

Appendix E: Public Participation Summaries

[This Appendix will be updated as public participation is ongoing.]

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Introduction

Engagement for the 6th Housing Element began in 2021 and continued through the completion of public comment period on September 21, 2023. [Upon receiving comments from State HCD in January 2024, CDA staff have continued to the extent possible to engage with residents over the Housing Element, particularly changes to the Sites Inventory and to proposed programs.](#) The following sections describe the public meetings, surveys, interviews, and other techniques utilized to engage the public on the draft Housing Element. [The final section contains a record of all comments received during the Housing Element Process as well as updated staff responses to those comments.](#)

Public Meetings

November 18, 2021 Joint MAC Meeting

On November 18, 2021, Alameda County held a joint meeting of the Castro Valley, Eden Area, and Fairview Municipal Advisory Councils (MACs). Each MAC represents a different geographic area of the Unincorporated County. A notice for the meeting and the agenda were posted on the County website prior to the meeting. Due to COVID-19 restrictions, the meeting was held virtually on Zoom with the option to participate by phone. In addition to members from each of the three MACs, the meeting was attended by County Planning Department staff and members of the public. The meeting was recorded and the recording was posted on the County website.

County Planning staff presented a PowerPoint presentation that included a summary of state housing element law, including the required components, the purpose of the housing element, and the process for developing the revised housing element. The presentation explained the purpose of the Regional Housing Needs Allocation, how it was determined for each jurisdiction, and the importance of the sites inventory to demonstrate the County's capacity to accommodate it's RHNA.

Summary of Comments Received at November 18, 2021 meeting:

- Open space value should be factored into metric for identifying appropriate sites for housing
- Climate change should be considered in reviewing residential development proposals regarding requirements for elements such as energy efficient lighting and drought tolerant landscaping.
- It will be difficult to meet the RHNA and maintain the current quality of life in unincorporated communities.
- The RHNA numbers seems to be based on historical population growth and not more recent population loss.

- The County needs to look at how infrastructure is impacted by the increase in population that comes with adding more housing in an area.
- Water supply needs to be considered in determining appropriate sites for housing.

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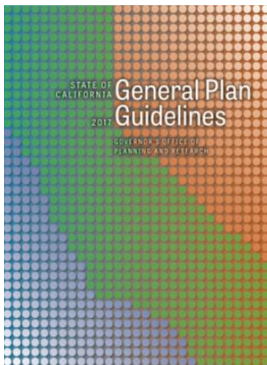
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November 18, 2021 Meeting Presentation

Housing Element Update & RHNA Allocation



ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY
PLANNING DEPARTMENT NOVEMBER 18, 2021



General Plan Required by State Law (Government Code Section 65300 et seq.)

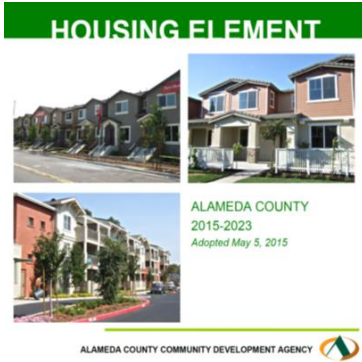
Required Elements:

- Land Use
- Circulation
- Housing
- Open Space
- Conservation
- Safety
- Noise
- Environmental Justice (separate element or integrate policies throughout other elements)

County General Plan Documents	STATE REQUIRED ELEMENTS							
	Land Use	Circulation	Housing	Conservation	Open Space	Safety	Noise	Envir. Justice
AREA PLANS								
Castro Valley General Plan	X	X		X	X	X	X	
East County Area Plan	X	X		X	X	X	X	
Eden Area General Plan	X	X		X	X	X	X	
COUNTY-WIDE ELEMENTS								
Housing Element			X					
Conservation Element				X				
Open Space Element					X			
Safety Element						X		
Noise Element							X	
Ashland/Cherryland Community Health & Wellness Element to become Environmental Justice Element								X
Community Climate Action Plan	Optional Element							
Scenic Route Element	Optional Element							
Park and Recreation Element	Optional Element							
(An "X" indicates that the County document addresses topics related to the state required element.)								

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The current County Housing Element was adopted in 2015.

<http://www.acgov.org/cda/planning/generalplans/documents/CompleteHousingElementBOSAdopted050515.pdf>

Housing Element Update Required Components

- Evaluate existing Housing Element
- Assess Housing Need
 - Existing
 - Projected – Regional Housing Needs Allocation (RHNA)
 - Populations with Special Needs
- Site Inventory & Analysis
- Governmental & Nongovernmental Constraints
- Programs required to implement stated policies and achieve stated goals and objectives
- Board of Supervisors approval
- Certification by State HCD

Housing Element Update Schedule

State law requires each local jurisdiction to revise its Housing Element every eight years.

All cities and counties within a region must update their housing elements on the same eight-year cycle.

The next cycle for the Bay Area will be 2023 2031 (Sixth Cycle).

Revised Housing Element must be approved by State HCD and Board of Supervisors by January 2023.

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What is the Regional Housing Needs Allocation (RHNA)?

- Since 1969, State law has required that all jurisdictions plan to meet the housing needs of everyone in the community.
- State HCD identifies total number of units, across all income groups, for which the region must plan for the eight-year RHNA period (2023 to 2031).
- ABAG collaborates with local governments and stakeholders to develop a formula to assign each community a share of the Bay Area's housing need.
- Each local government must update Housing Element of General Plan and zoning to show how it plans to accommodate its share of the regional need.

What are the statutory objectives of RHNA?

Increase housing supply and mix of housing types, tenure, and affordability in all cities and counties in an equitable manner

Promote infill development and socioeconomic equity; protect environmental and agricultural resources, encourage efficient development patterns, and achieve GHG reduction targets

Promote improved intraregional job-housing relationship, including balance between low-wage jobs and affordable housing

Balance disproportionate household income distributions (more high-income RHNA to lower-income areas and vice versa)

Affirmatively further fair housing

What's new for this RHNA cycle?

Greater emphasis on social equity

Higher total regional housing need

Expanded HCD oversight on methodology & allocations

More factors to consider in allocation (overpayment, overcrowding, greenhouse gas target, jobs-housing fit)

New requirements for identifying eligible sites for Housing Elements

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How does HCD calculate the Regional Housing Need Determination?



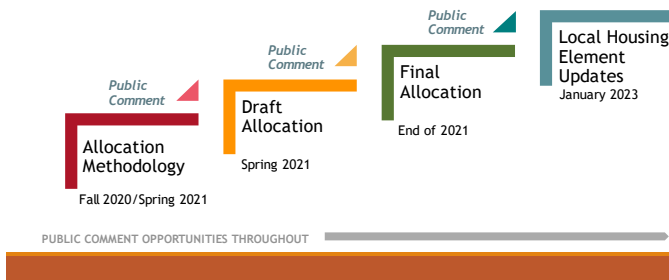
ABAG Region RHND Increase from Current Cycle

CYCLE	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
2015-2023	46,680 units	28,940 units	33,420 units	78,950 units	187,990 units
2023-2031	114,442 units	65,892 units	72,712 units	188,130 units	441,176 units
% Increase	145%	128%	118%	138%	135%

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RHNA Methodology Development



Final 2023-2031 RHNA Methodology

- **STEP 1: Group RHND by income**
- **STEP 2: Factor weight = units allocated by factor**
 - Allocation Factors for Very Low- and Low-Income Units
 - 70% Access to High Opportunity Areas
 - 15% Job Proximity - Auto
 - 15% Job Proximity - Transit
 - Allocation Factors for Moderate- and Above Moderate-Income Units
 - 40% Access to High Opportunity Areas
 - 60% Job Proximity - Auto
- **STEP 3: Calculate jurisdiction's units from each factor**
- **STEP 4: Apply equity adjustment**
 - Equity Adjustment redistributes lower-income units to ensure all 49 jurisdictions identified as exhibiting above average racial and economic exclusion receive an allocation of lower -income units that is at least proportional to its share of households in 2020

Unincorporated Alameda County RHNA Increase from Current Cycle

CYCLE	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
2015-2023	430 units	227 units	295 units	817 units	1,769 units
2023-2031	1,251 units	721 units	763 units	1,976 units	4,711 units
% Increase	191%	218%	159%	142%	166%

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Comparison to Other Jurisdictions

JURISDICTION	2015-2023	2023-2031	PERCENTAGE INCREASE
Uninc. Alameda County	1,769 units	4,711 units	166%
Uninc. Contra Costa County	1,367 units	7,645 units	459%
Uninc. Santa Clara County	277 units	3,125 units	1,028%
Uninc. San Mateo County	913 units	2,833 units	210%

Housing Element Sites Inventory and Analysis

- The land inventory must identify specific sites suitable for the development of housing within the planning period that are sufficient to accommodate the jurisdictions share of the regional housing need for all income levels (Gov. Code § 65583)
- The site-specific listing must be accompanied by analysis to demonstrate that the land is suitable for development in the planning period and sites and zoning are sufficient and appropriate to accommodate the jurisdiction’s share of the regional housing need for all income levels.
- The analysis of sites must indicate whether the inventory can provide for a variety of housing types, including multifamily rental housing, factory built housing, mobile homes, housing for agricultural employees, transitional and supportive housing, singleroom occupancy units and emergency shelters.

