



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)



September 12, 2020

City of Alameda Planning Board
2263 Santa Clara Avenue, room 190
Alameda, CA 94501

Subject: Alameda General Plan - -8-13-20 Draft and Survey #1

Dear Boardmembers,

The General Plan is a very ambitious, complex and extremely important project. The Alameda Architectural Preservation Society (AAPS) is developing comments on the entire document, but in this letter is focusing on some overarching concerns plus the topics addressed in Survey #1.

It is unfortunate that the public forums have been scheduled while the COVID – 19 restrictions are still in place and during the run-up to the November 3 election, including the proposed repeal of Article 26. Many Alameda residents are distracted by these issues, which may impair full community participation in the General Plan process.

PUBLIC INPUT AND SURVEY ISSUES.

It is good that the public forums are being held under Planning Board auspices. **But the Planning Board meeting format should be modified to allow for more thorough public discussion than allowed under the Planning Board's usual rules, including the three minute time limit.** A document as important and complex as the General Plan needs more opportunity for in-depth discussion. The usual process found in most other communities is more informal – allowing true back-and-forth discussion between members of the public, staff and Planning Board members. This allows more opportunities for ideas to be further developed and conflicting points of view and ambiguities to be resolved.

Regarding the survey, we agree with the staff report assessment that the survey results may not reflect a full cross-section of the community. Responding to the survey requires computer skills and equipment that many Alameda residents do not have, especially lower income people and older residents. Although challenging, providing the survey in hard copy form to as many of these residents as possible might be helpful.

GENERAL PLAN CONTENT.

The draft General Plan still needs lots of work. **Many of the draft provisions are ambiguously worded, overly subject to interpretation and sometimes internally inconsistent.** It is difficult to provide definitive comments, including responses to the surveys and for the Planning Board to respond to the four questions in the staff report, until these issues are corrected.

Here are some specific comments:

1. **Provide explanatory commentary embedded within at least the more significant policy and action statements as was done in the existing General Plan.** This commentary is necessary to present the rationale and specific implementing options for each policy and action. As mentioned in our comments below, the rationale and implementing options are not clear for many of the policies and actions. We called for this in our February 23, 2020 letter to the Planning Board (attached), but the recommendation has not been implemented.
2. **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 used this approach.

We recommended alpha-numeric designations in our February 23, 2020 letter and the Planning Board and staff expressed support for this recommendation. Like our recommendation in Item 1 above, this recommendation has also not yet been implemented. The latest draft Noise and Safety Element now even omits its previous alpha-numeric designations for the action statements.

In our comments below, we attempt to mitigate this by assigning numeric designations to the action statements.

3. Land Use and City Design Element.

- a. **The draft Land Use and City Design Element is too vague for determining the extent and locations of possible increases in development intensity.** The proposed development intensities are not clearly defined in the land use map on page 14. The land-use classification definitions beginning on Page 15 appear to describe only existing conditions, not what is proposed, and seem to leave proposed intensities very open ended. The proposed maximum intensities must be clearly identified in the General Plan and the impacts discussed.

In addition, the updated Land Use and City Design Element should include an analysis of the updated plan's impacts on transportation and infrastructure and the maximum number of residential units and maximum floor area ratios and/or residential densities 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 and proposed development levels should also indicate the overall existing residential density for each area or other geographic unit, such as census tract or block.

The impacts of the State Density Bonus Law on height limits, other development regulations and overall future density also 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 50 foot or greater height (one or more additional stories). If floor area ratio, height limits and other form-based standards are adopted to replace residential density standards (as implied by

Policy LU-16, Action Bullet 1), the consistency of form-based standards with the State Density Bonus Law needs to be verified and the method for calculating density bonuses determined.

b. **Policy LU-1, Action Bullets 3, 4, 5 and 8: Complete and sustainable Neighborhoods.**
Policy LU-1 states:

Maintain complete and connected neighborhoods that support a mix of uses and meet the needs of residents of all ages, physical abilities, and incomes.

