



February 23, 2020

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

Subject: General Plan Update Draft Elements (Item 7-B on Planning Board's 2-24-20 agenda)

Dear Boardmembers:

The Alameda Architectural Preservation Society (AAPS) comments provided below are somewhat preliminary and incomplete due to the relatively brief ten calendar day comment period, beginning from when the plan documents became available on Thursday, February 13. **We therefore request that the Planning Board continue consideration of the Draft Elements until completion of its review of the upcoming Draft Land-Use and Transportation Elements**, both to allow additional time for consideration of the subject draft elements and to allow the Board's consideration of the draft elements to be combined with consideration of the Draft Land-Use and Transportation Elements.

Here are our preliminary comments:

1. **Chapter 1, Section 1.4 ("Themes").** The Themes section is especially important, since it presents the overarching objectives of the General Plan. See Page 3 of the attached introduction to the existing General Plan for the existing Themes text. The "Themes" section restates much of the Themes language in the existing General Plan, but with several notable exceptions:
 - a. The following language from the existing text is omitted:
 - i. **Small town feeling.** ...The City does not have or want tall buildings, freeways, highway commercial strips, or vast tracts of look-alike housing. Measure A, the 1973 initiative that was passed to prevent Alameda from becoming predominantly a city of apartment buildings, stands as a clear rejection of the change that seemed at the time to be engulfing the City.
 - ii. **Respect for history:** The City's rich and diverse residential, commercial, industrial, and institutional architecture is continually gaining recognition as an irreplaceable asset. The Bay Area has no similar communities and none will be built. The

General Plan emphasizes restoration and preservation as essential to Alameda's economic and cultural environment.

- iii. **De-emphasis of the automobile:** In a city where almost every street is a residential street, it is not surprising that increased traffic is seen as a major threat to the quality of life. The General Plan commits Alameda to vigorous support of transit improvements, ferry service, reduction of peak-hour use of single-occupant vehicles, and an enjoyable pedestrian environment.
- b. On the other hand, the following language has been added under “small town feeling” and “respect for history” on pages 10 and 11, replacing the item (a)(i) and (a)(ii) text above:

Small town feeling: Alameda is a quiet, predominantly residential community, originally developed in an era when transportation was limited to walking, bicycling, horses, trains, and ferry. General Plan policies are designed to manage change to retain Alameda’s small town feeling and to reinforce the historic, transit oriented urban fabric. These policies support the provision of a variety of safe, convenient, and environmentally friendly modes of transportation, a network of interconnected public parks and open spaces, and traditional mixed use commercial main streets.

Respect for history: The General Plan emphasizes restoration and preservation of Alameda’s history and the historic urban fabric and architecture that is essential to Alameda’s economic, social and cultural environment.

Although the new “small town feeling” text is good and reflects most of the existing “De-emphasis of the automobile” text in Item (a)(iii) above, much of the existing language in Items (a)(i) and (a)(ii) above is **not** reflected in the new Themes text, but should be, possibly in modified form. Given the recent discussion concerning Measure A, we recognize that the Planning Board may want to remove or significantly modify the existing Measure A sentence.

Since much of the Themes language relates to the upcoming Land-Use and Transportation Element, the Themes language may need to be further refined depending on the final provisions of the Land-Use and Transportation Element. We will therefore wait for completion of the Land-Use and Transportation Element before suggesting how the existing Measure A section in the Themes should be treated and before recommending specific revisions to the proposed Themes language.

Hopefully a consensus on Measure A will be reached as part of the Land-Use and Transportation Element revision.

2. Chapter 3, Policy CC-12 on page 21.

Climate-Friendly, Transit-Oriented Development: Reduce automobile use and vehicle miles traveled by new residents by requiring transit oriented, medium and high density mixed use development on transit and commercial corridors and near ferry terminals in Alameda.

Actions:

- *Residential Density. When zoning property for residential or residential mixed use, zone for medium and high density housing and prohibit low density housing to*

reduce vehicle miles travelled and greenhouse gas emissions from new housing in Alameda.