Site Inventory Process



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Consequences of Not Fulfilling RHNA

- SB 35 (Weiner 2017) - local jurisdictions where construction of new housing units by developers has not met planning goals established through the Regional Housing Needs Allocation (RHNA) process are required to offer a ministerial approval process for multifamily residential developments under certain circumstances.
- AB 1174 (Grayson 2021) clarified the requirements that must be met for an approved development to be valid indefinitely and the process for modifications to applications.

Incentives for Housing Element Compliance

Grant and loan programs that require an HCD certified housing element include:

- Permanent Local Housing Allocation (PLHA)
- Affordable Housing and Sustainable Communities (AHSC)
- SB 1 Planning Grants
- CalHOME Program
- Infill Infrastructure Grants
- ProhousingDesignation Program
- Local Housing Trust Fund Program (LHTF)
- Regional Transportation Funding: One Bay Area Grants (OBAG)

Consequences of Housing Element Noncompliance

- General Plan inadequacy
- Litigation
- Loss of permitting authority
- Financial penalties
- Court receivership

Status of Process

- Funded by \$500,000 Local Early Action Program Grant from State HCD
- Request For Proposals to recruit consultant



Public Meetings July to October 2022

From July to October 2022, County staff presented updates on the housing element process (in addition to other concurrent general plan projects) and solicited feedback from decision-makers and the public at the following meetings:

- Board Unincorporated Services Committee – July 27, 2022
- Castro Valley MAC – August 8, 2022
- Fairview MAC – September 6, 2022
- Eden Area MAC – September 13, 2022
- Planning Commission – September 19, 2022
- Agricultural Advisory Committee (AAC) – September 27, 2022
- Sunol Citizens' Advisory Council (Sunol CAC) – October 19, 2022

Due to COVID-19 restrictions, the meetings were held virtually on Zoom with the option to participate by phone. In addition to members from each of the decision-making bodies, the meetings were attended by County Planning Department staff and members of the public. Each meeting was recorded and the recordings were posted on the County website. County planning staff presented a PowerPoint presentation that outlined the housing element update process. Staff explained the requirements for the affirmatively furthering fair housing assessment, the importance of fulfilling the County's RHNA obligation, and the process for selecting sites for the sites inventory.

Summary of Comments Received at July - October 2022 Meetings:

July 27, 2022 Board Unincorporated Services Committee

- Many speakers expressed concern about how pandemic eviction moratorium was affecting the housing market/potentially discouraging development of more units.
- More protections are needed for renters.

- Maintenance of existing rental units should be addressed.
- Concern about young adults being able to afford rent.

August 8, 2022 Castro Valley MAC

- Utility service providers should be consulted as part of the housing element process.
- Development should be coordinated between unincorporated communities.
- Concern about ability to fulfill new RHNA when fell short of fulfilling previous RHNA

September 6, 2022 Fairview MAC

- The location of earthquake faults should be taken into consideration in sites inventory.
- Stormwater runoff is a safety concern in Fairview and should be considered in housing element.
- Wildfire risk and slopes should also be considered.

September 13, 2022 Eden MAC

- Preservation of trees and open space in the urban area should be taken into consideration, not just building housing.
- Environmental justice should be incorporated into the housing element.
- The County should adopt an inclusionary zoning ordinance.
- The public should be involved in the sites inventory to promote housing equity.

September 19, 2022 Planning Commission

- All unincorporated communities should share the burden of providing adequate sites to accommodate RHNA.
- New state law allowing residential development in commercial areas should be considered.
- Given the limited availability of potential sites, local opposition should not eliminate inclusion of some sites.

September 27, 2022 Agricultural Advisory Committee

- Concern housing development will result in loss of open space.
- Concern about condition of roads and lack of water impacting ability to build more housing in rural areas.
- More housing should be built in the cities instead of in the unincorporated areas.
- Ag worker housing and accessory dwelling units should be encouraged in rural areas.

October 19, 2022 Sunol Citizens' Advisory Committee

- Concern about consequences of completing HE late and potential enforcement by HCD.

Example July-October 2022 Meeting Presentation:

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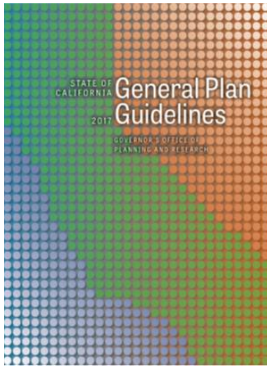
Update on General Plan Projects Housing Element, Environmental Justice Element, and Safety Element/Community Climate Action Plan

Unincorporated Services Committee

July 27, 2022



ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY
PLANNING DEPARTMENT



General Plan Required by State Law (Government Code Section 65300 et seq.)

Required Elements:

- Land Use
- Circulation
- Housing
- Open Space
- Conservation
- Safety
- Noise
- Environmental Justice (separate element or integrate policies throughout other elements)



County General Plan Documents	STATE REQUIRED ELEMENTS							
	Land Use	Circulation	Housing	Conservation	Open Space	Safety	Noise	Envir. Justice
AREA PLANS								
Castro Valley General Plan	X	X		X	X	X	X	
East County Area Plan	X	X		X	X	X	X	
Eden Area General Plan	X	X		X	X	X	X	
COUNTY-WIDE ELEMENTS								
Housing Element			X					
Conservation Element				X				
Open Space Element					X			
Safety Element						X		
Noise Element							X	
Ashland/Cherryland Community Health & Wellness Element to become Environmental Justice Element								X
Community Climate Action Plan								Optional Element
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General Plan Projects 2021-2024

Housing
Element

Environmental
Justice
Element

Safety Element
& Climate
Action Plan

Housing Element

Housing
Element Update
Process

State law requires each local jurisdiction to revise its Housing Element every eight years.

All cities and counties within a region must update their housing elements on the same eight -year cycle.

The next cycle for the Bay Area is 2023 -2031 (Sixth Cycle).

Revised Housing Element deadline for approval by State HCD and Board of Supervisors January 2023.

Estimated completion date – January 2024.

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Housing Element Update Required Components

- Evaluate existing Housing Element
- Assess Housing Need
 - Existing
 - Projected – Regional Housing Needs Allocation (RHNA)
 - Populations with Special Needs
- Site Inventory & Analysis
- Governmental & Nongovernmental Constraints
- Affirmatively Further Fair Housing
- Programs required to implement stated policies and achieve stated goals and objectives
- Board of Supervisors approval
- Certification by State HCD

Affirmatively Furthering Fair Housing

AB 686 (2018) requires that housing elements demonstrate the local jurisdiction is “affirmatively furthering fair housing.” Jurisdictions need to demonstrate compliance with the statute by:

- Analyzing existing fair housing and segregation issues
- Identifying fair housing goals
- Developing strategies to implement these goals
- Ensuring sites in the inventory are identified in such a way that promotes AFFH

What is the Regional Housing Needs Allocation (RHNA)?

State HCD identifies total number of units, across all income groups, for which the region must plan for the eight-year RHNA period (2023 to 2031).

ABAG collaborates with local governments and stakeholders to develop a formula to assign each community a share of the Bay Area’s housing need.

Each local government must update Housing Element of General Plan and zoning to show how it plans to accommodate its share of the regional need.

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What's new for this RHNA cycle?

Greater emphasis on social equity

Higher total regional housing need

Expanded HCD oversight on methodology & allocations

More factors to consider in allocation (*overpayment, overcrowding, greenhouse gas target, jobs-housing fit*)

New requirements for identifying eligible sites for Housing Elements

ABAG Region RHND Increase from Current Cycle

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Comparison with Other Counties

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Housing Element Sites Inventory and Analysis

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- The analysis of sites must indicate whether the inventory can provide for a variety of housing types, including multifamily rental housing, housing for agricultural employees, transitional and supportive housing, single room occupancy units and emergency shelters.

