

CHAPTER 7

Impact Overview and Growth Inducement

In accordance with Public Resources Code Section 21100(b)(2) and State CEQA Guidelines Section 15126.2, this chapter identifies significant impacts on the environment that cannot be avoided if the Project is implemented and significant effects on the environment that would be irreversible if the Project is implemented. In addition, this chapter analyzes the issues of “growth inducement” and “urban decay,” as defined below.¹ Effects found not to be significant are discussed in Section 4.17 of Chapter 4.

7.1 Significant and Unavoidable Environmental Impacts

A significant and unavoidable impact would result if a project were to reach or exceed the defined threshold of significance and no feasible mitigation measures are available to reduce the impact to a less-than-significant level. Thresholds of significance and potential impacts of the proposed Project are identified along with feasible mitigation measures in Chapter 4, *Environmental Setting, Impacts, and Mitigation Measures*, and Chapter 5, *Project Variants*.

For each topic in Chapter 4, the analysis also identifies cumulative impacts, which Section 15355 of the State CEQA Guidelines defines as “two or more individual effects which, when considered together, are considerable, or which can compound or increase other environmental impacts.” This section of the State CEQA Guidelines goes on to state that “the cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonable foreseeable probable future projects.”

As discussed in the introduction to Chapter 4, this EIR analyzes the potential cumulative effects of the proposed Project by considering the Project in the context of projections of future growth and a list of past, present, and reasonably foreseeable future projects. If a cumulative effect is identified, the analysis then evaluates whether the proposed Project’s contribution to the cumulative effect is *cumulatively considerable*, which is considered a significant impact.

Approval of the proposed Project would result in the following significant and unavoidable Project-level or cumulative impacts under CEQA, as identified in Chapter 4 of this EIR. These impacts would be the same under the Maritime Reserve Scenario.

¹ The analysis of “urban decay” in this chapter is based in part on information about Oakland–Coliseum vendors, and a survey of local businesses (Environmental Science Associates, 2019).

7.1.1 Hazardous Wind Speeds

Impact AES-5: Wind Hazards – The Project would create winds that exceed 36 miles per hour for more than one hour during daylight hours during the year. This significant and unavoidable impact would occur both during Phase 1 and at buildout. The impact would be addressed with implementation of Mitigation Measure AES-1, which would require a wind impact analysis before building permits are issued for buildings 100 feet or greater in height, but the effectiveness of this measure cannot be determined with certainty.

Impact AES-1.CU: Cumulative Wind Hazards – The Project would also contribute to a significant cumulative exceedance of the wind hazard criterion when combined with cumulative development in the Project vicinity. The Project’s contribution would be addressed with implementation of Mitigation Measure AES-1, which would require a wind impact analysis before building permits are issued for buildings 100 feet or greater in height, but the effectiveness of this measure cannot be determined with certainty.

7.1.2 Air Quality

Impact AIR-1: Criteria Pollutant Emissions from Construction – Demolition and construction associated with the Project would result in average daily emissions of criteria pollutants that would exceed the City’s construction significance thresholds of 54 pounds per day of reactive organic gases (ROG), oxides of nitrogen (NO_x), and particulate matter with a diameter of less than 2.5 micrometers (PM_{2.5}), or 82 pounds per day of and particulate matter with a diameter of less than 10 micrometers (PM₁₀). Mitigation Measures AIR-1a, AIR-1b, AIR-1c, and AIR-1d would reduce these emissions, but not to a less-than-significant level for NO_x emissions.

Impact AIR-2: Criteria Pollutant Emissions from Operation of the Project and Overlapping Construction and Operations – Operation of the Project (and combined construction and operation) would result in average daily emissions of criteria pollutants that would exceed the City’s thresholds of 54 pounds per day of ROG, NO_x, or PM_{2.5} or 82 pounds per day of PM₁₀; or would result in maximum annual emissions exceeding 10 tons per year of ROG, NO_x, or PM_{2.5} or 15 tons per year of PM₁₀. Mitigation Measures AIR-1b, AIR-1c, AIR-1d, AIR-2a, AIR-2b, AIR-2c, AIR-2d, AIR-2e, as well as Mitigation Measures TRANS-1a, TRANS-1b, TRANS-1c, TRANS-1d, TRANS-1e, TRANS-2a, TRANS-2b, TRANS-2c, TRANS-3a, and TRANS-3b, would reduce these emissions, but not to a less-than-significant level for these pollutants.