- *Commercial Intensity. When zoning property for commercial use, allow for higher floor area ratio (FAR) when proximate to transit or planned transit.*

Policy CC-12's call for "medium and high density mixed use development on transit ... corridors" is overly simplistic and problematic, since it would appear to apply to all of the 51 and 19 bus lines on Santa Clara and Buena Vista Avenues, most of which extends through historic neighborhoods. In addition, "transit corridor" needs to be defined.

Similarly, the first action statement's apparent prohibition of "low density" housing is ambiguous and highly problematic, since it seems to apply to **all** residential zoning, yet also appears to be directed only toward "new housing". If applicable to all residential zoning, it effectively calls for eliminating one- and two-family zoning citywide, which is overkill, would require repeal or major modification of Measure A and is inconsistent with much of the "Themes" text. As discussed in the Planning Board's recent Measure A review, the linkage between low density housing and greenhouse gas emissions is tenuous.

In addition, the terms "low-density housing", "medium and high density housing" and "higher floor area ratio (FAR)" need to be expressed more specifically, i.e. units per acre and specific FARs. Since Policy CC-12 and its related action steps concern land use, they should be considered as part of the Land-Use and Transportation Element.

In general, the action statements throughout the draft General Plan materials need to be stated more specifically, as was done in much of the 1991 General Plan.

3. Chapter 3, policy CC-17 on page 23.

Energy Efficiency and Conservation Promote efficient use of energy and conservation of available resources in the design, construction, maintenance and operation of public and private facilities, infrastructure and equipment.

Actions:

- *Energy Efficient Building Renovations. Streamline permitting requirements for energy-efficient building renovations.*

The implementation of this action step needs to be clarified. **If the strategy means eliminating design review for window replacements, it is unacceptable.** The city needs to recognize that the energy conservation benefits of window replacements are not that significant nor cost-effective in Alameda's mild climate and that the double glazing used in energy-efficient windows frequently breaks down after 20 years or so, causing condensation between the two sheets of glass and requiring replacement of the failed unit and sometimes the entire window. This sets up the building for an ongoing cycle of failed unit and/or window replacements and negating much of the energy and resource conservation intended by the policy and action statements.

In addition, any provisions promoting window replacements also need to consider the loss of the embedded energy in the existing and replacement windows through their manufacture and the inconsistency of replacing serviceable old growth wood windows

(which, properly maintained, can often last hundreds of years) with resource conservation objectives.

4. Upcoming Land-Use and Transportation Element.

Many of the existing Land-Use and Transportation Elements' provisions are very good, still relevant and should be retained.

The updated Land Use Element should include an analysis of the updated plan's impacts on transportation and infrastructure and the maximum number of residential units and maximum non-residential floor area ratio that could be achieved under build-out according to different land-use scenarios involving various densities. A "holding capacity" analysis should be provided similar to the analysis on pages 5–11 of the existing Land-Use Element. See attached Table 2-6 of the existing Land-Use Element that shows existing development levels by area compared to potential build out development levels. The existing development levels should also indicate the overall existing residential density for each area or other geographic unit, such as census tract or block.

Given the importance of the Land-Use and Transportation Elements, a review period greater than the 10 calendar days for the subject General Plan Draft Elements should be provided. We recommend at least three weeks.

The impacts of the state density bonus law on height limits, other development regulations and overall future density need to be considered. For example, a density bonus project in an area zoned for a 40 foot height limit could end up with a 55 foot or greater height.

