

# NORTH WATERFRONT COVE, LLC

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Via email to City Clerk

February 2, 2021

Dear Mayor Ashcraft and City Council:

In advance of tonight's Housing Element workshop, I write to encourage your consideration of our Encinal Terminals site's potential to assist the City in meeting its anticipated obligations under the next cycle of the Housing Element.

We have proposed a modification to the Tidelands portion of the Encinal Terminals site in the form of a Tidelands Exchange. The Tidelands Exchange will create a significantly improved land plan, which:

- allows housing density on the site to decrease, with lower average building height and more varied housing.
- provides housing that is convenient to existing and future transit and improves jobs-housing balance due to its adjacency to the 1.4 million square feet of office space at Marina Village.
- creates over 4 acres of waterfront open space with shoreline access and bike-pedestrian recreation, all with no cost to the City and with no maintenance burden on the City's budget.
- conveys to the City more than 13 acres of submerged property to generate leasing revenues from a potential new marina.

The modified Encinal Terminals plan would not increase the number of units approved for the site, but rather reconfigures the land plan to redistribute the units in a more viable and cohesive manner and can make this project viable to count 589 homes, including 79 affordable units, in the next Housing Element cycle, on a site that already has a multi-family overlay. Inclusion of these units means fewer sites will need to be re-zoned for Multi-Family housing in areas of the City that may not be as well served by transit, are not adjacent to employment and/or would impact other current uses. Moreover, approval of the Tidelands Exchange, and inclusion of hundreds of housing units in the Housing Element, can happen without approving additional housing units on the site, and without creating a new multi-family overlay or conflicting with Article 26.

As you consider sites for inclusion in the next Housing Element, please consider this proposed modification to Encinal Terminals, to improve the land plan and create a vibrant mixed-use community along the Northern Waterfront. Thank you.

Sincerely,

DocuSigned by:

*Michael O'Hara*

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Michael S. O'Hara

Director of Forward Planning



## YIMBY LAW

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2/1/2021

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Via Email

**Subject:** Recommendation to Review, Comment, and Provide Direction on the City's General Plan 2021 to 2031 Housing Element Update Process and Schedule and Authorize Staff to Request Updated Guidance from the State of California regarding Compliance with Applicable Housing Law

Dear Alameda City Council:

YIMBY Law submits this letter to inform the council that it has an obligation to abide by state housing law when evaluating the above-captioned proposal, including AB 72 (2017) and AB 686 (2018).

As your staff presentation correctly states, California Government Code § 65583(c)(1) requires cities to identify sites as needed to facilitate and encourage the development of a variety of types of housing for all income levels, including multifamily rental housing, factory-built housing, mobile homes, housing for agricultural employees, supportive housing, single-room occupancy units, emergency shelters, and transitional housing. Furthermore, California Government Code § 65580(d) states that the housing element must make adequate provision for the housing needs of all economic segments of the community.

Additionally, AB 686 modified several sections of government code by establishing the duty of local agencies to affirmatively further fair housing, which includes "taking meaningful actions that, taken together, address significant disparities in housing needs and in access to opportunity, replacing segregated living patterns with truly integrated and balanced living patterns, transforming racially and ethnically concentrated areas of poverty into areas of opportunity," among other things. This



## YIMBY LAW

law became effective on January 1, 2021 and is enforced by the state Housing and Community Development Department.

Unfortunately, Article XXVI, Section 26-1 of the City of Alameda City Charter states “[t]here shall be no multiple dwelling units built in the City of Alameda,” and Article XXVI, Section 26-3 states “[t]he maximum density for any residential development within the City of Alameda shall be one housing unit per 2,000 square feet of land.” These sections of the city charter are in direct conflict with state law, and this conflict will inevitably prevent the city from having its adopted housing element certified by HCD. Given HCD’s previous admonishment of the City of Alameda’s unlawful charter language, the city will need to amend its charter to come into compliance with the law.

We encourage the city to not invest its time and resources in appealing or litigating its RHNA numbers, ignoring HCD’s long-held position that the city’s charter has been and is still now incompatible with state law, or exploring other ways to circumvent state law. There is a well-established body of legal precedent that makes such a strategy ineffective and generally useless—see such cases as *Sacramento Housing Alliance v. City of Folsom*, *Ivory v. County of Yuba*, *Mejia v. City of Mission Viejo*, and *Urban Habitat Program v. City of Pleasanton*.