Actions:

1. *Family-Friendly Neighborhoods. In all neighborhoods, provide equitable access to parks and recreation facilities, community services, public facilities, schools, child care facilities, and amenities.*
2. *Parks and Open Space. Maintain a comprehensive and integrated system of parks, trails, open space, and commercial recreation facilities within a safe and comfortable 1/4 mile walk from all neighborhoods.*
3. *Affordable Housing. In all neighborhoods, provide housing opportunities for all income levels, ages and family types and sizes. Provide both “for-rent” and “for-sale” affordable housing units.*
4. *Accessory Dwelling Units. In all neighborhoods, allow for accessory, in-law or secondary units to provide affordable housing opportunities for seniors and small households.*
5. *Shared Housing. In all neighborhoods, allow for shared housing opportunities, including co-housing, congregate housing, senior assisted living, single room occupancy housing, transitional housing, emergency warming shelters, and shelters for the homeless.*
6. *Cottage Business and Home Occupations. Allow employment and business opportunities by permitting “cottage businesses”, home occupations, and live-work opportunities in all neighborhoods to reduce distances between home and work and home and shopping.*
7. *Local Food. Allow for farmers’ markets, fresh food stands and community gardens to supplement the availability of healthy food throughout the City.*
8. *Prohibit Barriers. Prohibit land use regulations that are not equitable or that are exclusionary.*

How literally is the reference “all neighborhoods” to be taken from these action statements? For Action Bullet 5, is allowing “cohousing, congregate housing, senior assisted living, single room occupancy housing, transitional housing, emergency warming shelters, and shelters for the homeless” really being proposed for **all** neighborhoods and **everywhere** within all neighborhoods? If so, it would appear that abolition of one family zoning, duplex zoning and possibly other low density zoning classifications is being

proposed. If this is the actual proposal, what is the strategy for accommodating social services and other support for transitional housing, homeless shelters and some of the other types of shared housing in existing low density residential neighborhoods?

For purposes of this policy, “neighborhood”, needs to be defined. If “neighborhood” means those shown on the Survey #1, Exhibit 1 map, there appears to be enough flexibility to accommodate these uses in all neighborhoods. But criteria needs to be developed for each of these uses to help identify the most suitable locations to accommodate them within each neighborhood. However, within the plan document itself, we only find the neighborhood names on some of the maps without the neighborhood boundaries that are shown on the Exhibit 1 map. If these are the “neighborhoods” referred to in Policy LU-1, the survey map showing the neighborhood boundaries needs to be included in the Plan, perhaps with brief descriptions of each neighborhood.

In addition, what kinds of land use regulations are considered “not equitable” or “exclusionary” as stated in Action Bullet 8?

As in the case of many are the plan’s other policy and action statements, commentary and analysis needs to be provided describing how these proposals will actually be implemented.

c. **LU-15: Transit Oriented Infill Development.** Policy LU-15 states:

Promote and support dense mixed-use infill development on vacant and underutilized parcels in the Mixed-Use, Community Mixed-Use, Neighborhood Mixed-Use, and Medium-Density Residential areas.

What is meant by “dense”? What are considered “underutilized parcels”?

d. **Policy LU-16. City Charter and Municipal Code Amendments.** Land Use and City Design Policy LU-16 states “...consider amendments to Article 26 of the City Charter...” and describes various related changes to the Municipal Code’s zoning ordinance.¹ This Article 26 statement is already somewhat obsolete, since the Alameda City Council (over AAPS objections) voted on July 7, 2020 to put repeal of Article 26 on the November ballot. For purposes of Plan review, it should be assumed at least for now that Article 26 will be repealed, which will open the door to a wide range of development options. Related to this, are several problematic statements in Policy LU-16’s action statements:

***Action Bullet 1: Transit-Oriented Mixed Use Development.** Consider amending the Municipal Code to remove existing zoning prohibitions on multifamily buildings and residential zoning density limits in the transit oriented areas within a 1/4 mile radius of a daily commute transit line or ferry terminal in the Medium Density, Mixed Use, Community Mixed Use and Neighborhood Mixed Use areas. Regulate building size in these areas with height, setback, lot coverage, setback, and/or floor area ratio standards.*

¹ Article 26 has two main parts: Section 26-1 limits the number of residential units in a building to two; Section 26-3 requires at least 2000 sf of lot area per unit.

