



East Bay Housing Organizations

November 15, 2021

City Council
% City Hall
City of Alameda
2263 Santa Clara Avenue
Alameda, CA 94501

Dear Mayor Ezzy Ashcraft, Vice Mayor Knox White and Councilmembers Daysog, Herrera Spencer and Vella

On behalf of East Bay Housing Organizations (EBHO), I am submitting the following comments on the October Draft Housing Element, which appears as item 7B on your agenda for tonight (November 16, 2021).

EBHO is a member-driven organization working to preserve, protect, and create affordable housing opportunities for low-income communities in the East Bay by educating, advocating, organizing, and building coalitions.

We welcome the opportunity to comment on this draft document, as we have done with past Housing Elements in Alameda.

We particularly appreciate the effort to accommodate the City's Regional Housing Needs Allocation (RHNA) by siting housing for all economic levels throughout the city in ways that promote fair housing and racial equity while avoiding concentrating lower income housing in areas referred to by State law as areas of racial and ethnic concentrations of poverty, including recommendations to rezone areas of the city to accommodate multifamily housing in previously exclusionary locations. We also appreciate the early consideration of draft housing element policies, well in advance of the deadline for adoption and submission of the final housing element.

We understand the need to develop an early site inventory, given the constraints Alameda faces in identifying sites for housing and the need to rezone several



parcels in order to allow them to accommodate housing, in particular affordable housing, that will enable the City to meet its RHNA obligations. However, we would ask that the site inventory not be finalized until the companion analysis of fair housing is complete, as they are intended to go together as part of the obligation to “affirmatively further fair housing”- a key legal requirement of state housing element law for cities to follow.

Affirmatively furthering fair housing also requires specific and ongoing efforts to maximize public participation in all stages of the preparation of the housing element, including outreach and engagement with community members and stakeholder groups, particularly with respect to low income households and members of protected classes.

Recent changes to State housing element law also require that the City not only provide an inventory of adequate sites for all components of its RHNA in the adopted housing element, but that the city continue to maintain adequate capacity throughout the entire eight-year cycle. Thus, if the city approves market-rate, above-moderate income projects on sites that were designated for lower income housing, or approves fewer units than provided in the site inventory, it must designate new sites with appropriate zoning to make up for such lost capacity. If the City is projecting accommodation of 1,000 units of housing for very low and low income households at shopping center sites, it must assure that those sites are developed with affordable housing. If market-rate housing is developed instead, new affordable housing sites must be identified before approving a project that deviates from the housing element.

We greatly appreciate the city’s past efforts to meet the challenge of providing affordable housing, and we are confident that the city can and will develop a housing element that fully meets statutory and regulatory requirements. We



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urge you to treat the current draft as the starting point of a discussion, and to ensure that staff moves quickly to prepare and publish for comment all the required sections of the housing element, along with a robust and inclusive public participation process, before finalizing any part of the document.

Sincerely,

Sophia DeWitt

Rev. Sophia DeWitt
Program Director