Yimby Law is a 501(c)3 non-profit corporation, whose mission is to increase the accessibility and affordability of housing in California. As part of this mission, we actively and aggressively pursue remedies when cities and counties fail to comply with state housing law. Some of the statutory remedies available when cities fail to comply with state housing law include:

- Empowering judges to order the city to approve a project, even if the project is not zoning compliant and violates the city’s charter. This is commonly referred to as a city losing “local control” over its zoning authority and its discretion to approve or reject project proposals.
- Referral of noncompliant cities to the California Attorney General’s office for prosecution, with outcomes including an injunction against new non-residential development; strict timelines to bring a housing element into compliance, with fines for failure to comply with a court order; and attorneys’ fees for the state and intervenors.
- A carryover of the previous planning period’s RHNA numbers
- Ineligibility to obtain grant funds, such as the LEAP and REAP grants

I am signing this letter both in my capacity as an employee of YIMBY Law, and as a resident of California who is affected by the shortage of housing in our state.



YIMBY LAW

Sincerely,

Jon Wizard

Housing Elements Coordinator  
YIMBY Law

CC: Mayor Marilyn Ezzy Ashcraft  
Vice Mayor Malia Vella  
Councilmember Tony Daysog  
Councilmember Trish Herrera Spencer  
Councilmember John Knox White

**From:** [Drew Dara-Abrams](#)  
**To:** [City Clerk](#)  
**Cc:** [Marilyn Ezzy Ashcraft](#); [John Knox White](#); [Malia Vella](#); [Tony Daysog](#); [Trish Spencer](#)  
**Subject:** [EXTERNAL] Re 6-A Housing Element Update and 9-A Parcels Zoned C-2-PD  
**Date:** Monday, February 1, 2021 11:41:06 AM

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Dear Mayor, Vice Mayor, and Councilmembers,

As an Alameda resident, I encourage you all to move ahead with city planning staff's recommended approach for preparing a new Housing Element and working diligently to meet Alameda's next RHNA allotment in good faith.

The shortage of housing in Alameda and the greater Bay Area continues to be one of the thorniest of challenges, underlying so many of our problems, from climate change to racial equity to the economic competitiveness of local businesses. For better or worse, the "levers" for addressing this problem rest with you and other local leaders.

Item 9-A shows one way to use these local levers: throw sand in the gears. This may please a vocally engaged group of folks — who I guess have very strong feelings about the parking lot in front of the South Shore Safeway? In any case, I see that this proposal has already received the response it deserves: a letter from a YIMBY legal group citing relevant state law. (For anyone who isn't already familiar with Sonja Trauss and her collaborators' track-record suing local cities, including Lafayette, let me recommend the recent book "Golden Gates" by New York Times reporter Conor Dougherty or [this excerpt](#).)

Item 6-A shows another way forward: a careful step-by-step process of creatively maximizing housing development on key sites, crafting a new zoning addition that would allow sufficient density and flexibility across wider areas, and community engagement that is broad and inclusive.

The latter option isn't only the right option as far as housing is concerned, it's also the right option in terms of "good governance." That is, protecting city finances from state penalties and trying to pursue more, rather than fewer, state grants. Also, treating Alameda residents as adults in a medium-sized city — who all have concerns and priorities, some of which clash, but all of whom should be expected to honestly engage with trade-offs and with the substance of regional and state regulations relevant to their proposals.

I joke about the parking lot in front of Safeway and why anyone would care so much for it, but honestly, I can understand why some folks would be opposed to change of any kind. Let's use this as an opportunity to engage with them in good faith, help them understand the "sticks" that really do compel Alameda to open shopping centers to mixed-use re-development, and also help them to see some of the benefits to the "carrots" offered by the state and where Alameda can craft thoughtful compromises.

Alameda is fortunate to have planning staff who are skilled and creative enough to "thread the needle" of a new Housing Element past many constraints and obstacles. Please move ahead with the new Housing Element process to make a good-faith effort to meet Alameda's RHNA numbers.

