



## SECURITY RISK ASSESSMENT – FINDINGS REPORT

**Location:** **CHARLES P. HOWARD TERMINAL**  
1 Market Street, Oakland Seaport  
The Port of Oakland  
Oakland, California 94607

**Project:** Proposed Oakland Waterfront Ballpark District

**Client:** East Oakland Stadium Alliance

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**Submission Date:** July 13, 2021



## EXECUTIVE SUMMARY

The Edward Davis Company (EDC) was contracted on behalf of the East Oakland Stadium Alliance to conduct a comprehensive security risk assessment of Charles P. Howard Terminal (“Howard Terminal”). Howard Terminal is the proposed location of the Oakland Waterfront Ballpark District Project (“Project”) proposed by the Oakland Athletics Investment Group, LLC (“Oakland A’s”).

EDC conducted a site assessment, review and analysis of the potential threats, vulnerabilities, and overall risk profile of Howard Terminal as the proposed location of the Project. We performed this review well aware of the political, economic and community controversies surrounding this effort. We are cognizant of the strong sentiments surrounding this effort but limited our analysis to the sole issue of the safety and security challenges for the proposed Project.

As planned, the Project anticipates games and concerts up to 103 days of the year and other events throughout the year for an estimated total of 354 events per year. Other elements of the proposed development, including up to 3,000 residential units, up to 1.5 million square feet of office space, up to 270,000 square feet of retail uses, and a 400 room hotel, would substantially exacerbate the vulnerabilities and risks identified in this assessment.

Our overall assessment is clear: we do not believe that the Project can, regardless of mitigation measures proposed, satisfy basic safety needs of the community and jurisdiction. EDC identified seven (7) major vulnerabilities and security related concerns surrounding Howard Terminal that would result in a significant increase to the Seaport’s overall risk profile if redeveloped to include a large-scale entertainment and sporting venue as planned. In conclusion, Howard Terminal is not a suitable site for an MLB Stadium due to insurmountable safety and security vulnerabilities.

### 1) PEDESTRIAN INGRESS/EGRESS

Lack of on-site parking and public transit alternatives poses significant public safety risk, as it steers pedestrians towards the convenient but hazardous at-grade crossing of Embarcadero West.

#### a) Lack of On-Site Parking:

The Project calls for approximately 8,900 on-site parking spaces with 2-3,000 reserved for a capacity of up to 35,000 ballpark attendees. This lack of adequate, on-site parking will lead to an increase in traffic congestion heightening risk to pedestrians and drivers.

#### b) Lack of Public Transportation in Walkable Proximity:

i. BART (Public Passenger Train Service). There are no BART Stations with direct Jack London Square/Howard Terminal access as exists in the current RingCentral Coliseum, nor are there any proposed plans to construct additional BART Stations to service the Site. There are three BART Stations located in relative proximity to the Site ranging from an approximate 14 minute to 20-minute walk.

ii. Alameda-Contra Costa Transit (Public Passenger Bus Service) declined to provide services as currently proposed in the Plan as the timing of this supplemental game day service would coincide with “peak transit demand” hours and require a significant investment of resources including equipment, personnel and physical enhancements to the routes. The bus service also noted the potential harmful impacts the Project would have on their currently existing bus routes across the



district, including critically disadvantaged communities whose primary means of transportation is the public option.

iii. Ferry (Water Transport Service). The Project calls for water transport as an alternative to routes crossing Embarcadero West and could provide an alternative public transportation option. However, the ferry solution does not take into sufficient consideration the capacity requirements needed to accommodate an influx of this magnitude and the increase to vessel congestion in the Estuary.

c) Lack of Grade-Separated Pedestrian Crossings:

i. On-Grade (Road/Rail) Pedestrian Crossing. The location of the site requires all pedestrians seeking access to the Site to cross the freight/passenger rail corridor on-grade or via two existing overcrossings with insufficient capacity. An additional overcrossing and additional safety enhancements at current crossings are proposed but require further review and do not adequately address the influx of thousands of people entering and exiting the Site.

## 2) TRAFFIC (ROAD/RAIL) CONGESTION

The Oakland Seaport is the hub of the Bay Area intermodal supply chain. The amount and type of commercial traffic flowing in and out of West Oakland, via ship, road, and rail, presents significant public safety concerns for the Project.

a) Increase and Mixture of Pedestrian and Industrial Rail/Roadway Traffic:

i. Roadway Traffic. There are only four vehicular ingress/egress access routes into the Seaport. All vehicles linked to Seaport operations enter and exit via these four routes, presenting unsafe volume and mix of commercial trucks, ballpark attendee/employee vehicles and pedestrians.

ii. Railway Traffic. There are several rail service providers including commuter and freight trains passing Embarcadero West each day. This creates a significant obstruction for ingress/egress of the venue, first responder access and evacuation of the stadium and surrounding areas in the event of an emergency as well as overall impact on cargo movement and local/state roadway traffic congestion.

iii. Train Crossings. UP estimates the average size of freight trains operating in the Seaport is 9,500 feet, or 1.8 miles in length and can take significant time to pass without stopping. Freight trains are not run on reliable schedules like passenger trains and vary, making mitigation much more difficult to implement.

iv. Train Stoppage. Trains operating on the Seaport network routinely idle on the Embarcadero West corridor, directly adjacent to the Site blocking vehicle ingress/egress and causing them to wait often for a lengthy time period before the train begins to proceed through the corridor. Additionally, when considering the surge of pedestrian activity created by events at the Site, tracks, particularly without grade-separated crossways, will lead to an increase in hazardous crossings during stoppages.

v. Switching. As part of their access and unloading process, freight trains must be broken into half mile increments, referred to as "switching," which requires the stoppage of all incoming/outgoing traffic from Jack London Square. During train stoppages and switching processes which can be prolonged, ingress/egress to Howard Terminal, and oftentimes to Jack London Square, is entirely obstructed.



### 3) EMERGENCY ACCESS AND EVACUATION

- a) The safety and security issues detailed above, particularly blockages resulting from train stoppage/switching on Embarcadero West, reduce the likelihood of continuous and unimpeded emergency vehicle ingress/egress routes to the Site.
- b) During an evacuation, pedestrians (including patrons and employees), would need to cross the tracks in order to leave the area, return to their vehicles, or access public transportation alternatives. The three (one planned, and two already-existing) pedestrian over-crossings would have to be leveraged for evacuation and have capacity to service tens of thousands of people leaving the venue at the same time. Other alternative routes discussed have significant challenges re: truck traffic and stoppages. Train crossings and blockages would further obstruct pedestrian egress to a safe location.
- c) Site accommodations for emergency egress of persons with disabilities, particularly those with limited mobility, have not been sufficiently addressed by Site planners. This is a significant oversight, and evacuation considerations for disabled persons should be incorporated into any future Site plans.

### 4) FACILITY SECURITY/COUNTER TERRORISM

In today's threat environment, all large-scale entertainment and sporting venues must assess and reduce their vulnerability to terrorist attacks and other hazards. MLB's global prominence, symbolism, and attendance numbers make its stadiums particularly attractive to terror actors. While Project planners must address the counter-terrorism challenges faced by all MLB stadiums, there are multiple facility security challenges specific to this Site.

**Access Control.** Due to the high-risk profile of United States ports, access to all ports, including the Seaport, is controlled via the Transportation Worker Identification Credential (TWIC) program, administered by the Transportation Security Administration and the U.S. Coast Guard.

If the proposed stadium is built on Howard Terminal, currently access controlled via the TWIC program, uncredentialed pedestrians and vehicles will now have access to the area. This includes the shoreline directly in front of the IHTB, a vulnerability that exposes super container ships maneuvering slowly and near the shoreline.

Project renderings show an opening in the MLB stadium's walls toward the Estuary. The close proximity of the Oakland Estuary to the proposed ground level opening of the stadium, which will face the water, is a concern. Its open access creates an exploitable point of entry via the Estuary. Note: This is also applicable to areas on Alameda, directly across from the proposed stadium site.

The Seaport is currently rated by the TWIC program as a MARSEC Level 1. The proposed Project could result in heightened threat, resulting in increases in the Seaport's MARSEC rating, from Level 1 to Level 2 or Level 3, putting an additional strain on community resources.

**Transportation.** The volume of trains and trucks utilizing the Seaport's rail and road networks mixed with the pockets of concentrated individuals inherent in any large-scale entertainment venue present counter-terror challenges. Bad actors could exploit the Seaport's large-scale cargo holding capacities to inflict massive harm on individuals and structures on Site. Congestion caused by train stoppage/switching would only magnify the impact of a terror event.



