



April 27, 2026

TO: City of Oakland
Strategic Planning Division
Oakland General Plan Update Team
1 Frank H. Ogawa Plaza
Oakland, CA 94612

FR: California Business Properties Association
NAIOP San Francisco Bay Area Chapter
Supply Chain Federation

To Whom This May Concern,

On behalf of the organizations listed above, we submit the following comments on the City of Oakland's Draft Land Use Framework (General Plan Update, Phase 2). We support the City's interest in growing sectors such as life sciences and research and development, but the current draft raises concerns about the reduction of land available for logistics, warehousing, and goods movement uses that remain essential to Oakland's economy.

The draft proposes redesignating significant areas currently zoned General Industrial (IG/IL) into new Technology and Research (TR) and Green Low-Impact Industrial (GLI) categories. These designations prioritize campus-style office, bioscience, and R&D uses, with only limited advanced manufacturing. In practice, this narrows the range of uses that have historically operated in these areas, including logistics and distribution.

The draft also prohibits warehousing and distribution as primary uses within TR and GLI areas. This is a significant policy shift that would directly affect key logistics areas, including West Oakland near the Port and the Coliseum and Airport area. These locations function as core goods movement hubs because of their proximity to major transportation infrastructure. Limiting those uses in these areas will constrain reinvestment options and create uncertainty for existing and future operators. It also risks creating a growing number of nonconforming uses, which can negatively impact long-term investment decisions and property values.

At the same time, the draft's shift away from industrial uses, including the rezoning of certain industrial areas to residential, raises broader concerns when viewed alongside recent state policies. The state has placed new constraints on warehouse development while also encouraging residential uses in traditionally industrial areas. Introducing new residential uses in these locations creates additional sensitive receptors, which can trigger further restrictions on logistics operations under existing state requirements. Layering these policies together further limits where logistics uses can operate and creates a misalignment that puts additional pressure on already constrained industrial land.

Taken together, these changes would push logistics uses out of the areas where they function best. A more workable approach would preserve flexibility so these districts can support both emerging industries and the ongoing need for warehousing and distribution, particularly in proximity to the Port and Airport.

We appreciate the opportunity to comment and look forward to continued engagement as the General Plan Update moves forward.

For additional information, please contact Skyler Wonnacott, Vice President of Government Relations, California Business Properties Association at (916)960-3951 or swonnacott@cbpa.com.

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