Sincerely,  
Drew Dara-Abrams

Calhoun St



**From:** [William Smith](#)  
**To:** [Andrew Thomas](#)  
**Cc:** [City Clerk](#); [Lara Weisiger](#); [Pauling, Catherine](#); [Eric Strimling](#); [Laura Thomas](#); [Laura Woodard](#); [saylor, doyle](#); [Lee, Lynette](#); [Lois Pryor](#); [Mari Perez-Ruiz](#); [Darcy L Morrison](#); [Toni Grimm](#); [DeWitt, Sophia](#); [Jake Gardner](#); [Angela Pallatto Hockabout](#); [Jared Wright](#); [Lyons, Pat](#); [Joy Malloy](#); [Brian McGuire](#); [Ross Ojeda](#); [Pryor, Alan](#); [catherine relucio](#); [Jan Santos](#); [Austin Tam](#); [Delores Wills-Guyton](#); [Michael Yoshii](#); [Smith, William](#); [gaylon parsons](#); [mrawson@pilpca.org](#); [Grover Wehman-Brown](#); [Rasheed Shabazz](#)  
**Subject:** [EXTERNAL] Transmittal of Comments of W.J. Smith on Alameda General Plan 2040  
**Date:** Tuesday, January 19, 2021 12:16:08 PM  
**Attachments:** [We sent you safe versions of your files.msg](#)  
[SmithWJ-General-Plan-2040-Comments\\_19Jan2021.pdf](#)

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Mimecast Attachment Protection has deemed this file to be safe, but always exercise caution when opening files.

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Mr. Andrew Thomas,

Thank you and your staff for providing a comprehensive structure and comprehensible text for the many themes and elements in the draft Alameda General Plan 2040. I especially appreciate the demographic data your staff and consultants indicating who has participated in the review process. Regrettably, but revealingly, the demographic data show that the young and lower income residents of the City have either been unable to, or uninterested in, participating in the review process at the same proportion as the wealthiest residents of our City.

Although I have owned my home for decades and belong to a wealthier demographic, I have also worked with and advocated for the interests of low, and increasingly moderate, income residents of the City during those same decades. My comments reflect my understanding of their, and my, desire to see Alameda evolve into a more equitable and inclusive City that provides better opportunities and housing for all of my city's diverse communities in 2040.

I have reviewed the attached comments with leaders and board members of two groups who have long represented the housing interests of underrepresented demographic groups, ARC (Alameda Renters Coalition) and Renewed Hope Housing Advocates. I was an officer of Renewed Hope for over a decade until I redirected more of my time to changing housing policy at the State and Federal levels. Changes at these levels are necessary to house all Alamedans. I remain an active member of Renewed Hope and frequently attend ARC general meetings. I appraise them of state legislation related to housing and in return inform myself as to how new state policies are benefitting various communities in Alameda. .

The attached comments reflect my own views, not necessarily those of ARC and Renewed Hope. These community activists broadly agreed with my recommendations, including promotion of multi-family housing in more neighborhoods across the City. They maintained, however, that the recommendations were too limited to ensure that in 2040 all residents who worked in Alameda could live here if they wished to. They were alarmed that the changes I recommended might allow the affordable housing shortage to worsen, while providing cover to City policies that would lead to even greater misery in our community and the continued explosion of homelessness in neighboring Oakland and just beginning in Alameda.

Unfortunately, the concerns of my friends and colleagues in ARC and Renewed Hope are well founded. Although likely to reduce the rate at which our housing problems would otherwise worsen, my comments, even if adopted *in toto*, will be [inadequate.to](#) ensure that the shortage of affordable housing declines in Alameda by 2040. Therefore, they are considering submitting additional comments that directly address the root of inequities in American

housing, the many and layered unearned privileges that accompany ownership of homes by both residents and landlords (see, for example, Richard Rothstein's *The Color of Law* and Mike Bird's article "How to Fix the Housing Bias That Warps Investment Decisions" in the January 5, 2021 issue of the Wall Street Journal).

I have urged my colleagues and friends in ARC and Renewed Hope to submit additional comments that address the root problems worsening our housing situation in Alameda.

Still, as my comments address incremental policies for regulating housing independent of ownership models, I request that you incorporate them into Alameda's General Plan 2040 as a beneficial interim measure. Under-represented groups could then submit more transformative comments later.

