



November 8, 2019

City of Oakland
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Submitted via e-mail to: plandowntownoakland@oaklandca.gov

Comments Re: Downtown Oakland Specific Plan Public Review Draft (8/28/19)

On behalf of the businesses, labor unions, and trade association signatories to this letter, we respectfully offer these comments on the Downtown Oakland Specific Plan (DOSP) *Public Review Draft Plan* dated August 28, 2019. ***We must collectively object to the DOSP’s proposed elimination of the City’s industrial buffer and the introduction of massive housing investments to the west of Jack London Square.***

The City’s 3rd Street Corridor industrial buffer zone area¹ adjacent to the Port of Oakland serves an important role for the City in maintaining distance between the incompatible land uses of heavy industrial freight transportation infrastructure - uses integral to successful Port operations - and the residential and commercial uses and public amenities of Downtown and Jack London Square east of Broadway.

The DOSP has two equally unacceptable visions for the 3rd Street Corridor area:

- The “Howard Terminal Option” which would completely turn over the area to a mix of high-density housing in the instance that the A’s Howard Terminal project is approved; or,
- Without a stadium at Howard Terminal, the creation of a “Jack London Maker District” of intensive new residential development throughout the area.

Both of these options eviscerate the current Port industrial buffer zone. Significant new and additional housing on this edge of the Downtown Plan area, and along 3rd Street, which is a heavy truck route, will only further erode the integrity of future industrial uses in this area, which is critical to the support of the future growth of the Port of Oakland.

¹ The current buffer zone exists across both the West Oakland Specific Plan and Downtown Oakland Specific Plan – stretching from 880 and the UP railyard to the West to Broadway on the East. See attached “Existing 3rd Street Corridor Industrial Buffer Zone” and Figure LU-12 “Existing General Plan Designations” (DOSP, pg. 223).

Both the “Howard Terminal” and the “Maker District” scenarios will undermine Port operations and the ability to grow the maritime ancillary industrial base, albeit much more quickly under the Howard Terminal Option.

We have no doubt that the resulting land-use conflicts and congestion which will result are contrary to the goals of the Plan and will negatively impact the quality of life for future residents and businesses, just as they will negatively impact the Port of Oakland’s future. In short, the vision of the City of Oakland is one which does not value the long-term viability of the Port, its tenants, its customers, or the working people who rely on the intermodal supply chain as one of the last well-paying, steadily growing sources of blue-collar jobs in the Bay Area.

It is ironic that while the DOSP claims a policy which supports industrial spaces (E-2.7) and multiple policies meant to increase employment amongst groups most historically impacted by social disparities (E-3.2, E-3.3, #3.4), the Plan is actually proposing to do the exact opposite. The current General Plan protects industrial space and jobs by buffering their operations from inconsistent land uses and creating an industrial area which supports the successful growth of the blue-collar jobs which consistently provide the best wages to historically impacted groups.

Removing the protections for these properties will remove the jobs that are protected by and which rely on these properties. Common sense dictates that Oakland is more likely to produce the equity and economic opportunity outcomes that the DOSP claims to prioritize if it maintains the existing General Plan protection of the industrial lands that support intermodal and industrial jobs, including many of the highest-paid blue collar, often-unionized, and readily-accessible to underserved community labor forces in North America.

What evidence or logic would lead one to believe, as the DOSP concludes, that a fanciful new “cultural district” where none currently exists, with no dedicated public funding, and unaffordable artisan spaces surrounded by cookie-cutter condominiums, would be a better way to create or protect longshore, trucking, or warehousing jobs in Oakland? None is presented. And, if it cannot support the largest set of current jobs that provide “equity” and “economic opportunity” in the City, then the DOSP is not achieving its goals, it is not supporting its people, and it will be successful only at accelerating the demise of its economic workhorse in exchange for new condominiums (and possibly a baseball stadium) that could have been built elsewhere.

Moreover, if there is a successful stadium or stadium-complex project at Howard Terminal, then such a development would only increase the importance of maintaining this industrial buffer zone for the continuance of successful operations at the Port of Oakland and for those Oaklanders who rely on it for work. Yet, the DOSP does the opposite – and completely shreds what little buffer might have been left in the 3rd Street Corridor.

The Howard Terminal Option scenario is a nightmare for the Port and its users. Not only does the construction of the project itself force us to find a new location to accommodate container

and equipment services (totaling some 325,000 truck moves a year), but we lose all hope of maintaining our industrial buffer zone, we lose functionality in our overweight corridor, we lose our capacity for growing and enhancing truck and equipment services, and we are faced with the congestion and environmental impacts of having 30,000 new residents on our doorstep.

The DOSP's proposed transformational intensity upon the approval of a new Howard Terminal Option are hard to overstate. These changes (see LU-8b, LU-10b, LU-13b) would result in a land rush for new residential development and create one of Oakland's biggest neighborhoods right on our industrial doorstep virtually overnight.

While the DOSP does not clearly tell the public about the scope and scale of what is being proposed for this current industrial buffer zone, an analysis done for DOSP DEIR Review by Analytical Environmental Services (see affiliated organizations' DEIR comment letter, Attachment A) makes it clear what the level of intensity of new residential development that we are looking at: Roughly 30,000 new residents.

Summary of Allowable Residential Density - 16 Block Area and Howard Terminal		
Scenario	Max Residential Units	Potential Residents
Existing Land Use Designations	293	556
DTOSP Base Case Land Use Designations	6,983	13,269
DTOSP HT Option Land Use Designations	12,248	23,272
DTOSP HT Option plus Howard Terminal	16,248	30,872

A new neighborhood of 30,000 residents deserves at least some baseline analysis. Yet, the DOSP does not detail in the least how it intends to accommodate all of these new residents except in the most cursory of ways. The City has not analyzed its impact on the Port or its tenants, its transportation and circulation impacts, its transit impacts (noting the absence of any analysis of the amorphous A's gondola project), and to preserve its equity and economic development goals, where it intends to grow future blue-collar middle-class jobs if it is sacrificing its last urban industrial properties. Moreover, the City has yet to acknowledge the facial incompatibility of the DOSP with the West Oakland Specific Plan and the recently adopted West Oakland Community Action Plan under AB 617.²

We implore the City to re-evaluate its proposed elimination of our industrial buffer zone area. No analysis of any of these impacts has occurred, no plan has been discussed for protecting the Port and its related jobs, and no one has articulated a long-term vision for how the maritime industry, and the thousands of workers and businesses which rely on Oakland's continued and successful investment in the intermodal supply chain, will be protected under this Plan.

² The DOSP, by removing the buffer and adding thousands of new residents, would in fact run completely counter to the State's major goal to reduce impacts on residents near major industrial facilities as envisioned in AB 617.

The Downtown Oakland Specific Plan claims to be about equity and community empowerment, but by proposing to eliminate the industrial buffer zone, and to replace the only industrial and business mix properties left in the plan area with a baseball stadium and new condominiums, these grand goals are actually just one big strikeout.

We implore you to remove the residential mixed-use proposals for the 3rd Street Corridor industrial buffer zone west of Broadway and south of 880 from the draft DOSP.

Sincerely,

***American Waterways Operators
California Trucking Association
Customs Brokers & Forwarders Association of Northern California
Devine Intermodal
GSC Logistics
Harbor Trucking Association
Inlandboatmen's Union of the Pacific
International Longshore & Warehouse Union – Local 10
Pacific Merchant Shipping Association
Quik Pick Express, LLC
Schnitzer Steel
SSA Marine
Transportation Institute
Union Pacific Railroad***