- 5. Coordination of environmental review with the General Plan review process.** The staff report states that an Environmental Impact Report (EIR) will be prepared for the General Plan update. The EIR should include analysis of impacts on existing conditions, which will help guide the General Plan discussion. Analysis of impact on transportation and infrastructure will be especially important. The EIR's project alternatives section will also be very important. **The Planning Board should ask staff for the overall roadmap of the EIR process, including when a detailed analysis of impacts on transportation and infrastructure will be available.**
- 6. Provide explanatory commentary embedded within at least the more significant policy and action statements as was done in the existing General Plan.**
- 7. Historic Preservation Element.** We believe that the General Plan's 1980 Historic Preservation Element is still effective and should be incorporated into General Plan update or at least referenced, especially in the "Setting and Organization of the General Plan" chart on Page 5. An update of the Historic Preservation Element would be desirable.
- 8. Provide alpha-numeric designations for the action statements.** The action statements are designated only by bullets and should instead have alpha-numeric designations to facilitate reference. Designations could be based on the policy statements that each action statement relates to. For example, the action statements listed under Policy CC-12 discussed above could be designated either as CC-12a and CC-12b or CC-12.1 and CC-12.2. The recently adopted Noise and Safety Elements use this approach.

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

Attachments: (1) Existing General Plan Introduction
(2) Existing Land-Use Element Table 2-6 - Land Use by Planning Sector 1989-1990 and Buildout (2010)

cc: Andrew Thomas (by electronic transmission)
Mayor and City Council members (by electronic transmission)
AAPS Board and Preservation Action Committee (by electronic transmission)

1 SETTING AND ORGANIZATION OF THE GENERAL PLAN

The General Plan establishes the City of Alameda's development policies for the period 1990-2010. Its purpose is to guide residents, businesses, policymakers and elected officials in making choices about public and private activities that shape the City's physical environment.

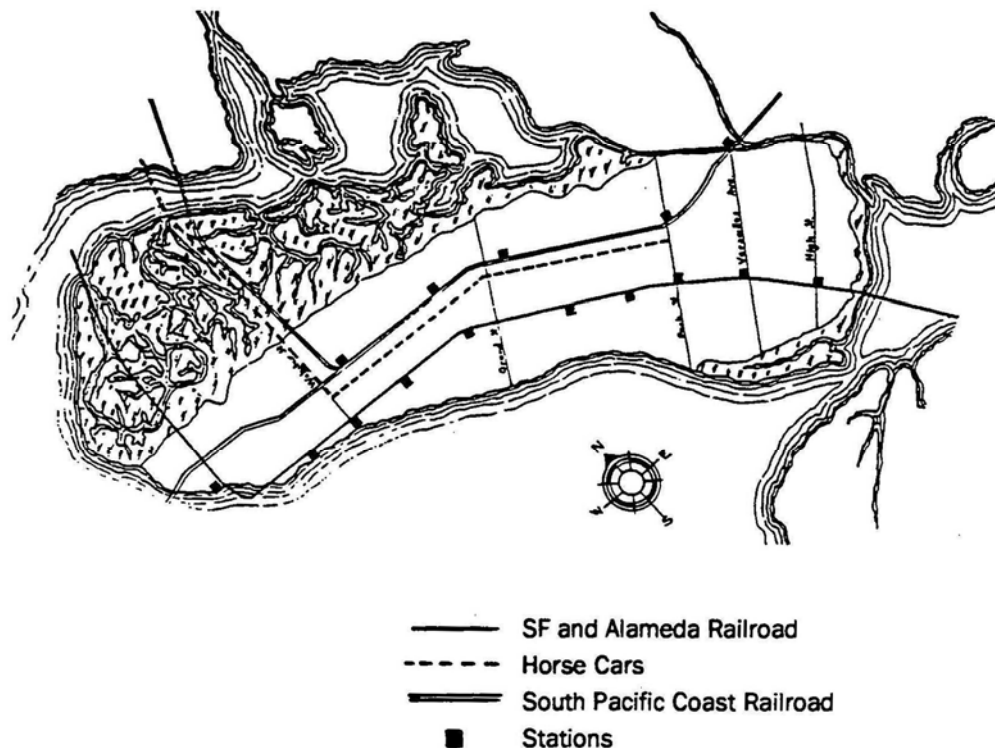
The General Plan as an expression of community values serves as a marker, both for where the community finds itself today and where it hopes to be in the future.

