

Nancy McPeak

From: Laura Thomas <ciaolauretta@comcast.net>
Sent: Monday, May 22, 2023 11:52 AM
To: Nancy McPeak
Subject: [EXTERNAL] Midway and Reshap project . Item #5A on tonight's agenda

Alameda City Planning Board:

Renewed Hope Housing Advocates has long been in support of the plans to provide new units and consolidate the Alameda Point Collaborative's supportive housing programs.

This project, which requires a for-profit developer such as the current applicants Brookfield and Catellus, has been in the works for at least a decade. The effort to include more affordable units and a variety of living units is commendable.

We hope it received your support tonight.

Thank you,

Laura Thomas
on behalf of
Renewed Hope Housing Advocates

Nancy McPeak

From: Lara Weisiger
Sent: Monday, May 22, 2023 4:02 PM
To: Nancy McPeak; Allen Tai; Erin Garcia
Subject: FW: [EXTERNAL] Public Comment for Midway Project

From: Shelby S [mailto:shelby.sheehan@gmail.com]
Sent: Monday, May 22, 2023 3:57 PM
To: City Clerk <CLERK@alamedaca.gov>
Subject: [EXTERNAL] Public Comment for Midway Project

Please include as Public Comment for tonight's Planning Board meeting and the upcoming (tomorrow?) City Council Meeting RE the Midway Project.

Thank you.

The Midway Project is overall a very good, much-needed and beneficial project that is generally consistent with the City of Alameda's goals and plans. However, there are some important inconsistencies with the City's Historic Preservation, Housing Element, and Land Use plans and policies that I have yet to see addressed. Regardless of the questionable CEQA "Streamline" approval, as a "Discretionary" project, the Project cannot be "streamlined" (per the General Plan), therefore I request the City evaluate the project accordingly.

Following are some of the Project's outstanding inconsistencies with current City Plans and policies. These are all required elements for development projects in the City but I have been unable to find any documentation regarding these issues (except Universal Design which is NOT in compliance). It might be there, but I can't find it. Please consider this caveat for issues already addressed.

LAND USE

The current proposed Midway Project is located in the Main Street Area of Alameda Point at the boundary of the Historic District. It is bounded to the North by the Historic Bungalows which are part of the adjacent Historic low-density residential single-family neighborhood.

This neighborhood is characterized by few homes per acre, wide spans of lawns, park-like grassy areas, mature vegetation and groves of trees, and important views. The remaining residential units across the street from the Project are 2-story 8-12 unit apartments separated by front and side lawns and landscaping.

Due to its proximity to the Historic neighborhood, current City policies such as Alameda Historic Preservation policies require complimentary architectural character and design for projects that ***are in the vicinity*** of the NAS Historic District. Applicable policies are listed at the end for reference.

Aside from Historic Preservation policies, a number of City Land Use and Housing Element policies require continuity of design and density of development in existing neighborhoods, including Policy HE-14, which "...aims to ensure new development complements the density, and physical and aesthetic character of the neighborhood and surrounding areas."

The Alameda Point Plan includes additional similar stricter restrictions and requirements to new development at the Point. As far as I can tell, none of these have been addressed thus far.

***Note: I believe the Project was initially proposed farther east, where impacts could have been much less of an issue; however, the change from the former to the current site, which is directly across the street from the Historic bungalows and adjacent to the Historic neighborhood, is what created this obvious need to address the potential for significant adverse impacts to the Historic District values and quality.*

As proposed, the Midway project plans to build 3-4 story units straight up from the sidewalk immediately across the street from these existing buildings with a much higher density than the surrounding neighborhood, and there are no plans for compatible design. If this or similar is still the current location and design, then the project needs to undergo an alternatives and mitigation analysis.

CHANGES

Upon review, I believe the City should find that changes to the first 1-2 blocks on West Midway from the Corner of Pan Am would be needed to conform with current City plans and policies, and should include complimentary design elements to the Historic District architecture, set backs with front lawns, and separated buildings akin to the multi-units across the street. An amenity such as a corner store would add value in the immediate surrounding areas as well.

OTHER QUESTIONS

1. Does the proposed project contain mitigation for potential cumulative impacts? Traffic? noise? infrastructure changes, impacts on police and other public services? Parking design?
2. Does this project conform with the Dark Skies Ordinance? Block sizes? Parking design? Universal Design? (NO)

CEQA COMPLIANCE

As a “Discretionary Use” project, I was anticipating a full CEQA analysis, as there will be a number of significant impacts from this Project due to the proposed significant change in land use and density, and proximity to the Historic neighborhood. However, the CEQA approval for this Project was “Streamlined” via a partial CEQA checklist, and no further CEQA analysis was performed despite the fact that the Project is not consistent with the General Plan or the Alameda Point Plan, and has a number of obvious potential adverse impacts.