Yours in Housing All,

***William Smith***

William J. Smith  
Alameda Resident  
(510)522-0390



# Comments on The City of Alameda's General Plan 2040

William J. Smith  
SmithWJA@gmail.com

January 19, 2021

Alameda's [Social Vulnerability Assessment](#) documents the land use patterns in the City of Alameda that exclude low and moderate income residents, especially renters and BIPOC (Black, Indigenous and People of Color). The comments below on the [Draft Alameda General Plan 2040](#) prepared by ARC (Alameda Renter's Coalition) and RH (Renewed Hope Housing Advocates) are directed toward changing the character of all neighborhoods to be more inclusive while preserving, to the extent feasible, the physical appearance of those neighborhoods and Alameda's small-town character.

The draft General Plan contains policies that recognize, and partially redress, some local policies, programs, ordinances and practices that disadvantage most renters and other underserved and underrepresented populations. The comments address more such policies to better promote the General Plan theme of "[equity, inclusion, and environmental justice](#) to ensure that Alameda is a place that is safe, healthy and inclusive for all."

Alameda land use patterns and policies in the draft Alameda General Plan 2040, perpetuate injustices Alameda has inherited from past governmental discrimination in housing in the San Francisco Bay Area (see Richard Rothstein's ***Color of Law***). Government policies at all levels, local, state and federal, continue to disadvantage renters in comparison to homeowners. The comments below address some of the most inequitable policies that have been in Alameda's general plan for decades.

# Promoting a healthy, equitable and inclusive city

## General Plan Theme 1

To create a healthy, equitable and inclusive Alameda, the Alameda community must muster the resources needed to produce thousands ([RHNA](#), Appendix 3. Page A12) of affordable rental and ownership homes before 2040. Along the way Alameda needs to preserve existing homes, especially affordable homes, and protect low and moderate income renters and homeowners from eviction or foreclosure.

These three keys to equity and inclusion for equitably housing all who live or work in Alameda, production, preservation, and protection, will be addressed in detail in a subsequent memo after the housing element for the general plan is updated. The other six elements of the Draft Alameda General Plan 2040 reviewed below, primarily the Land Use Element, also influence the production and preservation of rental and ownership housing.

*Table 1, Recommendations to Increase the Production of Housing, and Table 2, Recommendations for Preserving Affordable Housing, illustrate the changes needed to make the general plan consistent with its themes of equity, inclusion and sustainability. While these changes reduce some major inconsistencies, the City must propagate the intent of these changes throughout all the policies in the general plan to make the plan internally consistent with Theme 1, promoting a healthy, equitable and inclusive city.*

## Production of Affordable Housing

Alameda's housing policies constrain the production of housing in many ways. The two constraints these comments primarily address are 1) density limits and 2) location prohibitions. These constraints are promulgated in the second of seven elements of the draft general plan, the Land Use and City Design Element. The recommendations in Table 1 partially relieve density and location restrictions. The recommendations in Table 2 preserve more existing affordable housing stock. Recommended items for the glossary in both tables clarify the meaning of terms of art. Vague, inaccurate and misunderstood definitions of these technical terms are often used inappropriately to argue against housing.

Entries in the recommendations column in Table 1 describe the purpose and intent of the text changes requested in the adjacent column. The last column describes the location of the text to be revised. Requested changes are ***highlighted in bold italics*** in the text change column. Propagating the requested changes throughout all elements of the general plan would make the entire plan more consistent with its themes.

