



September 21, 2026

Alameda County Transportation Commission

Attn: Matthew Bomberg, Project Manager, East Bay Greenway

Tony Tavares, Executive Director

1111 Broadway, Suite 800, Oakland, CA 94607

EBGWinfo@alamedactc.org

City of Oakland, Department of Transportation

Attn: Josh Rowan, Director of Transportation

250 Frank H. Ogawa Plaza, Oakland, CA 94612

**RE: Comments of O-MAST on the 100% Design Submittal for the East Bay Greenway
— San Leandro Street (54th Avenue to the San Leandro City Limit)**

Dear Mr. Tavares and Director Rowan:

The Oakland Maritime Access, Sustainability, and Trade (O-MAST) coalition submits these comments on the 100% design submittal for the East Bay Greenway along San Leandro Street in Oakland. We write on behalf of the trucking companies, warehouse and distribution operators, and industrial property owners whose operations depend on this corridor.

O-MAST respects the city and Alameda CTC's goal to improve traffic safety for all roadway users and the project design gets something important right: separating people on bicycles from heavy-duty truck traffic. That separation, however, creates an obligation that the current design does not yet meet. Once bicycles are moved into their own protected facility, the remaining roadway should be designed for what it actually carries: the freight traffic that serves the Port of Oakland, the region's distribution network, and thousands of jobs in East Oakland. Instead, the 100% design narrows and constrains the truck roadway at the same moment it relieves it of bicycle conflict. That is a missed opportunity, and it is correctable.

We raise three issues below: a process failure, a strategic opportunity, and a set of specific right-of-way conflicts we need to resolve with your teams before this design is approved.

1. The freight community has again been left out of the engagement process

Truck companies, warehouse operators, and industrial property owners along San Leandro Street have not been included in Alameda CTC's engagement program. To our knowledge, no freight-specific outreach, no operator workshop, and no technical review with goods movement stakeholders has been conducted on the Oakland segment.

This is the same pattern O-MAST and its members have raised on the West Oakland Truck Management Plan, and on the City of Oakland's truck route update the General Plan Update: freight is consulted after the design is fixed, if at all, and is then asked to accommodate decisions it had no part in making. Our members are not a hard-to-reach population. They are identifiable, they are located on the corridor, they are organized, and they have asked to participate.

2. Use this project to prioritize trucks on San Leandro Street

The greenway should be the occasion for Alameda CTC and the City of Oakland to collaboratively and formally prioritize goods movement on San Leandro Street, not the occasion to erode it.

San Leandro Street is one of a small number of streets in Oakland that can carry heavy freight without routing it past homes and schools. Every foot of capacity is removed from it, and every design feature that makes it slower or harder to navigate, pushes trucks onto streets that are worse for residents and worse for air quality. A design that diverts trucks into their neighborhoods in the name of a trail is not a climate or equity win.

The greenway gives bicycles a protected facility of their own. In exchange, San Leandro Street should be affirmed — in this project's design and in the City of Oakland's forthcoming Citywide Goods Movement Policy, truck route update, and Capital Improvement Plan — as a truck-priority corridor: designed to the freight design vehicle, maintained to a freight pavement standard, and protected from further capacity reduction.

3. Specific right-of-way and design conflicts

The following items are drawn from the 100% design materials made available to date.

Issue	Design element	Goods movement conflict	Requested resolution
Travel lane reduction	Reduction in through-lane capacity on San Leandro Street between 54th Avenue and Seminary Avenue.	San Leandro Street is the primary industrial collector serving warehouse, distribution, and Port-related uses in this district. Reduced capacity concentrates truck queuing at signalized intersections and creates a strong incentive for drivers to divert onto adjacent residential streets that are neither designed nor designated for heavy vehicles.	Retain existing through-lane capacity for trucks on San Leandro Street. Where a reduction is unavoidable, provide a queuing and diversion analysis using truck volumes (not passenger-car equivalents), and identify the residential streets at risk of diversion together with mitigations.
Travel lane width	Proposed lane widths of 10.5 ft and 11 ft on segments of San Leandro Street.	The design vehicle on this corridor is a STAA/WB-67 tractor-semitrailer, not a passenger car. Narrowed lanes produce mirror-to-mirror conflicts between opposing trucks and encroachment into adjacent lanes.	Provide a minimum 12-foot travel lane on all segments of San Leandro Street carrying designated truck traffic, and confirm the design vehicle used for each cross-section. Where width is constrained, take the width from the parking or buffer rather than from the truck lane.

