

DEPARTMENT OF TRANSPORTATION

DISTRICT 4

OFFICE OF TRANSIT AND COMMUNITY PLANNING

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April 27, 2021

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Peterson Vollman
City of Oakland, Bureau of Planning
250 Frank H. Ogawa, Suite 2114
Oakland, CA 94612-2032

Re: Oakland Waterfront Ballpark District Draft Environmental Impact Report (DEIR), Case File # ER18-016

Dear Peterson Vollman:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for this project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the February DEIR.

Project Understanding

The Oakland Athletics Investment Group, LLC (Project sponsor) proposes to acquire the rights to develop the Howard Terminal from the Port of Oakland, acquire the rights to adjacent properties from private owners, and construct a new Major League Baseball ballpark, as well as residential, entertainment, office, hotel, and retail (mixed-use) development, creating a new Oakland Waterfront Ballpark District. The proposed Project is adjacent to major freight activity and near Interstates (I)-880 and I-980.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. Caltrans commends the City of Oakland regarding its vehicle trip reduction strategies through the proposed Transportation Management (TMP) Plan. This project supports the State's goals to reduce greenhouse gas emissions and improve multimodal transportation options for land use development. Caltrans encourages the City of Oakland to regularly provide TMP monitoring reports to Caltrans when made available.

Multimodal Safety

Due to the increased frequency and scale of multimodal transportation crossings through the State Transportation Network, local roads and rail line, Caltrans requests the following:

- All pedestrian facilities near the project site be brought to current Americans with Disabilities Act (ADA) standards;
- The Market Street buffered bike lane and road improvement be extended from 3rd Street to Embarcadero West;
- *Appendix 13, Section 5.2.1* states that the gondola may replace the need for shuttles to and from the 12th Street Bart station and the ballpark site during event times. Because the gondola has greater capacity to transport pedestrians, please discuss whether there are potential safety benefits through not requiring shuttle service on local roads;
- While fences along the rail line for grade separation between pedestrians and rail operations will be installed, there are fence gaps that diminish their effectiveness to maximize safety for pedestrians and other transportation modes. Additionally, fence gaps and additional crossings could result in impacts to freight rail and Amtrak operations. Please explain if a safety analysis for the rail corridor adjacent to this project area was performed. Such an analysis should include multimodal crossings at full capacity during game events and with current and projected rail operations; and
- On page 83 of the Howard Terminal Draft Transportation Management Plan, it is noted that "the multi-use path would be up to 30 feet wide between the fence and the existing buildings." Please confirm whether this aligns with Union Pacific Railroad (UPRR) and Capitol Corridor Joint Powers Authority (CCJPA) expectations regarding clearance and use along the rail right of way.

Freight Operations

The Port of Oakland handles 99% of containerized goods in Northern California and is considered the eighth busiest seaport in the United States. Therefore, freight, particularly containerized freight transported by truck, is a significant component of transportation operations along the existing roadway network near the project site. Given that this project seeks to acquire land currently designated as a Port Priority Use Area within the current San Francisco Bay Area Seaport Plan, there should be a discussion on this project's implications on freight operations:

Section 4.15-7 - 4.15-10, Existing Roadway Network, should include an acknowledgement and discussion on the following:

- The high levels and percentage shares of truck traffic traveling to and from the Port of Oakland and the State Transportation Network (STN) and local roadways;
- The three roads that access the Port of Oakland (Adeline Street, 7th Street, Maritime Street) and their associated AADTT levels; and
- That 3rd Street is part of the Port-City of Oakland Heavyweight Container Permit Program that allows heavy containers to be moved on local streets.

Section 4.15-1, Transportation and Circulation. An identification and discussion of all local, State, and federally designated truck routes should be provided in this section. Particularly, an acknowledgement of the Port-City of Oakland Heavyweight Container Permit Program along 3rd Street should be provided and discussed in terms of safety, efficiency, and general throughput.

