



May 17, 2021

City of Alameda Planning Board and Historical Advisory Board
2263 Santa Clara Avenue, Room 190
Alameda, CA 94501

Subject: Second Draft Alameda General Plan

Dear Planning Board and Historical Advisory Board members,

The Alameda Architectural Preservation Society (AAPS) is still reviewing the Second Draft General Plan so the following comments are somewhat preliminary and subject to modification and expansion.

We are pleased that many of our previous comments are reflected in the Second Draft, including:

- eliminating previous ambiguities concerning proposed development intensities (residential density, height limits and floor area ratio) by stating the proposed intensities in the land-use classifications;
- clarifying that no changes are proposed to the existing demolition protections in the historic preservation ordinance;
- discouraging demolition in favor of rehabilitation/renovation;
- requiring salvage or deconstruction where demolition would otherwise occur;
- proposing a Mills Act program; and
- several other historic preservation provisions that are in the existing General Plan.

We would like to thank the staff and the consultants for making these changes and Planning Board members for your support.

However, some provisions of the Second Draft are still problematic:

- 1. Potential demolition and insensitive additions and alterations to historic properties resulting from increased development intensities in many areas.** The proposed intensities are described in the land-use classifications on pages 23-25 of the Second Draft and mapped on the land-use diagram on page 22.
 - a. Especially concerning are the proposed intensity increases in the Plan's Medium Density Residential Area (MDRA), the "Stations" neighborhood commercial districts (existing CC-1 Zone), the Park Street and Webster Street Business Districts and the Mixed-Use Area.** The MDRA covers much of central Alameda and includes a very large number of buildings on the City's Historic Building Study List. The other land use

classification areas also contain many historic properties, including the Park Street National Register District and, in the case of the Mixed-Use Area, the Naval Air Station, Alameda, National Register District and the Del Monte Building.

In the MDRA (equivalent to the existing R-2 through R-6 zoning districts), densities are proposed to increase from the existing limit of 2000 ft.² of lot area per unit (ca. 21 units per acre) to:

- ca. 1452 ft.²/unit (30 units per acre) in R-4;
- 1000 ft.²/unit (40 units per acre) in R-5; and
- 870 ft.²/unit (50 units per acre) in R-6.

Height limits are proposed to range from 35 feet in R-2 to 50 feet in R-6. The R-2 35 foot height limit is only slightly higher than the current 30 foot height limit and 50 feet is already the height limit in R-6, so are not by themselves problematic. **However, the General Plan should clearly state that no increases are proposed to the existing 35 foot height limit in R-3 and R-4 or the 40 foot height limit in R-5.**

Similarly problematic density and height limit increases are proposed for the commercial areas. For the “Stations”, the height limit is proposed to increase from 30 feet to 40 feet. **The existing 30’ height limit in the Stations should be retained.** In the Park and Webster Street Business Districts, the height limits are proposed to increase from 40 feet (60 feet in certain parts of the Park Street District and six stories for certain parking structures) to as much as 80 feet in certain areas that are not specifically identified. **There should be no height limit increases in the historic portions of the Park and Webster Street Districts. An 80’ height limit is inappropriate anywhere within these districts. The 60’ height limit in the historic portions of the Park Street district should be reduced to 40’ as set forth in the existing General Plan.**

Unless mitigated, these intensity increases will encourage demolition and replacement of historic buildings with new and larger buildings that architecturally disrupt historic neighborhoods and are inconsistent with Theme 4 “Character” on page 17 of the Second Draft.¹ The increases could also encourage architecturally incompatible alterations and additions to historic buildings.

Although the City requires Historical Advisory Board (HAB) approval of demolition of properties on the Historic Building Study List or that were constructed prior to 1942, political pressure from developers due to the opportunities provided by the intensity increases, are likely to encourage demolition proposals. And even if the HAB denies a demolition, the demolition can be appealed to the City Council, which can approve the demolition if the Council finds that “Upon the evidence of qualified sources, that the historical resource is incapable of earning an economic return on its value”. This further increases the likelihood of more demolitions given the significant discretion offered by this demolition finding.

¹ Theme 4 is loosely derived from a similar theme in the existing General Plan, but omits existing General Plan text focused on historic properties. **This text should be restored.** See Item 3 below and Attachment 4 for further discussion.

- b. **Applying intensity increases to such large portions of the MDRA, Park and Webster Street Districts and the Stations does not appear necessary based on the analysis in the attached 2-2-21 City Council Housing Element staff report.** The increased residential densities above Article 26 of the City Charter's one unit per 2000 sq. ft. of lot area limit would be possible as part of the upcoming Housing Element update through mapping of the City's Multifamily Residential Overlay Zone when necessary to meet Alameda's expected Regional Housing Needs Assessment (RHNA) of ca.5400 new housing units by 2031 as discussed on page 24 of the Second Draft. State law preempts Article 26 regarding these Housing Element requirements.

However, the 2-2-21 staff report states that most of the ca. 5400 units could be located on "former Naval Air Station property, along the northern waterfront, on shopping center sites, and in the Webster Street and Park Street Commercial Districts", while only 200–400 of these units would result from the MDRA intensity increases and 300-500 from the Park Street and Webster Street increases. And no additional units are estimated for the Stations.

