIR 4.12-17, HOUSING #

⁶ Stadium Sets a New Standard for the Use of Recycled Water, June 2014, <https://www.levisstadium.com/2014/06/stadium-sets-new-standard-use-recycled-water/>

addressing windblown trash. As trash will likely blow into the Oakland Estuary causing more pollution in the Bay, the Project should speak to mitigation efforts, including considering the funding of a fleet of skimmers and the installation of gutters to catch windblown trash.

SPUR is invested in ensuring the proposed Oakland Waterfront Ballpark District Project is successful. The above comments are intended to bring to light elements of the proposed project EIR that, if addressed, will contribute to a more equitable, sustainable, and prosperous Oakland.

Thank you for the opportunity to bring these comments through your public process. This is a crucial dialogue for the City of Oakland.

Sincerely,

A handwritten signature in blue ink, appearing to read "R. Okoye". The signature is stylized and cursive.

[Ronak Davé Okoye](#)
Oakland Director, SPUR

cc: SPUR Oakland Board