Turning radii — 54th Avenue	Corner radii, protected-intersection islands, and curb extensions at San Leandro Street / 54th Avenue.	54th Avenue is a primary connector between San Leandro Street and large warehouse and distribution facilities. Reduced effective curb radii force trucks to make multi-point turns, encroach into opposing lanes, or mount curbs and islands — a safety hazard for the very cyclists and pedestrians the project is protecting, and a maintenance liability for the City.	Run vehicle turning templates for all four movements at this intersection and confirm an adequate effective radius. Where islands or extensions constrain the turn, use mountable or truck-apron treatments designed for the movement.
Turning radii — other freight connectors	Corner geometry at San Leandro Street intersections.	The same conflict recurs at every cross street that connects San Leandro Street to an industrial parcel or warehouse driveway. These movements have not been identified as freight-critical in the materials released to date.	Jointly identify, with O-MAST and affected operators, the full set of freight-critical turning movements on the corridor, and confirm each against turning templates before 100% design is approved.
Raised crossings and raised intersections	Raised crosswalks / raised intersection treatments at 54th Avenue and at Coliseum BART Station.	Vertical deflection on a loaded truck route causes load shift and cargo damage, undercarriage and landing-gear contact for low-clearance container chassis, and additional braking and acceleration	Remove raised treatments from the truck route on San Leandro Street, or replace them with horizontal and signal-based measures. Where a raised treatment is retained, provide the ramp profile and confirm

		cycles directly adjacent to homes and schools, increasing particulate and NOx emissions in an AB 617 priority community.	it against a loaded chassis.
On-street parking	Retained on-street parking along San Leandro Street.	On-street parking on this corridor is largely unused, and the parking lane functions in practice as a site for illegal dumping, long-term vehicle storage, and encampment — conditions the City spends significant resources abating. The lane also obstructs sight lines at driveways and reduces the effective width available to turning trucks.	Remove on-street parking on San Leandro Street and convert the width to a travel lane, recovering the capacity lost elsewhere in the design. Retain designated loading only where an abutting business demonstrates an operational need that cannot be met on site.

4. Requested actions

1. **Convene a freight technical design review.** Schedule a working session with Alameda CTC and City design staff, O-MAST, affected operators, and industrial property owners on the corridor, to walk the plan set and resolve the items in Section 3.
2. **Do not advance or approve the 100% design for the San Leandro Street segment until that review is complete.** We are not asking you to stop the project. We are asking that the segment of the design governing heavy-vehicle movement be held open long enough for the people who operate on it to review it.

3. **Incorporate the specific design revisions identified above**, including minimum 12-foot truck lanes, verified turning templates at 54th Avenue and other freight connectors, removal of raised treatments from the truck through-movement, and removal of on-street parking in favor of a travel lane.
4. **Affirm San Leandro Street as a truck-priority corridor.** Document, in this project's design record and in the City of Oakland's pending goods movement policy and truck route update, that San Leandro Street is designated to carry the corridor's heavy freight and will be designed and maintained accordingly.

We appreciate the work both agencies have put into this corridor, and we recognize the funding and schedule pressures the project is operating under. Our interest is a design that works for the people who ride it and the people who haul on it, and we think that design is available here.

Sincerely,
Oakland Maritime Access, Sustainability, and Trade (O-MAST) Coalition