Housing Element Schedule

July 2022 -February 2023	Technical Studies and Issues Evaluation
July-October 2022	Sites Inventory
July-December 2022	Affirmatively Furthering Fair Housing
July 2022 -HE Approval	Community Engagement
March 2023	Public Review Draft Housing Element
April-December 2023	State HCD Reviews Draft Element
January 2024	Public Hearing Draft Housing Element
February 2024	Final Housing Element Adopted
October 2022 -February 2024	CEQA Analysis

December 5, 2022 Planning Commission Work Session

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On December 5, 2022, County staff held a work session with the Planning Commission to request input for the housing element update. Due to COVID-19 restrictions, the meeting was held virtually on Zoom with the option to participate by phone. The meeting was attended by the Planning Commissioners, County Planning Department staff and members of the public. The meeting was recorded and the recording was posted on the County website. Staff provided an update on the status of each section of the draft housing element. Information presented included preliminary data for the housing needs assessment, prospective policies and programs, and a map showing properties on the draft sites inventory.

Summary of Comments Received at December 5, 2022 Meeting:

- Concern about consequences of completing housing element late, potential enforcement by HCD, and builder's remedy.
- Concern about impact of more ADUs and higher density on existing housing – need to improve amenities in impacted neighborhoods.
- Housing can't be built in the same way it has been and include higher density. The County needs to reduce parking requirements to accommodate higher density housing.

December 5, 2022 Planning Commission Work Session Presentation:

Housing Element Update



ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY
PLANNING DEPARTMENT

DECEMBER 5, 2022

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Housing Element Update Process

The Housing Element is an opportunity to shape how unincorporated communities grow in the next 8 years.

State law requires each local jurisdiction to revise its Housing Element every eight years.

All cities and counties within a region must update their housing elements on the same eight-year cycle.

The next cycle for the Bay Area is 2023-2031 (Sixth Cycle).

Housing Element deadline for approval by State HCD and Board of Supervisors January 2023.

Expected date for submittal of draft element to State HCD- April 2023

Estimate for approval by State HCD and Board of Supervisors – Fall 2023 (depends on number of rounds of review by HCD).

Housing Element Update Required Components

- Assess Housing Need
 - Existing
 - Projected – Regional Housing Needs Allocation (RHNA)
 - Populations with Special Needs
- Policies and programs required to fulfill identified need and address issues
- Site Inventory & Analysis
- Governmental & Nongovernmental Constraints
- Evaluate existing Housing Element policies & programs
- Affirmatively Further Fair Housing
- Community Engagement

Housing Needs Assessment

Goal: to cover the demographic, employment, and housing trends and conditions that affect the housing needs of the community.

128 subsidized, deed-restricted housing units located in 6 residential developments are at risk of being converted to market-rate housing by 2033.

28.9% of unincorporated homeowners and 51.5% of renters are cost burdened, meaning they spend 30% or more of gross income on housing costs.

26.3% of renters spend 50% or more of their income on housing, compared to about 10.6% of homeowners.

Of the unincorporated senior population, 36.8% are cost burdened.

14.1% of households in unincorporated Alameda County are extremely low income.

41.1% of unincorporated households are low-income households (earn less than 80% of Area Median Income [AMI]).

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Prospective Policies and Programs

- Rezoning sites to meet the RHNA
- Tracking ADU permit issuance to build accountability
- Creating a process for SB 9 lot splitting
- Finding ways to address potential displacement within unincorporated
- Targeting additional community resources in lower resource areas with additional prospective housing
- Updating the building code for maintenance and code enforcement
- Passing an inclusionary zoning ordinance or other community benefit program
- Protecting tenants' rights through rent stabilization, a rental registry, and establishing a rental inspection process
- Working with BART to facilitate the development of housing at the Castro Valley and Bay Fair BART stations.
- Creating universal design guidelines

Unincorporated Alameda County RHNA Increase from Current Cycle

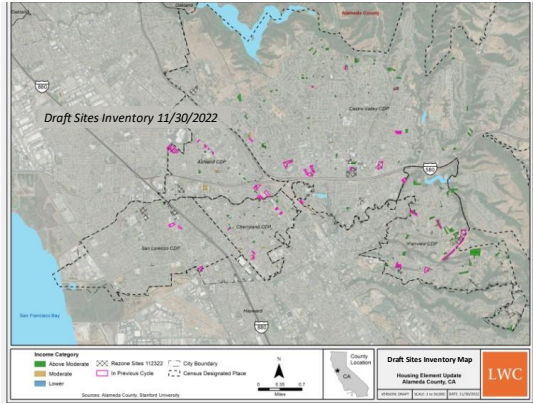
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Income Categories for Alameda County

Income Category	Percent of median income	Annual income (1-person household)	Annual income (3-person household)	Annual income (4-person household)
Extremely low-income	30%	\$28,800	\$37,000	\$41,100
Very low-income	50%	\$47,950	\$61,650	\$68,500
Low income	80%	\$76,750	\$98,650	\$109,600
Median income	100%	\$87,900	\$113,050	\$125,600
Moderate income	120%	\$105,500	\$135,650	\$150,700

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Housing Constraints

- Goal: analyze and recommend solutions to existing and future governmental and nongovernmental barriers to housing development.
- Requirements for creation of private streets
 - Need for consistent objectivity in residential design standards, especially lot size analysis
 - Process for implementing 100% residential projects in mixed-use zones without requiring rezoning.
 - Amending zoning code for consistency with State law.

Program Review

- Goal: analysis of previous Housing Element's policies and programs.
- The 2015-2021 Housing Element had 7 goals, 79 policies, and 31 corresponding programs.
 - Staff are working to coordinate with others to obtain feedback to inform the review.

Affirmatively Furthering Fair Housing

Goal: (1) to analyze the history of fair housing in unincorporated; (2) to affirmatively further fair housing throughout the Housing Element, especially through the Sites Inventory and Programs and Policies.

- Accessed records at the Hayward Area Historical Society
- Opened a venue for residents to share their housing stories <https://bit.ly/achousingstory>
- Targeted outreach stakeholders representing populations with 'special housing needs,' such as elders, renters, and people with disabilities, to understand their housing needs and policy priorities
- Working with our consultants to develop draft policies

Community Engagement

SO FAR:

- General Plan updates shared with EMAC, CVMAC, FVMAC, Sunol CAC, AAC, USC, and this body
- Hosted office hours
- Met with the "Environmental Justice Bucket" of the Ashland Cherryland Healthy Communities Collaborative (ACHCC)
- Contacting key landowners
- Scheduling meetings with key stakeholders

WHAT WE'RE LOOKING FORWARD TO:

- Developing and publicizing a more detailed quantitative survey
- One or more in-person gallery walks, to enable deeper discussion of the Site Inventory
- A panel featuring housing leaders from unincorporated communities with discussion of housing needs and challenges
- And a large, virtual, feedback forum where staff will describe how comments and input from throughout the update process has informed the public review draft.

Contact Information

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Elizabeth.mcelligott@acgov.org 510-670-6120

Contact our team: housingelement@acgov.org

Planning Department Website:
<http://www.acgov.org/cda/planning/>

Housing Element Website:
<http://www.acgov.org/cda/planning/housingelement/housing-element.htm>

Share your housing stories <https://bit.ly/achousingstory>

Public Meetings February 2023

In February of 2023, County staff presented updates on the housing element process (in addition to other concurrent general plan projects) and requested input from decision-makers and the public at the following meetings:

- Fairview MAC – February 7, 2023
- Eden Area MAC – February 14, 2023
- Planning Commission – February 21, 2023
- Board Unincorporated Services Committee – February 22, 2023
- Castro Valley MAC – February 27, 2023

The meetings were held in-person with the option to participate virtually on Zoom or by phone. In addition to members from each of the decision-making bodies, the meetings were attended by County Planning Department staff and members of the public. Each meeting was recorded and

the recordings were posted on the County website. County planning staff presented a PowerPoint presentation that provided an update on the status of each section of the draft housing element. Information presented included preliminary data for the housing needs assessment, prospective policies and programs, and a map showing properties on the draft sites inventory.