Impact AIR-1.CU: Cumulative Regional Criteria Pollutants – The Project, combined with cumulative sources in the Project vicinity and citywide, would contribute to cumulative regional air quality impacts associated with criteria pollutants. Project mitigation in addition to Mitigation Measure AIR-1.CU would reduce but not avoid this significant impact.

Impact AIR-2.CU: Cumulative Health Risk Impacts – The Project, combined with cumulative sources would contribute to cumulative health risk impacts on sensitive receptors. Project mitigation in addition to Mitigation Measure AIR-2.CU would reduce but not avoid this significant impact.

7.1.3 Cultural Resources

Impact CUL-4: Crane X-422 Removal – The Project may result in removal of Crane X-422. Two studies examined the potential significance of this crane and reached different conclusions. Out of an abundance of caution, this EIR treats Crane X-422 as a historic resource for CEQA purposes. As such, removal of Crane X-422 from the site would result in the loss of a historical resource and would be considered a significant and unavoidable impact. Mitigation Measures CUL-3a, CUL-3b, and CUL-3c would reduce but not avoid this significant impact.

Impact CUL-1.CU: Cumulative Loss of Historic Fabric – As noted above, the Project may include removal of Crane X-422, and out of an abundance of caution, this EIR treats Crane X-422 as a historic resource. As such, the proposed Project, in combination with development anticipated under the Downtown Oakland Specific Plan (DOSPP) and citywide, would contribute to cumulative adverse impacts on historic resources. Project mitigation would reduce but not avoid this significant impact.

7.1.4 Noise and Vibration

Impact NOI-1: Construction Noise – Construction of the proposed Project would result in substantial temporary or periodic increases in ambient noise levels in the area in excess of standards established in the general plan or noise ordinance or applicable standards of other agencies. Mitigation Measures NOI-1a, NOI-1b, NOI-1c, NOI-1d, and NOI-1e would reduce noise levels, but not to a less-than-significant level for daytime and nighttime Phase 1 construction activities.

Impact NOI-2: Construction Vibration — Construction of the proposed Project would expose persons to or generate groundborne vibration that exceeds the criteria established by the Federal Transit Administration. Mitigation Measure NOI-1e would reduce vibration, but not to a less-than-significant level for human exposure.

Impact NOI-3: Operational Noise Impacts — Operation of the proposed Project would result in generation of noise resulting in a 5-dBA permanent increase in ambient noise levels in the Project vicinity above levels existing without the Project, or generate noise in violation of City of Oakland Noise Ordinance (Oakland Planning Code section 17.120.050) regarding operational noise. Mitigation Measures NOI-2a, NOI-2b, TRANS-1a, and TRANS-1b would reduce noise levels from concert events, increased roadway traffic, and crowds leaving the proposed ballpark, but would not reduce the impact to a less-than-significant level.

Impact NOI-1.CU: Cumulative Impact/Construction Noise – Construction activities for the proposed Project combined with cumulative construction noise in the Project area could cause a substantial temporary or periodic increase in ambient noise levels in the Project vicinity during construction. Project mitigation would reduce but not avoid this significant impact.

Impact NOI-2.CU: Cumulative Impact/Operational Noise – Operation of the proposed Project when considered with other cumulative development would cause a substantial permanent increase in ambient noise levels in the Project vicinity. Mitigation Measures TRANS-1a and TRANS-1b would reduce but not avoid this significant impact.

7.1.5 Transportation and Circulation

Impact TRANS-3: Consistency with Adopted Policies/Multimodal Traffic at At-Grade Railroad Crossings – Operation of the Project (during Phase 1 and at buildout) would generate additional multimodal traffic traveling across the at-grade railroad crossings on Embarcadero that would cause or expose roadway users (e.g., motorists, pedestrians, bus riders, bicyclists) to a permanent or substantial transportation hazard. Mitigation Measures TRANS-3a and TRANS-3b would reduce the hazard, but not to a less-than-significant level.

Impact TRANS-6: Congestion Management Program (CMP) Roadway Segments – Operation of the Project would increase congestion on regional roadways included in the Alameda County Congestion Management Plan (CMP). Specifically, conditions would degrade from Level of Service (LOS) E or better to LOS F or increase the volume to capacity (v/c) ratio by 0.03 or more for segments already projected to operate at LOS F in 2020. Two segments would be affected:

- Posey Tube in the eastbound direction between the City of Alameda and the City of Oakland
- Webster Tube in the westbound direction between the City of Oakland and the City of Alameda

Mitigation Measures TRANS-1a and TRANS-1b would reduce but not avoid this significant impact.

