



August 28, 2026

Mr. John Monetta
Mr. Corey Alvin
Planning & Building Dept.
City of Oakland
250 Frank H Ogawa Plaza, 2nd Floor
Oakland, CA 94612

Re: ITS Bulk Terminal
325 Burma Road
Oakland, CA 94607

Subject: DRX Application for ITS Bulk Terminal – R1 Description of Project + Services - *Revised*
File # ZW2601456

Dear Mr. Monetta and Mr. Alvin,
Below is our *Revised* (R1) Project Description and Description of Services in support of our Design Review Exemption (“DRX”) Application (ZW2601456) for Insight Terminal Solutions (“ITS”) proposed Bulk Commodities Export Marine Terminal (“Bulk Terminal”) and related operations at Berth 7 in the West Gateway of the Oakland Army Base at 325 Burma Road in Oakland (APN #s 018050802300 and 018050802400).

Narrative Description of Bulk Commodities Export Marine Terminal Operations

Applicable Zoning Definition (Oakland Municipal Code §17.10.584(a))

A. Seaport. The accommodation of freight services and operations by ship. This classification includes piers, wharves and docks, marine terminals, container and break-bulk storage areas (where container storage is an accessory, rather than a principal activity), related inter-modal facilities, and support services such as port and harbor operations and navigational services.

Business Overview and Nature of Operations

The proposed project consists of the development and operation of a bulk commodities export marine terminal that meets the definition of a “Seaport” use as set forth above. The facility is designed to accommodate freight services and operations by ship, supported by integrated rail infrastructure and associated intermodal systems.

The terminal will function as a marine-based logistics hub where bulk commodities are received via rail, handled through on-site material handling systems, temporarily stored, and loaded onto ocean-going vessels for export. The inclusion of **on-dock rail service** is a central component of the operation, allowing for direct transfer of commodities between railcars and marine vessels without reliance on off-

site trucking. This configuration enhances operational efficiency, reduces off-site impacts, and is consistent with modern port terminal design.

Summary of Proposed Operational Structures, Facilities and Improvements

- “Rail Dump” building (for transfer of commodities from external supply trains to Stock Pile facilities, including dust collector equipment)
- 2 Stock Pile (bulk storage) facilities including conveyors, and transfer towers (for transfer of commodities (received at Rail Dump) from internal rail cars and conveyors to Stock Piles)
- Transfer conveyor (from Stock Pile to Ship-loading conveyor)
- Sampling Building (for sampling/testing of commodities prior to ship loading)
- Ship Loading Conveyor + Telescoping ship loader (to transfer commodities from Stock Pile transfer conveyor onto marine vessels)
- Office/Changing Room Buildings
- Maintenance facilities, Site infrastructure and utilities to support operations

Additional Basic Info:

- Proposed hours of operation: 24 hours per day, Monday-Sunday.
- Number of employees: ~100 (68 for the terminal, 25 for the rail, 7 management)
- Square footage used by the business: ~818,087 square feet (*see Enlarged Site Plan – Lease Area 2/GA-102*)

NOTE: Actual rail tracks, ties, and related infrastructure in the rail corridor are distinct from this project and outside the scope of this application, as they are being reviewed under the **Letter of Determination file # DET260067**. Some of the scope and project elements included in this application are, however, located in the rail corridor and will interact with those rails.

Products and Services Offered

The terminal will provide the following services consistent with a Seaport classification:

- **Bulk Commodity Export Services:**
Handling and export of dry bulk materials which may include, but are not limited to, minerals, natural resources, and other non-hazardous commodities.
- **On-Dock Rail Transloading:**
Direct unloading of railcars within the terminal footprint and transfer of materials to storage or vessel loading systems.
- **Marine Vessel Loading:**
Loading of bulk carriers at piers, wharves, or docks using conveyors and ship-loading equipment.

