



July 8, 2019

(By electronic transmission)
Planning Board
City of Alameda
2263 Santa Clara Avenue
Alameda, CA 94501

Subject: Proposed zoning text amendments (Item 7-C on Planning Board's 7-8-19 agenda)

Dear Boardmembers:

The Alameda Architectural Preservation Society (AAPS) has the following comments on the draft amendments:

DESIGN REVIEW EXEMPTIONS

1. **General comment.** As the different categories of exemptions expand, there needs to be a more rigorous protocol to ensure that staff's interpretation of the design review criteria and design review manual are correct. For example, there have been some replacements of original wood windows where the replacement windows do not conform with the "visually match" criteria in the design review manual. Similarly, the City's replacement of original steel windows at the O Club at Alameda point with aluminum windows did not maintain the narrow profile of the steel windows. Some communities have an administrative appeal process to address these kinds of administrative decisions. Bringing back some form of the old minor design review process might also be considered.
2. **One-story additions.** Although the staff report states that this exemption is not available to additions located within street side yards on corner lots, the ordinance text only references "side yard". The ordinance language should make clear that additions on street side yards on corner lots are not exempt.
3. **Energy efficient windows and doors.** Energy-efficient windows and doors are typically double glazed, which adds to expense and leads to long-term problems such as condensation between the two sheets of glass that often requires replacement of the window and a continuing cycle the window replacements. Replacement or installation of traditional single glazed wood windows should still be exempt from design review, if they are replacement in kind or are consistent with the architectural style of the building. The staff report implies that this will be the case, but it is not clear from the ordinance text. The ordinance text needs to be clarified.

4. **Green/cool roofs, etc.** This exemption should not apply to existing roofs with tile, slate or other architecturally distinctive materials that are specifically called out in the ordinance.

Cool roofs are often made of highly reflective materials such as white thermoplastic or even stainless steel. Such materials can look very intrusive and compromise the architectural quality of many buildings and neighborhoods. We understand that more subdued looking materials are available. If this is the case, they should be specified to qualify for the exemption to minimize visual impacts. The exemption could be based on the solar reflectivity index (SRI) rating of the material or other recognized standard.

The trade offs between green/cool roofs and their impacts needs further analysis. For example, highly reflective cool roofs can sometimes cause unintended consequences, such as reflecting glare and heat onto taller neighboring buildings, resulting in heat gain and discomfort to users of these buildings and compromising the favorable climate change impacts of cool roofs. Have these kinds of impacts have been considered by staff?

There is also the contradiction that covering more undeveloped/landscaped surfaces with ADU's and additions generates heat gain, generating exactly the impacts that cool/green roofs are intended to address. Is the need for cool/green roofs really that great given that our microclimate is mild and doesn't have as much potential to benefit from energy conservation measures as other areas? The cool/green roofs are the ones that NEED to be reviewed for design compatibility with the neighborhood.

ADU AND WORK/LIVE AMENDMENTS

1. **General Comments.** Are the impacts on Alameda residents and the already inadequate infrastructure (roads, bridges, tunnels, sewers, water...), being considered as these and other measures to increase the housing supply are being developed, especially the cumulative impacts? Getting off the island already become significantly more difficult in recent years and has to be timed to avoid frustrating traffic - - one stalled car or roadwork can cause major delays. Public transportation is a very long way from solving this problem. Increased housing density needs to be centered around existing transportation hubs and not on islands with restricted ingress/egress. In the case of emergency, we're trapped.

Regarding work/live, due to Alameda's inadequate infrastructure should we really be considering eliminating the residential density standards? Reducing parking requirements creates a problem for existing residents who struggle to find parking in their neighborhood; this will get worse as density increases. The City needs to recognize that cars aren't going away anytime soon and changing people's use of automobiles will be challenging. Encouraging more retail with more employees without addressing parking could further increase congestion and, ironically, reduce air quality and fuel economy at least until there are major reductions in the use of the internal combustion engine.

AAPS knows that there is a great need for more housing, especially affordable housing, and that Alameda is under state mandates to provide more housing, but AAPS is concerned that the impacts of additional housing and possible mitigations are not being fully analyzed. The

Environmental Review exemption for these amendments seems questionable. An Initial Study is advisable.

2. **Prefab/modular ADUs.** The various types of modular/prefab ADUs that are available should be researched to determine if there are specific types that would be better suited to Alameda neighborhoods than others. Has staff done this? If there are more compatible types, the exemption should be limited to just these types, which would be identified in the ordinance by specific characteristics, such as surface materials, roof and window type and materials, etc.

In addition, since side yard setbacks are relatively shallow, additional consideration should be given to help ensure that modular/prefab units are not visible from the street, perhaps requiring that they be set back from the side property line at least 20 feet.

Finally, modular/prefab units added to backyards that are not seen from the street can still be seen from adjacent properties and may adversely impact their property values. This could negatively impact property tax collection. Although the taxes on the property adding the unit will probably go up, the tax revenue from the adjacent 2-4 lots may go down. Has this possibility been considered? This scenario seems especially likely in historical neighborhoods.

3. **Eliminating the owner occupancy requirement for ADUs.** This proposal is problematic because absentee landlords are often motivated by profit with little or no regard for the neighborhood. AAPS members frequently see beautiful homes that have been turned into multi-unit rentals and suffer from poor maintenance and insensitive architectural alterations. It is true that not all homeowners adequately maintain their properties but absentee landlords are more likely to ignore their neighbors/neighborhood.

The staff concerns about enforcement seem overstated. Would not an owner occupancy exemption on the property tax statement be sufficient? This issue was discussed as part of the ADU ordinance adopted several years ago and the City Council decided to keep the owner occupancy requirement. Of course, if and when state law is changed to eliminate the requirement, Alameda would need to follow suit, but only at that time.

4. **Allowing up to two ADUs on a single-family lot.** We could not find this provision in the actual ordinance. Is it actually being proposed?

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

cc: Andrew Thomas and Allen Tai (by electronic transmission)
AAPS Board and Preservation Action Committee (by electronic transmission)

NANCY McPeak

From: Keith Mccoy <keith@urbanmixdevelopment.com>
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Subject: Proposed work/live Ordinance amendments - Item 7-C 7/8/19 Planning Board Mtg
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City of Alameda Planning Board Members,

We are in support of Staff's recommended amendments to the City's Work/Live Ordinance as described in **Agenda Item 7-C, 2019-7070, Exhibit 3.**

The amendments as proposed would allow for more flexibility and diversity of Work/Live Units to be built throughout the City of Alameda. However, they are especially needed in locations such as Alameda Point where the creation of new businesses and employment opportunities are a primary goal. These proposed amendments will go along way to supporting the redevelopment of the former base.

Thank you for your consideration.

Respectfully,
Keith McCoy
Founding Partner



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