**Vertical Attack via High-Rise Structures.** Project renderings depict tall residential buildings on the northeast border with direct line of sight access into the proposed MLB stadium. High-rises typically require an elevator to regularly access a top floor, and the top of the building is out of reach for firefighting apparatus. These high-rises create security gaps by providing line of sight from high-level floors, directly into the stadium. The height of the building creates barriers and longer travel distances for first responders to overcome. Bad actors may utilize this time to cause more harm and/or find routes of escape. The 2017 Las Vegas Mandalay Bay shooting, the deadliest mass shooting in United States history, provides a tragic example of the risks associated with such security gaps.

## 5) HAZARDOUS MATERIALS

The Site's proximity to large volumes of hazardous materials presents vulnerabilities for bad actors to exploit and also exposes the site to the potential adverse effects of inadvertent exposure via seepage or freight derailment.

Hazardous materials in the Port of Oakland include marine pollutants, and oxidizers transported as cargo, jet fuel for the Peaker Power Plant transported via an underground jet fuel pipeline and diesel fuel stored in 3 large sized tanks in the Seaport. There is also a diesel fuel and gasoline stored "fuel farm." Large sized tanks, while serving an important purpose, are a significant vulnerability when located in close proximity to the crowd-generating venue proposed by the Project. Jet fuel is an extremely volatile substance, easily combustible, and burns at an extremely high temperature.

Fuel delivery trucks also regularly enter Schnitzer Steel through Embarcadero West and Market Street to fill a 10,000-gallon diesel storage tank and pumps fuel directly into equipment as needed. This entrance is to be shared with ballpark attendees and employees under the current plan. Diesel fuel, while not combustible is flammable.

## 6) PUBLIC SAFETY RESOURCES

### i. Lack of Resources and Increase in Demand:

The Project does not include a coordinated, comprehensive public safety services plan and needs further investigation and dedication of adequate personnel and equipment resources for a project of this size in a unique environment.

With the influx of tens of thousands of people at games and events there will be increased demand for services from first responders and US Coast Guard. These include response to accidents, medical incidents, crime, traffic control, seaport/maritime issues and community liaison response.

The US Coast Guard has indicated they do not currently have the capacity to provide security services to the Oakland Estuary under the current Project plans. As a result, the Oakland Police Department (OPD), which provides life safety and security services to the City of Oakland and the Seaport, would be responsible for maintaining the safety and security of both land and marine divisions of the Site.

While OPD representatives expressed their willingness to accommodate increased demand at the Seaport, there are reasonable concerns about the fiscal constraints, required additional staffing levels, equipment, and other challenges presented by adding the equivalent of a new police district to the City.



The Oakland Fire Department (OFD) provides fire protection and local emergency medical response services to the City of Oakland and the Seaport, including emergency medical response, firefighting, special operations, and all-risk mitigation. Adequate fire protection to the Seaport will require possible station relocation and significant investment in equipment and personnel.

## 7) MARITIME CONGESTION

i. Seaport Vessel Traffic. According to [figures](#) provided by the Port, the Seaport's cargo volume makes it the eighth busiest container port in the United States. Industry projections forecast an increase in container shipping activity both internationally and domestically. Vessels are predicted to increase in size and number.

ii. Inner Harbor Turning Basin. The Inner Harbor Turning Basin (IHTB) is a critical component of Terminal operations. The IHTB is directly adjacent to Howard Terminal (and the proposed location of the Ballpark). While access to Howard Terminal is currently controlled by the TWIC program, prohibiting non-credentialed individuals from gaining close proximity to vessels turning in the IHTB, this control will be lifted with the development of the Project.

iii. Recreational Boating. Estuary stakeholders anticipate an increase in recreational boating, and other water sport activity in the Estuary if the Project proceeds as planned. Comingling of industrial shipping operations with recreational watercraft traffic will likely generate new safety hazards that have to be considered and addressed by Terminal operators and shipping companies. SSA representatives stated that since the Project gained traction, shipping companies have delayed entering into long-term contracts with SSA, citing the need for Project stakeholders to sufficiently address Estuary safety concerns before they can agree to continue operating there.



## OVERVIEW

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## METHODOLOGY

EDC physically surveyed relevant portions of the Inner Harbor of the Oakland Seaport (“Seaport”), proximate rail and roadway networks, and Jack London Square and surrounding environs. RingCentral Coliseum and Oracle Park were also surveyed to provide a historical perspective, context, and benchmarks. EDC reviewed publicly available documentation relative to the Project, including those promulgated by Major League Baseball (MLB), The Oakland Athletics, The City of Oakland, and several Port of Oakland stakeholder representatives indexed in **APPENDIX A**. For specifications regarding the Project goals, scope, and scale, EDC relied predominantly on the Draft Environmental Impact Report for the Oakland A's Waterfront Ballpark District Project (DEIR) drafted by Environmental Science Associates (ESA) and released for public comment on February 26, 2021. EDC also reviewed the public comments submitted to the City of Oakland.

## QUALIFICATIONS OF EDC TEAM

EDC has brought together a team of highly experienced subject matter experts with specialties spanning the physical security spectrum, including national security, enterprise security, threat intelligence and analysis, facilities security design, all hazards emergency preparedness and response, continuity of business and workforce, and complex investigation. Our wealth in experts enables us to provide the most comprehensive and tailored security services to our clients across the globe. EDC has developed creative, data-driven security solutions that go beyond best-practice standards, implementing layered security that can consistently and comprehensively insulate our clients from broad and specific security threats.

Information about EDC, our executive, project, and survey leadership teams, is included in this report as **APPENDIX B**.



## **THE OAKLAND WATERFRONT BALLPARK DISTRICT PROJECT (“PROJECT”): PROJECT DETAILS**

The following information includes details of the proposed Project and current usage of Inner Harbor Terminals.

### THE PROJECT AS PROPOSED

The Project proposes the re-location of the Oakland A’s MLB baseball stadium to Howard Terminal, located in the Inner Harbor of the Oakland Seaport (“Seaport”).

The Oakland A’s have proposed the acquisition and redevelopment of Howard Terminal, and several other privately-owned parcels located in the Inner Harbor of the Oakland Seaport, as their principal location for the Project. A redevelopment of this magnitude would transform the physical landscape of the Seaport, and invite residents, commerce, entertainment, innovation, and technology to the presently industrial-zoned district. The Project, as planned, encompasses approximately 55 acres, with the ballpark located on the easternmost border of the Site (west of Jack London Square; east of Market Street).

The Site is bordered to the south by the Oakland Estuary. North of the Site, across Embarcadero West, are two Pacific Gas and Electric Company (PG&E) substations servicing the area’s “Peaker Power Plant,” which directly abuts the Site’s easternmost border, and provides supplemental power supply to the area during periods of peak demand. East of the Peaker Power Plant, directly across Jefferson Street, is a large diesel fuel storage tank. The westernmost border of the Site directly abuts a Schnitzer Steel Industries, Inc. metals recycling plant.

As planned, the Project anticipates games and concerts up to 103 days of the year and other events throughout the year for an estimated total of 354 events per year. Other elements of the proposed development include up to 3,000 residential units, up to 1.5 million square feet of office space, up to 270,000 square feet of retail uses, and a 400 room hotel.

### THREATS TO PROFESSIONAL SPORTS ORGANIZATIONS/STADIUMS

The Department of Homeland Security and industry specialists agree that the following threats should be considered and mitigated for by every professional sports organization in the United States:

- Personal Injury/Medical Emergency
- Small Arms Assault
- Seismic Instability
- Internal/External Sabotage via Theft/Vandalism
- Chemical, Biological, Radiological, Nuclear Attack
- Arson
- Air, Maritime Attack



Cyber Attack

Contamination of Food/Water

### THE RINGCENTRAL COLISEUM

The RingCentral Coliseum (“Coliseum”) is the current home of the Oakland A’s MLB Stadium. EDC performed a walk-through of the Coliseum. However, a comprehensive evaluation of the risk profile of the Coliseum is beyond the scope of this assessment. There are however objective differences between the proposed site at Howard Terminal and the Coliseum.