**Table 1**  
**Recommendations to Increase the Production of Housing .**

	Recommendation	Text Change	Location
1.	<p><i>Make neighborhoods more inclusive</i></p> <p>As necessary, change the character of neighborhoods, especially low-density residential neighborhoods where the greatest opportunities lie, to be more inclusive of low- and middle-income residents, especially renters, while preserving, to the extent feasible, the physical appearance of neighborhoods and Alameda's small-town character.</p>	<p><b>NEIGHBORHOODS AND CENTERS</b></p> <p>Alameda is a city of neighborhoods and centers that has endured and evolved over time. By maintaining and enhancing mixed-use neighborhoods and nearby commercial main streets, centers and stations, living in Alameda feels more like living in a small town than living in a metropolitan city of 80,000. General Plan policies preserve and build on this neighborhood fabric to accommodate residential and commercial growth <b>while promoting more inclusivity of low and middle income residents, especially renters and small businesses while maintaining</b> <del>losing its basic small-town</del> character.</p>	<p>Page 19</p> <p>Land Use</p>
2a.	<p><i>Construct more housing in exclusive high opportunity areas</i></p> <p>Alameda's most exclusionary housing opportunity areas are classified as low density residential and constitute about 1/3 of the City's area zoned for residential housing. The City can provide more inclusionary housing opportunities for lower- and middle-income residents in these areas by increasing their housing density. This density should be immediately increased to allow duplexes, as currently allowed by the City Charter. To address State imposed regional housing allocations on the City, the City could and should allow triplexes and quadplexes and even denser housing in all, or at least a representative fraction, of low density</p>	<p><b>City Charter and Municipal Code Overrides and Amendments</b></p> <p><b>Whenever allowed by state law, consider overriding</b> <del>Consider amending the City Charter to</del> <b>create equitable housing opportunities in all areas with residential, mixed use and business classifications</b> <del>of remove the citywide prohibition on</del> <b>by allowing</b> residential densities over 21 units per acre <del>to</del> <b>and removing other</b> barriers to affordable housing to support an inclusive, non-exclusionary community, meet local and regional housing needs, and support environmentally sustainable, transit-oriented mixed-use development.</p>	<p>Page 26</p> <p>Land Use</p> <p>LU-16</p>

	residential areas. The minimum fraction of these areas to upzone to permit multi-family housing could be the ratio of the area of single-family (R-1) and duplex (R-2) residential areas to the total area zoned for residential in the City.		
2b.	<p><i>Add bullet point promoting equitable distribution of housing opportunities</i></p> <p>Creation of housing opportunities in low density residential and business areas will promote housing equity if even a few housing sites become available in these areas. Integrated neighborhoods bridge the dangerous social gap that have been growing between those granted the inequitable privileges accompanying homeownership and those paid wages and salaries struggling to pay rents and unable to afford a home. As the experience of BIPOC peoples has shown, the racist privileges granted homeowners for more than a century not only continue today ,but are inequitably excluding the growing numbers of those of any race unable to afford a home.</p>	<ul style="list-style-type: none"> <li>• <b><i>Equitable Distribution of Housing Opportunities</i></b></li> <li>• <b><i>Consider amending the Municipal Code to permit duplexes in all low density residential neighborhoods. Consider amending the municipal code to ensure that the area of low density residential neighborhoods that permits multifamily housing (quadplexes or more) represents an equitable share of the area required to meet the State’s RHNA (Regional Housing Needs Allocation).</i></b></li> </ul>	<p>Page 26</p> <p>Land Use</p> <p>LU-16</p>
2c.	<p><i>Allow multi-family housing in Low-Density and Business and Employment Areas</i></p>	<ul style="list-style-type: none"> <li>• <b><i>Transit-Oriented Mixed-Use Development.</i></b> Consider amending the Municipal Code to remove existing 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 <b><i>the Low-Density,</i></b> the Medium Density, Mixed Use, Community Mixed Use, and Neighborhood Mixed Use and <b><i>Business and</i></b></li> </ul>	<p>Page 26</p> <p>Land Use</p> <p>LU-16</p>