Section 4.15-45, Existing Port Characteristics, 3rd Street Corridor. The Heavy Container Permit Program allows the passage of heavy trucks along the 3rd Street corridor to serve commercial businesses and industries located between the Port of Oakland, East Oakland and San Leandro. While the DEIR states that the program's primary purpose is to prevent overweight trucks from using the State highways, please note that the main benefit of the program is to allow shippers to maximize the loading and transloading demands of heavy commodities moving to and through the Port of Oakland. The Port-City of Oakland Heavyweight Container Permit Program also has restrictions relating to time of day and speed of travel which could impact some surface transportation efficiency related project mitigation.

Section 4.15-46 – 4.15-47, Existing Port Characteristics. Based on high levels of truck Vehicle Miles Traveled (VMT) in the region and State, there is a significant shortage in truck parking options, particularly within the West Oakland community and Port of Oakland area. The need for drivers to park is seldom discretionary and is often driven by a terminal's commercial practices, most notably the hours of operation, when a load is ready to be picked up or transferred, and the day of the week. Additionally, the need to park to take required rest is governed by federal and State rules concerning safety relating to hours of driving and mandatory rest periods. When the location choice for drivers cannot be furnished by the facility (terminal or yard), the truck operator may drive a significant distance for the right location. Due to shortages in legal truck parking facilities and dedicated off-street truck parking and as a result of the loss of the Howard Terminal as a truck parking and ancillary facility, the DEIR should include a discussion and propose mitigation measures on potential demand and impacts from truck drivers parking in local neighborhoods and streets while waiting to access the Port of Oakland.

Section 4.15-80, Parking. Please include a discussion of truck parking demand as a result of the proposed Oakland Waterfront Ballpark District at Howard Terminal. The associated supply, service, and delivery needs generated by the proposed project will almost exclusively be handled by trucks and the need to park and/or stage for deliveries is essential to the safe and efficient delivery of goods. Additionally, the San Francisco Bay Area is considered a non-attainment area for PM 2.5 which is primarily generated through the combustion of diesel fuel from trucks and other heavy-duty equipment. Due to these concerns, an analysis of truck parking needs as well as the potential for on-site Zero Emission Truck charging and/or fueling stations to improve safety and air quality should be included.

State Right of Way (ROW) over and under the STN

Aerial Gondola Variant. The proposed Gondola will require a ROW Use Agreement, with payment of a fair market rent, for the use of the State's airspace. The Federal Highway Administration (FHWA) would need to approve the federal environmental document, the Right of Way Use Agreement, and the Plans associated with this gondola utilizing the Airspace over the STN.

Pedestrian Corridor Improvements under the STN. These corridors will require an encroachment permit to relocate the fence lines under the freeway. Please note that the State has ROW Use Agreements with various tenants underneath the STN and the relocation of the fence-lines may impact those tenants' lease areas. Additionally, please consider the implications of removing the public art installation along Broadway under the STN as there may be liability under the Visual Artists Rights Act if this public art is altered or removed.

Construction-Related Impacts

Potential impacts to the State ROW from project-related temporary access points should be analyzed. Mitigation for significant impacts due to construction and noise should be identified. Project work that requires movement of oversized or excessive load vehicles on state roadways requires a transportation permit that is issued by Caltrans. To apply, visit: <https://dot.ca.gov/programs/traffic-operations/transportation-permits>.

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN. Consider that the aerial gondola variant may require temporary closures of the STN, and transportation impacts should be evaluated in the TMP.

Utilities

Any utilities that are proposed, moved or modified within the State ROW must be discussed. If utilities are impacted by the project, provide site plans that show the location of existing and/or proposed utilities. These modifications require a Caltrans-issued encroachment permit.

Terminology

Section 4.15-28 – 4.15-29, Freeway Segments. Caltrans strives to achieve equity by participating in a transparent and inclusive process, and that we engage in practices where everyone is treated with dignity and justice. Caltrans requests that the word “grandfathered” be replaced with “legacy” to describe exempt roadway segments and associated analyses.

Lead Agency

As the Lead Agency, the City of Oakland is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Mark Leong at mark.leong@dot.ca.gov. Additionally, for future notifications and requests for review of new projects, please contact LDIGR-D4@dot.ca.gov.

Sincerely,



MARK LEONG
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse