

City of Oakland Bureau of Planning
250 Frank H. Ogawa Plaza
Oakland, CA 94612
[By email]

June 13, 2022

Dear Planning Bureau staff:

Thank you very much for the opportunity to comment on the 2023 - 2029 Oakland General Plan Housing Element Update.

As a statement of general principles, the Rockridge Community Planning Council (RCPC) wants to acknowledge that the State of California is experiencing a housing crisis of historic proportions and that Oakland as a City and Rockridge as a neighborhood within the City must do their parts to ease this crisis. Furthermore, as a “high resource” neighborhood with some of the highest housing prices in the entire region, we believe it is incumbent upon us to lead by example in advocating for more housing development within our borders. We believe that welcoming significant numbers of new residents to Rockridge would be entirely consistent with our values and the cherished historically diverse character of our neighborhood.

Please find our specific comments on a few portions of the draft Housing Element below:

Housing Sites Inventory

First and foremost, we were extremely surprised and disappointed to see that the large “Shops at the Ridge Phase II” site at Broadway and Pleasant Valley was not included in the Inventory and we cannot understand the reasoning behind this omission. This site, which is flat, not within an established low-density neighborhood and less than a 15-minute walk from Rockridge BART, is clearly one of the most important undeveloped housing opportunity sites in the City. The current Home Depot proposal for this site would be an extremely inappropriate use. A survey of Rockridge residents from RCPC indicated that neighbors overwhelmingly prefer housing at the Ridge Phase II. The site should be included within the Inventory. As an implementation action of the Housing Element, the site should be rezoned to encourage high density residential development and prohibit stand-alone non-residential uses.

While some infill and densification is likely to occur organically in Rockridge’s lower density residential neighborhoods, we believe the most important opportunities exist on a handful of larger sites within the neighborhood. The maps and tables in the draft are a little difficult to

navigate, but we believe we can see the following sites identified on Figure 3-1: Housing Sites Inventory:

- CCA Site
- Rockridge BART Site
- Triangular site at the corner of Claremont and College
- A portion of the Dreyer's Ice Cream site
- Wendy's site at College and Broadway

We agree with the inclusion of these sites on the inventory but believe several other important potential housing development sites have been left out, including:

- Ridge site at Broadway and Pleasant Hill (already discussed above)
- Carpet store site at College and Kales
- Dialysis Center site at Claremont and Clifton
- DMV Site at Claremont and Cavour
- Chevron Station Site at Telegraph near highway 24

The omission of these sites or others yet to be identified in Rockridge contradicts a key narrative discussed in the Housing Action Plan beginning on page 60 to affirmatively further fair housing goals. The section reads: *"The City must work towards breaking down barriers towards accessing high-opportunity neighborhoods for those who choose to live there, while simultaneously investing in "lower resource" neighborhoods. Increasing affordability and expanding the housing types permitted in high-opportunity neighborhoods will be key to ensuring that currently exclusive neighborhoods become inclusive."*

We are aware that some of the sites on the second list above may have been omitted from the Inventory by staff because of technical guidelines governing what sorts of sites are eligible for inclusion. However, we feel strongly that we should err on the side of inclusivity due to the seriousness of the housing crisis. We would welcome an opportunity to discuss these criteria further with Planning Department staff.

Housing Action Plan:

Five Overarching Goals

The first paragraph of the narrative on page 59 under Goal #3 "Expand Affordable Housing Opportunities" discusses the importance of the general production of housing and asserts that "thoughtfully adding housing at every level can reduce market competition for existing homes..." before going on to point out the overarching importance of making a concerted effort to increase production of homes that are affordable to very-low, low and moderate income households. We agree with these sentiments but feel that the headline "Expand Affordable Housing Opportunities" is not descriptive of the Element's stated policy goals. We recommend the headline be amended to read something like "Expand Housing Opportunities at All Income Levels, With a Very Strong Emphasis on Affordable Housing."

Policy 3.2: Create a More Diverse Mix of Homes to Meet Community Needs

This policy would be implemented in part by zoning amendments to permit more “missing middle” type small scale multi-unit housing in low density zoning districts like those found in most of Rockridge. Our own economic studies have shown that similar to SB 9 which is already in effect, these regulatory changes will result in only a small amount of change in Rockridge, where very high land values mean that demolition of most existing houses is unlikely. However, we are supportive of these policy changes for both our own neighborhood and the City as a whole. If feasible, we would like to see these zoning amendments incentivize family, senior and disabled – friendly units.

This policy would also be implemented by actions taken by the City to reduce regulatory constraints to the development of ADUs and also to help older or lower-income homeowners develop ADUs. We are very supportive of these efforts and feel that they could help bring a modest number of moderately affordable units to Rockridge.

Policy 3.3: Expand Resources for the Construction of Affordable Homes

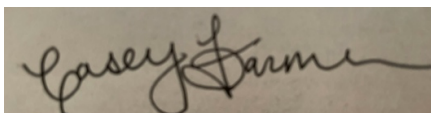
We are broadly supportive of the intent and implementation ideas contained in this section, recognizing that while it is important to add housing at all affordability levels, by far the greatest need is for affordable units. We also recognize that construction of affordable housing is unfortunately very expensive and there is a need to find more resources and innovative ways to pay for this.

In particular, we are intrigued by the concept of an “affordable housing overlay” outlined in action 3.3.5. We would be interested in exploring this idea along College Avenue as well as on some or all of the opportunity sites discussed above.

Lastly, we think there is a role to play for measures that don’t involve new construction, such as discouraging holding of units off the rental market and condo conversions. In addition, the City should look at amending the CN-1 zoning to prohibit conversions of upper floor residential units to non-residential uses.

We look forward to continuing to participate in the Housing Element process and thank you for your considerable work on creating a vision for inclusive neighborhoods throughout Oakland.

Very truly yours,

A handwritten signature in black ink that reads "Casey Farmer". The signature is written in a cursive style and is positioned above the printed name of the signatory.

Casey Farmer, Board Chair, Rockridge Community Planning Council

A handwritten signature in black ink that reads "Kenneth Rich". The signature is written in a cursive style and is positioned above the printed name of the signatory.

Ken Rich, Land Use Committee Chair, Rockridge Community Planning Council

cc: RCPC Board members