This statement calls for elimination of all residential zoning density limits in the transit oriented areas of the medium density, mixed use, community mixed use and neighborhood mixed use areas and relying on the building envelope provisions of the zoning ordinance to determine building size, including, perhaps, a new floor area ratio standard.

As noted in Item 3a above, it is not clear what the maximum intensity might be within the transit oriented areas and elsewhere, leaving the question of maximum intensity open ended. If residential density standards are eliminated, it would appear that form-based standards, such as floor area ratio, would be relied on.

What are the proposed numbers for floor area ratios, height limits and other form-based standards? How would form-based standards interface with the State Density Bonus Law, which is based on residential density standards?

The Medium Density Residential Area applies to much of central Alameda. The “commute transit lines” referred to in Action Bullet 1 need to be defined, but we assume the term refers to the 51 and 19 bus lines. **There needs to be a clear definition of “commute transit lines” in the plan.** If the 51 and 19 are, in fact, considered “commute transit lines”, eliminating density limits on properties within a quarter-mile of these lines in the Medium Density Residential Area could open up much of central Alameda to more intense development.

The Medium Density Residential Area includes a very large number of buildings on the City’s Historic Building Study List which forms by far the greatest portion of the City’s list of historic properties. The other land use classification areas also contain substantial numbers of historic properties, including the Park Street National Register District and, in the case of the Mixed Use Area, the Alameda Naval Air Station National Register District and the Del Monte Building.

Note: Using something as ephemeral as a commuter bus line as the sole criterion for promoting something as expensive and long-term as multi family housing seems inadvisable, since these bus lines can easily be eliminated, rerouted or have their headways increased by a simple vote of the AC Transit Board. Basing such development on less ephemeral public transportation, such as fixed rail, would make more sense.

The impacts of the zoning changes, including additional density increases resulting from application of the state density bonus law (whether or not the base intensity is derived from form-based standards or residential density standards), on these historic buildings as well as on other parameters need to be more clearly described in the Land-Use and City Design Element.

Action Bullet 2: Architectural Character. *Consider amending the Municipal Code to prohibit the demolition of residential buildings constructed prior to 1942 for the purpose of increasing the number of housing units on the property, unless the property is a designated in the Housing Element as a Housing Opportunity Site necessary to meet the City’s regional housing needs allocation or the structure lacks architectural merit. Permit increases in residential density within existing residential buildings provided that the structure is not demolished.*

As written, this action suggests that the current requirement for Historical Advisory Board (HAB) approval of demolition for all pre-1942 buildings will be limited to just pre-1942 residential buildings that are to be demolished for the purpose of increasing the number of housing units on the property, and providing an automatic exception to the demolition prohibition if the property is “designated in the Housing Element as a Housing Opportunity Site necessary to meet the City’s Regional Housing Needs Allocation (RHNA) or the structure lacks architectural merit”. If this is the case, HAB approval would no longer be required for demolition of other pre-1942 residential buildings nor pre-1942 nonresidential buildings. **AAPS considers any such limitation of the scope of the existing demolition ordinance to be highly objectionable.**

However, is any such limitation of the scope of the existing demolition ordinance actually being proposed? It seems inconsistent with Policy LU-26, Action Bullet 2, which states “Maintain demolition controls for historic properties”.

Also, what is the definition of “demolition” and “architectural merit”? And is a “Housing Opportunity Site” the same as the “Housing Opportunity Areas” referred to elsewhere in the draft Plan?

