



San Francisco Bay Chapter

Serving the counties of Alameda, Contra Costa, Marin and San Francisco

13 August 2001

Ms. Linda Gardner
Alameda County Housing and Community Development Department
224 West Winton Avenue, Room 108
Hayward, CA 94544-1215

Housing Element Revision comments

Dear Ms. Gardner:

Thank you for the opportunity to participate in the Alameda County General Plan Housing Element revision process. The comments presented today are made for the purpose of modifying the Goals, Policies, and Objectives Section of the 1990 Housing Element to better reflect current conditions, currently accepted "Smart Growth" principles, as well as the policy determinations of the voters of Alameda County in adopting Measure D, the Save Agriculture and Open Space Lands Initiative in November 2000. We look forward to providing additional comments on draft sections of the revised Housing Element as these become available.

Sincerely,

Dick Schneider

Countywide Policies

Objective 1, Principle 1.1

- * Implementation 1.1.2--Appropriate inclusionary zoning requirements should be part of development approvals. (Measure D contains one form of such requirements in Section 8, Policy 43.)
- * Implementation 1.1.4--Appropriate linkage fees should be required for non-residential development to provide funding for meeting the affordable housing needs reasonably attributed to the development, if such housing is not directly provided by the development. (See, for example, Measure D, Section 8, Program 13.)

Objective 1

New Principle 1.6--Alameda County should not bear the responsibility for providing housing to meet the unmet demand for housing created in jurisdictions outside of Alameda County.

New Implementation 1.6.1--Determine how much demand for housing in Alameda County is attributable to jurisdictions outside of Alameda County that do not provide sufficient housing commensurate with the level of job growth permitted by those jurisdictions.

Objective 2, Principle 2.4

New Implementation 2.4.2--Environmental and fiscal constraints on new development should be specifically analyzed, including impacts on air pollution, water pollution biological resources, transportation capacity, water supply, schools, park and recreation facilities, etc.

New Implementation 2.4.3--New developments should bear the full incremental cost of complying with all applicable federal, state, and local environmental requirements, and of providing any needed public infrastructure expansion (e.g., roadway or transit expansions, schools expansions, park and recreation facility expansions, etc.).

^{Implementation}
Unincorporated Area Policies

Objective 1, Principle 1.1.7--Add new language as follows to reflect voter approved urban growth boundary. "Continue to survey all County-owned, city-owned, and other public lands within the County Urban Growth Boundary for their suitability as housing sites...."

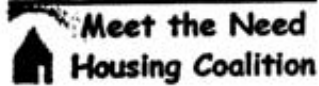
Objective 3

Principle 3.1--Delete clause "or on land contiguous to existing urban areas." This deletion should be made for several reasons: (1) for consistency with Principle 2.1 (P.99), which does not contain this clause; (2) for consistency with the emphasis throughout the Element that infill on vacant or redevelopable lands shall be the method for providing land for additional housing. (see, e.g., Countywide Policies, Principles 1.3 and 2.1, and Implementations 1.4.1, 2.1.1, and 2.1.2; Unincorporated Area Policies, Implementation 3.1.1 and 3.1.2).

Delete Implementation 3.1.3 in its entirety--Implementation 3.1.3 is contrary to ABAG's currently accepted "Smart Growth" concept that all jurisdictions should provide the needed housing associated with their level of employment growth. Externalizing to other jurisdictions (in this case to the unincorporated County from eastern Alameda County cities) such associated housing burdens is both unfair and leads to unnecessary additional commuting with its attendant impacts on traffic congestion, air pollution, and consumption of finite fossil fuels.

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LUVA



Dedicated to Increasing
the Bay Area's Housing Supply

August 16, 2001

Home Builders
Association of
Northern California

Bay Area Council

California Alliance
for Jobs

Board of Supervisors
Alameda County
1221 Oak St., #536
Oakland, CA 94612

Dear Members of the Board of Supervisors:

We are pleased to announce the formation of the Meet the Need Housing Coalition (Housing Coalition). The Housing Coalition is a coalition of business, real estate, economic development, and labor organizations dedicated to addressing the Bay Area's current and past housing shortage by increasing the region's supply of housing. The Coalition's principal focus in 2001 will be the State-required review and revision of local governments' housing policies through the housing element update process.

As you may know, the Association of Bay Area Governments (ABAG) has completed its Regional Housing Needs Determination (RHND) for the 1999-2006 planning period. Through the RHND process, ABAG allocates to each city and county a share of the regional housing need. The regional housing need for all ABAG jurisdictions for the 1996-2006 planning period was determined by the California Department of Housing & Community Development and ABAG to be 230,743 housing units¹, making the annual regional housing need 30,766 housing units. Pursuant to state housing laws, local governments must revise their general plans and zoning ordinances to accommodate their share of the regional housing need as allocated to them by ABAG.

Recognizing that providing adequate housing to accommodate job and population growth is essential to provide a high quality of life, and that the region has consistently not provided sufficient new housing, the Housing Coalition intends to be actively involved in the review and revision of city and county housing elements. In that regard, the Coalition supports the following policies:

P.O. Box 5160
San Ramon, CA
94583

Tel: 925.820.7626
Fax: 925.820.7296

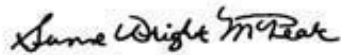
¹ This figure is substantially lower than the 310,761 housing units that HCD proposed.

- At a minimum, each jurisdiction must plan and zone sufficient vacant land with appropriate standards – including minimum densities – to accommodate the overall number of housing units allocated pursuant to the Regional Housing Needs Determination.
- To determine whether or not it has sufficient vacant land planned and zoned for residential development with appropriate standards, each jurisdiction should conduct a vacant land inventory that identifies all of the vacant land within the jurisdiction and the applicable general plan and zoning designations. If the vacant land inventory indicates that the RHND allocation cannot be accommodated under the existing planning and zoning (*i.e.*, general plan amendments, rezonings, or other legislative approvals would be necessary), the jurisdiction must designate and zone additional vacant land for housing or increase the density of vacant land that is already planned and zoned for housing.
- Although state law requires each jurisdiction to plan and zone sufficient vacant land for housing, each jurisdiction should also identify and pursue additional housing opportunities on underdeveloped or underutilized sites.
- A jurisdiction should not limit the number of building permits that may be issued each year such that the overall RHND allocation cannot be met.
- Where vacant land intended for housing development is designated as planned development (PD), the jurisdiction should ensure that the designation does not require additional legislative approvals (rezonings) before housing development is allowed.

The Housing Coalition looks forward to working with cities and counties to increase the region's supply of housing. We request that you send a copy of your draft Housing Element to the Coalition at the time you submit it to the State Department of Housing & Community Development, at the following address:

Meet the Need Housing Coalition
Attn: Paul Campos
P.O. Box 5160
San Ramon, CA 94583

Thank you.



Sunne Wright McPeak
President/CEO
Bay Area Council



Gary Hambly
President/CEO
Home Builders Assn.
of Northern California



Jim Earp
Executive Director
California Alliance
for Jobs

cc: Julie Bornstein, Director, Dept. of Housing & Community Development
Cathy Creswell, Deputy Director, Dept. of Housing & Community Devel.
James Sorenson, County Planning Director