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Sent: Monday, May 19, 2025 2:17 PM
To: McNulty, Liza
Cc: Ishii, Adena; Berkeley Mayor's Office; All Council; Taplin, Terry; Kesarwani, Rashi; Bartlett, Ben; Lunaparra, Cecilia; Humbert, Mark; Tregub, Igor; Blackaby, Brent; O'Keefe, Shoshana; Lam, Nelson; Manager, C; BMASP; Berkeley City Council Policy Committee; Claudia Kawczynska; E Diehm; Allan Abshez
Subject: EIR scoping comments for Berkeley Water Transportation Pier Ferry
Attachments: EIRscopingcommentsBWCC-May19-2025.pdf

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Dear Ms. McNulty,

Attached please find our submission for the request for EIR scoping comments on the Berkeley Water Transportation Pier Ferry Project.

Thank you for taking these into consideration. Please let us know if there are any questions.

Best regards,

Camille Antinori for the Berkeley Waterfront Community Coalition

Date: **May 19, 2025**

To: **Liza McNulty, PE, Project Manager**
City of Berkeley, Parks, Recreation and Waterfront Department
2180 Milvia, 3rd Floor
Berkeley, California 94704

From: **Berkeley Waterfront Community Coalition**

Re: **Berkeley Water Transportation Pier Ferry EIR Scoping Comments**

[Berkeley Waterfront Community Coalition](#) is a nonprofit organization formed under the auspices of [Berkeley Partners for Parks](#), a 501(c)3 organization. Its founding members are motivated by the diversity and range of stakeholders in the waterfront who nevertheless have few channels of shared communication for supporting this unique urban shoreline. BWCC's mission is to develop projects that raise awareness of these stakeholders, enhance a sense of community, and support the waterfront's role in providing value as affordable public access to blue- and greenspace amenities to the region. Below we submit comments in response to City of Berkeley's (COB) Notice of Preparation and Scoping Meeting Environmental Impact Report for the Berkeley Water Transportation Pier Ferry (NOP), dated April 18, 2025, in which COB is the lead agency and the Water Emergency and Transportation Authority (WETA) is the responsible agency under the proposal. In these comments, we also reference the City of Berkeley Public Tidelands Area Project, aka the Waterfront Specific Plan (WSP), for commercial redevelopment and recreation in the same area as the ferry project.

Overview of concerns

The Berkeley marina has long been a waterfront agora and mecca for city residents and visitors seeking to use and enjoy its singular mixture of natural and human resources. It draws a range of people of widely divergent economic means from Berkeley, neighboring cities, and afar. All seek respite and recreation options in this local and regional gem. Projects proposing major changes to the area's physical and social landscape must undergo rigorous debate about impacts, costs, and benefits affecting both built structures and the cultural and human environment. In view of this, the EIR must thoroughly and rigorously assess the physical, cultural and human environmental impacts of the proposed new Berkeley pier and ferry service, expected to serve around **915 passengers departing per day** (about 0.7% of the Bay Bridge vehicular traffic), with its attendant facilities, including parking. In particular, the scope of the EIR must characterize the individual and cumulative effects of a dual construction (pier plus ferry facilities) on equitable access by the public, capital infrastructure and ongoing costs for Berkeley/Alameda County residents, **constriction of the marina's limited parking** options, impacts on sustainable fishing and recreational boating, other environmental

impacts and overall utility to the people who use the marina. The scoping should thoroughly consider alternatives to the proposed WETA ferry, including **smaller ferries**, **inside-marina docking**, and **no ferry at all**. It must clearly evaluate the human and environmental impacts of turning the marina into a **transportation hub for a limited population**, versus reconstructing the pier to enable the Berkeley waterfront to serve as a park unique to the Bay Area.

The outline of comments below is as follows:

1. Impact on social equity and cultural resources
2. Baseline conditions must be with pier and without ferry
3. Impact on recreational and subsistence fishing
4. Fish habitat
5. Dredging for WETA ferry project is new dredging
6. Characterization of alternatives
 - a. Alternative 1: Ferry dock inside Marina
 - b. Alternative 2: Smaller scale ferry
7. Impact of tree removal
8. Ferry parking management
9. Bird nesting and feeding grounds
10. Economic factors to contextualize project impact
11. Compatibility of electrification and emergency service

1. Impacts on social equity and cultural resources

The Berkeley Pier has long standing cultural significance for Berkeley. Since it was closed to ferries in 1937, it has been a focal point for recreation and an important, low-cost asset for many visitors. The [Berkeley Fishing Memories Oral History Project](#) documents intergenerational and community connections to the outdoors as experienced at the pier and waterfront by Berkleyans and frequent visitors. It reveals how people have experienced and appreciated the recreational pier and waterfront as “Berkeley’s backyard,” connoting a low-cost, welcoming, relaxed atmosphere where children and adults enjoy the outdoors in a relatively safe space, for almost 90 years. This use of this space is historical and current. For Berkeley, Alameda County, and beyond, the pier and Berkeley Marina area are integral to **low-cost public access to bluespace**. Among other data, the Kittleson parking study (p. 42) across lots in the waterfront area underscores the socioeconomic diversity of current Berkeley waterfront visitors. Forty-seven percent reported earning *below* the median household income for Berkeley of \$108,558 (<https://www.census.gov/quickfacts/fact/table/berkeleycitycalifornia/PST045224>).