The last sentence of LU-16, Action Bullet 2 is also needs clarification. What degree of residential density increases is envisioned within existing residential buildings? Would it be the same in all neighborhoods? Would such increases be limited to existing building envelopes or would additions be allowed to accommodate the increases? What would be the extent of the additions? Could they exceed the volume of the existing building and, if so, to what degree?

e. **Policy LU-17. Housing Opportunity Areas.** Policy LU-17 states:

Provide opportunities for new housing and appropriately zoned property to accommodate the regional and local housing need consistent with the regional Sustainable Communities Strategy, in Mixed-Use, Community Mixed-use, and vacant sites within Medium-Density Residential areas.

Identifying housing opportunity areas within the listed land use classifications would be a major expansion of the geographic scope of housing opportunity areas, which under the current Housing Element and zoning map are limited to the Multi-Family Overlay Zone, which is mostly along the northern waterfront.

The impacts of this expansion, including additional density increases resulting from application of the State Density Bonus Law, on the numerous historic buildings in the listed land use classifications need to be discussed in the Land-Use and City Design Element as well as on the other parameters.

*Note: Survey #1, Exhibit 7 deletes “vacant lots within the medium density residential area” from its recitation of Policy LU-17. **Which version of Policy LU-17 is correct? Is it the version within the Land-Use and City Design Element itself or is it the version that is in the survey?***

Adding to the confusion, the staff report lists the “North Housing and Tilden Avenue (sic-- it is Tilden Way) vacant sites” among the housing opportunity areas, but these sites are not listed in the plan itself as housing opportunity areas. **If these are the only sites envisioned for increased density within the medium density residential area, AAPS’s concerns regarding the policy’s impacts on the medium density residential area would be satisfactory addressed.**

f. **LU-18 Balancing Regional Housing Needs and Business Needs.** Policy LU-18 states:

When meeting regional housing needs, prioritize up-zoning of existing residentially zoned sites over rezoning of business and employment zoned areas in Business and Employment, Maritime Commercial, and Industrial lands on the Land Use Diagram.

It is not clear why upzoning of existing residentially zoned areas is necessary given the availability of the existing mixed use zoned areas and the various identified priority development areas (PDAs) and housing opportunity areas (HOAs). The Land Use and City Design Element needs to explain this, including providing the number of residential units that can be accommodated within each PDA and HOA and the potential magnitude of any RHNA shortfall (in terms of number of units) caused by limiting potential multifamily residential development to the PDAs and HOAs.

In any case, LU-18 opens up all existing residential areas, including R-1, to upzoning. **Is upzoning of R-1 and all other residential zones really being proposed?** If this is the case, the rationale of such a radical upzoning needs further explanation and the impacts discussed.

The intent of Policy LU-18 appears to be identification of additional sites besides those in PDAs and HOAs for multifamily housing to help address the RHNA. If this is the case, it should be stated more clearly as part of Policy LU-18 and possible additional areas listed in priority order. **Other non-residential sites should be prioritized rather than existing residential areas** and include, perhaps, additional shopping centers (such as Bridgeside), and the large open parking area between Wind River and Encinal Terminals/Del Monte.

4. **Conservation and Climate Action Element**

We would like to reiterate our previous comments regarding the Conservation and Climate Action Element in our February 23, 2020 letter:

a. **Policy CC-12. Climate-Friendly, Transit-Oriented Development:** Policy CC-12 states:

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 City Charter Article 26 and is inconsistent with much of the "Themes" text. As stated in AAPS's January 10, 2020 letter to the Planning Board responding to the December 9, 2019 staff evaluation of Article 26, the linkage between low density housing **in Alameda** and greenhouse gas emissions is tenuous.

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.

b. Policy CC-17. Energy Efficiency and Conservation. Policy CC-17 states:

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 units 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.

Related to this, **the Conservation and Climate Action Element needs a resource conservation section, including a salvage or recycle policy.** The potential demolition of buildings (to promote more housing) instead of rehab/reuse goes against any conservation practices. **The most green building is a preserved building!** The Plan needs stronger policies that promote rehabilitation and adaptive reuse and require recycling and salvage for any construction project, especially demolition.