1.1 A CAPSULE HISTORY OF ALAMEDA

Alameda in its natural state was a peninsula covered by a dense forest of coastal live oak. Prior to the arrival of the Spanish and Mexicans it was inhabited by Coastal Miwoks who sustained themselves through hunting, fishing and gathering. Settlement by non-natives began in 1776 after Luis

Figure 1-1
Alameda Rail Transportation, 1887

Source: *Alameda: A Geographical History*, Imelda Merlin



Peralta divided part of his large East Bay land grant, the Rancho San Antonio, among his four sons. Alameda derived its original name, "the Encinal," from the large stands of native oaks ("encino" means "oak" in Spanish) on the Main Island. The name "Alameda," meaning "grove of poplar trees," was given to the City as a poetic gesture upon popular vote in 1853.

In 1849, the California Gold Rush brought Americans and Northern Europeans to San Francisco Bay. Many made their fortunes in supplying goods and services to the region's burgeoning population. Among these were two young entrepreneurs, William Worthington Chipman and Gideon Aughinbaugh, who purchased the Encinal from Antonio Maria Peralta for \$14,000 in 1851, the year after California became a state. They subdivided the land and sold tracts for residences and orchards. By 1872, three separate settlements, the Town of Alameda, Encinal and adjacent lands, and Woodstock, were established in the east, central and western sections of the peninsula. The Town of Alameda was granted a charter by the State Legislature in 1854; incorporation of all peninsula settlements under one local government occurred in 1872.

Early growth of residential, commercial and industrial areas depended upon water and rail transportation, and an excellent climate. (See Figure 1-1, Alameda Rail Transportation, 1887) The City's industrial waterfront and small commercial districts ("the stations") developed in conjunction with rail improvements, while neighborhoods of Victorian homes were built, and beach resorts attracted tens of thousands of weekend visitors. In 1902, the Tidal Canal was completed and Alameda became an island. Major shipyards and Neptune Beach (the "Coney Island of the West") were established along the northern and southern shores to take advantage of the island's assets.

The decades between 1920 and 1970 witnessed cycles of boom and bust. Following an enlightened era of civic building during the 1920s, Alameda endured difficult years of political scandal and corruption through the 1930s. The entry of the United States into World War II focused the City's attention on the war effort. During World War II, shifts ran around the clock at the Naval Air Station (commissioned in 1940) and in the City's shipyards, and the City's population reached an all-time high of 89,000.

By 1973 concern about replacement of Victorian homes by boxy apartment buildings and the prospect of all-apartment development on Bay Farm Island led to passage of initiative Measure A, which prohibits residential structures having more than two units. Despite this restriction, an average of 300 homes per year were built between 1970 and 1990, mainly on Bay Farm Island. Bay Area growth pressure has facilitated redevelopment of unused shipyards on the Northern Waterfront as business park, homes, and marinas that make Alameda the yachting capital of Northern California. Approval of the last large residential project on Bay Farm Island in 1989, plus senior housing under

construction and Navy housing committed, will bring Alameda to 95 percent of residential holding capacity.

The only major committed nonresidential project is completion of Harbor Bay Business Park on Bay Farm Island, which will add space for one-third as many jobs as exist in Alameda in 1990. Entering the '90s, Alameda's greatest unknown is the effect of impending defense budget cuts on the future of the Alameda Naval Air Station (NAS), which occupies one-quarter of the City's land area and is its largest employer.

1.2 THEMES OF THE GENERAL PLAN

The General Plan's policies reinforce five broad themes:

An island: Arriving in Alameda is an event – a journey across or through the water that clearly establishes the City's boundaries and identity. General Plan policies strengthen awareness of the City's island setting by making the shoreline more visible and accessible.

Small town feeling: Alameda has always been a quiet, predominantly residential community, an ideal urban/suburban community created in an era when commutes were by rail or ferry. The City does not have or want tall buildings, freeways, highway commercial strips, or vast tracts of look-alike housing. Measure A, the 1973 initiative that was passed to prevent Alameda from becoming predominantly a city of apartment buildings, stands as a clear rejection of the change that seemed at the time to be engulfing the City.

Respect for history: The City's rich and diverse residential, commercial, industrial, and institutional architecture is continually gaining recognition as an irreplaceable asset. The Bay Area has no similar communities and none will be built. The General Plan emphasizes restoration and preservation as essential to Alameda's economic and cultural environment.