Science increasingly shows the positive impacts of regular bluespace exposure on mental and physical health (Gascon et al. 2017, Pouso et al. 2021, Sturm and Cohen 2014, While et al. 2020). As the **only urban shoreline** in Berkeley, it provides a crucial, inclusive center for public recreation, relaxation, interaction, and growth through **multiple educational and sport-related resources located at the Marina**. Further, it provides these benefits to historically underserved communities and low- and middle-income users who have fewer means to travel to other coastal areas for shoreline access.

While the NOP notes maintaining public space access as an objective, related COB and WETA project documents and considerable COB Parks Department staff time has focused on the needs of the proposed ferry service as the primary objective, with recreation secondary. For example, during the course of WETA ferry project negotiations, **funds earmarked for waterfront and marina infrastructure have been diverted to the ferry project at the expense of maintaining existing recreational amenities**. Further, basic, long-standing facilities central to the waterfront and marina's success as a bluespace public good – e.g. the failing seawall along the Bay Trail bike path in front of the area's two sailing clubs and docks, the recreational east dock in the South Cove, and the watersports launch at Hs Lordship's cove – have been allowed to deteriorate and/or be shuttered. As of May 1, 2025, the COB has laid off its waterfront security monitors, making recreational usage **less safe and secure**. These monitors cost \$100,000/year.

These points also illustrate overlaps in project scope between the ferry project and the WSP. The spatial, policy and operational requirements of the ferry service impede affordable recreational opportunities, as noted in the parking studies, as would a WSP design focus to attract mainly ferry patrons. Data shows that riders in the WETA ferry system tend to be high-income. Serving the high-income segment of population while lessening services to others will transform the waterfront's value as a cultural and affordable public bluespace recreational resource into a transportation hub supporting mainly a high-income ridership profile.



Figure 1: Image of east dock in South Sailing Basin, closed in February 2025. Cost of repairs estimated at \$250,000 are unfunded.

The EIR itself should consider that the proposed facility would be the **only WETA ferry terminal in the WETA system within a long-standing nature-based public park** where water-land recreation is an interconnected and highly-prized amenity. Compare this concept to the locations of other WETA ferries:

- Alameda/Oakland ferry – within Oakland's Inner Harbor and shipping lanes for Port of Oakland, next to barge docks and naval ships
- Mare Island and Vallejo terminals – built in an unused location around Mare Island naval base and shipyard within the Mare Island Strait at mouth of Napa River. The land has long been dominated by housing development and the naval base.
- South San Francisco – by an industrial location within an existing Marina near the airport
- Richmond – site of former Ford factory and WWII shipbuilding site
- Alameda Seaplane Lagoon – within a decommissioned naval base
- Harbor Bay – the terminal serves the housing development and businesses around Bay Farm Island that closely abut the shoreline
- San Francisco terminals – at preexisting marine terminals and piers within industrial sites

At none of these ferry terminals is fishing, swimming, sailing, boating, and other windsports a dominant activity on the water as they are at the Berkeley waterfront.

Those venues are already environmentally degraded: a large-scale ferry there does not displace the pattern of park usage in “Berkeley’s backyard,” nor add substantially to environmental damage. As currently conceived, the Berkeley pier-ferry plan attempts to

allow for recreation with what would be the only intentionally dual-use pier in the WETA system. Unfortunately, many of the project elements listed are **incompatible with existing patterns of recreation**.

The Bay Conservation and Development Commission (BCDC) incorporates into its goals and mission **social equity in shoreline public access** (BCDC, 2020). In October 2019 the agency amended the SF Bay Plan to incorporate issues of cultural diversity of the waterfront and environmental justice considerations into its policymaking process (Adapting 2019, BCDC 2019, Wasserman 2019). See in particular the BCDC SF Bay Plan (https://bcdc.ca.gov/plans/sfbay_plan.html) under Major Proposals (4), Recreation: Findings (b) (w), Recreation: Policies (1), (9), Public Access: Findings (b), Environmental Justice and Social Equity: Findings (g), Policies (3).

EIR scoping input: BCDC policy requires protection of existing and future recreational uses and consideration of social equity. As the proposed ferry is the only terminal in the WETA system to be located in a primarily recreational park, the only waterfront park in Berkeley, mandated as a recreational area by BCDC, the EIR must rigorously assess the cumulative and distributional impacts of these overlapping WETA ferry and WSP projects and **their ultimate impact on the waterfront as a cultural feature and affordable recreational resource, including loss of affordable bluespace recreation, both existing and future**. Specific items may include:

- *The EIR must acquire and present data on socioeconomic characteristics across all current and expected future visitation modes (via car, public transit, bike, walking) and recreational uses to the area and examine if the cumulative impacts of the proposed WETA ferry project and the Waterfront Specific Plan would “gentrify” the area such that affordable and inclusive access to green and bluespace recreation is impeded.*
- *In doing so, the EIR must identify increased costs and access barriers in terms of, for example, recreational space and amenities, recreational services, parking, access to the shoreline and water areas, and level and scope of commercial services.*
- *The EIR analysis must examine the consistency of the overall plans with BCDC policy on social equity in coastal recreation.*
- *The EIR must demonstrate that COB waterfront and park staff who maintain the area have the capacity and the directive to maintain low-cost recreational assets across areas located in the WSP and the ferry plan. As it stands, it is unclear that the COB has a sound plan to manage diverse recreational activities and public access for the life of the ferry project.*

2. Baseline comparison must be recreational demand at waterfront *with* pier and *without* ferry

City staff have indicated that the baseline for comparison is the status today of the waterfront area and pier. However, COB closed the pier in 2015 after a long history of popularity and high usage. Subsequent to closure, the city has made no new capital investments to maintain walkways, seawalls, or adjacent parking lots around the shoreline or pier. Around 2017, COB began negotiations with WETA for a ferry terminal, reviving talks reflecting a 2008 proposal to place a WETA ferry terminal at the location. Hs Lordships Restaurant closed in 2018 and remains derelict. D&E docks have been removed. While there is still extensive usage of the waterfront despite 10 years of minimal maintenance, the **feasible baseline activity should be usage of a reopened pier (to 2000' or 3000') on par with its length prior to closure**, not baseline usage after 10 years of the waterfront area falling into disrepair during COB-WETA negotiations.

Research and reports indicate a large increase in public demand if the pier were reopened and a basic functional facility maintained:

- Ken Jones, chronicler of pier fishing in California, states: “If a survey had been done over the past twenty-five years as to the most visited pier in the Bay Area, the winner undoubtedly would have been either the pier at Pacifica or this pier in Berkeley” and “For availability, transportation, ease of fishing, and facilities, Berkeley was hard to beat” (<https://www.pierfishing.com/berkeley-pier/>).
- Before its closure, Hs Lordships Restaurant was heavily used as an event space for large groups (e.g. school proms, Berkeley Public Schools Fund annual fundraiser, family reunions, etc.). Reviving the venue may see similar increases in demand, since few large event spaces at affordable prices exist in Berkeley.
- If the pier were reopened under the baseline condition of a somewhat shorter 2000' without the ferry, an economic valuation study by [Antinori et al. \(2025\)](#) predicts almost double the visitation rate for fishing over future expected visits to the shoreline along Seawall Drive.

COB 2021 states that replacement solely of the pier with a 2000-foot pier would cost \$26 million, and to 3000 feet, around \$32-\$44 million. City staff have indicated in public meetings that COB's share of the waterside costs alone for the pier/ferry project would be approximately \$26 million. Therefore, a 2000-foot reopened pier facility alone, without a ferry, is a reasonable baseline, as it is the opportunity cost of the WETA/COB pier/ferry project. Even as WETA and COB update all cost estimates to 2025 dollars across all projects, as long as all costs scale relatively equally, this fact would remain.

EIR scoping input:

The EIR must take as a baseline the following conditions: Estimates of level and range of usage for recreation and other non-ferry visitation should the original pier be retrofitted/replaced and reopened to a length of 2000', and with at least the following baseline amenities repaired/reopened:

- *Tenant activity for Hs Lordships location*
- *Street and walkway repair of Seawall Drive*
- *South Cove East Dock repaired*
- *D&E dock replaced*

In doing so, the EIR must clarify whether the proposed ferry terminal and ~500' pier with ~500 foot pier extension adequately accommodates historical, existing and future expected recreational usage as compared to at least a 2000' pier with the amenities listed above.

3. Impact on recreational and subsistence fishing

Before its closure in 2015, the pier was one of the most popular fishing venues in the Bay Area. It hosted fishing derbies like the “mudfish” and kids’ fishing derbies. Closure eliminated or displaced this activity to other piers. Fishers continue to visit the area along the shoreline (which requires a license) as opposed to pier fishing, which does not. According to a recent survey analysis from 2021 to 2023 ([Antinori et al. 2025](#)), 77% of a random sample of shoreline anglers fished in Berkeley prior to COVID, implying a long association with the area, and 61% said they prefer to fish in Berkeley in comparison to other locations. In addition, 55% reported fishing for consumption needs. Other locations like the piers in Pinole and Antioch are not substitutes for fishing at Berkeley but appear to be complementary assets, with fishers traveling north and south along I-80 ([Antinori et al., 2025, p. 23](#)) to these fishing spots.

Because pier fishing does not require a license, it is especially attractive to low-income anglers. For example, Quimby et al. (2020) reported that in a study of pier fishing in generally wealthy Santa Barbara, California, 88% reported annual household income below the state median and 73% were non-white. Further, the study of Los Angeles pier fishing by Stevenson et al. (2012) found that the majority identified as persons of color, fished *only* from piers, and spoke English as a second language. Likewise, many anglers who continue to fish the Berkeley shoreline are lower- to middle-income ([Antinori et al., 2025](#)). This same study also projects an increase in angling visits should the Berkeley pier reopen to even just a length of 2000' *without the ferry*, of 70%, 88% and 114% for low, middle, and high income anglers, respectively.