		<b>Employment</b> areas. Regulate building size in these areas with height, setback, lot coverage, and/or floor area ratio standards.	
3a..	<p><i>Create housing opportunities in low-density residential areas</i></p> <p>Creation of housing opportunities in low density residential and business areas will promote housing equity if even a few housing sites become available in these areas.</p>	<p><b>Housing Opportunity Areas.</b> 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, <b>Business</b> and vacant sites within the <b>Low-Density</b> and Medium-Density Residential areas.</p>	<p>Page 26</p> <p>Land Use</p> <p>LU-17</p>
3b.	<p>Propagate change allowing multiple family housing in Business and Low-Density Residential areas throughout the General Plan.</p>	<p>Revise language throughout the General Plan to ensure consistency with the revised LU-17 to allow multi-family housing in Business and Low-Density Residential Areas.</p>	<p>General Plan</p>
4.	<p><i>Prioritize, but allow, up zoning of residential neighborhoods over rezoning of business areas to meet regional housing needs</i></p> <p>Policy LU-18 recognizes that the City in the future could want, or be required, to up zone or rezone for residential in any area of the City to promote business development or balance state-mandated regional housing and business needs.</p> <p><i>Leave text of LU-18 , unchanged</i></p> <p><b>Balancing Regional Housing Needs and Business Needs.</b> 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,</p>	<p>For consistency with LU-18, eliminate all language in the general plan prohibiting housing in any area of the City, with the possible exception of areas that have been designated as state or national historic areas. The City can set priorities for the use of a given area, but so long as there is a regional housing shortage, a blanket prohibition of housing in an area may prove to be unenforceable and thus misleads residents as to what are potentially allowable uses of an area. The City Charter ban on multifamily housing anywhere in the City is an example of a misleading City prohibition on residential housing since in recent years the City has up zoned many areas in violation of the ban.</p>	<p>Page 26</p> <p>Land Use</p> <p>LU-18</p> <p>General Plan</p>

	Commercial, and Industrial lands on the Land Use Diagram.		
5.	<p><i>Allow multiple units in Low-Density Residential Areas</i></p> <p>Change the description of the classification of Low-Density Residential to unambiguously include multiple units on a lot, at least duplexes on small lots and triplexes, quadplexes or more on large lots. Prevent splitting of empty large lots to facilitate construction of multi-family homes. About 1/3 of Alameda's residential areas are classified as Low-Density Residential and most are also in high opportunity areas.</p> <p>While even with this change, the opportunities for new infill development will still be limited, opening up these neighborhoods is essential to provide "in all neighborhoods, housing opportunities for all income levels, ages and family types and sites," a goal of policy <b>LU-1</b>.</p> <p>Allowing multiple units, duplexes and more, on lots as they become available in Low-Density Residential neighborhoods will provide moderate- and low-income families with housing in these neighborhoods. By law, ADUs are too small for most families.</p> <p>Multiple units in these neighborhoods will also help meet the goal of <b>LU-2</b> to provide Transit-Oriented streets. Increased residential densities support more frequent transit service and allow bus stops to be more closely spaced, further encouraging transit use, furthering Mobility Element policies</p>	<p><b>Low-Density Residential</b></p> <p>These areas are existing residential neighborhoods of primarily single family detached houses, accessory dwelling units, parks, schools, religious institutions and other similar community serving uses. Existing residential density in these areas is between 4 and 10 units per acre. <b><i>Increase limited opportunities for new infill development by encouraging the construction of multiple units on suitable lots as well as</i></b> accessory dwelling units on existing residential properties.</p>	<p>Page 15</p> <p>Land Use</p>

	ME-3, ME-4, and ME-5., Increased transit service in high opportunity neighborhoods promotes equity by increasing access to community resources in these neighborhoods, such as Franklin Park (ME-3 and ME-4) and Cross-Island Transit for everyone (ME-5).		
6a.	<i>Allow residential in business and employment areas</i> Prohibiting homes in the two business and employment areas along the Northern Waterfront and on Bay Farm Island conflicts with several other policies and themes of the draft general plan. Prohibitions on commercial development will also inhibit recruit of the growing number of developers who find that services like restaurants and pharmacies within walking distance of their offices make their properties easier to market.	<b>Business and Employment Areas:</b> These lands at the Harbor Bay Business Park, Marina Village Business Park, and Ballena Isle provide space for offices, research and development, bio-technology, food manufacturing, maritime commercial manufacturing, hotels and distribution uses. <del>Residential use is not permitted in these areas.</del> The ratio of floor area to land area in this mixed-use district varies from 0.25 to 2.0.	Page. 16  Land Use
6b.	<i>Allow Residential in Business Areas</i> Integrated residential increases the customer base for services. Prohibiting residential may eventually discourage the types of industries listed in LU-8 from locating in Alameda. These industries include Life Sciences, green tech, clean tech and high tech, retail, restaurant and hotels. Alameda's largest employer, Penumbra, was a major supporter of the effort to repeal Alameda's charter ban on multi-family homes as more of its employees want to live and work in Alameda.	<b>Protect Business Maritime Industrial Areas from Residential Intrusions.</b> Protect and preserve <del>Business and Employment and Maritime Industrial</del> Areas shown on the Land Use Diagram by prohibiting introduction of residential uses and rezoning of property in these areas to allow residential uses.	Page 22  Land Use  LU-9
6c..	Propagate changes 6a.and 6b throughout the document	Review all elements and remove language indicating that residences are prohibited in Business and Employment Areas.	General Plan