1. The Coliseum is in East Oakland, approximately 5.5 miles distance from Oakland’s city center. The East Oakland parcel is relatively isolated, with zero industrial activity in its neighborhood. The Coliseum is therefore less exposed to the risk factors inherent in any industrial zone: traffic congestion inhibiting smooth ingress/egress, abundance of hazardous materials, risk to trespassers, strain on public safety resource allocation (increased vulnerability reduction, hazard prevention, mitigation, and response needs),
2. The Coliseum is completely encircled by a perimeter of four parking lots (A, B, C, and D). The Coliseum has over 10,000 on-site parking spaces. Pedestrians parking on-site can walk directly into the stadium from the lots without having to cross any road/rail ways.
3. The Coliseum is directly accessible by public transportation via the Coliseum BART Station. The Station connects directly to the Coliseum by pedestrian bridge. Pedestrians traveling by BART can also walk directly into the stadium from the BART Station without on-grade crossing of any road/rail ways.
4. The geography surrounding Coliseum, unlike the proposed Site at Howard Terminal, does not inhibit ingress/egress. The Oakland Estuary limits potential ingress/egress routes from Howard Terminal, requiring all routes to include grade crossing of the industrial rail/road networks.

### THE PROJECT’S PROPOSED MITIGATION MEASURES

**The Aerial Gondola Variant.** This variant proposes, as a supplemental at-grade crossing risk mitigator, construction of an aerial gondola above and along Washington Street, extending from 10<sup>th</sup> Street in downtown Oakland to Jack London Square at Washington Street. The gondola is proposed “to cross over the skyway between the courthouse and police buildings at Washington and 6<sup>th</sup> Streets, over the Nimitz Freeway/I-880,” and over the UP tracks.

At time of writing, all documented plans for the aerial gondola variant have been conceptual in nature. Capacity issues in operating an over-water pedestrian conveyance of this volume have not been sufficiently quantified or evaluated.

**Grade-Separated Pedestrian Pathways.** The Project does include plans for safety measures to mitigate potential harm to pedestrians accessing the Site on foot via Embarcadero West, including construction of one additional grade “pedestrian and bicycle overcrossing” at Jefferson or Clay Streets and Embarcadero West. Please note that there are currently two grade-separated over crossings which are discussed in more detail below. EDC assumes the two existing over crossings will remain, for a total of three grade-separated pedestrian pathways. See DEIR Section 4.15 Transportation and Circulation.



**Safety Enhancements along Embarcadero West Corridor.** The Project proposed the implementation of “at-grade railroad crossing improvements along the project’s frontage and extending to Broadway.” It is unclear what the proposed “pedestrian” and “at-grade” crossing “improvements” call for. Physical barriers (fencing), however, will not be a sufficient deterrent. To accommodate vehicular traffic, any physical barriers would require “breaks” at every intersection crossing Embarcadero West. Pedestrians will likely exploit the breaks in the barrier line to cross the tracks at-grade for convenience.

Also proposed are “pedestrian improvements along 7<sup>th</sup> Street, Market Street, Martin Luther King Jr. Way, Washington Street, and Broadway,” which are the streets connecting the closest three BART Stations to the Site.



## THE PORT OF OAKLAND SEAPORT: CURRENT OPERATIONS

Directly adjacent to the Site, and requiring continued, unimpeded access to the existing roadway network (Port of Oakland, Interstates 880 and 980, local roadways), is the eighth busiest freight transportation seaport in the United States. The Seaport is comprised of four harbors: the Inner, Middle, Seventh Street, and Outer Harbors. Each harbor houses one to four container terminals (eight terminals in total). Intermodal transport and industrial facilities currently operating within the Seaport's harbors are listed in **TABLE A**.

Seaport container terminals import up to 100,000 full, and 20,000 empty, Twenty-Foot Equivalent Units (TEUs), and exports up to 100,000 full, and 40,000 empty, TEUs, per month. In 2020, the Seaport's total TEU activity exceeded 2.4 million.

TABLE A: Facilities Operating within Oakland Seaport		
Facility Name/Operator	Operation Type	Location
<b>Fire Station 2, Oakland Fire Department (OFD)</b> OPERATOR: Not Applicable (Independent from Seaport)	Public Safety	East of Inner Harbor
<b>Charles P. Howard Terminal</b> ("Howard Terminal") OPERATOR: Not Applicable (Available for Lease)	Marine Terminal	Inner Harbor
<b>Schnitzer Steel Industries</b> OPERATOR: Not Applicable (Independent from Seaport)	Metals Recycling Yard/Port	Inner Harbor
<b>Roundhouse Property</b> OPERATOR: Stevedoring Services of America Terminals, Inc. (SSA)		Inner Harbor
<b>Matson Terminal</b> OPERATOR: SSA	Marine Container Terminal	Middle Harbor
<b>Oakland International Container Terminal</b> OPERATOR: SSA	Marine Container Terminal	Middle Harbor
<b>Union Pacific Railway Railport Oakland</b> OPERATOR: Union Pacific Railroad Company ("UP")	Railroad Terminal, Class I	North of Inner, Middle Harbors
<b>Amtrak Capitol Corridor</b> Via UP's Railport Oakland	Rail Service (Passenger Train)	North of Inner, Middle Harbors
<b>Coast Starlight</b> Via UP's Railport Oakland	Rail Service (Passenger Train)	North of Inner, Middle Harbors
<b>San Joaquin</b> Via UP's Railport Oakland	Rail Service (Passenger Train)	North of Inner, Middle Harbors
<b>The Altamont Corridor Express (ACE)</b> Via UP's Railport Oakland	Rail Service (Commuter Rail)	North of Inner, Middle Harbors
<b>Oakland International Gateway Joint Intermodal Terminal ("JIT")</b> OPERATOR: Burlington Northern Santa Fe (BNSF)	Railroad Terminal, Class I	North of Middle Harbor
<b>Cool Port Oakland</b> OPERATOR: Not Applicable (Independent from Seaport)	Warehouse – Cold Storage	North of Middle Harbor
<b>GSC Logistics</b> OPERATOR: Not Applicable (Independent from Seaport)		North of Middle Harbor
<b>Unicold Corporation</b> OPERATOR: Not Applicable (Independent from Seaport)	Warehouse – Cold Storage	North of Middle Harbor
<b>Ben E. Nutter Terminal</b> OPERATOR: Seaside Transportation Services; Evergreen Terminal Services, Inc.	Marine Container Terminal	7 <sup>th</sup> Street/Outer Harbor
<b>Berths 33 – 34</b> OPERATOR: Not Applicable (Available for Lease)	Marine Terminal	7 <sup>th</sup> Street/Outer Harbor
<b>TraPac Terminal</b> OPERATOR: TraPac, Inc.	Marine Container Terminal	7 <sup>th</sup> Street/Outer Harbor
<b>Ports America Outer Harbor Terminal</b> OPERATOR: Ports America, Inc.	Marine Container Terminal	Outer Harbor
<b>Berths 20 – 24</b> OPERATOR: Not Applicable (Available for Lease)	Marine Terminal	Outer Harbor
<b>Seaport Logistics Complex</b> OPERATOR: Various	Rail, Warehouse, Cargo, Transload	Outer Harbor
<b>Outer Harbor Intermodal Terminal (OHIT)</b> OPERATOR: Oakland Global Rail Enterprise	Rail Manifest, Support Yard	Outer Harbor



<b>Pacific Coast Container (PCC Logistics)</b> OPERATOR: Not Applicable (Independent from Seaport)	Warehouse	North of Outer Harbor
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**The Seaport's Middle and Inner Harbors** are accessed via the narrow Oakland Estuary. All functioning Inner and Middle Harbor Terminals are currently operated by Stevedoring Services of America Terminals, Inc. (SSA). According to SSA representatives, the Harbor's existing infrastructure barely supports the Seaport terminals' current level of activity.

**Oakland International Container Terminal (OICT)** provides stevedoring services for 20 shipping lines serving Asia, Europe and Central America. The terminal handles approximately 100 vessel calls each month, discharging and loading predominantly containerized cargo. Oversize and heavy lift cargo is also handled at OICT, including non-containerized cargo such as yachts.

**Matson Terminal** is a Matson Navigation-dedicated facility, providing service to the Hawaiian Islands and Guam. SSA handles approximately 124 vessel calls per year for Matson.

SSA-operated terminals of the Inner and Middle Harbors account for approximately 70% of the Seaport's business. SSA recently signed a long-term (twenty-year), one-billion-dollar lease with the Port of Oakland and have invested over ten million dollars in additional and more substantial cranes needed to continue meeting import/export demand. SSA expects further investment and expansion will soon be necessary, including the long-awaited expansion of the Inner Harbor Turning Basin.