The environmental economics literature is replete with studies that estimate the value of angling trips for recreational fishing. For example, Pendleton (2011) estimated a value of \$10 to \$100/day (p. 156), and from \$34-\$536/ trip with charter boat fishing being towards the high end (Pendleton and Rooke, 2006). California is second only to Florida in percentage of population that participates in marine recreation (Pendleton and Rooke, 2006). A recent study based on shoreline fishing at Berkeley puts the value at \$78 per trip, considering that the average shoreline fisher travels 24 miles one way from their home to the Berkeley waterfront solely to fish. In springtime, sportfishing boats and private boats go out into the Bay inside the Golden Gate bridge to fish for halibut. According to a Barrientos et al. (2017) report on recreational benefits for the California halibut recreational fishery, based on party/charter/private/rental fishing, Berkeley is the highest valued port in northern California and most frequent port of embarkation for halibut fishing for all of California.

Sources of Berkeley-specific fish reports and species caught off the pier near the shoreline, along the existing (previously opened) pier, and from sportfishing boats leaving out of the Berkeley marina include:

1. BerkeleyMarina_baitntackle: Instagram posts on regular basis from the marina's bait shop show catches from nearby Berkeley waterfront locations
2. California Dawn sportfishing Facebook page:
<https://www.facebook.com/californiadawnsportfishing/>
3. Golden Eye 2000 sportfishing Facebook page:
<https://www.facebook.com/goldeneye2000sportfishing/>

Although the WETA and WSP plans mention adding much-valued fishing amenities like fish-cleaning stations and seats to the proposed pier extension, they include elements with potential to reduce fishing as a recreational and subsistence activity. Yet, **the project makes practically no reference to nor includes data on fishing as a potentially displaced activity with social equity consequences.**

EIR scoping input for angling impact:

- *Incorporate existing reports and studies on shoreline and pier fishing relevant to the Berkeley waterfront area to value changes in visitation rates for fishing and compare baseline condition of 2000' pier without ferry and the dual use ~1000' pier with ferry and design-specific 400' breakwater.*
- *The 400' breakwater in the ferry plan is designed to service the ferry in sheet-pile cement design, which inhibits fish migration and spawning. The design encourages siltation and therefore requires additional dredging over time. The*

EIR should assess specifically the impact of the breakwater design and maintenance on fishing catch rates over the lifetime of the project.

- *Examine potential safety risk and deterrent on fishing demand of crowding on a dual-use pier for the first 500' of pier accommodating ferry passengers and recreational/subsistence fishers.*
- *Examine the impact of parking fees and access barriers in the WSP and ferry plan.*
- *Verify consistency of plan with BCDC policies on social equity with regard to fishing activity.*
- *Compare the baseline (at least) 2000' pier which accesses deep water historically prized by fishers visiting the Berkeley pier to the ~500' recreational pier extension to the proposed ferry pier and breakwater.*
- *Assess impacts on recreational/subsistence fishing of dredging along the pier and ferry route throughout project lifetime.*
- *Assess noise and traffic from ferry operations that would reduce catch rates and therefore the expected value of an angling trip to Berkeley.*
- *Expand analysis of the above to cover all seasons, not just a single point in time, to capture fishing effort which follows migration patterns of targeted fish species.*
- *Expand analysis to include a cumulative impact on above for the built-out ferry system beyond the proposed project outline.*

4. Fish habitat

While the comments in this section overlap with the section above, we attempt to isolate and expand on impacts the biological resources themselves. The bay waters around the pier prior to 2015 are known as spawning grounds for some fish species.

Fish populations are also migratory and seasonal, and interact with other parts of the bay ecosystem. A number of plan elements could negatively affect fish habitat in the area:

- Dredging to accommodate a large vessel alongside the pier close to shore (within 500') plus initial construction and ongoing maintenance could interfere with all fish populations.
- An estimated 16 morning and 12 afternoon weekday crossings between Berkeley and San Francisco alone, plus 14 crossings on weekends and additional crossings for the Berkeley-Larkspur route, would create additional turbulence and noise, interfering with fish populations as well as angling (COB 2021 Feasibility Study).
- The original WETA plan called for a diesel ferry, while electric ferries were mentioned later in the process. Uncertainty remains whether an electric ferry

would accommodate the natural conditions of the Berkeley pier, which experiences high winds and waves during much of the year.

EIR scoping input: *EIR should assess impacts on all fish and marine species that are part of the ecosystem in the path of the proposed WETA ferry with respect to:*

- *New and long-term maintenance dredging*
- *Siltation from a sheet pile breakwater that interferes with halibut and other fish spawning grounds and habitat*
- *Turbidity/turbulence and noise from the San Francisco, Larkspur and other routes in the plan*
- *Ship strikes*
- *Light pollution*
- *Diesel versus electric vessels*

5. Dredging for WETA ferry project is new dredging

The area proposed for the ferry route includes a federal navigation channel under the Army Corps of Engineers. However, the channel is not dredged by the Corps, as it is not considered a critical navigational location. Nor has it been dredged in possibly 50 years or more. **The area proposed for the ferry dock has not been dredged recently and should be considered new dredging.**

The Berkeley Marina was partially dredged under a recent project permitted by the Corps. The intended area is shown in the figure below. But it does not include the channel proposed by the ferry route. Moreover, the area covered in the diagram was not fully dredged.