Impact TRANS-3.CU: Cumulative Impact/Multimodal Traffic at At-Grade Railroad Crossings – Operation of the Project (during Phase 1 and at buildout) would generate additional multimodal traffic traveling across the at-grade railroad crossings on Embarcadero that would contribute to a cumulative transportation hazard. Mitigation Measures TRANS-3a and TRANS-3b would reduce this significant impact, but not to a less-than-significant level.

Impact TRANS-6.CU: Cumulative Impact/CMP Roadway Segments – The Project in combination with other planned development would contribute to increased congestion on regional roadways included in the Alameda County CMP. Specifically, conditions would degrade from LOS E or better to LOS F or increase the v/c ratio by 0.03 for segments already projected to operate at LOS F in 2040. The following six segments would be affected:

- I-880 in the northbound direction between 23rd Avenue and Embarcadero
- SR 24 in the eastbound direction between Broadway and State Route 13
- Posey Tube in the eastbound direction between the City of Alameda and the City of Oakland
- Webster Tube in the westbound direction between the City of Oakland and the City of Alameda
- Market Street in the northbound direction between 12th Street and 14th Street
- Market Street in the southbound direction between Grand Avenue and 18th Street

No mitigation measures identified.

7.1.6 Project Variants

In addition to the significant and unavoidable impacts identified above, the Project variants would result in the following significant and unavoidable impacts, as described in Chapter 5 of this EIR:

Impact CUL-8: Peaker Power Plant Partial Demolition (Peaker Power Plant Variant) – The proposed Project with the Peaker Power Plant Variant would directly affect a historic resource by removing portions of the east and west wings of the building at 601 Embarcadero West. Mitigation Measures CUL-6a and CUL-6b would reduce the severity of this impact, which would nonetheless remain significant and unavoidable.

Impact CUL-10: Gondola – Old Oakland (Aerial Gondola Variant) – The proposed Project with the Aerial Gondola Variant could result in indirect impacts on the Old Oakland Area of Primary Importance (API), a historic resource, by introducing new gondola-related features above and at the northern boundary of the API. Mitigation Measures CUL-2 and CUL-7 would reduce the severity of this impact, which would nonetheless remain significant and unavoidable.

Impact CUL-3.CU: Cumulative Impact/Peaker Power Plant Modifications (Peaker Power Plant Variant) – The Project, in combination with the Peaker Power Plant Variant and development anticipated under the DOSP, would contribute to a citywide cumulative impact on cultural and historic resources identified in the DOSP EIR through the loss of the historic wings of the Peaker Power Plant. Mitigation Measures CUL-6a and CUL-6b would reduce the severity of this impact, which would nonetheless remain significant and unavoidable.

Impact CU-4.CU: Cumulative Impact/Aerial Gondola (Aerial Gondola Variant) – The proposed Project, in combination with the Aerial Gondola Variant and development anticipated under the DOSP, would contribute to a citywide cumulative impact on cultural and historic resources identified in the DOSP EIR through changes to the setting of the Old Oakland API. Mitigation Measures CUL-2 and CUL-7 would reduce the severity of this impact, which would nonetheless remain significant and unavoidable.

7.2 Significant Irreversible Environmental Effects

Section 15126.2(d) of the State CEQA Guidelines states that:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, because a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irrecoverable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project;

- The project would involve a large commitment of nonrenewable resources or the proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy); or
- The primary and secondary impacts would generally commit future generations to similar uses.

Each of these three categories is discussed below.

7.2.1 Irreversible Damage from Environmental Accidents

The proposed Project would require the use and disposal of hazardous materials during construction and operation. No significant irreversible environmental damage, such as what might occur as a result of an accidental spill, is anticipated; however, whenever hazardous materials are present, the potential always exists for accidents that may damage the environment. The presence and use of hazardous materials and remediation of existing hazardous materials on-site anticipated with the Project are described in Section 4.8, *Hazards and Hazardous Materials*, along with existing regulations and mitigation measures that would reduce the possibility of significant environmental damage to less than significant. Based on this conclusion, any potential damage would not be irreversible.

7.2.2 Consumption of Nonrenewable Resources

In an urban context where there are no agricultural or forest lands or minerals and mines, consumption of nonrenewable resources involves the use of nonrenewable building materials and energy sources, including fossil fuels, natural gas, and electricity. The proposed Project would use building materials for construction of buildings and infrastructure on-site and would use energy resources for construction, transportation, building heating and lighting, food preparation, and other activities, as described in Section 4.5, *Energy*.