De-emphasis of the automobile: In a city where almost every street is a residential street, it is not surprising that increased traffic is seen as a major threat to the quality of life. The General Plan commits Alameda to vigorous support of transit improvements, ferry service, reduction of peak-hour use of single-occupant vehicles, and an enjoyable pedestrian environment.

Multi-use development on the Northern Waterfront: Retention of seaports and related industries, priority space for boating-related activities, and extension of an existing residential neighborhood to a new 10-acre park along the Estuary are the Plan's boldest policies for both preservation and change.

1.3 THE PLANNING PROCESS NEED FOR REVISION OF THE 1979 COMBINED LAND USE PLAN (CLUP)

The City's 1979 CLUP is a 270-page volume crammed with detailed information and proposals. It includes three of the seven General Plan Elements mandated in 1990 by the State: Land Use, Open Space, and Circulation. Separately prepared and adopted elements are the Conservation Element (1973), Safety (including Seismic Safety) Element (1976), Noise Element (1976), Scenic Highways Element (1976, now optional), Energy Element (1979, optional), Historic Preservation Element (1980, optional), and Housing Element (1990).

CLUP policies were based on a 1975 Community Goals Study prepared by a committee of 600 citizens. Some of the CLUP's key proposals call for Zoning Ordinance amendments that, as of 1990, have not been implemented. Many CLUP policies are reaffirmed by this General Plan – the major policy changes involve the Northern Waterfront. The CLUP, other Plan elements, and the Strategic Plan adopted by the City Council in 1989 have been valuable resources for General Plan revision.

PUBLIC PARTICIPATION IN PLAN-MAKING

Work on plan revision began in late 1988, and three community workshops were held in February 1989 (East End, West End, Bay Farm Island) to identify planning issues facing Alameda. More than 150 issues or ideas were offered by 100 workshop participants – some of whom attended all three sessions. A list of planning options (choices) was prepared for review by the City Council and Planning Board, and a Working Paper (Existing Conditions, Issues and Options) analyzing the options selected by the City Council for study was published in June 1989.

At a second round of four community workshops in July and August a professional facilitator aided clear communication, and participants used an electronic voting machine to register their anonymous opinion of each option. Following review of the Working Paper and summaries of the workshops, the City Council discussed the options and requested further study of Northern Waterfront alternatives. In March 1990, after hearing public comment and considering Planning Board recommendations made at the close of two hearings, the City Council gave direction to the planning consultants for preparation of the Draft General Plan.

Council decisions were on major issues such as new access routes to Alameda, the future of housing in areas that have long been zoned for commercial use, and underused land on the Northern Waterfront. The purpose of the Draft General Plan is to enable a constructive community debate on Alameda's

future. There are many policies in the Draft that the Planning Board and City Council have not discussed. Revisions and additions are expected and invited as the Planning Board and City Council hold public hearings prior to adoption of a revised General Plan.

1.4 NATURE AND SCOPE OF THE GENERAL PLAN

A city's General Plan has been described as its development constitution – the set of policies within which development regulations and decisions must fit. The General Plan is a statement of the community's vision of its long-term or ultimate physical form and, desirably, a guarantee of stable development policies.

State Law requires each city and county to adopt and maintain a General Plan. Actions relating to zoning, subdivision approval, housing allocations, and capital improvements must be consistent with the General Plan.

The Alameda General Plan is not simply a compendium of ideas, data and wishes: it consists of a diagram (a drawing that shows arrangement and relations) and carefully worded policies, accompanied by explanations needed to make the reasons for the policies clear. The Plan has three purposes:

- To enable the Planning Board and City Council to reach agreement on long-range development policies;
- To provide a basis for judging whether specific private development proposals and public projects are in harmony with policies; and
- To allow city departments, other public agencies and private developers to design projects that are consistent with City policies, or to seek changes in those policies through the process of amending the General Plan.

