

June 29th, 2022

Bay Conservation and Development Commission  
375 Beale Street, Suite 501  
San Francisco, CA  
94105

Dear Commissioners,

SPUR supports the amendment of the San Francisco Bay Plan and Seaport Plan to remove the Port Priority Use Area (PUA) designation at Howard Terminal. We agree with BCDC and Port staff assessment that removing Howard Terminal from PUA would not detract from the region's capability to meet future projected growth in cargo.

We also understand that the removal of this designation is essential for the proposed Oakland Waterfront Ballpark project at Howard Terminal to move forward. However, SPUR believes that in order for the Oakland Waterfront Ballpark project to be successful, it needs to address uncertainties related to project financing, transportation infrastructure, and housing affordability options. SPUR previously voiced these concerns in both our comments on the [Draft EIR](#) and [Development Term Sheet](#). To our knowledge, these concerns have not yet been resolved.

**We believe that the removal of Howard Terminal from the Port Priority Use Area designation is appropriate.**

We appreciate BCDC and Port staff's analysis that Howard Terminal is not essential to meet the region's projected growth in cargo.<sup>1</sup> While we agree with staff's assessment, SPUR recognizes that containerized traffic into and out of the Port of Oakland is a major contributor to the job market and economy of California, and that this traffic has grown since the 2008 global financial crisis. We also note that some privately owned parking lots near the West Oakland Bart Station formerly in use as commuter parking lots are now occupied for container and trailer storage (and repairs in some cases) to cater to this growth, as is Howard Terminal. However, Howard Terminal represents only 6.18% of the Port of Oakland's total 809-acre total available land and current operations are not the best use of this site given its encumbrances.

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<sup>1</sup> BCDC, *Staff Final Recommendation for Bay Plan Amendment 2-19 Concerning Removing Howard Terminal from Port Priority Use Designation*, Dated June 17th 2022.

We would also like to note that approximately 80% of the Port of Oakland's throughput travels by the Bay Area's Interstate network.<sup>2</sup> This contributes to high particulate pollution and community health issues in neighborhoods in close proximity to these necessary truck haulage routes. Increasing freight efficiency and cleanliness should assist Oakland and other East Bay cities alleviate the issues of pollution they are grappling with.

We understand that removal from port designation is only one step in the lengthy process of approving and completing the proposal for a new waterfront ballpark and associated development. **We continue to believe that the new waterfront ballpark must address the following unresolved issues in order to be successful:**

**Plans for financing the project must be clarified.**

If built, the project will require significant offsite infrastructure improvements, particularly transportation improvements, in order to accommodate the heightened amount of activity around the new ballpark and its surrounding facilities. However, it is still unclear how these off-site improvements will be financed, as the proposed EIFD would only cover the Howard Terminal site. Community benefits face similar uncertainties and continue to be argued over by the A's and the City of Oakland. A transparent and implementable plan for financing off-site infrastructure and community benefits must be finalized before the project can move forward.

**Public transit improvements and safety must be prioritized.**

The Howard Terminal site currently lacks access to public transit capable of transporting ballpark sized crowds and also poses freight safety risks. In order for the project to be successful, a complete transportation plan must be financed and carried out to ensure the safety of pedestrians. This plan must also ensure that pedestrian traffic from ballpark activity does not negatively impact port operations. Lastly, this project is an opportunity to better connect to the transportation improvements envisioned in Link 21. Specific recommendations for transportation options and ensuring rail safety can be found in SPUR's earlier [Draft EIR response](#).

**The project must develop housing at a range of affordability.**

SPUR supports the project's plan to build a large amount of housing units adjacent to the ballpark. However, it is unclear how many of these units will be considered affordable. Many new jobs generated by the project will be low income positions and it is important that the project provide housing opportunities for these employees. SPUR encourages the City of Oakland and the Oakland A's to reach an agreement to finance and build the maximum number of feasible affordable units, in addition to a multitude of units at higher ranges of affordability.

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<sup>2</sup> <https://www.freightwaves.com/news/freightwaves-flashback-oakland-targets-intermodal>

**The process to develop the proposal needs to be more inclusive and better address the concerns of the broader community.**

Redevelopment proposals like the proposed Oakland Waterfront Ballpark project present an opportunity to positively impact Oakland and the region. At the same time, the Port of Oakland remains a critical use that needs to be protected and strengthened to meet economic, social and environmental outcomes. Both goals are possible, but will require a stronger commitment from the A's to work proactively with community groups, impacted businesses, the Port, the City, and others to ensure the project delivers on its promise.

SPUR appreciates BCDC's staff and commissioners for their attention towards this issue and commitment to the economic vitality of Oakland. We are invested in ensuring that the proposed Oakland Waterfront Ballpark project is successful and hope our comments shed light on future improvements that must be addressed.

Sincerely,

A handwritten signature in black ink, appearing to read 'SK', written in a cursive style.

Sarah Karlinsky  
Senior Advisor