As discussed in Section 4.5, the proposed Project would not result in wasteful, inefficient, and/or unnecessary use of energy and would not conflict with adopted energy conservation plans or violate energy standards. Among other things, the Project would comply with the City's Green Building Ordinance; would meet the Leadership in Energy and Environmental Design (i.e., LEED) Gold (or equivalent) requirement identified in Assembly Bill AB 734; and would include measures to reduce vehicle trips by at least 20 percent below what would otherwise be expected for the Project without such measures. These and other Project features would limit consumption of nonrenewable energy; therefore, consumption of nonrenewable energy resources would be less than significant.

The proposed Project's consumption of building materials would involve uses that are common and accepted, enabling the construction of infrastructure and buildings that would be designed to last for many years. In addition, the City's Construction and Demolition Ordinance (Municipal Code Title 15, Chapter 15.34) requires that projects prepare waste reduction and recycling plans as part of the building permit application process. Such a plan must detail how the project will salvage and recycle debris generated in the course of building construction, alteration, and demolition. These requirements would address the use of nonrenewable building materials, resulting in a less-than-significant impact.

7.2.3 Changes in Land Use or Impacts that Commit Future Generations

The proposed Project would involve repurposing and reusing the Howard Terminal for a ballpark and mixed-use development. This would change the land use of the site, which is currently used for maritime support uses, including truck parking, storage and staging of loaded and empty containers, longshoreperson training facilities, and occasional berthing of vessels.

This change in land use would mean that future generations would not be able to use the site for maritime use, with the following possible exceptions:

- Within 10 years, the Port may choose to exercise its option, triggering the Maritime Reservation Scenario and reuse of up to about 10 acres of the site for expansion of the turning basin.
- The City of Oakland General Plan's land use designation and zoning would permit continuation of the existing uses or other (new) maritime uses on the site if the Port and the Project sponsor do not reach a mutually acceptable agreement, or if the Project does not move forward for another reason.
- The Howard Terminal ballpark area and lease areas could revert to maritime uses after the conclusion of the lease term.

Use of the site for non-maritime development was anticipated in *Plan Bay Area 2040*, adopted by the Association of Bay Area Governments and the Metropolitan Transportation Commission in 2017, and the commitment of land for non-maritime uses would not in and of itself result in a significant and unavoidable impact. However, there would be land use impacts requiring mitigation as described in Section 4.10, *Land Use, Plans, and Policies*, as well as other, secondary impacts of the proposed development, as described throughout this EIR.

7.3 Growth-Inducing Impacts and Urban Decay

7.3.1 Growth Inducement

The State CEQA Guidelines require that an EIR evaluate the growth-inducing impacts of a proposed action (Section 15126.2(d)). A growth-inducing impact is defined in State CEQA Guidelines Section 15126.2(d) as:

[T]he ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth ... It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

A project can have direct and/or indirect growth-inducement potential. Direct growth inducement would result if a project involves construction of new housing that would result in new residents moving to the area. A project could have indirect growth-inducement potential if it were to establish substantial new permanent employment opportunities (e.g., commercial, industrial, or governmental enterprises), or if it were to involve a substantial construction effort with substantial short-term employment opportunities and indirectly stimulate the need for additional

housing and services to support the new employment demand. Similarly, under CEQA, a project could indirectly induce growth if it were to expand roadway capacity or remove an obstacle to additional growth and development, such as removing a constraint on required public services or utilities, such as by adding a sewage treatment plant that has capacity to serve demand beyond the associated project.

The Project is located within the “Oakland Downtown & Jack London Square” Priority Development Area (PDA). PDAs, as identified in *Plan Bay Area 2040*, call for an increasing percentage of Bay Area growth to occur as infill development in areas located near transit and where services necessary to daily living are provided near housing and jobs.² With its abundant transit service and mixed-use neighborhoods, Oakland is expected to accommodate an increasing share of future regional growth.

As stated in Section 4.12, *Population and Housing*, Impact POP-2, adding up to 3,000 new market-rate and affordable residential units would increase the residential population on the site by approximately 6,000 persons. The number of residents in Oakland is projected to increase from 428,827 in 2018 to 650,630 by 2040 (see Table 4.12-1), or 221,803 more residents than in 2018. The estimated residential population introduced under the proposed Project (6,000) would constitute less than 3.0 percent of this population increase; therefore, the population increase associated with the proposed Project is accounted for and well within the planned growth for Oakland.

