



April 10, 2026

City of Oakland, Bureau of Planning
Oakland City Hall
250 Frank H. Ogawa Plaza, 2nd Floor
Oakland, CA 94612
Submitted via email: generalplan@oaklandca.gov

RE: O-MAST Formal Comments on the Draft Land Use Framework (March 2026)

To Whom it May Concern,

On behalf of the Oakland Maritime Access, Sustainability, and Trade (O-MAST) Coalition, we are submitting our formal response to the Draft Land Use Framework released in March 2026.

After a thorough review of this latest draft, O-MAST is compelled to express its alarm over the lack of responsiveness to our previous letter and meeting. Despite our active participation in the General Plan Update (GPU) process, it is evident that this updated document fails to address the substantive technical and economic concerns detailed in our previous [letter](#) dated September 24, 2025, as well as the Port of Oakland's [letter](#) of the same date, and our verbal comments provided in December 2025. By failing to incorporate these long-standing comments, the City is moving forward with a framework that lacks the necessary safeguards for Oakland's most critical economic engine.

I. Lack of Foundational Evaluation and "Future Study" Delays

Throughout this process, City staff have repeatedly assured stakeholders that more detailed evaluations, specifically regarding industrial compatibility and goods movement, would appear in future versions of the document. However, this March 2026 draft makes it clear that the City has not laid the groundwork for such evaluations to occur.

We are concerned that the City is deferring critical analysis to a later stage when the policy "bones" of the Plan will already be set. Without overlaying truck routes, establishing baseline data on truck volumes, industrial land-use needs, and jurisdictional boundaries in this Framework, any "future evaluation" will be performative rather than data-driven. We urge the City to cease deferring these studies and incorporate the foundational maritime data O-MAST has already provided.

II. Formalize a "Goods Movement" Policy within the LUTE

The current draft treats trucking primarily as a source of "noise and air pollution" (Page 9) rather than a vital economic function.

- **Our Request:** Establish a standalone "Goods Movement" policy within the Land Use and Transportation Element (LUTE).
- **Justification:** A formal policy is necessary to protect the "Overweight Corridor" and ensure truck access is prioritized on designated routes. Without this, the City risks "truck spillage" into residential neighborhoods, undermining both safety and operational efficiency. Furthermore, the definition of transportation on Page 2 must be expanded to include "goods movement" alongside transit and vehicle circulation.

III. Adopt a Formal Tiered Trucking Network

To achieve the City's goals of environmental justice and climate resilience, Oakland must move beyond treating trucking as a singular nuisance and instead manage it as a sophisticated network.

- **Our Request:** O-MAST calls for the formal adoption of a comprehensive Trucking Map as part of the Framework 'Key Transportation Strategies' (Figure 6) that distinguishes between various weights and modes.
- **Justification:** Defining exactly where goods movement belongs is the only way to safely carve out space for other users, make appropriate land use choices, and identify last-mile options. Establishing framework analysis upfront will lay the groundwork for future analysis related to land use and transportation interactions.

IV. Conflict Resolution: Industrial Throughput vs. Multimodal Design

The Framework proposes re-allocating street space to prioritize "walkable areas" and "green infrastructure" (Page 4).

- **Our Request:** Adopt city design standards for trucking corridors of various weight classifications similar to existing city-adopted NACTO design guidelines. Specify that on designated Truck Routes (specifically 3rd Street, Adeline Street, and Market Street) "multimodal" improvements must not compromise industrial requirements such as truck turning radii, lane widths, and stopping distances.
- **Justification:** Recent project drafts showing 12-foot sidewalks or bioswales on these corridors create significant liability and safety hazards for heavy-duty logistics. On these specific routes, industrial throughput must remain the primary design constraint.

V. Reassess Transportation Network Feasibility

City staff have advised that multiple bikeway projects identified in the adopted Bike Plan have required significant revisions following further feasibility analyses. Given this finding, it is inappropriate to carry those errors forward into the General Plan's Land Use and Transportation Element.

- **Our Request:** Reevaluate the City's proposed bikeway network for feasibility based on right of way widths and interactions with existing truck routes and propose designs that maintain safety for all roadway users and maintain necessary goods movement throughput.
- **Justification:** The Department of Transportation is pursuing multimillion dollar Active Transportation Grants for projects that are later revealed to be infeasible and in conflict with city goods movement efforts, causing significant delay to project delivery. Conducting an initial feasibility analysis of these projects would result in a streamlined project delivery effort.

VI. Technical Mapping Corrections

We are concerned that Figure 2 (Draft Land Use Diagram), Figure 5 (Key Industrial Lands Strategies), and Figure 6 (Key Transportation Strategies) fail to display designated truck routes.

- **Our Request:** Overlay the City's designated truck routes on all land use and transportation diagrams.
- **Justification:** Without these overlays, there is no technical basis for the City's commitment to "manage industrial parcels in relation to truck routes" (Page 24), nor any technical foundation for Key Industrial Land Strategies (Figure 5), or, finally, any technical basis for the Key Transportation Strategies (Figure 6).

VII. Economic Impact Realism (Job Projections)

The draft estimates a capacity for 109,000 new jobs (Page 3) but appears to overlook the specific contributions of the maritime sector. Additionally, these figures appear unrealistic if the City has not provided clear strategies to support existing employment center growth.

- **Request:** Revise "Chart 1b: Total Jobs" to explicitly include the 98,000+ direct jobs generated by the Port of Oakland.
- **Justification:** Current projections undervalue the Port's contribution to the \$9.4 billion in state and local tax impacts. Accurate data is essential to justify the preservation of industrial land over conversion to other uses.

VIII. Supportive Infrastructure Investments

The draft identifies key transportation strategies including transit frequency improvements, bike/ped bridges and regionally significant studies (Page 29). However, it fails to mention a critical, regional investment that OMAST has named in previous comments: Adeline Street Overhead Bridge Seismic Retrofit.

- **Request:** Revise Figure 6 to include the Adeline Street Overhead Bridge Seismic Retrofit.
- **Justification:** This project is regionally significant to the goods movement network and its improvement unlocks significant opportunities to reduce traffic on the city's alternative overweight truck routes among other environmental improvements.

O-MAST remains ready to assist the City in creating a General Plan that is both visionary and operationally sound. However, we cannot support a document that ignores the technical requirements of the maritime industry. We request a technical meeting with the Planning Bureau and the Department of Transportation to resolve these mapping and policy omissions before the framework is finalized.

Sincerely,

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

CC:

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