**The Inner Harbor Turning Basin (IHTB)** is adjacent to Howard Terminal and the proposed location for the MLB Ballpark segment of the Project and is a critical component of SSA operations. The container ships serviced by SSA reach lengths up to 1,200 feet and widths up to 250 feet and must utilize the IHTB to safely reverse direction and exit the Estuary. Even using the 1,400-foot long IHTB, turning a ship of 1,200 feet in the narrow Estuary is a challenging process, and requires the assistance of several tugboats for each turning ship. The only alternative to turning via the IHTB is for the ships to navigate in reverse, and "back-in" through marked channel and into the Estuary. Shipping companies do not permit their pilots to use this maneuver due to liability concerns created by the maneuver. Vessels of the size serviced by SSA, therefore, must use the IHTB to dock or exit, making continuous operation of the IHTB essential for SSA's current and future use of Seaport harbors.

While on site, EDC counted twenty-five anchored ships in the Bay, all waiting for access to Seaport terminals. Where even conservative industry forecasts are predicting larger ships and increased container transportation demands, SSA's plans to update their Seaport infrastructure, including the IHTB, and expand their capabilities appear necessary.

**Howard Terminal** currently occupies approximately 50 acres of the easternmost parcel of the Inner Harbor. The terminal was purchased by the Port in 1978 and operated as a fully operational ship-to-shore container terminal until 2014. Since 2014, Howard Terminal continues to serve as an essential resource for the various Seaport terminal operations. The vacant acreage and berths at Howard Terminal provide Seaport operators the space needed for shipping vessel queue control (lay berth), trucking queue control, heavy truck relief parking, and container storage and transfer (drayage) functions.

Howard Terminal shares its main vehicle entrance with Schnitzer Steel (Embarcadero West and Market Street). All trucks entering and exiting Schnitzer Steel from the hours of 3:30 AM to 6:00 PM PT (Pacific Time) do so via this main access point. Schnitzer Steel representatives approximate at least 175 – 200 trucks pass through this access point per day.



**Schnitzer Steel Industries** operates a metals recycling yard and port on the parcel between Howard Terminal and Roundhouse properties. The plant receives metal materials via truck, shreds those materials via heavy machinery operating on a 24/7 basis, and then exports the shredded metal via ship for repurposing abroad. Shipping vessels are loaded via crane and are docked at the site for periods of up to two weeks before fully loaded and ready to depart.

**The Roundhouse Property** is currently operated by SSA and functions in a similar way to Howard Terminal, providing the space for short-term storage of trucks, containers, and chassis. Roundhouse has been proposed as a potential location for any displaced functions of Howard Terminal but is currently operating at 80% capacity and will likely not be able to absorb the overflow of the truck, container, and chassis space provided by Howard Terminal.

**Oakland International Gateway Joint Intermodal (“JIT”)** and **Railport Oakland Terminals** are located directly north of the OICT for near-dock train operations, serviced by the Burlington Northern Santa Fe (BNSF) and Union Pacific Railroad (UP) companies.

**Union Pacific Railroad Company (UP)** and **Burlington Northern Santa Fe (BNSF)** operate the multifaceted rail network within the Seaport. The network is utilized by UP and BNSF’s Class I freight transport operations, in addition to the several passenger rail service providers listed in **TABLE A**. These operations all send/receive trains (eastward/westward) via the main line tracks on Embarcadero West. UP estimates approximately 100 commuter trains and thirty industrial freight trains pass Embarcadero West each day. This equates to at least one train crossing every fifteen to twenty minutes. The time in which a train is operating and/or stopped along the delineated segment of railway creates a significant obstruction for anyone attempting to enter or leave the venue. This is of particular concern for first responder access to the site and the ability to evacuate the venue in the event of an emergency.

The UP and BNSF freight rail operations work in conjunction with the Outer Harbor Intermodal Terminal (OHIT) to provide streamlined movement of cargo between the adjacent marine terminals and transload facilities, and the intermodal rail facilities, facilitating unimpeded supply chain throughput. Due to volume, location, and supply chain positioning of these tracks, stopping or limiting train traffic on these lines is not feasible without significant impact on network operations, and significant increase in local/statewide traffic congestion levels.

**The Outer Harbor Intermodal Terminal (OHIT)** was completed in 2017, and services Seaport rail operators carrying bulk products for transfer to cargo containers and eventual export by ship. The addition of OHIT’s 39,000 linear feet of track was designed to expand the Seaport’s rail network capabilities and has performed accordingly. According to UP representatives projected growth in import and export shipping, coupled with the increasing growth of container capacity and physical ship size, has rail operators planning for increased volume and correspondingly larger freight sizes.



## **VULNERABILITIES AND SECURITY-RELATED CONCERNS**

As a result of the site assessment, DEIR and other document review, EDC identified the following vulnerableness and security-related concerns:

### **1) PEDESTRIAN INGRESS/EGRESS**

Lack of On-Site Parking  
Lack of Public Transportation in Walkable Proximity  
Lack of Grade-Separated Pedestrian Crossings

### **2) TRAFFIC (RAIL/ROAD) CONGESTION**

Increase and Mixture of Pedestrian/Industrial Rail/Roadway Traffic  
Commercial vehicles

### **3) EMERGENCY ACCESS/EVACUATION**

Lack of and Impediments to Emergency Ingress/Egress Routes  
Unique Evacuation Challenges Pertaining to Person with Disabilities

### **4) FACILITY SECURITY/COUNTER-TERRORISM**

Estuary Access Control

### **5) HAZARDOUS MATERIALS**

### **6) PUBLIC SAFETY RESOURCES**

Increased accidents, crime, traffic, seaport/marine security  
Community liaising work

### **7) MARITIME CONGESTION**

Turning Basin  
Increase and Mixture of Pedestrian/Industrial Vessel Traffic in Estuary



## SITE SPECIFICS AND ANALYSIS

When physically surveying the site, EDC focused on the “outer perimeter” of Howard Terminal, the proposed ballpark location, where the safety and security factors concerning the Seaport, its commercial and residential communities, and future patrons of the Waterfront Ballpark District, will be most impacted.

Site specifics and corresponding risk analysis are included below and organized by identified vulnerability category.

### 1) PEDESTRIAN INGRESS/EGRESS

The most significant public safety hazard created by redeveloping Howard Terminal into a professional sports stadium and entertainment complex is the inability to mitigate the risks posed by the Embarcadero West Corridor. The geography surrounding Howard Terminal offers limited ingress/egress routes. The Site is bordered by the Oakland Estuary to its south, the industrial Seaport to its west, and the Embarcadero West Corridor to its north. Therefore, pedestrians entering and exiting the site must do so by crossing the Embarcadero West Corridor by foot or vehicle.

The factors discussed below including the Project’s lack of on-site parking options, direct public transportation access, and grade-separated crossings, all contribute to the public safety risk created by insufficient pedestrian ingress/egress routes to/from a large-scale sporting and entertainment venue.

#### Lack of On-Site Parking

The Project calls for approximately 8,900 on-site parking spaces (at full buildout), with 2-3,000 reserved for ballpark attendees. The ballpark is designed to accommodate up to 35,000 patrons, and during the 2019 MLB Season, the Oakland A’s averaged approximately 20,000 attendees per game. At the Oakland A’s current MLB stadium at RingCentral Coliseum, the majority of attendees arrive by vehicle. At the Howard Terminal ballpark, the majority of attendees will choose, out of convenience or necessity, to arrive to the ballpark by alternative means (via off-site parking, bike, taxi/ride-share, BART, AC Transit, etc.), which will result in increased pedestrian (on-foot) traffic, vehicular congestion at drop-off locations, and local roadways, bicycle traffic, and at-grade pedestrian and vehicle crossing of Embarcadero West.

#### Lack of Public Transportation in Walkable Proximity

**BART (Public Passenger Train Service).** Unlike the RingCentral Coliseum, which is connected directly to the BART Station via pedestrian overcrossing, there are no BART Stations with direct Jack London Square/Howard Terminal access, nor is there any indication of plans to construct additional BART Stations to service the Site.

There are three BART Stations located in relative proximity to the Site: (1) 12<sup>th</sup> Street BART Station, (2) Lake Merit BART Station, and (3) West Oakland BART Station. The closest BART Station is the 12<sup>th</sup> Street Station, located 1105 yards (fourteen-minute walking distance) away. Lake Merit Station is 1147 yards away (fifteen-minute walking distance), and West Oakland Station is 1 mile away (twenty-minute walking distance). \*

\*Listed walking distances are approximate.