As also described in Impact POP-3 (see Table 4.12-8), the employment-generating uses on the Project site would result in total employment of about 9,499 employees under full buildout (or 7,988 net new employees if existing A’s staff at the Oakland Coliseum are subtracted), a substantial increase in on-site employment compared to the existing approximately 98 Howard Terminal employees and up to 12 fire personnel.³ Construction would also employ approximately 1,200–1,300 workers in the near term. Most employees would already have housing in Oakland or elsewhere in the region, and some would be new residents and seek housing either on the Project site (which would provide up to 3,000 new units), or elsewhere in Oakland or the region. The total number of jobs in Oakland is projected to increase from 220,792 in 2018 to 272,760 by 2040 (see Table 4.12-3, or 51,968 more than in 2018). The estimated increase in full-time employment (i.e., not construction workers) under the Project would constitute approximately 18 percent of this increase in jobs, well within the planned growth for Oakland.

As addressed under Impact POP-3, and in the discussions of other topics in this EIR, the Project would include infrastructure improvements necessary to serve the Project site, and would not extend services to other adjacent areas that could be redeveloped. Project-related growth would be adequately served by existing utility and public services providers and would require no additional public facilities that would have significant environmental effects. In summary, the increase in the residential and employment population on the Project site would not result in an

² Association of Bay Area Governments, *Plan Bay Area, Priority Development Area Showcase*. Available: <http://gis.abag.ca.gov/website/PDAShowcase/>. Accessed May 1, 2018.

³ Existing businesses and tenants on the Project site provide a total of 40 on-site employees and 58 contractors/drivers, as well as up to 12 fire personnel at Fire Station 2. This number does not include independent owner-operator truck drivers who park their trucks at the Howard Terminal site.

unplanned increase in Oakland’s population or extend services beyond the site boundary in a way that might indirectly foster unplanned growth.

As discussed in Section 4.15, *Transportation and Circulation*, a Non-CEQA Recommendation is identified for the Project that included one street modification. Adeline Street, between 3rd and 5th Streets, would increase physical street capacity by adding one new lane each way for 600 feet. This proposal would close a traffic lane gap where the corridor to the south and north is two lanes each way and so allow truck drivers to access the Seaport with less truck idling on Adeline Street. The added lanes also allow intersection traffic controls to be upgraded to provide additional pedestrian and bike traffic signal features at 3rd Street, which has Class 2B Buffered Bike Lanes. In the context of overall changes on several corridors in the vicinity, the increase would not be sufficient to result in substantial increases in traffic volumes or to make underdeveloped lands more accessible such that unplanned growth could occur, even when combined with the two planned and funded infrastructure investments described in Section 4.15, the Global Opportunities at the Port of Oakland (GOPORT) project and the Oakland Alameda Access Project.

The proposed Project would be located on an infill site in an urbanized area within the Oakland Downtown & Jack London Square PDA where future growth has been planned, and would not involve any extensions of roads or other infrastructure that could enable additional development in currently undeveloped areas. Consequently, the proposed Project would not be growth-inducing.

7.3.2 Urban Decay

In accordance with State CEQA Guidelines Section 15131, economic or social effects of a project are not considered significant effects on the environment and do not require review under CEQA. However, if the economic or social effects would result in physical changes to the environment, the analysis shall focus on these physical changes. Courts have recognized that such physical changes may include the potential for projects to cause or contribute to “urban decay,” such as the substantial physical deterioration of downtown shopping centers caused by major “big box” retail construction outside the downtown.

For the purpose of this analysis, urban decay is defined as, among other characteristics, visible symptoms of physical deterioration that is caused by a downward spiral of business closures and long-term vacancies. Decay occurs when this physical deterioration of properties or structures is so prevalent, substantial, and lasting for a significant period of time that it impairs the proper utilization of the properties and structures, and may affect the health, safety, and welfare of the surrounding community. Manifestations of urban decay can include such physically visible conditions as plywood-boarded doors and windows, long-term unauthorized use of the properties and parking lots, extensive graffiti painted on buildings, dumping of refuse on-site, overturned dumpsters, broken parking barriers, broken glass littering the site, dead trees and shrubbery together with weeds, lack of building maintenance, and unsightly and dilapidated fencing.

This analysis examines whether a downward spiral of numerous business closures and long-term vacancies resulting in pervasive physical deterioration or “urban decay” could be associated with the departure of the Oakland A’s from the Oakland Coliseum, and in the cumulative context of

the departure of Oakland's two other professional sports teams, the Golden State Warriors and the Oakland Raiders. The analysis is based in part on information about Coliseum vendors and a survey of local businesses (Environmental Science Associates, 2019).

