



June 13, 2021

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

**Subject: AAPS response to General Plan and Housing Element staff reports on Planning Board/HAB June 14, 2021 agenda - -Items 7-A and 7-B.**

Dear Planning Board and Historical Advisory Board members:

The Alameda Architectural Preservation Society (AAPS) would like to respond to the June 14, 2021 staff reports on the General Plan and Housing Element.

## 1. General Plan

- a. **General Plan versus zoning.** We agree that the General Plan is just a framework for zoning changes. But state law requires that the zoning conform with the General Plan, so if the General Plan establishes ranges for development intensities (residential density, height limits etc.) or sets specific numbers for these intensities, the zoning must fit within these ranges or conform to any specific numbers. And if there is a range, the zoning, arguably, needs to show the maximum number within the range somewhere on the zoning map. So any specific development intensities provided in the General Plan will translate into zoning provisions, unless the General Plan is amended.
- b. **Extending multi-family and shared housing to *all* residential zones (LU-2f).** The draft Plan currently provides that these facilities be permitted just in Medium Density Land Use Classification and higher. In its 5-17-21 letter, AAPS questioned the architectural impacts of these facilities if they involve new construction in residential neighborhoods. **AAPS requests that Plan identify what, if any, architectural impacts could occur and how they might be mitigated.**

Also, does this mean that multi-family housing would be allowed by right in the R-1 single-family residential zone? And, if so, how many units per lot? At face value, it appears that the effect of the revised LU-2f would be to eliminate one-family zoning in Alameda. **Is this the intent?**

- c. **Architecture, design and historic preservation (LU-17b and LU-26b).** The staff report's implication is false that AAPS argued in its May 17 comments that "new and creative contemporary architectural design is inappropriate **anywhere** (emphasis added) in Alameda". Although as one option we recommended LU-17b and LU-26b be deleted

entirely, we also recommended as an alternative that they be limited to areas not containing historical monuments, historic building study list properties or predominately pre-1942 buildings.

In any case, the phrase “creative and contemporary design” is highly subjective and open to interpretation. The Plan needs to at least include photographs illustrating what is considered appropriate “creative and contemporary architectural design”.

In addition, LU-26b and LU-17b imply changes need to be made to the Citywide Design Review Manual. Examples of possible changes should be included in the Plan.

The staff suggestion to delete the “does not mimic” language is good. But limiting LU-26b to newer and undeveloped areas should still be considered.

## 2. Housing Element

The staff report gives a very good overview of the issues Alameda needs to address as part of the Housing Element. The strategy to maximize development at Alameda Point and Encinal Terminals is also good. However, the “now therefore be at resolved” clause concerning Article 26 in the draft resolution is unnecessarily broad. And why is the clause even necessary? If the clause is retained, we recommend that it be amended to read as follows:

*NOW, THEREFORE, BE IT RESOLVED, that the City Planning Board recommends that the City of Alameda City Council finds that City Charter Article 26 is ~~in direct conflict with state housing law and is preempted and unenforceable in these circumstances. More specifically, Article 26 of the City Charter is preempted in part~~ by Government Code Sections 65583.2(c), (h), and (i) and Section 65583(c)(1) which require the City to allow multi-family housing, and Government Code Section 65583.2(c)(3) which requires the City to allow at least 30 du/acre to meet its RHNA and that the City has used and intends to continue to use the Multi-Family Overlay Zone where needed to provide adequate housing development sites to meet its RHNA.*

We have reviewed this modification with staff and believe staff is agreeable to it.

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

Sincerely,

Christopher Buckley, Chair  
Preservation Action Committee  
Alameda Architectural Preservation Society

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)