7.	<p><i>Co-locate housing and employment</i></p> <p>Promote affordable housing in proximity to and within employment areas. Housing in employment areas will reduce commute hour congestion, moderate rent increases and support businesses that serve both residents and employees. Housing in proximity to or within employment areas is especially important for retail businesses, restaurants and hotels that have predominantly low wage employees.</p>	<p><b>On-Island Employment. <i>Equitably and sustainably</i></b> increase on-island employment <b><i>and housing opportunities, especially by housing low- and medium-income workers within Business and Employment Areas</i></b>, to reduce <b><i>regional</i></b> commute hour congestion and greenhouse gas emissions by Alameda residents.</p>	<p>Page 22</p> <p>Land Use</p> <p>LU-8</p>
	<p><i>Glossaries</i></p>		
	<p><i>Clarify the definition of human scale.</i></p> <p>In human scale environments we interact with our surroundings based on their physical dimensions, capabilities and limits. Human scale architecture means buildings with steps, signs, doorways, railings, work surfaces, seating, shelves, fixtures, walking distances, and other features that fit well to the average person. These human scale features are scaled to human physical capabilities. If building features are scaled to human capabilities, <a href="#">human scale architecture</a> does includes buildings with heights of more than two stories.</p>	<p>..... It is critically important to retain a human scale while accommodating density and a diversity of building types. <i>To retain human scale, buildings of any height must have steps, signs, doorways, railings, work surfaces, seating, shelves, fixtures, walking distances and other features that fit well to the average person and also accommodate those with special needs.</i></p>	<p>Page 18</p> <p>Land Use</p>
	<p><i>Add glossary for architectural and planning terms</i></p> <p>In addition to a climate glossary, include a glossary for architectural and planning terms. This would include the terms human scale and community services. A search for Alameda community services on the Internet brings up 30 voluntary service organizations and no commercial organizations, such as neighborhood</p>	<p><b><i>Architectural and Land Use Glossary</i></b></p> <p><b><i>Human Scale Architecture .....</i></b></p> <p><b><i>Human Scale Neighborhoods .....</i></b></p> <p><b><i>Community Services .....</i></b></p>	<p>Page 19</p> <p>Land Use</p>

	markets, cleaners, laundromats, restaurants etc. In the Architectural and Land Use Glossary make it clear that community services include these and other commercial organizations.		
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Note: Deleted text struck out and ***added text*** shown in bold italics

**Table 2**  
**Recommendations for Preserving Affordable Housing**

	<b>Recommendation</b>	<b>Text Change</b>	<b>Location</b>
1.	<p><i>Add bullet requiring replacement of affordable housing</i></p> <p>Many older homes throughout Alameda, with little architectural merit, contribute to Alameda's affordable housing stock. With the exception of upgrades necessary to protect the health and safety of residents, major renovation or demolition of these homes should be conditioned on the prior addition of affordable housing in the same or nearby neighborhoods.</p>	<ul style="list-style-type: none"> <li>• <b><i>Replacement of Affordable Housing.</i></b> Consider amending the municipal code to require replacement of affordable homes prior to issuing permits for major renovation or demolition. The replacement housing should be in the same or in a nearby neighborhood to maintain equitable access to opportunities in the neighborhood.</li> </ul>	<p>Page 26</p> <p>Land Use</p> <p>LU-16</p>
2.	<p><i>Add Architectural Merit to Glossary</i></p> <p>In the Architecture and Land Use Glossary, the General Plan should describe what constitutes architectural merit that qualifies for demolition protection for buildings built prior to 1942. For example, if Alameda's Spite House on Broadway, was simply cute, would it merit preservation?</p>	<p><b>Architectural and Land Use Glossary</b></p> <p><i>Architectural Merit (list or describe characteristics considered, e.g. styles, historic significance)</i></p>	<p>Page 19</p> <p>Land Use</p>

Note: Deleted text struck out and ***added text*** shown in bold italics