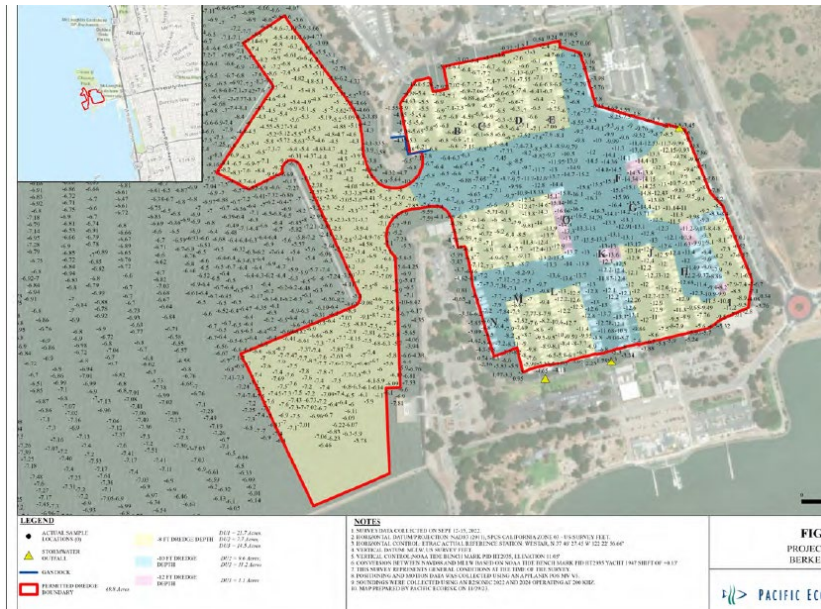


Figure 2: Dredging area map for Berkeley Marina project

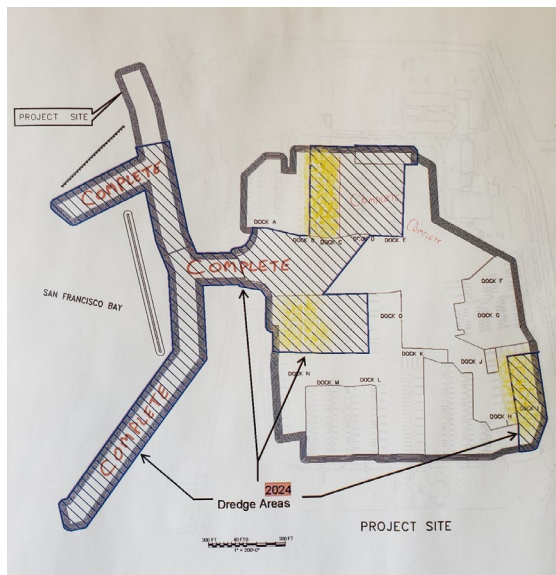


Figure 3: Areas actually dredged (Berkeley harbormaster office)

