

San Francisco Bay Conservation and Development Commission

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September 23, 2020

Elaine Forbes, Executive Director
Port of San Francisco
Pier 1, The Embarcadero
San Francisco, CA 94111

SUBJECT: Piers 30-32

Dear Elaine:

I hope that this letter finds you, your family, and your staff safe and healthy.

Very recently, our staff learned from the [San Francisco Chronicle](#) that the Port of San Francisco staff has selected a proposal to develop Piers 30-32 along the San Francisco waterfront. We gather from the news article and various public port documents that the proposal includes approximately 376,000 gross square feet (GSF) of office space and 30,000 GSF of retail that would be placed on two newly constructed finger piers in the San Francisco Bay. A deep draft berth is proposed on the eastern edge of one of the new piers as an active maritime use and housing and other upland uses are proposed on Seawall Lot 330.

We were surprised by the announcement of the proposal, given the promising discussions that BCDC, the Port, and the State Lands Commission (SLC) held last fall and earlier this year concerning policies for future waterfront development along the San Francisco shoreline. Providing BCDC with an early opportunity to comment on the proposal's suitability and legality would have been a promising continuance of those discussions, as well as consistent with the plan implementation requirements in the San Francisco Waterfront Special Area Plan (SFWSAP), which call for early consultation with BCDC and the SLC on development and design objectives in requests for proposals that the Port proposes to issue for waterfront projects. In addition, we were surprised by the comment on the first page of an executive summary of the proposal that appears to refer to a BCDC permit that was issued for a cruise ship terminal at this site, seemingly suggesting that a proposal for general office uses on new piers in the Bay in 2020 is analogous to a BCDC permit for a cruise ship terminal in the Bay 15 years ago.

Unfortunately, based only upon what we now know, it seems rather clear that this proposal runs counter to BCDC's founding legislation – the McAteer-Petris Act, as well as the SFWSAP, and, just as important, the principles upon which BCDC was created and through which the Bay has prospered for over fifty years. Demolishing the pier to build two new piers in the Bay on which new general office buildings would be located, instead of using an alternative upland location, raises substantial issues regarding consistency with many of BCDC's laws and policies, and certainly with the public trust.



While the BCDC staff endorses the Port's desire to improve the conditions at Piers 30-32, especially given the accelerating threat of rising sea levels due to climate change and the goals of removing Bay fill and improving shoreline access and recreation, the Port should reconsider the concept of building new office buildings in the Bay instead of on land where state law requires that they be located.

As always, the BCDC staff looks forward to learning more about the proposal and assisting the Port as it determines the most appropriate method to move forward.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lawrence J. Goldzband".

LAWRENCE J. GOLDZBAND
Executive Director

LG/gg

cc: Jennifer Lucchesi, State Lands Commission