The Alameda General Plan must be:

- **Long-range:** However imperfect our vision of the future is, almost any development decision has effects lasting more than 20 years. The Alameda General Plan is geared to buildout, which is expected to be reached in about 20 years.
- **Comprehensive:** It must coordinate all major components of the community's physical development. The relationship between land use intensity and traffic is most obvious.
- **General:** Because it is long-range and comprehensive, the Plan must be general. The Plan's purpose is to serve as a framework for detailed public and private development proposals. It establishes requirements for additional planning studies where greater specificity is needed before the City can act on development proposals.

The General Plan is implemented by staff in making administrative decisions, the decisions of the Planning Board and City Council, and by the zoning and subdivision ordinances, specific plans, redevelopment plans and the City's capital improvement program.

The Zoning Ordinance includes detailed use classifications and standards. The Zoning Map should be consistent with the General Plan Diagram, but it is not intended to be identical to it. Several zoning districts may be consistent with a single General Plan land use classification, and boundaries of zoning districts may be similar to but not identical with General Plan designations. Zoning Map changes affecting the extent of a Neighborhood Business District, for example, will be based on detailed parcel-by-parcel study and may not match the General Plan boundary precisely.

USING THE GENERAL PLAN

The Plan text distinguishes adopted policies from information describing the reasons for a policy. *Guiding Policies* are the City's statements of its goals and philosophy. *Implementing Policies* represent commitment to consistent actions. Implementing Policies are as specific as is appropriate given the City's current level of knowledge and consensus on each issue. Adopted policy statements are printed in roman type; explanatory material appears in italics and is not adopted.

The General Plan Diagram in the pocket at the rear of this volume depicts the desired ultimate land use and street network. The Diagram must be used in conjunction with the Plan text. The Land Use Classifications (See Section 2.2) explain the legend on the Diagram and specify density and intensity ranges for each category. A glossary defines technical terms. To make the General Plan diagram readable, it is necessary to omit isolated use designations smaller than an acre. Places of religious assembly are not shown.

ORGANIZATION OF THE PLAN

California's General Plan Law is a product of the incremental nature of the legislative process. If literally followed, it creates confusion as to where some topics should be located and some duplication among the seven mandatory Plan elements. Fortunately, Government Code 65301(a) allows a city to reorganize the material as long as all topics are covered. The exception is the Housing Element, which is required by State guidelines to contain extensive data as well as policies focusing on housing production. Alameda adopted a Housing Element for the period 1990-1995 in December 1990. The content of the remaining six state-mandated elements (land use, transportation, open space, conservation, safety and noise) appears in the sections of the Alameda General Plan as noted:

Land Use Element establishes land use classifications, sets densities and intensities for development, and creates a pattern of land uses (including open space) to meet space needs.

City Design Element (Optional) provides ideas and policies to enhance Alameda's design quality and maintain its strong visual image.

Transportation Element (formerly Circulation Element) contains policies for streets, transportation systems management, transit, pedestrian routes, bikeways, and movement of goods.

Open Space and Conservation Element (Open Space and Conservation Elements) includes policies for management of categories of open space lands and prescribes policies for conservation of both natural and cultural resources.

Parks and Recreation, Shoreline Access and Development, Schools and Cultural Facilities Element (Optional). These facilities are interrelated in Alameda so are treated in a separate element rather than included under Land Use or Open Space.

Airport Environs Element (Optional) contains policies that otherwise would appear under Land Use, Safety and Noise, but are grouped for convenient reference and to direct attention to the City's concern about airport impacts.

Health and Safety Element (Safety and Noise Elements) considers strategies to cope with the management of seismic, geologic, and soils hazards, fire and flooding, hazardous materials, and noise.

Alameda Point Element (Optional) contains site-specific policies regarding land use, transportation, open space, and cultural resources, and health and safety which address the redevelopment of the former Alameda Naval Air Station.

Northern Waterfront Element (Optional) contains site-specific policies which address the redevelopment of certain lands generally located along the northern waterfront between Sherman and Grand Streets.

