



November 8, 2020

City of Alameda Planning Board
2263 Santa Clara Avenue, room 190
Alameda, CA 94501

Subject: Alameda General Plan Update – Public Forum #3: Protecting the environment, responding to the climate crisis and meeting regional responsibilities- - (Item 7-A on Planning Board’s 11-9-20 agenda)

Dear Boardmembers:

The Alameda Architectural Preservation Society (AAPS) has the following comments on the Public Forum #3 topics:

1. **Revisit Policies CC-12 (Climate Friendly, Transit Oriented Development), and LU-16 (City Charter and Municipal Code Amendments).** Of the policies listed in the survey and staff report, those of concern to AAPS are CC-12 and LU-16. Both policies and their related action steps appear to call for:

Upzoning in extensive portions of Alameda; and

Eliminating residential density limits, relying instead on building envelope limits (height limits, minimum setbacks, floor area ratio, etc.) to regulate building size.

AAPS is concerned that implementation of these policies and actions could adversely impact the extensive historic neighborhoods that occupy much of the areas identified in these policies. In addition, like many other draft General Plan provisions, these policies and actions have significant ambiguities, including what specific building envelope provisions are being proposed and an unclear definition of the impacted areas.

As stated in Policy LU-16, its implementation would require amendment of Article 26 of the City Charter. Policy CC– 12 would also probably require amendment to Article 26. The effort to repeal Article 26 in its entirety in the November 3 election appears to have failed.

See our September 12, 2020 letter (attached) for more complete comments on these policies, as well as on other related provisions, including Policies LU-1, LU-15, LU–17, LU–18 and CC–17.

2. **Provide a resource conservation section,** including a building materials salvage and recycling policy as stated on Pages 8–9 of our September 12 letter. Many older buildings contain valuable materials, such as old growth lumber, that should not be indiscriminately consigned to landfill.

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The resource conservation section should also promote rehab/reuse of existing buildings as much as possible as an alternative to new construction to, among other things, conserve the embedded energy that was used to construct the existing buildings and minimize the additional energy that must be expended for replacement buildings. **The greenest building is a preserved building!**

3. **Add an action step for improving the City’s tree preservation ordinance.** Although Policy ME–13 and other plan provisions promote tree planting and the city already has a very good master street tree plan, there should be a specific action step to strengthen the city’s tree preservation ordinance. The current ordinance only protects Coast Live Oaks and certain landmark street trees and other city-owned trees, such as the London Planes along Central Avenue. **The existing ordinance should be expanded to protect all tree species over a certain size, except those considered undesirable, and provide clearer standards for defining “removal“ and the circumstances justifying removal.** Many other Bay Area cities have stronger tree preservation ordinances with these provisions.

4. **Inconsistency between the plan provisions described in the staff report and those listed in the survey.** The survey only listed Policies CC-3, CC-16, LU-14, LU-16 and SN-15. Of these, the staff report listed only CC-3, SN–5 and CC–16, but also lists CC-4, CC-20, CC-23, CC-25, CC-9, LU-2, ME-13, ME-12 and CC-12 (for some reason not in alpha-numeric order). Why is there this inconsistency? If staff and the Planning Board are seeking public input on certain plan provisions, it would seem to make more sense to discuss all of the survey-listed policies in the Planning Board staff report.

Thank you for the opportunity to comment. Please contact me at (510) 523-0411 or cbuckleyAICP@att.net if you would like to discuss these comments.

Sincerely,

Christopher Buckley, Chair
Preservation Action Committee
Alameda Architectural Preservation Society

Attachment: AAPS 9-12-20 letter to the Planning Board.

By electronic transmission:

cc: Andrew Thomas and Allen Tai
Mayor and City Council
Historical Advisory Board
AAPS Board and Preservation Action Committee