- c. **The impacts of the state density bonus law on height limits, other development regulations and overall future density need to be considered.** For example, a density bonus project in an area zoned for a 40 foot height limit could end up with a 50 foot or greater height (one or more additional stories).

The proposed residential density increases will significantly increase the number of sites eligible for density bonus projects. Under Article 26's 2000 ft.² of lot area per unit rule, only lots of 10,000 ft.² or more are eligible for density bonus projects, since the state density bonus law limits these projects to those with five or more units. But the proposed density increases would decrease the threshold size to 7260 ft.² in R-4, 5000 ft.² in R-5 and 4350 ft.² in R-6. This will significantly increase the number of sites eligible for density bonus projects in R-4 and likely the majority of sites in R-5 and R-6. **The General Plan should include an estimate of how many additional density bonus project sites could result from the proposed intensity increases.**

- d. **The General Plan should include: (1) an analysis similar to that in the 2-2-21 City Council staff report; and (2) strategies for accommodating the additional units expected within the MDRA and Park and Webster Street Districts to mitigate possible adverse effects on historic buildings and neighborhoods.** One promising strategy identified for the MDRA and possibly applicable elsewhere, is limiting additional units to existing building envelopes. This strategy should be presented in the General Plan as a possible option to mitigate historic preservation impacts.

But if no additional off-street parking would be required for the additional units, the impacts of a lack of additional parking will need to be considered. The assumption appears to be that many of the residents of these units will not have cars, but this assumption needs to be verified. In some Alameda neighborhoods, where former 1-2 unit residences have been converted to additional units, cars are sometimes parked in paved or unpaved front yards. **There should be an analysis that includes surveys of car ownership of residents of existing multifamily buildings in the MDRA as well as residents who have moved into new multifamily buildings at Alameda Landing and elsewhere.** Locational criteria

for such units should also be developed, perhaps based on surveys of areas where on-street parking is normally available and/or where existing residential densities are relatively low. See the very helpful Attachment 2 staff analysis showing existing densities by block.

Also, would density increases allowed within existing building envelopes also trigger density bonus projects? If so, would the state density bonus law allow the developer to force a waiver of the requirement that new units be located within the existing building envelope?

- e. **The Plan should evaluate its impacts on transportation and infrastructure and the maximum number of residential units that could be achieved under build-out according to different land-use scenarios involving various densities.** A “holding capacity” analysis should be provided similar to the analysis on Pages 5–11 of the existing General Plan’s Land-Use Element and in the existing Element’s Table 2-6 that shows existing development levels by area compared to potential build-out development levels. The Attachment 2 existing densities by block map would be a good starting point for this holding capacity analysis.
- f. Finally, **the General Plan needs to be very selective in proposing development intensity increases**, since the California Housing Crisis Act of 2019 (SB 330) makes it difficult to reverse increases set forth in the General Plan.

2. Proposed General Plan design provisions that could adversely affect historic areas and are inconsistent with existing City policy, including the Citywide Design Review Manual.

Action LU-26b on Page 46 states:

- i. ***b. Creativity.*** *Encourage and support creative and contemporary architectural design that complements, but does not mimic, existing architectural designs in the neighborhood or district.*

Action LU-17b on Page 37 is similar:

- ii. ***b. Innovative Design Solutions.*** *Encourage and support innovative design solutions for the restoration and reuse of older buildings for new uses and avoid design solutions that mimic a prior design style.*

These action statements are inconsistent with the City’s existing design review policies that promote designs consistent with the surrounding neighborhood. They are also too open-ended in their use of undefined and overly subjective terms, such as “creative” and “contemporary”. Adoption of these actions could set the stage for architecturally intrusive new development in historic areas and potentially compromise the continued eligibility of existing and potential National Register and California Register districts for these registers. See Attachment 3 photographs of new buildings in other communities as examples of what could result from these action statements.

Related to this, **why does Action LU-26e on Page 46 state that design guidelines “should focus on desired outcomes rather than prohibited outcomes”?** This is inconsistent with standard

methodology for effective design guidelines, that show “encouraged” as well as “discouraged” approaches. Design guidelines should show both and is the approach now used in the Citywide Design Review Manual.

Actions LU-26b, LU-17b and similar action statements should either be deleted or their applicability limited to areas not containing Alameda Historical Monuments, Historic Building Study List properties, or predominantly pre-1942 buildings.

- 3. Retain important existing General Plan provisions.** There are still provisions in the existing General Plan that are not included in the new draft Plan or have been modified with wording that is not as satisfactory as that used in the existing Plan, sometimes with important text omitted. Examples of these provisions are attached. **These provisions should be retained in the new Plan with minimal modifications.** Most of the attached provisions were included with our December 13 letter to the Planning Board.

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

Attachments:

1. February 2, 2021 Housing Element City Council staff report.
2. Existing residential densities by block.
3. Photos of new buildings with architecturally intrusive modernistic designs in older neighborhoods.
4. Examples of existing General Plan provisions that should be retained in the new Plan.

cc: Mayor and City Councilmembers (by electronic transmission)
Andrew Thomas and Allen Tai, Planning, Building and Transportation Department (by electronic transmission)
AAPS Board and Preservation Action Committee (by electronic transmission)