**Alameda-Contra Costa Transit (Public Passenger Bus Service).** The DEIR anticipates shuttle-bus services will be provided as a supplemental game day transit service, connecting commuters from the nearest BART Stations to the ballpark. Alameda-Contra Costa Transit (“AC Transit”) declined to participate in the plan as currently proposed. According to AC Transit, the timing of this supplemental game day service would coincide with “peak transit demand” hours. To accommodate this increase in demand, the district would have to purchase additional buses, hire and train additional bus drivers, and/or budgeting for additional working hours of existing drivers. AC Transit stated that the DEIR did not adequately consider the amount of funding, nor the necessary physical improvements required, to ensure bus inventory, drivers, and lanes are sufficiently enhanced to accommodate the influx of riders of this magnitude in such a heavily trafficked industrial zone. The bus service also noted the potential harmful impacts the Project would have on their existing bus routes across the district, including critically disadvantaged communities whose primary means of transportation is the public option.

**Ferry (Water Transport Service).** The Project calls for water transport as an alternative to routes crossing Embarcadero West and could provide an alternative public transportation option. However, the ferry solution does not take into sufficient consideration the capacity requirements needed to accommodate an influx of this magnitude.

Additionally, the introduction of ferry-boat traffic to the Estuary will contribute to vessel congestion, a major concern for Estuary stakeholders.

Lack of Grade-Separated Pedestrian Crossings

**On-Grade (ROAD/RAIL) Pedestrian Crossing.** All mass-transportation options described above are located north of Embarcadero West. The proposed Site is to the south of Embarcadero West. This forces all pedestrians seeking access to the district to cross the freight/passenger corridor on-grade (on foot or by vehicle), or via two existing overcrossings incapable of holding such a capacity, or the planned additional overcrossing. Current at-grade crossings projected to experience an increase in activity following Project implementation are listed in

**TABLE B.**

<b>TABLE B: At-Grade Highway/Rail Crossings, Embarcadero West</b> <i>Crossing Location (Listed West to East)</i>
Martin Luther King Jr. Way
Clay Street
Washington Street
Broadway
Franklin Street
Webster Street
Oakland – Jack London Square Station



There are currently two above-grade pedestrian walkways over Embarcadero West. The first is above Harrison Street, connecting the Jack London Market [parking] Garage with the Channel House apartment building. The second is located just west of Washington Street, and connects Jack London's Waterfront Parking [garage] with an unidentified multi-tenant commercial building. These parking garages have limited capacity, estimated at no more than 1,000 vehicles total.

The Project includes inadequate plans for safety measures to mitigate potential harm to pedestrians accessing the Site on foot via Embarcadero West, including construction of a single grade-separated overcrossing at the intersection of Jefferson Street and Embarcadero West, and implementing safety enhancements at-grade crossing locations. Track crossings with or without sufficient safety measures, such as video surveillance and access control systems, high-security grade physical barriers, and ideally under or over crossings, pose a public safety risk to pedestrians, regardless of location, custom, or cargo type. Also proposed are "pedestrian improvements along 7<sup>th</sup> Street, Market Street, Martin Luther King Jr. Way, Washington Street, and Broadway," which are the streets connecting the three BART Stations to the Site. Also included are plans for "at-grade railroad crossing improvements along the project's frontage and extending to Broadway," and construction of a third "pedestrian and bicycle overcrossing" at Jefferson or Clay Streets. It is unclear what the proposed "pedestrian" and "at-grade" crossing "improvements" call for. Physical barriers (fencing), however, will not be a sufficient deterrent. To accommodate vehicular traffic, any physical barriers would require "breaks" at every intersection crossing Embarcadero West. Pedestrians will likely exploit the breaks in the barrier line to cross the tracks at-grade for convenience.

The DEIR rightfully notes that a third overcrossing at Jefferson Street would require substantial review due to its proximity to the Peaker Power Plant and consequent safety/security concerns. Additional structural considerations such as size, capacity, and resilience are required to determine whether a total of only three pedestrian overcrossings will provide sufficient incentive for pedestrian use. If the new pedestrian crossing is of similar size and construction as the existing overcrossings, congestion and convenience concerns are likely, and would lead to hazardous at-grade pedestrian crossing of Embarcadero West.

This risk profile increases when an area is redesigned to accommodate 35,000 plus pedestrians with minimal consideration of the requisite infrastructure updates needed to ensure safe travel and access to that area. These risks should be further considered and addressed by Project planners in coordination with Seaport stakeholders. Detailed and undeviating (or mandated) mitigation measures, including construction of several grade-separated crossings, should be included in any further plans and should meet or exceed industry best practice standards.

## 2) TRAFFIC (ROAD/RAIL) CONGESTION

The Oakland Seaport is the hub of the Bay Area intermodal supply chain. The amount of commercial traffic flowing in and out of West Oakland, via ship, road, and rail, presents significant public safety concerns for the Project.

### Increase and Mixture of Pedestrian/Industrial Rail/Roadway Traffic

**Roadway Traffic.** There are only four vehicular ingress/egress access routes into the Seaport: (1) via 7<sup>th</sup> Street, (2) via Adeline Street, (3) via Maritime Street, and (4) via the 3<sup>rd</sup> Street Corridor. All vehicles linked to operations listed in **TABLE A** enter and exit the Seaport via these four routes. Per the Heavyweight Container Permit Program, "heavy" trucks exporting/importing commodities totaling over 80,000 pounds in weight, must do so via the 3<sup>rd</sup> Street Corridor. Pedestrian ingress/egress via the 3<sup>rd</sup>



Street Corridor would therefore be coalesced with heavy-weight industrial vehicle activity, creating traffic safety concerns.

Due to the sheer volume of trucks entering/exiting the Seaport, and the impact on surrounding neighborhoods, the Port developed The Port of Oakland's Maritime Comprehensive Truck Management Program (CTMP). The program addresses security, air quality, business operations, and community concerns related to trucking activity centered around the Seaport. As explained above, and as part of the CTMP, the secured space provided by Howard Terminal is leveraged to accommodate for congestion caused by ever-increasing demand and limited access routes for truck access to the Seaport.

Often, independent truckers in queue for loading/unloading at the Seaport will utilize Howard Terminal as a holding and staging area. This keeps the trucks from idling on the roadway in surrounding residential neighborhoods, alleviating daytime traffic congestion, and corresponding fuel consumption and air pollution. Departing trucks leave the staging area during off-peak nighttime hours to further reduce congestion. During EDC's survey of Howard Terminal, approximately 1,000 trucks, trailers, and chassis were parked, stored, and staged there. Loss of the short-term storage space provided by Howard Terminal may result in trucks, trailers, and chassis being stored on surrounding surface roads.

By leveraging this space, Seaport operators are able to reduce truck and vessel congestion, particularly truck queuing that significantly impacts congestion on state and federal highways, as well as local streets and neighborhoods. Loss of this asset will require Seaport operators to find alternative locations to conduct these operations. Relocation, reduction, or total loss of this acreage will have significant impacts on marine and land-based traffic control/congestion.

Project plans included four main ingress/egress points for the MLB Site, including two vehicular entrances at Market Street and Martin Luther King Jr. Way, and two pedestrian (on-foot) entrances on Jefferson Street and Water Street (via Jack London Square). As stated above, Howard Terminal currently shares its main vehicle entrance with Schnitzer Steel (at Embarcadero West and Market Street). Project plans indicate that this entrance will be retained and used as the Market Street entrance to the Site. EDC witnessed a queue on Embarcadero West of approximately 25 trucks waiting to enter Schnitzer Steel property via the Market Street entrance while surveying the Site. Mixing of industrial and pedestrian vehicular traffic would cause increased public safety risk during every event occurring at the Site during Schnitzer Steel hours of operation. Insufficient planning for the allocation of on-site parking, public transportation resources, and addressing industry concerns regarding mixture of industrial and residential/entertainment uses, and the inevitable on-grade crossings of Embarcadero West, present significant public safety concerns when considering how pedestrians will gain access to the Site.

**Train Crossings.** UP estimates the average size of freight trains operating in the Seaport is 9,500 feet, or 1.8 miles in length (noting that this is an average, some trains will be shorter in length, others longer). The time needed for an entire freight train to pass, without stopping, can take up to 15 minutes, and varies based on destination.

Unlike passenger trains that adhere to a set schedule of arrival and departure time (to the extent possible), freight train operation schedules are not consistent, and vary by day. This unpredictability of freight crossings adds to the volatility of the area and makes mitigation measures harder to implement in a consistent/comprehensive manner.