Summary of Comments Received at February 2023 Meetings:

February 7, 2023 Fairview MAC

- Parking available on residential streets is inadequate.
- Private streets are an issue because of maintenance needs and lack of parking.

February 14, 2023 Eden MAC

- San Lorenzo Village should be developed with commercial uses, not residential.
- The historic resources in the communities should be considered and more ADU's should be encouraged.
- The natural resources on the 238 bypass parcels should be taken into consideration.
- The history of racial displacement should be included in the housing element.
- It's important to include San Lorenzo's history of racial discrimination and also current gentrification issues.

February 21, 2023 Planning Commission

- The long development application review process is a constraint on development.
- Non-governmental constraints include high EBMUD hookup fees, and PG&E takes too long to hookup electrical connections for new developments.
- Mobile home parks should be replaced with denser housing.
- Missing middle housing is important to provide opportunities for home ownership.
- Regarding construction of housing at BART sites, BART ridership is down so less parking is needed.

February 22, 2023 Unincorporated Services Committee

- Commercial property in San Lorenzo area should remain commercial.
- Support services and infrastructure improvements are needed to encourage the development of more housing.
- ADU's should be encouraged to increase housing supply.
- Schools are overcrowded because of closures.
- More low-income housing is needed in the area to counteract the impacts of historic redlining.
- County policies and ordinances like the eviction moratorium are not friendly to rental property owners and the development of more housing.
- The root cause of the housing crisis is lack of supply. Infrastructure improvements are needed.
- Housing providers deserve protections, not just tenant protections.
- Housing supply is important. Incentives for more housing need to be provided.

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- There are too many restrictions on rental housing.

February 27, 2023 Castro Valley MAC

- Preserving commercial property is important. Communities need amenities.
- Excited to see potential for new development in Castro Valley. Mixed use developments should be encouraged.
- Too much low-income housing is being considered near former Caltrans 238 by-pass parcels.
- Mixed income housing should be encouraged, not just low-income, and developments should include retail space.
- Concerned that the current environment is not friendly to property owners. How can the County attract builders if rental property owners can't collect rent? Utility capacity needs to be considered.
- Infrastructure and school capacity needs to be considered.

Example February 2023 Meeting Presentation:

Housing Element Update

Unincorporated Services Committee February 22, 2023



ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY
PLANNING DEPARTMENT



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Housing Element Update Process

The Housing Element is an opportunity to shape how unincorporated communities grow over the next 8 years.

State law requires each local jurisdiction to revise its Housing Element every eight years.

All cities and counties within a region must update their housing elements on the same eight-year cycle.

Housing Element deadline for approval by State HCD and Board of Supervisors January 2023.

Expect to distribute draft for 30-day public review period in late March and submittal of draft element to State HCD in late April 2023

Estimate for approval by State HCD and Board of Supervisors – Fall 2023 (depends on number of rounds of review by HCD).

Housing Element Update Required Components

- Assess Housing Need
 - Existing
 - Projected – Regional Housing Needs Allocation (RHNA)
 - Populations with Special Needs
- Policies and programs required to fulfill identified need and address issues
- Site Inventory & Analysis
- Governmental & Nongovernmental Constraints
- Evaluate existing Housing Element policies & programs
- Affirmatively Further Fair Housing
- Community Engagement

Prospective Policies and Programs

- Targeting additional community resources in lower resource areas planned for additional housing
- Addressing potential displacement within unincorporated
- Rezoning sites to meet the RHNA
- Tracking ADU permit issuance to build accountability
- Passing an inclusionary zoning ordinance or other community benefit program
- Working with BART to facilitate the development of housing at the Castro Valley and Bay Fair BART stations.
- Creating universal design guidelines

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Unincorporated Alameda County RHNA Increase from Current Cycle

CYCLE	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
2015-2023	430 units	227 units	295 units	817 units	1,769 units
2023-2031	1,251 units	721 units	763 units	1,976 units	4,711 units
% Increase	191%	218%	159%	142%	166%

Income Categories for Alameda County

Income Category	Percent of median income	Annual income (1-person household)	Annual income (3-person household)	Annual income (4-person household)
Extremely low - income	30%	\$28,800	\$37,000	\$41,100
Very low -income	50%	\$47,950	\$61,650	\$68,500
Low income	80%	\$76,750	\$98,650	\$109,600
Median income	100%	\$87,900	\$113,050	\$125,600
Moderate income	120%	\$105,500	\$135,650	\$150,700

Sites Inventory

- State law requires each city and county to demonstrate that zoning & general plan designations allow enough housing development capacity to accommodate RHNA.
- Inventory sites have been identified in every Unincorporated Community.
- Property owners will decidewhether or notto develop their properties.
- Applications for housing developments still need to go through an approval process.
- For purposes of assigning properties to an income category, State HCD generally uses density as a proxy for income level, assuming higher density units will be more affordable.

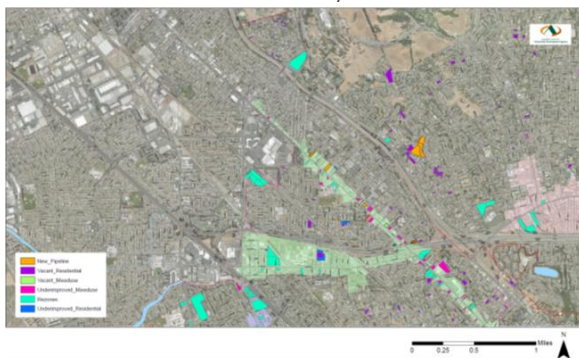
Methodology for Identifying Sites

1. Identified projects in the development pipeline.
2. Identified vacant public and private parcels, using assessor's data, satellite imagery, and local knowledge.
3. Identified underutilized parcels, defined as property where the value of the land is higher than the value of the existing improvements (pavement, buildings, etc.)
4. Staff is in the process of reviewing vacant and underutilized sites appropriate for rezoning to accommodate more units to help meet the RHNA.
5. Taking into consideration potential environmental hazards and sensitive areas

Key Inventory Sites

- Bay Fair & Castro Valley BART station parking lot
- Castro Valley Boulevard Rite Aid Site
- County Radio Communications Station at Foothill Boulevard and 150th Avenue in Castro Valley.
- First Presbyterian Grove Way site, adjacent to Trader Joe's in Castro Valley.
- 177 Lewelling Blvd. (Crunch Fitness) & adjacent parcels
- San Lorenzo Village area
- Large site in East County inside the Urban Growth Boundary to the east of the City of Pleasanton.

Draft Sites Inventory for Ashland



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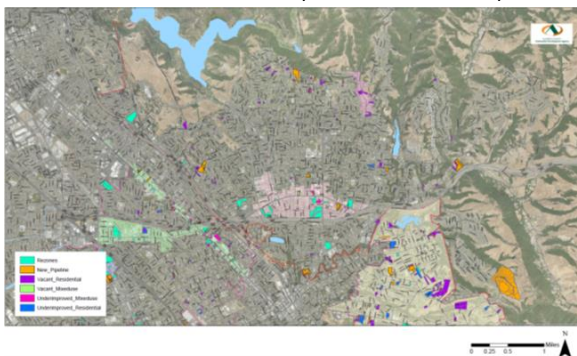
Draft Sites Inventory for Cherryland



Draft Sites Inventory for San Lorenzo



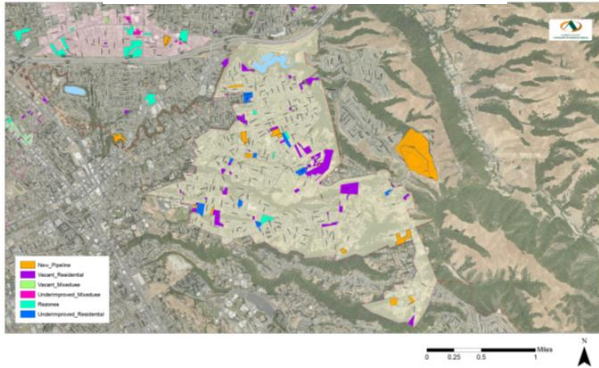
Draft Sites Inventory for Castro Valley



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Draft Sites Inventory for Fairview



Housing Constraints

Consultant has completed initial draft and staff is conducting internal review.

Program Review

Staff is close to completing analysis of previous Housing Element's policies and programs.

Affirmatively Furthering Fair Housing

Purpose: (1) to analyze the history of fair housing in unincorporated; (2) to affirmatively further fair housing throughout the Housing Element, especially through the Sites Inventory and Programs and Policies.