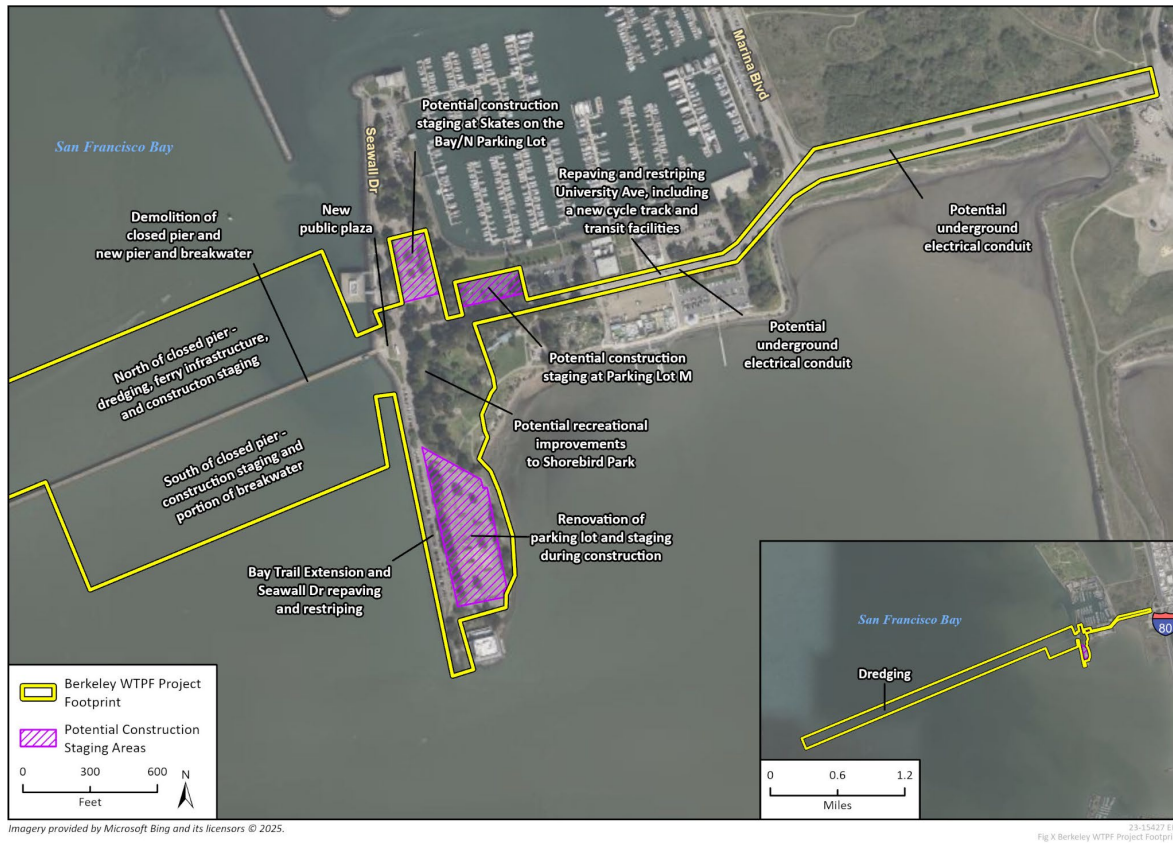


Figure 4: Areas required to be dredged and staged under the WETA ferry project (NOP of EIR, COB).

The area proposed for the ferry terminal and for the ferry service routes were not dredged. The Army Corp of Engineers website at <https://www.spn.usace.army.mil/Missions/Regulatory/Public-Notices/Article/3655212/spn-2005-299690-berkeley-Marina-dredging/> shows a Marina dredging project in 2024. Dredging was focused inside the Marina and the Marina entrances.

EIR scoping input: *This is not Corps maintenance dredging nor is it COB maintenance dredging. Any dredging for the ferry project should be considered new dredging and treated as such under the rules and regulations of BCDC, CEQA, the Army Corps of Engineers and any other agency overseeing dredging in the Bay.*

6. Characterization of alternatives

a. Location alternatives must be adequately assessed

The only alternative examined by the WETA ferry plan is a site innermost in the Berkeley Marina near an old slab of concrete that once served as a ferry dock (aka the Old Ferry Pier). The last time this was used for a ferry was in 1989 by the Red and White Fleet for about six months after the earthquake, after which it suspended service **due to lack of ridership**. This location is not viable as an alternative, and acts a “**straw man**” in the analysis as currently structured. During public meetings, the city only offered as alternatives differences in breakwater design of the project.

Several feasible alternatives exist which have not been analyzed. One is the previous D&E dock location near the Hornblowers docks and the Doubletree Hotel. Another is the Hornblower docks themselves, in underused space. Third are docks currently used by the Genentech and previously the Tidelines ferries, which closed during the pandemic. The latter is a central location in the Marina and adds only two minutes’ travel time to San Francisco, based on the Genentech ferry departures/arrivals, excluding docking maneuver time.

In addition, an in-harbor dock reduces need for new dredging, and thus marginal environmental impact, as the Marina undergoes maintenance dredging regardless. As such it possibly reduces Berkeley’s cost of Marina maintenance because the needed dredging costs could be shared over the years with WETA, and thus provide a more viable economic pathway for ferry service.

EIR scoping input:

- *EIR scoping should integrate the ferry project with the WSP and include examination of options to access a central in-Marina facility.*
- *Specifically, the EIR must assess, as a docking location alternative, a central location within the Marina, such as the previous D&E docks, Hornblower docks or the K docks.*



Figure 5: Concrete slab inside Marina just above red traffic dot serviced old ferry, and is innermost location. D&E dock location is much closer to entrance, out of sight in image but on far right about halfway up. K dock extends from the harbormaster's office in center of marina. The Hornblowers dock by the hotel on far right (not shown) in the marina. Source: <https://berkeleyca.gov/your-government/our-work/capital-projects/waterfront-specific-plan>

b. Alternative scale of ferry should be included

Current ridership demand estimates for the WETA Berkeley-SF are 4000, using a 400-passenger ferry, according to WETA business plan documents. Several indicators suggest the WETA ferry may not reach this level of usage. Public transit demand is down across the Bay Area systems including BART. About 60% of respondents in a [COB questionnaire](#) said they would never use the ferry to commute. For leisure, 56% said they'd never use it or use it less than 10 trips annually. **There is a real danger that the envisioned large-scale ferry with about 28 crossings per day would be mainly empty.** Stranded assets would pose a considerable cost to WETA and Berkeley, as well as having serious environmental impacts.

A reasonable alternative of a smaller scale ferry service must be included in the EIR. A smaller ferry would result in less cost, should demand predictions collapse. Smaller scale service (and e.g. docking within the Marina) could reduce the financial burden on Berkeley and at the same time fit demand patterns more accurately. However, smaller scale ferries have not been considered in planning as alternatives.