According to the General Plan (GP) programmatic EIR, CEQA “Streamlining” shall only be used in a limited way and does not allow streamlining of discretionary use projects. The General Plan cites 3 circumstances under which a streamlined permit process *may* be permitted not allowed for discretionary projects They are:

- LU-10: Park St and Webster Façade Improvement
- CC-6: promoting climate-friendly fueling infrastructure
- CC-14: Weatherization and Energy Efficient Building Renovations

Regardless of the Planning Department’s questionable CEQA determination, the permitting process requires the Midway Project to undergo the City Council's full discretionary evaluation according to City and state regulations, plans, and policies per the “Discretionary Use” process because it is:

1. an entirely new high-density development in a currently nearly vacant area associated with potentially significant adverse impacts
- AND
2. across the street from (per CEQA “...in the vicinity of...”) and will have impacts on a currently very-low density Historic neighborhood

AND

3. the Project description itself requests approval for a number of design variations that are inconsistent with the GP development requirements, goals, plans and policies.

REFERENCES: CITY OF ALAMEDA POLICIES

Note this list is not an all-inclusive.

HISTORIC PRESERVATION POLICIES

Historic Preservation is high on the list of priorities for Alamedans, and as such, the GP has several goals, plans, policies and “actions” designed to ensure preservation of the resource significance, character and value.

Due to the location of the Project site in the vicinity of Historic Resources, the proposal needs to be evaluated for potential significant adverse impacts to Historic Resources and mitigated or avoided before this project can be built directly adjacent to the Historic District and abutting the Historic low-density residential neighborhood.

On Historic Preservation, the General Plan includes the following:

Policy LU-19 Alameda Point Main Street Neighborhood Mixed-Use District.

Action: ***NAS Alameda Historic District.** Preserve the character defining features of the NAS Alameda Historic District Residential Subarea. Preserve the “Big Whites...”*

Mixed-Use: ..at Alameda Point ...are designated Priority Development Areas (PRAs)...with residential densities of 10 to 100 units per acre and FAR of 0.25 to 4.0. and a maximum FAR of 0.25 to 5.0 depending on the sub district and historic district designations.

Policy LU-21 Alameda Point Adaptive Reuse Sub-District.

Action: ***Preservation of the NAS Alameda Historic District.** Support and promote a pedestrian, bicycle, and transit supportive urban environment that is compatible with the character-defining features of the NAS Alameda Historic District.*

Policy LU-23 Northern Waterfront Mixed-Use Area.

Action: ***Historic Resources.** Preserve the unique historical, cultural, and architectural assets within the area and utilize those assets in the creation of a new, vibrant mixed-use district.*

Policy LU-25 Historic Preservation. *Promote the preservation, protection and restoration of historic sites, districts, and properties...*

Action: ***Partnerships.** Work in partnership with property owners, ...and non-profit organizations, such as the Alameda Architectural Preservation Society (AAPS) to ensure that the City’s unique and memorable buildings and landscapes are preserved...*

Action: ***Study and Prioritize.** ...creation of improved historic preservation regulations, which establish different levels of protection based upon the level of historical significance associated with the building or site.*

Policy LU-26. Architectural Design Excellence. Promote high quality architectural design in all new buildings and additions to complement Alameda’s existing architectural assets and its historic pedestrian and transit-oriented urban fabric.

Policy LU-27 Neighborhood Design.

Actions: Architectural and Landscape Design. Require that neighborhood infill development and alterations to existing residential buildings respect and enhance the architectural and landscape design quality of the neighborhood.

Local Historic Preservation Ordinance, Municipal Code Section 13-21.1. The purpose of the ordinance is “to promote the educational, cultural, and economic welfare of the City by preserving and protecting historical structures, sites, parks, landscaping, streets, and neighborhoods

- The Housing Element includes Historic Preservation policies as well:

- **Policy HE-1** Support public and private efforts to increase the supply of housing in Alameda consistent with...historic preservation, and economic development policy objectives.

Policy HE-14 Maintain the integrity of existing residential neighborhoods by protecting and enhancing the historic architecture and ensuring that new development complements the density, and physical and aesthetic character of the neighborhood and surrounding areas.

Policy HE-15 Ensure that new neighborhoods seamlessly integrate with older residential neighborhoods by designing new housing developments that complement, but not mimic, the historic, architectural, aesthetic, and physical qualities of existing neighborhoods.

ALAMEDA POINT PLAN AND EIR

- The Alameda Point Plan (APP) and programmatic EIR require avoidance of any Project that will have a “potentially significant adverse impact” on the value of Historic Resources –not only in the District, but in the vicinity of the District.

“Impact 4.D-5: Development facilitated by the proposed project, in conjunction with, past, present, and future development, could potentially adversely affect historic architectural **resources in the project vicinity.**”
(Significant even after mitigation) (p. 2-28)

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