- Accessed records at the Hayward Area Historical Society
- Opened a venue for residents to share their housing stories: <https://bit.ly/achousingstory>
- Targeted outreach to stakeholders representing populations with 'special housing needs,' such as elders, renters, and people with disabilities, to understand their housing needs and policy priorities
- Working with our consultants to develop draft policies

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Community Engagement	
July-Oct 2022	Updates to EMAC, CVMAC, FVMAC, Sunol CAC, AAC, USC, and PC
Nov 2022-Jan 2023	Hosted online office hours
Nov 2022-Present	Small group interviews with key stakeholders
Nov 2022-Present	Contacted key landowners to determine interest in including their property in inventory.
Dec 2022	Met with the “Environmental Justice Bucket” of the Ashland Cherryland Healthy Communities Collaborative (ACHCC)
Ongoing	On-line survey
Ongoing	“Share your housing stories” online template
Feb 2023	Updates to EMAC, CVMAC, FVMAC, Sunol CAC, AAC, USC, and PC
March-April 2023	Public Review Period <ul style="list-style-type: none"> • Community Workshops • Presentations to EMAC, CVMAC, FVMAC, Sunol CAC, AAC USC, PC, T&P, BOS

Current Meeting Schedule

February 7 Fairview MAC

February 14 Eden MAC

February 21 Planning Commission

February 22 Board Unincorporated Services Committee

February 27 Castro Valley MAC

Comments Received at Recent Meetings

Fairview MAC

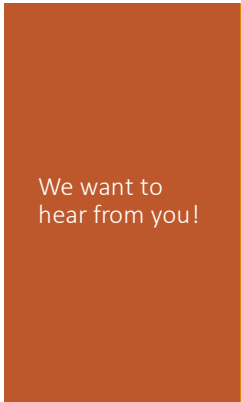
- Concerns about inadequate private streets and lack of parking.

Eden MAC

- Objections to more residential development in San Lorenzo Village
- Objections to the potential replacement of Crunch Fitness
- The historic value of the communities should be taken into consideration.
- The natural resources on the 238 bypass parcels should be taken into consideration.
- It is important to address the current threat of gentrification as well as historic racial displacement.

Planning Commission

- BART ridership is down so not as much parking will be needed at stations in the future.
- Only 500 to 600 housing units were built in the Unincorporated County during the last housing element cycle, well below the 9th cycle RHNA of 1,769.



Email our team: housingelement@acgov.org

Housing Element Website (*Sign up for email notices.*):
<http://www.acgov.org/cda/planning/housing-element/housing-element.htm>

Housing Element Survey:
<https://bit.ly/unincorporatedhousingelementsurvey>

Share your housing stories:
<https://bit.ly/achousingstory>

Agricultural Advisory Committee – April 25 & May 23, 2023

At its April 25 and May 23, 2023 meetings, the Agricultural Advisory Committee (AAC) received a presentation from Planning Department staff on the housing element update process. The meetings were held in-person with the option to participate virtually on Zoom or by phone. In addition to members of the AAC, the meetings were attended by County Planning Department staff and members of the public. The meetings were recorded and the recordings were posted on the County website. Staff informed the AAC that farmworkers are identified in state law as a population with special housing needs and the state requires that the need for farmworker housing be analyzed and addressed in the housing element. Staff requested the Committee's input on the need for farmworker housing in the County and how the need can be addressed in the housing element policies and programs. Staff added that the Committee can continue to explore and develop programs to facilitate the construction of farmworker housing after the housing element has been adopted.

Summary of Comments Received at April 25 & May 23, 2023 Meetings:

- Agriculture has steadily declined in the County and there is a need to increase agriculture.
- There is more of a need for farmworkers for labor intensive crops, but cattle ranching needs fewer workers.
- The landscape industry uses lots of H-2A migrant workers and they stay in hotels and could this be part of the discussion. Cross training between agricultural sectors should be considered to keep workers busy all year and available.
- The agricultural scope should include entire farm to fork sector to meet specialty crops economy. Member Norton said seasonal workers tend to migrate to Stockton/Tracy and

they carpool in. Most probably would prefer to stay near farms and ranches. He spoke on federal law and standards for farmworkers housing.

- Septic requirements are an issue and alternatives should be considered.
- This is a way of using housing as a strategy for employment and have workers close by instead of commuting hours to work.

Public Meetings July-August 2023

From late July through August of 2023, County staff presented the Public Review Draft of the County Housing Element and requested input from decision-makers and the public at the following meetings:

- Board Unincorporated Services Committee – July 26, 2023
- Eden Area MAC – August 8, 2023
- Fairview MAC – August 10, 2023
- Castro Valley MAC – August 14, 2023
- Public Meeting (San Lorenzo Library) – August 21, 2023
- Agricultural Advisory Committee – August 22, 2023

The meetings were held in-person with the option to participate virtually on Zoom or by phone. In addition to members from each of the decision-making bodies, the meetings were attended by County Planning Department staff and members of the public. Each meeting was recorded and the recordings were posted on the County website. County planning staff presented a PowerPoint presentation that explained the various sections of the Public Review Draft Housing Element. Information provided included a summary of the goals, policies, and programs, maps showing properties on the draft sites inventory, and multiple ways for the public to submit comments on the draft.

Summary of Comments Received at July-August 2023 Meetings:

July 26, 2023 Unincorporated Services Committee

Supervisors:

- Stressed the need to encourage housing by keeping the cost of construction per unit low.
- Stressed the need to make the public aware of the consequences of not fulfilling the County's RHNA

Members of the public:

- Expressed concern about fear of displacement among renters and the lack of a safety net.
- Expressed the need to address equity and fair housing issues in the Eden Area.
- Opposed the potential loss of commercial sites in San Lorenzo to housing.

August 8, 2023 Eden Area MAC

Council Members:

- Voiced concern about proposed increased density in Eden Area, specifically Ashland and San Lorenzo Village

- Voiced concern about assignment of additional low-income housing in Eden Area, especially Ashland
- Voiced concern about net export of jobs and possible replacement of commercial areas with housing
- Desire to have commercial first floors, specifically at former Cherryland Place
- Voiced concern about affordable and senior housing projects being exempt from Park Fee (Program 2.D)
- Noted that regional population is in decline
- Desire for additional tenant rights to be present in the Housing Element

Members of the public:

- Against the possibility of Crunch Fitness (APNs 413-15-33-5 and 413-15-34-3) being rezoned to enable housing
- Against removal of housing cap in San Lorenzo Village area
- Against addition of high-density housing in Ashland; for the addition of high-density housing in Castro Valley
- Expressed desire to maintain the suburban nature of existing community, particularly San Lorenzo

Fairview Municipal Advisory Council, August 10, 2023 (Special Meeting)

Council Members:

- Voiced concern about additional housing in Fairview overall (323 proposed units of housing)
- Voiced concern over constrained access to water and parking
- Voiced concern over minimum public notice period for development projects
- Voiced support for the development of the Castro Valley and Bay Fair BART sites
- Disappointed in program to limit use of site development review to only noncompliant projects (see Program 3.B)
- Expressed desire for Fairview to remain a rural place

Members of the public:

- Voiced concern about additional housing in Fairview overall
- Voiced concern over constrained access to water
- Voiced concern over the impact on traffic in Fairview and access to surrounding communities
- Voiced concern over possible development at the Bayhill Foods location (note: staff are currently reviewing an application for a development with 19 units and several commercial spaces for this site)
- Voiced concern over minimum public notice period for developments

Castro Valley Municipal Advisory Council, August 14, 2023

While the Eden Area MAC had fewer than 15 attendees, the Castro Valley MAC had approximately 190 virtual attendees in addition to a full in-person meeting room. Twenty-nine people gave comments; many commenters expressed similar ideas. Comments received at the Castro Valley MAC meeting are summarized below.