EIR scoping input:

- *Examine costs and environmental impacts of an alternative smaller-scale electric ferry, say, for example, a 150-passenger ferry, as a feasible alternative to the current plan and assess the difference in environmental impact.*
- *Data on current usage by Genentech ferry and previous usage of Tidelines ferry ridership must be made available publicly for the report for a feasibility comparison of a small commuter ferry service operating in Berkeley.*
- *Data on the COB questionnaire must be included in the EIR and reconciled with WETA's expansive ridership projections.*

7. Impact of tree removals

The Marina area faces the mouth of the Golden Gate, referred to as "The Slot" (see graphic below). Existing large trees provide valuable wind relief to recreational visitors in the park for land-based activities like picnics and park events. They also shelter half of the South Sailing Basin, which supports children's water sports training. Therefore, removing large trees should be evaluated in terms of potentially decreasing the value of the park for recreational visitors, as well as air quality and wildlife habitat. For example, close to the pier, large trees are the roosting location for the resident wild turkeys. Hummingbirds nest in trees in Shorebird park. The white-tailed kite and osprey hunt in Shorebird Park and south cove waters.

EIR scope input: *Include analysis of tree removal impact on aesthetics, useability, wind protection and bird and animal habitat in the area.*

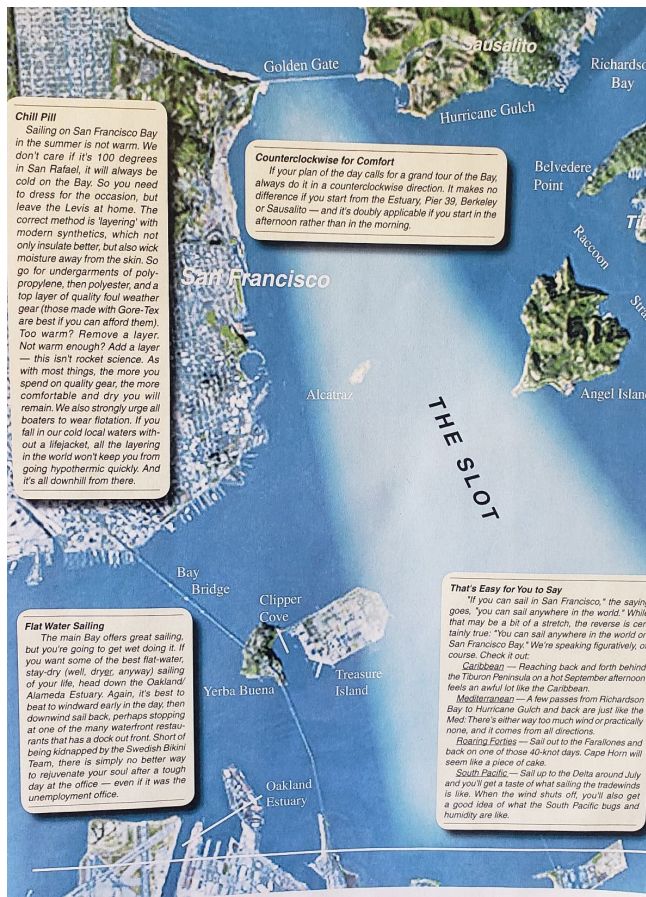


Figure 6: Graphic of “The Slot” wind pattern engulfing Berkeley waterfront and pier (bottom).

8. Ferry parking management

While this section overlaps with our first section on the waterfront as affordable public access and cultural resource, here we emphasize the particular impact of ferry patron *parking* on the Berkeley Marina as a major concern for equity, recreational, and land use. The parking study introduces paid parking (currently free) to recreational users. It forces them to park farther from Marina parks and shorelines. For many, visits to the project area and waterfront are intimately tied to access via private vehicle as well as public transportation. **Sailors, windsurfers, wingers, kayakers, fishers, families, guardians with children at the playgrounds, dog walkers, picnickers and others, crucially, cannot pile considerable amounts of gear, children, or animals aboard the 51 bus.** Thus, public parking remains critical to many who visit. A total of 16% in the Kittleson intercept survey said they cancelled trips to the Marina because they could not find parking.

Bus service to support ferry ridership is mentioned in the ferry parking study. However, consultants noted the limited utility of buses for ferry patrons. The Kittleson study notes in its case studies that AC Transit discontinued shuttle service to the Seaplane Lagoon WETA terminal due to low ridership, and that AC transit service to the Harbor Bay ferry terminal currently has few users.

It is unclear if and how Berkeley officials will fulfill their statutory obligation to keep ferry riders from usurping recreational users' parking. Past experience with Tidelines and Genentech ferries shows **that the city did not succeed in getting ferry patrons to park outside of the South Cove recreational parking lots, raising doubt as to the city's motivation and/or ability to meet its BCDC obligations to preserve recreational parking and access.**

The recent parking study addendum also calls for expanding ferry patron parking to Marina Boulevard and the Skates parking lot. This balloons the scope of the project location as noted in the NOP. This proposal overlaps with the COB Waterfront Specific Plan, which has not been completed, and is compiled independently from the pier/ferry project even though the pier has historically been the central feature of the Berkeley waterfront.

