



June 4, 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-- supplemental AAPS comments**

Dear Planning Board and Historical Advisory Board members,

The following comments and those in the attached Exhibit A supplement those in the Alameda Architectural Preservation Society's (AAPS) May 17, 2021 letter and should be read together with our May 17, 2021 letter. The exhibit consists of marked up pages from the Second Draft General Plan, which expresses the May 17 comments and the comments below more specifically as well as provides other, mostly minor, comments.

*Note: The page numbers on the website version of the Second Draft as of May 30, 2021 are not the same as the page numbers in the version attached to the April 27, 2021 Planning Board staff report. These page numbers should be kept consistent in different versions of the Second Draft to avoid confusion. For example, the page references in our May 17 letter are based on the Second Draft attached to the April 27 Planning Board staff report, while the page numbers in this letter are based on the version currently posted as of June 3, 2021 on the City's website.*

1. **Provide better integration with the upcoming Housing Element revisions.** Much of what is driving the Second Draft's Land-Use Element and to some degree the Conservation and Climate Action Element provisions for increased development intensities relate to the upcoming Regional Housing Needs Assessment (RHNA) now being developed for Alameda, and currently estimated at ca. 5400 additional residential units by 2031. Providing the strategy to create these additional units will be a primary focus of the upcoming Housing Element. The Housing Element therefore feeds into some of the most important parts of the Land-Use Element. It is unfortunate that the Housing Element update could not be done first or concurrent with the Second Draft Land-Use Element. Some of the following comments reflect this linkage between the Housing Element, the RHNA and the Land-Use Element.
2. **Provide in the Land-Use Element more background information and analysis of the RHNA, and the relation to the Housing Element and state density bonus law.** Although discussion of the RHNA is most appropriately a Housing Element topic, an explanation of the RHNA and its

linkage to the proposals for increased intensities as well as the current RHNA estimate of 5406 new housing units needs to be included in the Land-Use Element to provide users a better understanding of the challenges involved with the Land-Use Element proposals. Since the 5406 unit number has not yet been finalized, the Land-Use Element will, at least for now, need to acknowledge that the RHNA is a moving target and probably include a disclaimer to that effect until the final RHNA numbers are determined.

See our May 17, 2021 letter and Exhibit A for specific recommendations regarding the Land-Use Element's discussion and analysis of the state density bonus law.

3. **Provide a more cohesive and in-depth discussion of strategies for prioritizing locations of RHNA-mandated units.** References for providing the additional units are scattered throughout the Second Draft, but should be consolidated into a more focused discussion that clearly presents the overall strategy, such as what is provided in the February 2, 2021 Housing Element staff report to the City Council.

As part of these strategies, include:

- a. Since significant portions of the Medium Density Residential Area already have high densities, and much of this Area consists of historic buildings, any density increases in the Medium Density Residential Area should be limited to carefully targeted subareas and only: (i) where necessary to meet the RHNA and other General Plan objectives; (ii) if insufficient development capacity is available in the non-historic portions of the Neighborhood Mixed Use, Community Mixed Use and Mixed Use Areas to meet the RHNA and General Plan objectives; and (iii) in subareas where adverse impacts on historic buildings and on-street parking will be minimized.
- b. Do not increase the current two story height limit to three stories in the Neighborhood Mixed Use Land-Use Classification (the "Stations"). For density bonus projects developers will be able to build higher in any case.
- c. Retain the existing 5000 square-foot minimum lot size in the Low Density Residential Land-Use Classification (i.e. the R-1 zoning district). The draft Land-Use Element proposes a residential density of 13 units per acre which is ca. 150% of the existing density and equals a minimum lot size per unit of ca. 3351 ft.<sup>2</sup>. The existing 5000 square-foot minimum lot size is ca. 8.712 units per acre. Reducing the minimum lot size will encourage lot splits and architecturally disrupt some of Alameda's most significant historic neighborhoods.

*Note: Expressing residential density in terms of units/acre is difficult for many laypeople to fully understand. Expressing density as square feet of lot area/unit is easier to understand and more consistent with standard zoning ordinance practice. For example, the City Charter Article 26's 2000 ft.<sup>2</sup> of lot area/unit limit equals ca. 21.78 unit/acre (often incorrectly rounded in the draft Plan and in various staff explanations of Article 26 to 21 units/acre rather than the more accurate 22 units/acre). Residential density discussions should therefore be expressed whenever possible as square feet of lot area/unit rather than units/acre, perhaps with the units/acre equivalent also provided. Discussions of residential density should be consolidated as much as possible into a single section with a "spotlight"*

*that explains the difference between units/acre and square feet of lot area/unit along with a conversion table that could look something like this:*

*20 units/acre = ca. 21.78 ft.<sup>2</sup> of lot area/unit  
ca.21.78 units/acre = 2000 ft.<sup>2</sup> of lot area/unit  
30 units/acre = ca. 1452 ft.<sup>2</sup> of lot area/unit  
40 units/acre = ca. 1039 ft.<sup>2</sup> of lot area/unit  
50 units/acre = ca. 871 ft.<sup>2</sup> of lot area/unit*