Council Members:

- Voiced concern about Unincorporated Alameda County's RHNA (4,711) and the percentage allocated in Castro Valley (42%)
- Voiced desire for RHNA process to be redone with more recent data
- Expressed desire to move the Urban Growth Boundary in order to allocate new units to East County
- Expressed desire to hear from school districts, the Sheriff's office, and various utility providers in relation to the Housing Element
- Voiced concern about how the existing infrastructure in Castro Valley could support additional housing
- Expressed concern about higher crime levels and lower property values in relation to new housing
- Multiple county departments should be considered constraints for Appendix C
- Voiced concern about affordable and senior housing projects being exempt from Park Fee (Program 2.D)

Members of the public:

- Both support and protest of higher densities in the Castro Valley Business District, specifically near BART and the Lucky grocery store. Reasons for include: increased walkability, more foot traffic, lower greenhouse gases, increased efficiency, and supporting public transit. Reasons against include all other concerns listed in this section.
- Both support and protest of future development at the Castro Valley BART site, particularly at the density set by AB 2923
- Voiced concern about existing Castro Valley infrastructure being able to support new housing. Infrastructure included: parking capacity; road capacity for future traffic; Castro Valley and Hayward USDs' respective capacities; and the sidewalk network.
- Voiced desire for RHNA process to be redone with more recent data
- Voiced desire for county staff to focus on job creation before housing creation
- Supported addition of housing so that existing and future residents can afford to stay in Castro Valley
- Expressed concern about higher crime levels and lower property values in relation to new housing
- Expressed concern about the future quality of life in Castro Valley with additional housing
- Expressed desire to maintain suburban quality of Castro Valley community
- Called for a financial study to determine impact on property values or impact on county tax revenues with addition of new housing

Public Workshop, August 21, 2023

The following are comments received in person at the August 21st workshop held at the San Lorenzo Library.

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- Voiced support for inclusionary zoning and universal design policies
- Voiced support for the Housing Element as part of the County's response to climate change
- Voiced support for more lower income housing to support families and workers
- Voiced desire for higher densities (fourplexes) to be allowed in single family zoning by right
- Voiced concern over disjointed planning processes of Hayward Unified School District and the county regarding community growth and school closures
- Against the development of the Bay Fair BART station, especially in relation to parking
- Voiced concern over removal of commercial in downtown San Lorenzo and general lack of commercial to support new housing
- Voiced concern over the amount of above moderate-income level housing required and the large cost to build it
- Voiced concern over insufficient commitment to change over AFFH findings

Agricultural Advisory Committee, August 22, 2023

Committee Members:

- Voice appreciation for the element creating programmatic space for their future work (see program 4.E)

Members of the Public:

- Explained how very little housing can be built in East County
- Explained how Alameda County did not reach its RHNA in the previous cycle; compared to the units actually constructed in the 5th cycle, the new RHNA is 6 times bigger.

Example July-August 2023 Meeting Presentation:

Housing Element Public Review Draft

Castro Valley MAC

August 14, 2023

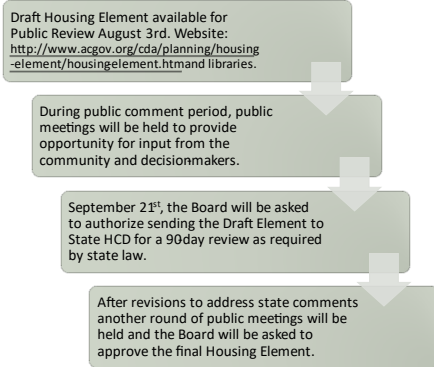


ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY
PLANNING DEPARTMENT

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Project Status



Contents of the Draft Element

- Section I** • overview of the document and relevant regulations.
- Section II** • summary of the projected housing need
- Section III** • summarizes adequacy of available housing sites and housing resources
- Section IV** • Housing Plan - contains goals, policies, and actions related to housing in the County

Housing Element Appendices

-  **Appendix A:** Housing Needs Assessment – analysis of the existing and projected housing needs of the community, including groups with special needs.
-  **Appendix B:** Sites Inventory and Methodology – inventory listing adequate sites zoned for residential uses and available for development within the planning period to meet the County’s fair share of regional housing needs across all income levels.
-  **Appendix C:** Housing Constraints – contains an assessment of impediments to housing production across all income levels covering both governmental and nongovernmental constraints.
-  **Appendix D:** Existing Programs Review – evaluation of the results of the goals, policies, and programs adopted in the previous Housing Element that compares projected outcomes with actual achieved results.

Housing Element Appendices cont'd.



Appendix E: [Public Participation Summaries](#) – includes a detailed summary of public outreach conducted during the preparation of the Housing Element. Not yet complete since the outreach process will continue through adoption of the Element.



Appendix F: [Affirmatively Furthering Fair Housing Assessment](#) – assesses accessibility to jobs, transportation, good education, and health services relative to the housing sites identified in Appendix B to determine how the inventory affects fair housing conditions and access to opportunity.



Appendix G: [Housing Resources](#) – provides a list of financial, administrative, and other resources at the local, regional, state, and federal levels to help the County address its housing needs.

Unincorporated Alameda County RHNA Increase from Current Cycle

CYCLE	VERY LOW INCOME (<50% of Area Median Income)	LOW INCOME (50-80% of Area Median Income)	MODERATE INCOME (80-120% of Area Median Income)	ABOVE MODERATE INCOME (>120% of Area Median Income)	TOTAL
2015-2023	430 units	227 units	295 units	817 units	1,769 units
2023-2031	1,251 units	721 units	763 units	1,976 units	4,711 units
% Increase	191%	218%	159%	142%	166%

Income Categories for Alameda County

Income Category	Percent of median income	Annual income (1-person household)	Annual income (3-person household)	Annual income (4-person household)
Extremely low - income	30%	\$28,800	\$37,000	\$41,100
Very low -income	50%	\$47,950	\$61,650	\$68,500
Low income	80%	\$76,750	\$98,650	\$109,600
Median income	100%	\$87,900	\$113,050	\$125,600
Moderate income	120%	\$105,500	\$135,650	\$150,700

Consequences of Not Fulfilling RHNA

- SB 35 (Weiner 2017) - Where construction of new housing units by developers has not met a jurisdiction's RHNA, cities and counties are required to offer a ministerial approval process for multi-family residential developments under certain circumstances:
 - 2/3 of the units must be residential
 - Must be located in urban area
 - Percentage must be affordable
 - Must comply with adopted "objective standards"
 - Subject to prevailing wage for construction workers
 - Must engage in Tribal Consultation
 - Public Hearings not required because a ministerial process



Sites Inventory

- State law requires each city and county to demonstrate that zoning & general plan designations allow enough housing development capacity to accommodate RHNA.
- Inventory sites have been identified in every Unincorporated Community.
- Property owners will decide whether to develop their properties.
- Applications for housing developments still need to go through an approval process.
- As required by State HCD, assigning properties to an income category is generally based on density, assuming higher density units will be more affordable.

Methodology for Identifying Sites

1. Identified projects in the development pipeline.
2. Identified vacant public and privately owned parcels, using assessor's data, satellite imagery, and local knowledge.
3. Identified underimproved parcels, defined as property where the value of the land is higher than the value of the existing improvements (pavement, buildings, etc.)

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Inventory Sites Identified

- 472 total sites
- 250 vacant sites
- 81 sites identified as underimproved
- 67 sites to be rezoned (to increase density allowed or to add housing as an allowed use)
- 74 sites with “pipeline” housing projects

Unincorporated Community	Units Per Area	% Of Total Units	Above Moderate Income Units	Above Moderate Units As % Of Total Units Per Area	Moderate Income Units	Moderate Units As % Of Total Units Per Area	Low And Very Low Income Units Per Area	Low And Very Low Income Units As % Of Total Units Per Area
Total	4,706	100.0%	1,956	41.6%	778	16.5%	1,972	41.9%
Eden Area	2,211	47.0%	703	31.8%	586	26.5%	922	41.7%
Ashland	1,358	28.9%	231	17.0%	267	19.7%	860	63.3%
Cherryland	215	4.6%	72	33.5%	81	37.7%	62	28.8%
Hayward Acres	47	1.0%	17	36.2%	30	63.8%	-	-
San Lorenzo	591	12.6%	383	64.8%	208	35.2%	-	-
Castro Valley	1,978	42.0%	767	38.8%	187	9.5%	1,024	51.8%
Fairview	323	6.9%	292	90.4%	5	1.5%	26	8.0%
Unincorporated Pleasanton	194	4.1%	194	100.0%	-	0.0%	-	-
Additional units (projected ADUs)	328		32		98		198	
Total Units Including ADUs	5,034		1,988		876		2,170	