Baseball games at the Oakland Coliseum currently occur 81–94 days per year, depending on the number of pre- and post-season games. Golden State Warriors basketball games previously occurred an estimated 41–45 days per year before the team's departure in summer 2019, and Oakland Raiders football games occurred 8–10 days per year before their departure in December 2019. Thus, even when Warriors, Raiders, and A's games all occurred on-site, the Coliseum complex has not been in use many days of the year, and the complex is fenced off from the public. This existing condition is an accepted characteristic of the vicinity and compatible with the area's industrial character, and thus does not constitute urban decay.

The majority (approximately 70–74 percent) of baseball attendees currently drive and park at the Oakland Coliseum, depending on the game time; approximately 19–23 percent take Bay Area Rapid Transit (BART) and access the site using an overpass directly from the station to the Coliseum. These characteristics mean that there are not significant numbers of local businesses in the immediate vicinity that rely on the business of baseball game attendees. Football and basketball attendees arrive in much the same manner as baseball attendees and are unlikely to constitute a major percentage of any local businesses' customer base, particularly given the smaller size of the basketball venue and the lower frequency of football games.

Prior to the COVID-19 pandemic, a number of businesses in the area surrounding the Oakland Coliseum were contacted by phone or in person to identify any potential impacts on their businesses from the possible move of the A's from the Coliseum to Howard Terminal, as well as the departure of the other sports teams. The businesses surveyed included a sampling of hotels, restaurants, retailers, industrial businesses, and private parking lots.

The survey found that the majority of the businesses in the area did not consider themselves dependent on attendees at sporting events, or on visibility associated with game attendance, with the exception of the hotels and restaurants in the Hegenberger Road/Edes Avenue cluster and a private parking lot. Although the hotels and restaurants may experience a negative business impact, they were not so dependent on the A's and the other sports teams that they were likely to close after these teams have moved or relocated. With few or no business closures expected as a result of relocating the A's from the Coliseum, pervasive negative physical impacts on the properties in the vicinity are unlikely, and hence, there would be no negative impact on the environment resulting in urban decay.

Regarding the potential for "urban decay" at the Oakland Coliseum site from the departure of the A's alone, or in combination with the Raiders and Warriors under cumulative conditions, urban decay is unlikely, given the adopted plan for redevelopment of the Coliseum complex, and because existing City code enforcement requirements and other regulations require that the Oakland Coliseum be maintained when vacant as it has been maintained for extended periods of time in the past.

The City and the Coliseum Way Partners LLC, an affiliate of the Oakland A's, currently own and manage the Coliseum site. The City has adopted a specific plan, the Coliseum Area Specific Plan (CASP), to support redevelopment of the site and the surrounding area. The CASP covers an area of approximately 800 acres, made up of several subareas, including Sub-Area A, where the approximately 112-acre Coliseum complex is located.

The 2014 CASP EIR considered several redevelopment scenarios for the site, all of which anticipated demolition of the Oakland Coliseum. One of the EIR scenarios fits the departure of all three sports teams: Alternative #2E (no new venues, demolition of the Coliseum as professional sports venue, and retention of the existing Oakland Arena). This sub-alternative variation includes 4,000 residential units, 850 hotel rooms, 1.5 million square feet of science and tech space, 190,000 square feet of neighborhood retail, and 225,000 square feet of regional retail. Given the region's current demand and low vacancy rates for housing, and because the site has substantial advantages, such as access to BART, the freeway, and the airport, its redevelopment for these or similar uses would be likely to proceed after the A's departure.

Also, although the City's adopted specific plan for the site, and the site's attractiveness as a development site, mean that the property would be unlikely to experience long-term vacancy after the A's relocation to Howard Terminal, the site (which is often not in use) would retain its current appearance even if it were vacant. The site would remain fenced and secure, similar to days when it is not currently in use. Maintenance and upkeep of the property would be required through enforcement of City code enforcement regulations. Also, as discussed above, few if any businesses in the vicinity would be affected by the absence of sports team employees and patrons to the point of closure. For all of these reasons, it is unlikely that the Oakland Coliseum or the nearby area would experience physical deterioration at a level to constitute urban decay.

7.4 References

City of Oakland, 2014. *Coliseum Area Specific Plan, Draft Environmental Impact Report*, Volume II. August 2014.

Environmental Science Associates, 2019. *Urban Decay Memo*. Prepared with assistance from ALH Economics, October 11, 2019.

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