



755 Winslow Way East
Suite 105B
Bainbridge Island, WA 98110

PHONE: 203.980.3051
EMAIL: ccostanzo@americanwaterways.com

Charles P. Costanzo
General Counsel & Vice President – Pacific Region

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

Re: Draft Environmental Impact Report
(EIR) for the Oakland Waterfront Ballpark
District Project

Dear Mr. Vollmann:

On behalf of The American Waterways Operators (AWO), thank you for this opportunity to comment on the Draft Environmental Impact Report (EIR) for the Oakland Waterfront Ballpark District Project.

The U.S. tugboat, towboat, and barge industry is a vital segment of America's transportation system. The industry safely and efficiently moves more than 760 million tons of cargo each year, including more than 60 percent of U.S. export grain, energy sources, and other bulk commodities that are the building blocks of the U.S. economy. The fleet consists of nearly 5,500 tugboats and towboats and over 31,000 barges. With seven members headquartered in California, and five of those within the San Francisco Bay Area, AWO and its members care deeply about the viability of the Port of Oakland and the positive economic impact its operation has on Northern California.

AWO opposes the proposed Oakland A's baseball stadium at Howard Terminal because, as currently designed, it would conflict with safe and efficient maritime operations in the surrounding navigation channels. Additionally, the Draft EIR does not evaluate the impact of the project on the operation of towing vessels working in the Port of Oakland. This is a substantial oversight as tugboats are necessary to perform ship assist services for vessels that move cargo into and out of the port and ensure marine safety in the Oakland Inner Harbor. The final EIR must account for these considerations to properly evaluate the impact of this proposal on the safe and efficient movement of maritime commerce.

AWO previously submitted comments to the City of Oakland on the Notice of Preparation (NOP) for the scoping of this Draft EIR document. Those comments highlighted the potential

negative impacts – physical and economic – that this project would have on the Port of Oakland and the maritime economy of the entire Bay Area. We also shared our concern about any development that would obstruct access to the Turning Basin or impede it through increased recreational use. Our NOP comments specifically focused on the need for access to and safe use of the Turning Basin and the navigation channel.

While we appreciate that the Draft EIR does include limited evaluation of the potential impacts of this project on navigation, the review and evaluation is limited. The Draft EIR focuses only on one specific maritime movement and possible impacts when a ship pilot is maneuvering in the center of the Turning Basin. Missing from this evaluation are the other assisting tugboats, the operators of these vessels, and consideration of all sight lines and vantage points necessary for the safe movement of a large ship. Nor does it consider other traffic that may be in the harbor.

Without addressing the critical role of commercial harbor craft in the Port of Oakland and nearby waterways, the Draft EIR has not adequately analyzed, addressed, or potentially mitigated the safety and transportation impacts associated with ship assist work in the inner harbor and Turning Basin.

In addition, AWO supports the comments submitted by the Harbor Safety Committee of the San Francisco Bay.

Thank you again for allowing us to comment on the Draft EIR. We are happy to provide additional feedback to ensure that the safe and efficient movement of maritime commerce are properly considered throughout this process.

Sincerely,



Charles Costanzo
General Counsel and Vice President – Pacific Region