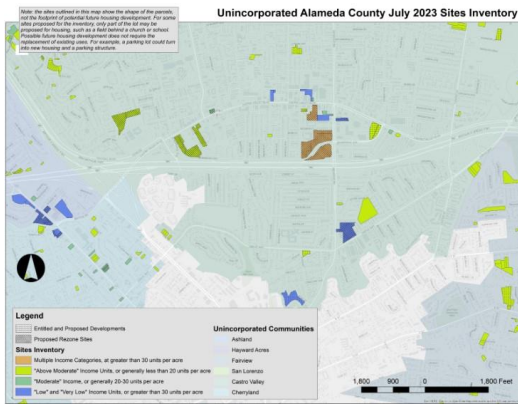
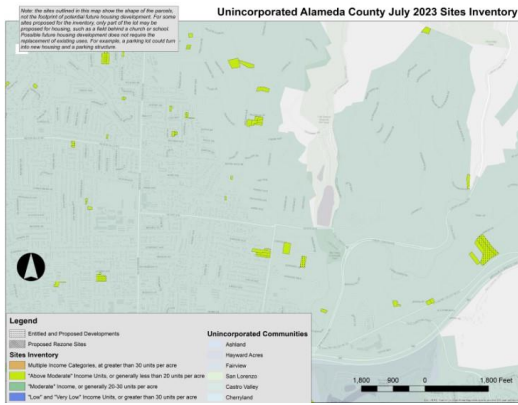
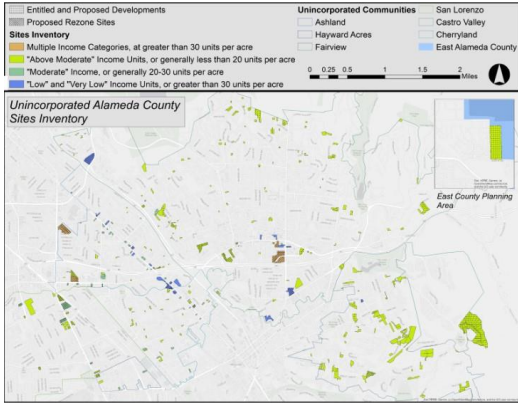
Key Inventory Sites

- Bay Fair & Castro Valley BART station parking lots
- County Radio Communications Station at Foothill Boulevard and 150th Avenue in Castro Valley.
- First Presbyterian Grove Way site, adjacent to Trader Joe’s in Castro Valley.
- San Lorenzo Village area
- Pipeline site in East County inside the Urban Growth Boundary east of the City of Pleasanton.

Alameda County Housing Element [April 2024 Draft](#)

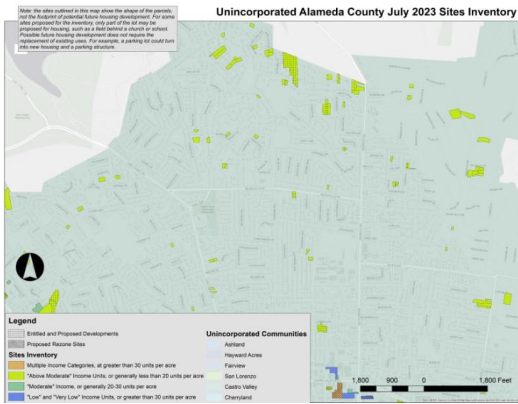
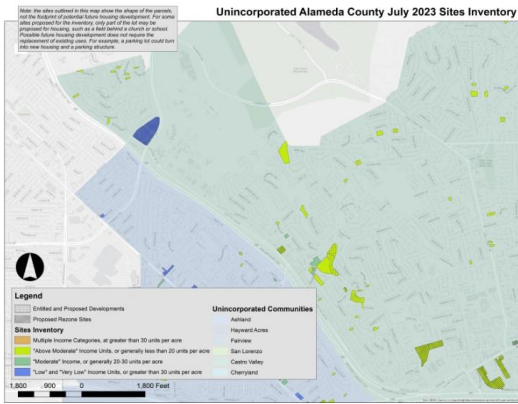
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Affirmatively Furthering Fair Housing

Compliance with the state statute requires:

- analyzing historical and existing fair housing and segregation issues in unincorporated communities
- identifying fair housing goals,
- developing strategies to implement these goals, and
- ensuring sites in the inventory are identified in such a way that promotes AFFH

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Section IV - Draft Housing Plan

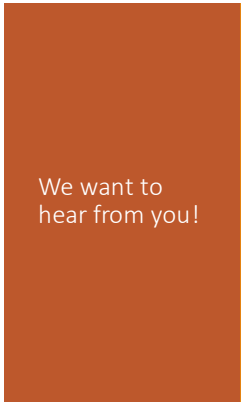
- The Housing Plan of the Housing Element describes the housing goals, policies, and programs for the County.
 - Goals indicate the County's direction and intent on housing -related needs.
 - Policies are statements that describe the County's preferred course of action among a range of other options.
 - Programs provide actionable steps to implement the goals and further progress toward meeting the County's housing allocation.

Draft Goals

- Goal 1: Accommodate a range of housing for persons of all income levels in accordance with the County's Regional Housing Needs Allocation (RHNA).
- Goal 2: Ensure a wide range of housing types to accommodate the housing needs of moderate - and lower-income residents and households.
- Goal 3: Mitigate constraints to housing development and affordability.
- Goal 4: Create housing opportunities for people with special needs.
- Goal 5: Conserve and improve the existing housing stock to enhance quality of life and provide greater housing stability.
- Goal 6: Ensure fair housing opportunity for all persons without discrimination in accordance with state and federal law.
- Goal 7: Minimize the adverse environmental impacts of housing and encourage sustainability measures.

Current Meeting Schedule

July 26	Board Unincorporated Services Committee
August 8	Eden Area MAC
August 10	Fairview MAC (Special Meeting)
August 14	Castro Valley MAC
August 22	Agricultural Advisory Committee
September 5	Planning Commission
September 21	Board of Supervisors Planning Meeting



Housing Element Website (*access draft document after August 3rd & sign up for email notices.*):
<http://www.acgov.org/cda/planning/housing-element/housing-element.htm>

Submit comments by email: housingelement@acgov.org

Help set priorities and submit comments using online engagement tool: <https://alamedacounty.consider.it/>

Call us at (510) 670-5400 or mail us your comments at 224 West Winton Avenue, Room 111, Hayward, CA 94544.

Planning Commission, September 5, 2023

At its September 5, 2023 meeting, the Planning Commission received a presentation from Planning Department staff on the Public Review Draft Housing Element and voted to recommend that the Board of Supervisors authorize staff to submit the draft to the State Department of Housing and Community Development. The meeting was held in-person with the option to participate virtually on Zoom or by phone. In addition to members of the Planning Commission, the meeting was attended by County Planning Department staff and members of the public. The meeting was recorded and the recording was posted on the County website.

Comments received from Commissioners:

- Commented that the sites inventory analysis was very thorough.
- Inquired how SB 9 was considered in the sites inventory
- The item should be continued because the community did not have adequate opportunity to review the sites inventory during the public comment period.
- The consultant's report regarding permit streamlining is not adequately addressed in the draft element.

Comments received from Members of the Public:

- Objected to loss of commercial uses in San Lorenzo if developed with housing. Supported keeping San Lorenzo suburban.
- Expressed concern that Ashland is already overburdened and the sites inventory would continue to concentrate populations of poverty in the area.
- Affordable housing developers should be required to pay park dedication fees since people living in their housing will use parks.
- Expressed support for the housing element but noted concern about concentration of low-income housing along East 14th Street.
- The County should prioritize resources in the unincorporated areas, including a new Office of Unincorporated Services, expanding funding for housing by supporting the regional housing bond, and providing permanent supportive housing for the homeless.

Alameda County Housing Element [April 2024 Draft](#)

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- The housing element should include more specific timeframes for implementation of the programs and should state explicitly how programs relate to AFFH findings.

Board of Supervisors, September 21, 2023

At its September 21, 2023 meeting, the Board of Supervisors received a presentation from Planning Department staff on the Public Review Draft Housing Element and voted to authorize staff to submit the draft to the State Department of Housing and Community Development. The meeting was held in-person with the option to participate virtually on Zoom or by phone. In addition to members of the Planning Commission, the meeting was attended by County Planning Department staff and members of the public. The meeting was recorded and the recording was posted on the County website.

