



August 21, 2022

Andrew Thomas, Planning Building and Transportation Director  
City of Alameda  
2263 Santa Clara Avenue, Room 190  
Alameda, CA 94501

**Subject: 8-12-22 Revised Draft Housing Element**

Dear Mr. Thomas:

Thank you for the opportunity to review the subject draft as well as the preliminary California Housing and Community Development Department (HCD) comments.

The Alameda Architectural Preservation Society (AAPS) has the following comments and questions regarding these materials:

- 1. Why is unlimited maximum density now shown for the transit overlay and on Park Street, Webster Street, the Stations and the North Park Street area?** We don't see anything in the HCD information request that this relates to this. This is another example of portions of the draft Housing Element functioning too much as a zoning ordinance. Although unlimited density for these areas is proposed in the most recent draft zoning amendments, not including unlimited density in the Housing Element itself would have provided some flexibility for the next stage of the Planning Board's and City Council's upcoming review of the zoning amendments.
- 2. Add discussion of potential demolitions and new construction to the Residential Infill Analysis along with the potential for lot subdivisions.** The revised draft's Site 15b Residential Infill Analysis (Appendix E) discusses how the Housing Element will allow additional units within existing buildings and on existing residential lots with unlimited density as was frequently done before adoption of City Charter Article 26 ("Measure A") in 1973, but says nothing about the potential for widespread demolition of existing buildings, especially historic buildings, for new and larger buildings (as also occurred before adoption of Article 26) that could also result from the massive Site 15b upzonings. It also says nothing about the effects of the potentially widespread subdivision of existing lots through the elimination of minimum lot area and lot width standards in all zoning districts except R-1.

In addition, the Residential Infill Analysis statement that "the City's projection of 34 additional units from conversions or additions to existing structures is very conservative and will most likely be much higher" (Page E-18), confirms our previous observations that the allowed addition of an unlimited number of units within existing buildings alone is much more than adequate to meet the

RHNA and the fair housing requirements. Our observations are further supported by Page E-17's statement that "by removing the multifamily prohibition and allowing buildings with three units, the R-2 district could accommodate *1,927 more units* (emphasis added), without increasing the overall density of the district above 21 units per acre". **We therefore reiterate our previous recommendation that the proposed blanket upzonings, including the transit overlay, be deleted**, since they are excessive and could lead to undesirable collateral impacts such as: (a) displacement of renters from existing relatively affordable (although not necessarily deed-restricted) residential units owned by small investors to build market-rate housing; (b) adverse effects on historic properties; and (c) preemption of future affordable housing sites, given that none of the Site 15b proposals require any of the new units to be deed-restricted affordable. All of these potential impacts need to be discussed in the Residential Infill Analysis.

3. It would seem that HCD's request for discussion of environmental constraints would include identification of Alameda's over 4,000 historic properties that could inhibit development involving these properties. **Why is there no discussion of historic properties as an environmental constraint in the subject draft?**
4. HCD requests discussion of the vacant sites "based on a list of questions". **Where can this list of questions be accessed?**
5. Under "quantified objectives", HCD requests "Expand rehabilitation objectives". **What kind of expansion is HCD seeking?**
6. The printed page numbers for Appendix F should begin with page F-1, but instead begin with page F-21.

Thank you again for the opportunity 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

By electronic transmission:

cc: Mayor and City Council  
Planning Board  
Historical Advisory Board  
Allen Tai, Planning, Building, and Transportation Department  
California Department of Housing and Community Development  
AAPS Board and Preservation Action Committee