**Train Stoppage.** Trains operating on the Seaport network routinely idle on the Embarcadero West corridor, directly adjacent to the Site. When trains stop in the area, vehicles must stop and wait (up to



45 minutes) for the train to proceed through the corridor. Pedestrians crossing on grade by foot are also impeded. During EDC's survey of the proposed Site, the team witnessed several pedestrians, after waiting fifteen to twenty minutes for a freight train blocking Embarcadero West (from Webster Street West through to the UP railyard) to clear the tracks, proceed to climb up, over, and through the train cars in order to pass. Pedestrians climbing over, under, and between train cars expose themselves to serious bodily injury or death. An empty freight car can weigh up to thirty tons, and a loaded car up to 130 tons. Any movement of a train of that capacity, particularly with people on or around its cars, has the potential to cause catastrophic harm.

According to UP representatives, following this type of pedestrian contact with stopped trains, regulatory obligations require thorough inspection for injury, tampering, and damage before the train can resume operations. Inspection requires the train to remain in place (at the point of pedestrian contact) until approved for safe resumption of operation, adding hours to the time frame in which pedestrians/vehicles are obstructed from safe crossing. When considering the surge of pedestrian activity created by events at the Site, tracks without grade-separated crossways will lead to an increase in hazardous crossings during stoppages.

**Switching.** To access the UP yard for un/loading, freight trains must be reduced in size to no more than 2,640 feet (half of a mile) in length. The process of breaking the freight into to half mile increments, referred to as "switching," requires the stoppage of all incoming/outgoing traffic from Jack London Square. Switching takes approximately fifteen to thirty minutes. During train stoppages and switching processes, ingress/egress to Howard Terminal (the proposed Site) is entirely obstructed. At times, based on the size of the stopped/switching train(s), ingress/egress to Jack London Square is also obstructed during these routine processes.

It is important to note that railroad operations in the United States are heavily regulated by the Federal Government. The Department of Transportation, through the Surface Transportation Board and the Federal Railroad Administration, plays a major role in issues that affect rail. Many issues outlined in this report may be of interest to these regulators.

### 3) EMERGENCY ACCESS AND EVACUATION

Large-scale entertainment venue and MLB best practices call for monitoring and control of the venue's outer perimeter to ensure unimpeded emergency vehicle ingress/egress access. This includes police, fire and emergency medical service providers. The considerations detailed above, particularly blockages resulting from train stoppage/switching on Embarcadero West, render the chance of continuous and unimpeded emergency vehicle ingress/egress routes to the Site unlikely.

In the event of emergency mass-evacuation of the site, train crossings and blockages would also obstruct pedestrian (by foot or vehicle) egress via Embarcadero West. As the Site is bordered by the Estuary to the south, and the Embarcadero West corridor to the north, geographic restrictions limit possible egress routes. Emergency egress during a train passing/stoppage would further reduce emergency pedestrian egress routes.

For reasons considered above, it is anticipated that most pedestrians will access, and therefore exit, the Site on foot in case of a mass-evacuation. Pedestrians (including patrons and employees), would need to cross the tracks in order to evacuate the area, return to their vehicles, or access public transportation alternatives. The three pedestrian over-crossings would have to be leveraged for evacuation; however, it is unclear if these structures could handle this surge capacity.



The only potential alternative would be a westerly route that continues on to the Seaport-owned access road to Middle Harbor Road, (directly south of the Adeline Street overpass) into the Port of Oakland. This route cuts through the industrial operations of the Seaport, including a substantial branch of the train tracks, which is also routinely blocked by freight trains. Representatives from GSC logistics approximated that the intersection at Middle Harbor Road and the Adeline overpass is the most heavily traveled truck route in the Port. This route could also be used for vehicular egress, although vehicular access would be equally impeded by the six to eight thousand vehicle crossings per day.

Portions of this emergency access road are unpaved and in need of repair. EDC was informed of the Port's potential plans to pave this road and re-route the designated heavy truck corridor from Middle Harbor Road through this access road to Embarcadero West. This would allow for less heavy truck traffic on the local roadways but would increase traffic congestion on Middle Harbor Road, creating a challenge to using this route as an emergency ingress/egress route.

Whether the evacuation was limited to the Site, or if the nature of adverse event necessitated a region-wide evacuation effort, the lack of available egress routes from the Seaport would endanger all visitors to and employees of the Site, Port workers and residents, and commercial and pedestrian vehicle/train operators/passengers.

Site accommodations for emergency egress of persons with disabilities, particularly those with limited mobility, have not been sufficiently addressed by Site planners. This is a significant oversight, and evacuation considerations for disabled persons should be incorporated into any future Site plans.

#### 4) FACILITY SECURITY AND COUNTER-TERRORISM

All large-scale entertainment and sporting venues must assess and reduce their vulnerability to terrorist attacks and other hazards. MLB's global prominence, symbolism, and attendance numbers make its stadiums particularly attractive to terror actors. While Project planners must address the counter-terrorism challenges faced by all MLB stadiums, there are multiple facility security challenges specific to this Site that must be further considered.

**Access Control.** Access to United States ports is controlled via the Transportation Worker Identification Credential (TWIC) program, administered by the Transportation Security Administration and the U.S. Coast Guard. The program provides a tamper-resistant biometric credential to maritime workers requiring unescorted access to secure areas of port facilities, outer continental shelf facilities, and vessels regulated under the Maritime Transportation Security Act of 2002 (MTSA).

Currently, Seaport is rated as a MARSEC Level 1 security risk. Access is controlled by the TWIC program. Everyone accessing Seaport berths, including truckers, longshore laborers, terminal and port workers, vendors and contractors, are all required to show a TWIC credential.

Project plans could result in regular increases in MARSEC Level to Level 2 or Level 3, putting an additional strain on community resources. Planners have not adequately considered the access vulnerabilities created by the Site's design. If the proposed stadium is built on this site, pedestrians and vehicular traffic will have access to an area previously limited by TWIC credentialing. This includes the shoreline directly in front of the IHTB, a vulnerability that exposes super container ships maneuvering slowly and near the shoreline.

Project renderings show an opening in the MLB stadium's walls toward the Estuary. The close proximity of the Oakland Estuary to the proposed ground level opening of the stadium, which will face



the water, is a concern. Its open access creates an exploitable point of entry via the Estuary. Note: This is also applicable to areas on Alameda, directly across from the proposed stadium site. A water platform would also give the potential threat a way to gain physical access to the stadium grounds without having to pass through the various security measures in place for those entering from the city. It would also provide an escape route that has very limited law enforcement resources available to respond.

**Transportation.** The volume of trains and trucks utilizing the Seaport's rail and road networks mixed with the pockets of concentrated individuals inherent in any large-scale entertainment venue present counter-terror challenges. Bad actors could exploit the Seaport's large-scale cargo holding capacities to inflict massive harm on individuals and structures on Site. Congestion caused by train stoppage/switching would only magnify the impact of a terror event.

**Vertical Attack via High-Rise Structures.** Project renderings depict tall residential buildings on the northeast border of the MLB stadium. Generally, a tall building over 75 feet (or about seven floors and up to 328 feet) can be characterized as a "high-rise." High-rises typically require an elevator to regularly access a top floor, and the top of the building is out of reach for firefighting apparatus. These high-rises create security gaps by providing line of sight from high-level floors, directly into the stadium. The height of the building creates barriers and longer travel distances for first responders to overcome. Bad actors may utilize this time to cause more harm and/or find routes of escape.

## 5) HAZARDOUS MATERIALS

The Site's proximity to large volumes of hazardous materials (detailed below) presents vulnerabilities for bad actors to exploit and also exposes the site to the potential adverse effects of inadvertent exposure via seepage or freight derailment.

**Hazardous Container Cargo.** SSA representatives approximated 5% of the cargo passing through the Port of Oakland (from ship to freight) is considered hazardous material, including marine pollutants and oxidizers.