4. **Prioritize Alameda Point and the northern waterfront (especially the estuary shopping centers) as sites for additional housing.** In addition to minimizing adverse impacts on historic buildings and neighborhoods, focusing on these sites will minimize transportation impacts given the estuary sites' (and, to a lesser degree, Alameda Point's) proximity to Oakland and public transit and thereby promoting the General Plan's transportation and climate change mitigation goals. Statements in the Second Draft, in Housing Element discussions and in various staff presentations have already emphasized these areas for housing development, but this focus has been diluted by identification of other areas, notably the Mixed Use Residential Area, as possible sites for new housing. To facilitate the focus on Alameda Point and the estuary shopping centers, the City should initiate the following actions as soon as possible:
  - a. **Obtain approval from the federal government to remove the Alameda Point 1425 housing unit cap (increased to 1900 units based on an additional 475 affordable units).** Staff has previously advised that the Biden Administration will probably look favorably on this request. Has the City made this request and, if not, when will the City proceed?
  - b. **Strongly encourage the owners of the estuary shopping centers (Marina Village, Bridgeside and Alameda Landing) to develop housing on their properties.** The February 2, 2021 City Council Housing Element staff report advised that although the owners of the South Shore Shopping Center have expressed interest in housing development, the owners of the estuary shopping centers have not yet been contacted. **Has such contact been made since February 2 and, if not, when will the contacts be initiated?** The Land-Use Element and/or Housing Element should identify possible incentives for housing development at the estuary shopping centers. In addition to those listed in Policy LU-16c and e and Policy LU-29, possibilities might include tax reductions and relaxation of development standards for **both** market-rate as well as affordable housing in addition to those provided by the state density bonus law for affordable housing.

*Note: Although the South Shore Shopping Center has been identified as a possible site for RHNA-required housing, the addition of housing units at South Shore offers none of the transit or traffic advantages of the estuary centers. Heavy traffic and large crowds already occur at South Shore on weekends and often during the week due to beach and shopping use. Recent lane constrictions on Park Street and around South Shore Center have exacerbated these issues. With its more than 45 acres, the potential amount of allowed population density increase if housing is added at this land-locked location will create an infrastructure choke point that would immediately overwhelm the entire area. South Shore Center housing development should therefore be avoided.*

5. **Revise the Mixed Use Land Use Classification text to delete reference to the North Park Street zoning district.** This appears to be a mistake. The North Park Street zoning district is shown on the land-use diagram on page 24 as in the Community Mixed Use and Medium Density Residential Land-Use Classifications, not the Mixed Use Classification, and is in any case inappropriate for the Mixed Use Classification.
6. **Delete Policy LU-17a’s (page 39) promotion of additional story heights for existing buildings.** Height increases are already allowed if consistent with zoning height limits and additional increases can be imposed by density bonus projects. Increases involving historic buildings can easily compromise their architectural integrity. Too many increases in historic areas will erode the areas’ sense of time and place and their human scale.
7. **Add a new action statement “c” to Policy LU-17 to minimize removal of existing exterior and interior building materials as part of adaptive reuse and rehabilitation projects.** Retention of existing materials is “climate-friendly” and should be an alternative to gut rehab. The action statement could read:

*Minimize removal of existing materials. To promote resource conservation, support adaptive reuse and rehabilitation that minimizes removal of existing interior and exterior materials. Provide guidelines for these approaches. Promote the use of the California Historical Building Code (CHBC) to encourage retention of existing historic materials. The CHBC applies to all pre-1942 buildings in Alameda.*

Also provide a “spotlight” for the CHBC.

8. **Add a new action statement “i” to Policy LN-25 (historic preservation) that calls for continuing the City’s existing application of the CHBC to pre-1942 buildings.** Use of the CHBC will reduce the cost of ADUs and other new housing units in pre-1942 buildings and will promote preservation of both exterior and interior character-defining features.
9. **Add provisions to Policy CC-18 (building renovation and reuse) to encourage building relocation when complete demolition cannot be avoided.** This will promote **both** resource conservation and historic preservation. Add action statements to implement this policy. (AAPS can make specific recommendations if requested).
10. **Consolidate the General Plan’s provisions and minimize repetition as much as possible.** The plan text contains significant repetition (sometimes internally inconsistent) which adds unnecessary length to the document. For example, Policies LU-21a and LU-19d both call for preservation of various parts of the NAS Alameda historic district. These two policies should be combined (possibly with similar Policies LU-23f and LU-23g for the northern waterfront), as part of a single Policy, perhaps incorporated into Policy LU-25 (historic preservation).
11. **Provide additional transit enhancements as justifications for increased residential densities.** Expand Policy ME-16f and/or g and Policy CC-8 to call for a BART, Caltrain and other regional transit shuttles with frequent headways to Alameda. Also explain, (perhaps in the transit-rich spotlight on page 39) how mothers with small children will be able to utilize transit to meet basic needs such as grocery shopping and going to school or doctor’s visits.

**12. Provide alpha-numeric designations for all figures and spotlights and provide lists of the figures and spotlights with page numbers as part of the table of contents.**

Thank you Boardmembers, staff and consultants for all of your work on the updated General Plan and 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

Attachments:

Exhibit A: Marked-up pages from the Second Draft General 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)