When the General Plan's Chapter 1 (Setting and Organization of the General Plan) was first issued in 2019, we felt reassured by the following statement in Section 1.3:

*The growth in housing and population will be primarily located in Alameda's two designated priority development areas at the former Naval Air Station lands at Alameda Point and the former industrial lands along the northern waterfront in Alameda. Locations for additional housing elsewhere in the City of Alameda are limited to a few small remaining vacant lots, accessory units on existing residential properties, and a limited number of mixed use opportunity sites along the Park Street and Webster Street corridors. **It is expected that Alameda's existing historic neighborhoods and commercial main streets will look very similar in 2040 as they do today and as they did in 2000** (emphasis added). The Land Use Element and the Housing Element identify housing opportunity areas and sites within the City of Alameda.*

However, some of the plan's specific provisions as discussed above appear highly inconsistent with Section 1.3. **What truly is the 2040 "vision" for Alameda?**

REVIEW OF THE DRAFT GENERAL PLAN BY THE HISTORICAL ADVISORY BOARD

Since some of the draft General Plan provisions could impact historic properties and some changes to the City's historic preservation program are proposed, the Historical Advisory Board should be given the opportunity to review and comment on the draft plan. Will this review occur?

PLANNING BOARD RESPONSES TO THE STAFF REPORT'S FOUR QUESTIONS:

Here are the four questions:

1. Does the Planning Board endorse the inclusion of Theme #1 in the General Plan?
2. If yes, does the Planning Board wish to modify or expand the theme in any way?
3. Does the Planning Board endorse the policy directions articulated by the policies highlighted in the survey and in this staff report?
4. Does the Planning Board wish to modify or revise policies in any way?

Given the ambiguities in the land use map and Policies LU-1 and LU-17, we recommend that the Planning Board respond to Question 3 by declining to "endorse" the "policy directions articulated by (these) policies" until their ambiguities can be resolved and to ask for a resolution of these ambiguities in its response to Question 4.

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) AAPS 2-23-20 letter to Planning Board
(2) Existing Land-Use Element Table 2-6 - -Land Use by Planning Sector 1989-1990 and
Buildout (2010)

By electronic transmission:

cc: Andrew Thomas and Allen Tai
Mayor and City Council
Historical Advisory Board
AAPS Board and Preservation Action Committee

**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.

Erin Garcia

From: Nancy McPeak
Sent: Monday, September 14, 2020 7:02 AM
To: Andrew Thomas; Erin Garcia; Celena Chen
Subject: Fwd: [EXTERNAL] letter to Planning Board re September 14th agenda

Follow Up Flag: Follow up
Flag Status: Flagged

FYI

Sent from my iPhone

Begin forwarded message:

From: Jay <garsurg@comcast.net>
Date: September 11, 2020 at 4:47:34 PM PDT
To: Lara Weisiger <lweisiger@alamedaca.gov>, Nancy McPeak <nmcpeak@alamedaca.gov>
Subject: [EXTERNAL] letter to Planning Board re September 14th agenda

Ladies,

I would appreciate it if you would forward the letter below to the members of the Planning Board in advance of their meeting scheduled for Monday, September 14, 2020.

Thank you.

Jay Garfinkle

City of Alameda Planning Board

September 11, 2020
14, 2020

RE: General Plan Update Agenda Item 7-A - September

Ladies and Gentlemen:

I believe that the updating of the City's General Plan will, without doubt, be the most important and consequential issue that you, the current members of the Planning Board, will be addressing during your tenure on the Board. It was, therefore, disheartening for me to learn that you are scheduled to proceed with this important and complex project at a time when a significant number of interested citizens will be unable to participate in the many public discussions and hearings that will undoubtedly be required if the project is to be completed in a manner that will best serve the interests of both the current and the future residents of our community.

Unfortunately, far too many citizens who might otherwise endeavor to become actively and constructively involved and participate are currently, and are expected to remain, unable to do so for at least the next several months due to the restrictions placed on us by the Covid-19 pandemic and for the next two months due to our time consuming involvement in the current election cycle.