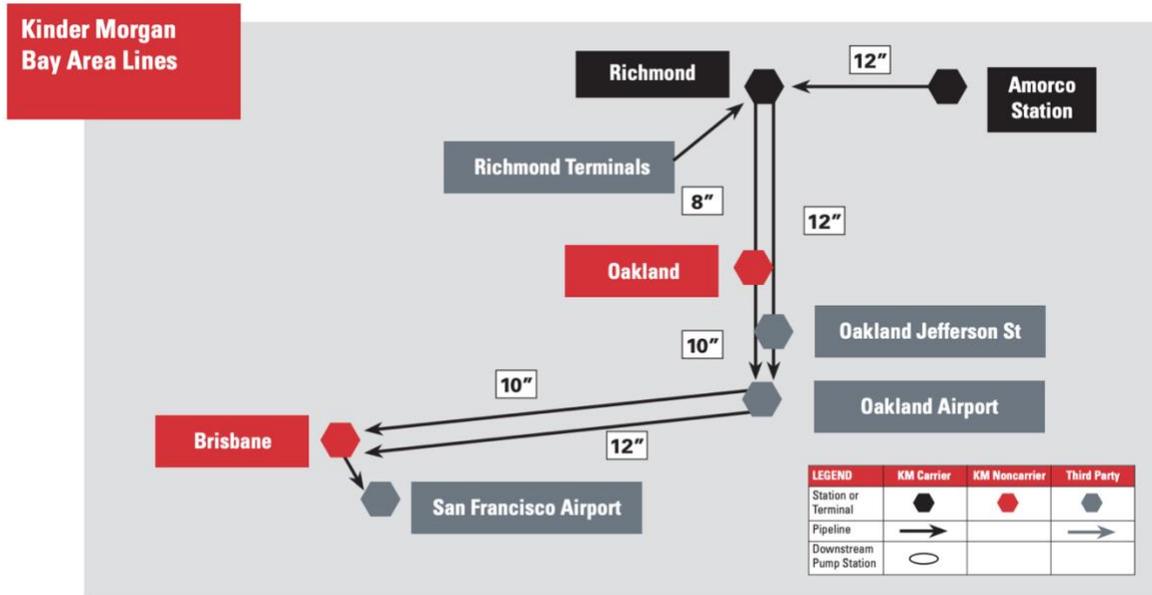
**PG&E "Peaker Power Plant" (1) and Substations (2).** The Peaker Power Plant borders Howard Terminal and is serviced by two nearby substations. The Peaker Power Plant Variant in the DEIR discusses potential plans of converting the plant from jet fuel turbine to battery-generation, thus eliminating the need for the jet fuel at the plant.

**Diesel Fuel Storage Tanks (3).** There are currently two diesel fuel storage tanks on SSA's Inner Harbor Terminals. A third tank on Embarcadero West, between Jefferson and Clay Streets, borders the Peaker Power Plant directly adjacent to Howard Terminal. The owner/operator of this tank was not identified, but Seaport stakeholders stated the tank is filled with diesel fuel. While the fuel tanks serve an important purpose for Seaport operators, tanks of this size are a significant vulnerability when located in close proximity to the crowd-generating venue proposed by the Project.

SSA also has a "fuel farm" on their property which holds 10,000 gallons of diesel fuel and 10,000 gallons of gasoline.

**Kinder Morgan Pipeline.** [Kinder Morgan's SFPP system's North Line](#), which includes approximately 864 miles of trunk pipeline in five segments that transport products from Richmond and Concord, California, to Brisbane, Sacramento, Chico, Fresno, Stockton and San Jose, California as well as Reno, Nevada. The products delivered through the North Line come from refineries in the San

Francisco Bay Area, various pipelines and marine terminals. The North Line's 12-inch underground jet fuel pipeline runs through the Seaport, under UP's right of way easement at Embarcadero West, and continues southwest to the Oakland Airport.



This pipeline currently provides jet fuel directly to the Peaker Power Plant bordering Howard Terminal. Jet fuel is an extremely volatile substance, easily combustible, and burns at an extremely high temperature.

**Fuel Delivery Trucks.** Schnitzer Steel receives the fuel to run its machinery via truck. Several times per week, fuel tankers enter Schnitzer Steel property through its main entrance (Embarcadero West and Market Street – as discussed above, Schnitzer Steel shares this main entrance with Howard Terminal, and the Project proposes the adoption of the entrance for its MLB stadium). The fuel tankers fill Schnitzer Steel's 10,000-gallon diesel storage tank, and also pumps fuel directly into equipment ("wet-hoses"), as needed.

## 6) PUBLIC SAFETY RESOURCES

If the Project proceeds as planned, the demand for public safety resources in the Seaport will more than double. Introduction of 3,000 new residential units, up to 1.5 million square feet of commercial office space, 270,000 square feet of retail and entertainment space, 400 hotel rooms, a 35,000-person capacity sports stadium, and a 3,500-person capacity performance venue, create previously non-existent public safety concerns to be considered, mitigated, planned for, and responded to. These efforts would be in addition to the existing public safety demands created by the heavy industrial zone of the Seaport. Budgetary and operational challenges the Project will create for public safety officials with jurisdiction over the Port of Oakland, the Seaport, and the Oakland Estuary have not been sufficiently considered by Project planners. The Project does not include a coordinated, comprehensive public safety services plan and needs further investigation and dedication of adequate personnel and equipment resources for a project of this size in a unique environment.



The United States Coast Guard has indicated they do not currently have the capacity to provide security services to the Oakland Estuary under the current Project plans. As a result, the Oakland Police Department (OPD), which provides life safety and security services to the City of Oakland and the Seaport, would be responsible for maintaining the safety and security of both land and marine divisions of the Site.

OPD representatives expressed their willingness to accommodate increased demand at the Seaport, but also expressed reasonable concern about the fiscal constraints, required staffing levels, equipment, and other challenges presented by adding the equivalent of a new police district to the City.

The Oakland Fire Department (OFD) provides fire protection and local emergency medical response services to the City of Oakland and the Seaport, including emergency medical response, firefighting, special operations, and all-risk mitigation. OFD Fire Station 2, at 47 Clay Street, is located on the easternmost portion of the Site. According to the DEIR, Station 2 is currently equipped with one Type 1 fire engine, a four-seat medical response golf cart, two inflatable rescue boat/trailers, a docked ridged-hull rescue boat, a F350 water rescue squad, and a Sea-Wolf fire boat. In 2003, following budget cuts, Station 2 was closed as a staffed fire station, and the Sea-Wolf fireboat was taken out of service. Though Station 2 has resumed operations, the Sea-Wolf remains non-deployable, but is regularly maintained, and currently docked in the Estuary in close proximity to Station 2. According to the DEIR, Fire Station 2 is proposed to remain in place as part of the Project and may require remodeling if it remains in place long term. Renditions of the Site reviewed by EDC indicated potential removal of the Station to make way for pedestrian entrances into the Site from Jack London Square.

OFD representatives stated that the Sea-Wolf fire boat has been de-commissioned due to budgetary constraints. If a fire boat response is necessary, San Francisco Fire Department boats would be called upon to respond. Those representatives also indicated it was unclear if Station 2 would remain operational if the Project proceeds at the Seaport location.

## 7) MARITIME CONGESTION

It can be reasonably anticipated, like in San Francisco Bay at Oracle Park, the Waterfront District will attract an increase in recreational boating activity in the Estuary. The Port of Oakland loads and discharges more than 99% of the containerized goods moving through Northern California. According to [figures](#) provided by the Port, the Seaport's cargo volume makes it the eighth busiest container port in the United States (based on Calendar Year 2020 data).

**Recreational Boating.** Estuary stakeholders anticipate an increase in recreational, “pleasure” boat, and other water sport activity in the Estuary if the Project proceeds as planned. Comingling of industrial shipping operations with recreational watercraft traffic will likely generate new safety hazards that have to be considered and addressed by Terminal operators and shipping companies. SSA representatives stated that since the Project gained traction, shipping companies have delayed entering into long-term contracts with SSA, citing the need for Project stakeholders to sufficiently address Estuary safety concerns before they can agree to continue operating there.

An increase in pleasure boating, coupled with the projected increase in commercial shipping activity in the Oakland Estuary, poses significant safety risks. These risks should be further considered and addressed by Project stakeholders in coordination with Seaport/Estuary stakeholders. Detailed and



undeviating mitigation measures should be included in any further Project plans and should meet or exceed industry best practice standards.



## CONCLUSION

The proposed location for the Oakland Waterfront Ballpark District (the Project) creates unique safety and security challenges. The Project calls for a 35,000-person capacity ballpark to be built within the third-busiest port in California. The Oakland Seaport is supported by a constant stream of industrial truck, shipping, and rail traffic all co-existing on the Seaport's limited and heavily congested geographic area. The EDC Team identified seven (7) critical vulnerabilities that need to be addressed with a comprehensive safety and security plan that considers threats and vulnerabilities to the site and provides workable solutions. These areas are discussed in detail in the body of this Report and include:

- 1) Pedestrian ingress/egress
- 2) Traffic (rail/roadway) congestion
- 3) Emergency access/evacuation
- 4) Facility security/counterterrorism
- 5) Hazardous materials
- 6) Public safety resources
- 7) Maritime congestion

In conclusion, the EDC Team finds that proposed mitigation efforts do not adequately satisfy public safety needs and Howard Terminal is not a suitable site for an MLB Stadium due to insurmountable vulnerabilities.