- **Break-Bulk and Ancillary Storage:**
Temporary storage of commodities in managed stockpiles. Any container storage, if present, will be accessory in nature and not a principal use.
 - **Intermodal Logistics Coordination:**
Integration of rail and maritime operations, including scheduling, staging, and coordination with rail operators and vessel operators.
 - **Support Services:**
Administrative functions, equipment maintenance, and operational management necessary to support terminal activities.
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Detailed Description of Business Activities

1. **On-Dock Rail Operations and Receiving**
The facility includes dedicated on-dock rail infrastructure designed to receive unit trains or individual railcars delivering bulk commodities. Railcars are positioned within designated unloading areas equipped with bottom-dump systems or similar mechanisms. This on-dock configuration enables direct, efficient transfer of materials from rail to the terminal's handling systems, minimizing handling steps and reducing reliance on truck-based transport.
2. **Material Handling and Conveyance Systems**
Following unloading, commodities are conveyed through a network of belt conveyors. These systems may be enclosed or equipped with dust suppression technologies to ensure environmental compliance and operational efficiency. Materials are routed either to storage areas or directly to vessel loading systems depending on scheduling and operational needs.
3. **Storage and Stockpile Management**
Commodities may be temporarily stored on-site in designated stockpile areas. Storage is short-term and operationally driven, supporting vessel loading schedules. All storage areas are managed to maintain product quality and minimize environmental impacts.
4. **Marine Terminal and Vessel Operations**
The terminal includes marine infrastructure such as piers, wharves, or docks capable of accommodating Panamax bulk cargo vessels. Commodities are transferred to ships using ship loaders or conveyor-fed systems designed for precise and efficient loading. Vessel operations are coordinated to optimize berth utilization and ensure timely export activities.
5. **Intermodal Integration**
The facility operates as an integrated intermodal terminal, combining rail and maritime transport within a single site. The on-dock rail system is directly connected to the marine loading infrastructure, enabling seamless transfer of goods and reinforcing the terminal's role as a regional freight transportation asset.
6. **Support and Ancillary Activities**
Supporting uses include administrative offices, control systems, maintenance facilities for equipment, and coordination with port authorities, rail operators, and maritime carriers. These activities are incidental and necessary to the primary seaport function.
7. **Environmental and Safety Compliance**
All terminal operations incorporate industry-standard environmental controls, including dust suppression, stormwater management, spill prevention, and noise reduction measures. The

facility will operate in compliance with all applicable local, state, and federal regulations governing air quality, water quality, and occupational safety.

Community Benefits

The Project's community benefits have already been established through the Standard Conditions of Approval and applicable Mitigation Monitoring and Reporting Programs ("SCA/MMRPs"), together with the Oakland Army Base Cooperation Agreement and the Construction and Operations Jobs Policies incorporated as material terms of the Lease Disposition and Development Agreement ("LDDA"). These binding requirements provide for environmental mitigation, monitoring and reporting, local and disadvantaged-worker hiring, apprenticeship opportunities, use of the West Oakland Jobs Center, living-wage compliance, and City oversight and enforcement. The Applicant will meet these obligations by complying with all applicable SCA/MMRP measures and continuing to implement the LDDA's Construction and Operations Jobs Policies, including incorporating those requirements into applicable contracts, leases and subleases and providing the required compliance documentation. In addition, the developer has paid \$541,440 to the West Oakland Community Fund as required by Item 1 of Attachment 15 to the LDDA, thereby satisfying that separate monetary community-benefit obligation.

Conclusion

The proposed bulk commodities export marine terminal is fully consistent with the definition of a "Seaport" use, as it accommodates freight services and operations by ship and includes marine terminal facilities, bulk storage, and related intermodal infrastructure. The inclusion of on-dock rail service further reinforces the project's alignment with the Gateway Industrial District TCIF Grant and zoning classification by providing an integrated rail-to-marine logistics function. All activities are characteristic of modern seaport operations and are appropriately located within an industrial maritime zoning designation.

This concludes our *Revised* Project Description and Description of Services re our DRX Application (ZW2601456) for Insight Terminal Solutions ("ITS") proposed Bulk Terminal and related operations at Berth 7 in the West Gateway of the Oakland Army Base at 325 Burma Road in Oakland. Please contact our office if you have any questions or need any additional information.

Thank you and best regards,

ARCHITECTURAL CONCEPTS, INC.



Dominic Dutra, Sr. Agency Manager

Enclosures
CC: ITS01-2536