I am writing, therefore, to respectfully request that the City's General Plan updating project be deferred until a time when the public will be better able to participate in this most important project.

Sincerely,

Jay Garfinkle

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Sent: Monday, September 14, 2020 7:45 AM
To: Nancy McPeak
Subject: [EXTERNAL] letter to Planning Board re September 14th agenda

From: Jay <garsurg@comcast.net>
Date: September 11, 2020 at 4:47:34 PM PDT
To: Lara Weisiger <lweisiger@alamedaca.gov>, Nancy McPeak <nmcpeak@alamedaca.gov>
Subject: [EXTERNAL] letter to Planning Board re September 14th agenda

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Sincerely,

Jay Garfinkle

Erin Garcia

From: Nancy McPeak
Sent: Monday, September 14, 2020 2:41 PM
To: Erin Garcia
Subject: Fwd: [EXTERNAL] Public Comment ---Review of Draft Alameda General Plan 2020Comments 9/14/20

Sent from my iPhone

Begin forwarded message:

From: Patricia Lamborn <patricia.lamborn@aol.com>
Date: September 14, 2020 at 12:33:13 PM PDT
To: Ronald Curtis <rcurtis@alamedaca.gov>, Hanson Hom <hhom@alamedaca.gov>, Rona Rothenberg <RRothenberg@alamedaca.gov>, Teresa Ruiz <truiz@alamedaca.gov>, Asheshh Saheba <asaheba@alamedaca.gov>, Alan Teague <ateague@alamedaca.gov>
Cc: Nancy McPeak <nmcpeak@alamedaca.gov>
Subject: [EXTERNAL] Public Comment ---Review of Draft Alameda General Plan 2020Comments 9/14/20
Reply-To: Patricia Lamborn <patricia.lamborn@aol.com>

Dear Planning Board Members,

RE; Planning Board review of Theme of Alameda General Plan #1 **Developing a healthy, equitable and inclusive city.** (September 14, 2020)

The Staff report summarized the surveys received on the 2020-2040 Alameda General Plan. To quote from the staff summary:

- **Alameda residents support a General Plan goal of creating a healthy, equitable and inclusive city. The theme should be retained in the draft General Plan**

I don't know what you are expected to decide on September 14 2020. I would just share an observation as a 30 year Alameda resident. The only housing that has truly made Alameda a more equitable and inclusive city, has been directly affordable, housing. Market rate housing with minimal affordable percentages does not make Alameda more equitable-- it makes it more expensive. It discourages inclusivity. Allocating waterfront land as a Priority Development Area contributes to building high end, expensive, housing. Waterfront = expensive. Expensive= exclusive.

I urge you, if you are in fact able to influence this general plan to emphasize these realities:

1. Sea Level Rise and flooding is coming to Alameda -- the more housing we build on the waterfront-- the greater expense in building sea walls to defend it - the less money for publicly, funded -- actual affordable housing.
2. The areas to focus on if we our true goal is equity, multi- ethnic and multi income is the **Alameda Point land**-- we own it. Then focus on transit from that neighborhood-- the tube, parking for the ferry, and additional access - ie ; bike bridge.
3. If you allow building housing in shopping malls- limit location to a safe distance from the waterfront, limit the number of units and make it for Seniors-- affordable. Seniors on limited incomes can walk to grocery stores. Accessible and equitable.
4. In- fill of multifamily units on Webster and Park street may help bring back those commercial streets-- limit it to affordable and consider workforce housing -- essential workers need to live near their jobs. That would be a big step forward towards equity in Alameda.

I agree with the theme, but lets be honest about the reality. The housing units at Del Monte, the Marina, Encinal Terminals, South Shore Center propped towers are not a path to equity. They are profitable for developers with a few crumbs for affordable housing.

My proposal--- if you commit to the theme, focus on affordable housing. Retreat from the waterfront--

RHNA #'s can be appealed based on safety. Flooding ? Unsafe. Just like fires. Plan what you believe in , and if it's equity----- mean it.

Sincerely,
Patricia Lamborn
30 year Alameda Resident