## APPENDIX A

### MATERIALS REVIEWED

The following **documentation** was reviewed in the formulation of this risk assessment findings report:

1. Draft Environmental Impact Report (DEIR), Waterfront Ballpark District at Howard Terminal. Environmental Science Associates. February 2021.
2. West Oakland Truck Management Plan (TMP). Port of Oakland; City of Oakland. May 2019.
3. Maritime Comprehensive Truck Management Program (CTMP). Port of Oakland; Maritime Air Quality Improvement Plan (MAQIP). June 16, 2009.
4. West Oakland Specific Plan Environmental Impact Report. City of Oakland. January 20, 2021.
5. Bay Area Council Economic Institute. [The Economic Impact of Proposed Developments at Howard Terminal](#). May 29, 2019.
6. Public Policy Institute of California. [Protecting the Nation's Seaports: Balancing Security and Cost](#). 2006.
7. Comments submitted to the City of Oakland by the following entities (in response to DEIR):
  - Alameda-Contra Costa Transit District
  - Alameda County Transportation Commission
  - California Department of Transportation, District 4
  - Capitol Corridor Joint Powers Authority (CCJPA)
  - California Highway Patrol (CHP), Oakland
  - California Public Utilities Commission (CPUC)
  - East Oakland Stadium Alliance
  - San Francisco Bay Region Harbor Safety Committee
  - Union Pacific Railroad Company
8. Best Practices in Anti-Terrorism and Security (BPATS). U.S. Department of Homeland Security (DHS). 2021.
9. Best Practices in Anti-Terrorism Security for Sporting and Entertainment Venues Resource Guide. Command, Control, and Interoperability Center for Advanced Data Analysis (CCICADA). July 2013.



10. Protective Measures Guide for U.S. Sports Leagues. U.S. Department of Homeland Security (DHS). 2008.

The following organizations/entities were **interviewed** via representatives in preparation for this report:

The Oakland Police Department (California)

Stevedoring Services of America Terminals, Inc. (SSA)

Local 10, International Longshore and Warehouse Union (ILWU), Local 10

The Propeller Club of Northern California

GSC Logistics, Inc.

Union Pacific Railroad

Schnitzer Steel Industries, Inc.

Pacific Merchant Shipping Association

EDC surveyed the following **key locations/areas** to gain an understanding of current Seaport operations and their impact on the Project and vice versa:

1. Charles P. Howard Terminal, 1 Market Street, Oakland, California 94607
2. Oakland International Container Terminal, Stevedoring Services of America Terminals, Inc. (SSA), East Gate, 1717 Middle Harbor Road, Oakland, California 94607; West Gate, 2505 Middle Harbor Road, Oakland, California 94607
3. Oakland Ring Central Coliseum, 7000 Coliseum Way, Oakland, California 94621
4. Oracle Park, 24 Willie Mays Plaza, San Francisco, California 94107
5. Embarcadero West, Railway Corridor, Union Pacific Railroad Company
6. Jack London Square, proximate transportation stations, industrial, residential, and commercial neighborhoods



## APPENDIX B

### EDC QUALIFICATIONS

#### THE EDWARD DAVIS COMPANY (EDC)

EDC is an independent security services and consulting firm located in Boston, Massachusetts that provides actionable strategies that protect the assets and reputations of our clients. Established in 2014 by former Boston Police Commissioner Edward Davis to provide high quality, personalized security solutions, we have grown to be a leader in enterprise security risk assessment, management and mitigation. EDC has provided safety and security services for a variety of businesses, industries, high profile individuals, educational institutions, professional sports teams, large-scale entertainment venues, utility companies, energy and resource providers, civil infrastructure, Fortune 500 companies, non-profit organizations and advocacy groups and local and international media and news outlets. We focus on what matters to the client with an understanding that each client has varying priorities, assets and unique challenges. We work closely with our clients to understand their individual priorities and to accomplish the identified objectives in the most comprehensive and forward-looking way.

#### PROJECT LEADERSHIP

The EDC Team is comprised of a highly experienced group of experts specializing in myriad security verticals, including analysis, physical, cyber, technological security systems, strategy, investigations, intelligence, forensic accounting, social media investigations and assessments, training, policy review and development of security across multiple verticals. Our wealth in experts enables us to provide the most comprehensive and tailored security services for each of our clients across the globe, setting us far apart from other security services and solutions companies. The EDC Team has developed creative, data-driven security solutions that go beyond best-practice standards using a layered security approach that can insulate our clients from the unique security threats they face of a day-to-day basis.

**Edward F. Davis** is Founder and Chief Executive Officer of The Edward Davis Company. Davis has brought together a team of security and technology solutions experts including former federal, state, local law enforcement, military officials, researchers and attorneys with direct personal connections to esteemed academic institutions, national and international governing and intelligence entities. Davis has focused on public health and safety for over 35 years, serving most recently as the Police Commissioner of the City of Boston from December 2006 until October 2013.

**Juliette Kayyem** has spent over 15 years managing complex policy initiatives and organizing government responses to major crises in both state and federal government. A national leader in homeland security, resiliency and safety, she is currently the Senior Belfer Lecturer in International Security at Harvard's Kennedy School of Government, where she is faculty chair of the Homeland Security and Security and Global Health Projects. Most recently, she was President Obama's Assistant Secretary for Intergovernmental Affairs at the Department of Homeland Security. There she played a pivotal role in major operations including handling of the H1N1 pandemic and the BP Oil Spill response; she also organized major policy efforts in critical infrastructure protections and community resiliency. Before that, she was Massachusetts Governor Deval Patrick's homeland security advisor guiding regional planning and the state's first interoperability plan, climate change policies, and overseeing the National Guard.



**Jim McDonnell** recently retired after serving for almost forty years in public safety. In 2014, McDonnell was elected as the 32nd Sheriff of Los Angeles County, the largest sheriff's department in the United States, leading over 18,000 employees and managing an annual budget of over \$3.3 billion dollars. McDonnell took over an agency that had been seriously impacted by scandal and, in a four-year term, was able to restore public trust, institutionalize systems of accountability and work collaboratively and effectively with federal, state and local partners. McDonnell began his career with the Los Angeles Police Department, where he served for twenty-nine years and held every rank up to First Assistant Chief of Police. He worked a wide variety of assignments including, homicide, gangs, organized crime, vice, patrol operations and community policing. McDonnell retired from LAPD in 2010 to become the Chief of the Long Beach Police Department, where he served for five years. Long Beach is home to the second busiest container port in the United States after the port of Los Angeles, which it adjoins. He is the first person to serve in senior executive leadership positions in the three largest policing agencies in Los Angeles County. McDonnell formed McDonnell Strategies Group in early 2019 to advise clients across the nation on a diverse range of public safety issues.

## SURVEY TEAM

**William Taylor** is the Director of Consulting Services for EDC and works closely with our consulting clients. Taylor has 35 years of law enforcement experience with the Lowell Police Department, most recently as Superintendent of Police from 2013 through 2018. He has demonstrated expertise in all areas of municipal law enforcement including administrative management, strategic planning, investigations, budgeting, policy and practice review and development and community policing. Taylor participated in Harvard University's Massachusetts Senior Executive Program and Kennedy School of Government, Executive Education, "Leadership for the 21st Century: Chaos, Conflict and Courage". Taylor also completed the FBI Academy's 294th session in June of 2012.

**Michael Magalski** is a Senior Physical Security Consultant for The Edward Davis Company. Magalski brings extensive law enforcement and security experience to the firm. He retired from the United States Secret Service after 30 years of service, to include his last 18 years as the Agent in Charge of their Portland, Maine Office. He managed, supervised, and coordinated the work of all law enforcement, technical, and administrative support personnel in carrying out all protective, investigative, and intelligence gathering functions under the jurisdiction of the United States Secret Service in the State of Maine and portions of Canada. This included the implementation of all security arrangements for the Bush residence in Kennebunkport, along with the numerous presidential visits, foreign heads of state, and other high ranking government officials that routinely visited the state.