KEEPING THE GENERAL PLAN CURRENT

All public works projects, subdivision map approvals, and zoning text or map changes must be consistent with the General Plan. From time to time, changes in policy as well as unforeseen opportunities or needs will require amendment of the General Plan. In an effort to prevent casual or automatic General Plan amendments, State law allows each mandatory element to be amended not more than four times per year, although there is no limit to the number of

changes made during each amendment. Most requests are likely to be for map changes, but each must be screened to determine effects on text policies.

The entire Plan should be reviewed and updated at least every five years. State law requires the Housing Element to be updated on a five-year schedule, and specifies 1990 and 1995 as revision years.

The Land Use Element is the core of the General Plan. It is composed of text, policies and a land use plan, called the General Plan Diagram, which designates the proposed general location, distribution, and extent of land uses. Land use classifications, shown as different patterns on the Diagram, specify a range for population density and building intensity for each type of designated land use.

**TABLE 2-6: LAND USE BY PLANNING SECTOR
1989-1990 AND BUILDOUT (2010)**

Planning Sector	Land Use	Housing Units/ 1989-1990	Gross Square Feet Buildout
West End	One Family Housing	1,405 units	2,455 units
	Two Family Housing	4,180 units	4,180 units
	Total Housing	5,585 units	6,635 units
	Commercial	10,000 sq. ft.	328,000 sq. ft.
	Business Park	0	132,000 sq.ft.
Webster Street	One Family Housing	5 units	10 units
	Two Family Housing	0	0
	Total Housing	5 units	10 units
	Commercial	349,000 sq. ft.	449,000 sq.ft.
West Central	One Family Housing	1,833 units	2,023 units
	Two Family Housing	2,809 units	2,809 units
	Total Housing	4,642 units	4,832 units
	Commercial	102,000 sq.ft.	140,000 sq. ft.
East Central	One Family Housing	1,533 units	1,748 units
	Two Family Housing	3,555 units	3,555 units
	Total Housing	5,088 units	5,303 units
	Commercial	38,000 sq. ft.	50,000 sq. ft.
Park Street	One Family Housing	6 units	11 units
	Two Family Housing	229 units	229 units
	Total Housing	235 units	240 units
	Commercial	945,000 sq. ft.	1,045,000 sq. ft.
East End	One Family Housing	3,805 units	3,845 units
	Two Family Housing	1,852 units	1,852 units
	Total Housing	5,657 units	5,697 units
	Commercial	54,000 sq. ft.	54,000 sq. ft.
South Shore	One Family Housing	1,395 units	1,400 units
	Two Family Housing	2,658 units	2,658 units
	Total Housing	4,053 units	4,058 units
	Commercial	550,000 sq. ft.	550,000 sq. ft.
Estuary	One Family Housing	342 units	1,120 units
	Two Family Housing	369 units	555 units
	Total Housing	711 units	1,675 units
	Commercial	125,000 sq. ft.	137,000 sq. ft.
	Business Park	876,000 sq. ft.	1,558,000 sq. ft.
Bay Farm Island	One Family Housing	4,539 units	5,194 units
	Two Family Housing	52 units	52 units
	Total Housing	4,591 units	5,246 units
	Commercial	64,000 sq. ft.	64,000 sq. ft.
	Business Park	1,135,000 sq. ft.	5,220,000 sq. ft.
Total	One Family Housing	14,863 units	17,481 units ^a
	Two Family Housing	15,704 units	16,215 units ^a
	Total Housing	30,567 units	33,696 units
	Commercial	2,237,000 sq. ft.	2,817,000 sq. ft.
	Business Park	2,011,000 sq. ft.	6,910,000 sq. ft.

Commercial includes retailing, services and business and professional offices with the exception of Harbor Bay Business Park where the support retail is included under Business Park. This table does not include manufacturing, distribution, and office space in general and light industrial areas.

^a Up to 325 low cost housing units may be built in Alameda as housing as replacement housing for the low cost units lost when Buena Vista Apartments were converted to market- rate housing in 1998. Some or all of these replacement units may be located at one or more the mixed-use sites, or in any area of the City where residential units are permitted.