The 315-space Seawall Drive lot was closed in 2018 to deal with a homeless RV encampment, and has been mostly closed ever since. **This was a major lapse in the city's responsibility to maintain public access.** Now the Berkeley Water Transportation Pier Ferry Project intends to devote the entire Seawall Drive lot to ferry parking. This will usurp Seawall Drive parking for people who fish or walk on the pier, which is more than ironic, given that this expensive project was presented as a way to reestablish the pier. Also usurped will be parking for new facilities at Hs Lordships restaurant site, parking to serve the southern Shorebird Cove picnic sites, and the boardsailing and swimming launch at Hs Lordships Cove, to say nothing of overflow parking for the heavily impacted South Cove parking lots.

EIR scoping questions:

- *Include analysis of what the city has done in the past when recreational parking was displaced by the Genentech and Tidelines ferry and plans for future, more effective enforcement capacity if large-scale ferry service is implemented.*
- *Expand project location to include all locations noted in the addendum to the parking study.*

- *Examine cumulative and distributional impacts of parking from the WSP and the pier/ferry project on the public's recreational use, affordable access, and the extant legal land use designations.*



Figure 7: South Cove west parking lot on Saturday, May 10, 2025 at 1pm, with east lot in background. Both are almost entirely used by recreational visitors. Paving the lot as planned will significantly reduce the number of parking spaces. The Kittleson ferry parking study attempts to plan for ferry parking in conjunction with the WSP. (Photo: C. Antinori)

9. Bird nesting and feeding grounds

The waterfront area is home to many birds in Cesar Chavez Park (<https://ebird.org/hotspot/L285281/bird-list>) and the Sylvia McLaughlin State Park, part of the [Eastshore State Park system](#). Resident bird populations include ospreys who feed in nearby waters.

EIR scoping input: The ***cumulative*** impacts of the WSP and the ferry project need to take into account increased noise, increased traffic, tree removal, new and maintenance dredging, ferry operations, and reconfiguration of parking patterns on bird habitat, over the course of migratory and seasonal cycles rather than at one point in time. In doing so, it should:

- *Document all bird species in area, migratory and resident*

- Use eBird "hotspots" and other sources to name the birds documented in the area, potentially up to 200 species. (<https://ebird.org/hotspots>)
- Consider the loss of trees at Shorebird Park that support hummingbirds (see section 7)
- Incorporate information that the burrowing owl is currently under consideration to be added to the Endangered Species list of the State of California (<https://wildlife.ca.gov/News/Archive/cdfw-seeks-public-comment-related-to-western-burrowing-owl>)
- Include bird species identified at the project location that are among the CA Species of Special Concern and Fully Protected Species. This includes the White-Tailed Kite and osprey (<https://wildlife.ca.gov/Conservation/SSC/Birds>)

10. Clarify economic factors to contextualize project feasibility

As BCDC considers environmental impacts overall and weighs any opportunity cost for *not* building the large-scale WETA ferry, realistic information should be provided about those opportunity costs. WETA documents offer no predictions, nor conjectures, of secondary economic benefits for Berkeley. Consultant reports suggest minimal economic benefits. The Keyser Marston report suggests very modest contributions to the Marina Fund which may generate only up to 10% more of any revenues the city receives from food and beverage consumer spending ([Keyser Marston, 2021, pp. 8-9](#)). The report **extends only aspirational comments, e.g. "It is hoped that a large-scale ferry with weekend service will attract an additional hotel"** ([Keyser Marston, p. 9](#)). **The WETA ferry terminal at Jack London Square, Oakland, has failed to prevent a large vacancy rate in commercial rental space.** Oakland's Waterfront Hotel which closed in January 2025 had 145 rooms, just steps away from this terminal.

EIR scoping should include: *Currently available estimates of the secondary economic benefits so that reviewers may weigh the proposed project against its environmental and human costs. The scoping should compare this against the baseline of 2000' pier without ferry.*

11. Compatibility of electrification and emergency service

The waterfront area is land filled for recreational purposes. As fill, the waterfront area servicing the dock may not be stable in an earthquake. The ferry dock is described as serving an electric ferry *if feasible*. In such a case, an electrification facility to serve electric zero-emission ferry vessels may not withstand natural disasters such as earthquakes, tsunamis or violent storms.

Storms also come from north and south throughout the year, making navigation in “The Slot” through the Golden Gate (see above) more challenging. Any final recharging station and breakwater design compatible with supporting electric ferry service year-round and in emergencies should be confirmed within the EIR. With this information, environmental impacts noted above (e.g. dredging, aesthetics, recreation, habitat) can be more clearly assessed.

EIR scoping input:

- *To properly understand the environmental impact of the above, the EIR must provide specifications on infrastructure to serve an electric ferry vessel in an emergency. If it cannot, then it must delete references to emergency response in the scope of the project.*
- *If it specifies electrification infrastructure to withstand natural disasters, then it should specify whether the ferry service will be able to handle emergency vehicles or just personnel. Include technical specifications of breakwater design to support operations year-round and in emergencies.*

Thank you so much for this opportunity to respond. Please let us know if we can answer any questions about these comments.

Berkeley Waterfront Community Coalition

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