Special Joint Meeting of the Three Municipal Advisory Councils (Castro Valley, Eden, and Fairview), March 21, 2024

On March 21, 2024 a Special Joint Meeting of the Municipal Advisory Councils (MAC) Workshop was organized by the Alameda County Planning Department staff. At a special joint meeting of the Castro Valley, Eden, and Fairview Municipal Advisory Councils, the Alameda County Planning Department staff presented the proposed changes to the County's Draft Housing Element to respond to comments received from the State Housing & Community Development Department, Project Schedule, and Sites Inventory Update. The meeting was held in-person with the option to participate virtually on Zoom or by phone. In addition to members of the Municipal Advisory Council, the meeting was open to the public who had the opportunity to provide public comments. The workshop was recorded, and the recording is available on the County website. There were forty-two (42) virtual attendees, twenty-four (24) in-person attendees, and seven (7) Planning Department Staff members in attendance.

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Comments Received from Castro Valley MAC Members:

- Highlighted the need for better outreach and communication, particularly to ensure diverse representation and input from renters, low-income residents, and communities of color.
- Expressed concerns regarding traffic and congestion, especially with the addition of ADUs and higher-density housing, and inquired about plans to mitigate this.
- Concerns raised on the feasibility of the Housing Element, particularly given the ambitions goals, high-interest rates, and current development climate.
- Inquired about strategies to incentivize developers to build affordable housing units.
- Concerns raised about overcrowding and inquired about the County's plans to address this issue.
- Questions raised on whether the Housing Element looks at project costs when determining sites to accommodate housing.

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Comments Received from Eden MAC Members:

- Echoed concerns about the lack of awareness and inadequacy of public notification regarding the Housing Element process and this meeting specifically.

- Concerns with infrastructure and environmental impacts and recommended the County couple the sites inventory with placed based strategies for community revitalization and displacement risk mitigation measures.
- Expressed frustrations with affordable housing development not being required to pay certain fees.
- Expressed support for a robust just cause eviction ordinance that protects all tenants including those in mobile home parks, single-family rentals, and newer apartments.
- Expressed concern about the concentration of lower-income housing units in Ashland and Cherryland and urged the County to identify more sites in higher-income areas of Castro Valley to address fair housing and displacement concerns.

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Comments Received from Fairview MAC Members:

- Echoed concerns about the lack of awareness and inadequacy of public notification regarding the Housing Element process and this meeting specifically.
- Concerns raised about the implications of not getting the Housing Element certified.
- Highlighted concerns about the impact of increased density on environment.
- Concerns also raised on how higher density will impact water and sewer capacity, traffic congestion and evacuation routes in Fairview based on the limited infrastructure.
- Questions on what happens if a property owner would like to be removed from the Sites Inventory list.
- Also expressed support for a robust just cause eviction ordinance that protects all tenants including those in mobile home parks, single-family rentals, and newer apartments.
- Noted that there are many vacant homes and questioned whether these properties have been explored.
- Questions raised on the development review process, particularly what an expedited review means and concerned with developer taking shortcuts with this process.

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Key Concerns/Issues/Comments Received from Members of the Public:

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Overall, the meeting underscored the need for a Housing Element Update that balances the state-mandated housing goals with the specific needs and concerns of Unincorporated Alameda County communities. Improved public engagement, careful consideration of site suitability, and a focus on infrastructure, environmental protection, and tenant rights are crucial for developing a plan that is both equitable and sustainable which are further discussed below.

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- Insufficient Public Engagement and Outreach: A number of attendees expressed frustration with the lack of awareness and inadequate public notification regarding the Housing Element update process. They called for more robust and inclusive outreach efforts to ensure diverse community representation and input, particularly from renters, low-income residents, communities of color, and non-English speakers. Several individuals highlighted the difficulty in accessing information about the meeting and the Housing Element itself, suggesting improvements to website accessibility and clarity. There were

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also concerns about the lack of representation from specific communities, like Cherryland, on the MAC.

- Concerns Regarding Specific Sites Inventory Locations: Significant opposition emerged against the inclusion of certain sites in the Housing Element inventory, particularly the former Sheriff Substation property and vacant lots on Madison Avenue. Concerns revolved around issues such as flooding, inadequate infrastructure, limited emergency access, environmental impact, and incompatibility with existing community character. Participants advocated for the removal of these sites from consideration and suggested exploring alternative locations that are more suitable for higher-density housing.
- Emphasis on Infrastructure and Environmental Impact: Community members consistently stressed the importance of addressing infrastructure limitations and potential environmental impacts alongside housing development. They highlighted concerns about water and sewer capacity, traffic congestion, wildfire evacuation routes, and the loss of green space and critical habitat in order to meet the County's housing needs.
- Emphasis on Tenant Protections: There were strong calls for robust tenant protections, including a comprehensive Just Cause eviction ordinance covering all renters and measures to protect residents of mobile home parks from displacement. Some participants

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Alameda County Housing Element [April 2024 Draft](#)

also advocated for exploring alternative affordability solutions, such as direct financial assistance and tenant purchase programs.

- Support for Affordable Housing: Staff received comments from members of the community who expressed their support to increase affordable housing in Unincorporated Alameda County.

Below are the PowerPoint slides from Staff's presentation:

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Update on the Draft Housing Element

Eden Area, Castro Valley, and Fairview
Municipal Advisory Councils

March 21, 2024



ALAMEDA COUNTY COMMUNITY DEVELOPMENT AGENCY
PLANNING DEPARTMENT

Housing Element Update Process

The Housing Element is a state-mandated process where local jurisdictions are required to designate possible sites for future housing and programs to support the construction of additional housing.

State law requires each local jurisdiction to revise its Housing Element every eight years.

All cities and counties within a region must update their housing elements on the same eight-year cycle.

Regional preparation for the 2023-2031 Housing Elements began in 2021

Alameda County began preparation in Fall of 2021.

Staff published the first draft in September 2023 and received comments from the state in January 2024

Staff anticipate submitting a second draft in April 2024.

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Required Components of Housing Element

- Assess Housing Need
 - Existing
 - Projected – Regional Housing Needs Allocation (RHNA)
 - Populations with Special Needs
- Policies and programs required to fulfill identified need and address issues
- Site Inventory & Analysis
- Governmental & Non-governmental Constraints
- Evaluate existing Housing Element policies & programs
- Affirmatively Further Fair Housing
- Community Engagement

Comments from State HCD & Staff responses

Comment	Staff response
Describe efforts to combat the gap in fair housing enforcement and outreach services and add or modify programs, as appropriate (p3)	Planning staff are coordinating with County HCD staff to ensure there is no gap in fair housing services.
Discuss the differences between racially concentrated areas of affluence (RCAAs) and racially or ethnically concentrated areas of poverty (R/ECAPs), especially differences in zoning (pg3)	Staff are further analyzing these areas and will add to policies and programs accordingly.
Further analyze education, economic, transportation and environmental components of the Tax Credit Allocation Committee’s opportunity scores (pg3-4)	Staff are further analyzing these topics and will add to policies and programs accordingly.
Further analyze how development at sites inventory sites will impact existing socio-economic patterns. Will development improve the quality of life for existing neighbors or exacerbate displacement? (pg4)	Staff will conduct a new analysis based on the new sites inventory and commit to policies and programs to improve exiting conditions for current and future residents, including reference to the Environmental Justice (EJ) Element.

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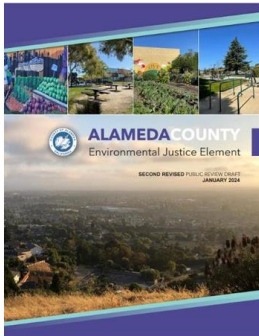
Comments from State HCD & Staff responses

Comment	Staff response
Add additional programs to meet Affirmatively Furthering Fair Housing (AFFH) requirements and affect meaningful change.	After updating the AFFH analysis based on the updated sites inventory, staff and consultants will add additional programs based on the analysis, including reference to the EJ Element.
Add programs to increase tenant protections, housing mobility through expanding housing choices in lower-density areas of the County, and new housing opportunities in relatively higher income or higher resourced communities.	Staff and consultants are adding programs reflecting the tenant protections proposed by Supervisor Miley. Staff are proposing increasing densities on vacant residential lots in parts of Castro Valley and Fairview to enable additional construction.
Further explain how many possible housing units could fit in sites in the sites inventory, including commercial or mixed-use sites	Staff are adding descriptions of the Housing Element Overlay and the history of developments in the unincorporated area.
Further explain how possible redevelopment is	Staff are adding descriptions of the Housing Element Overlay, further discussing local market trends, and further describing why sites are likely to redevelop.

Comments from State HCD & Staff responses

Comment	Staff response
Continue to engage the community	Staff will continue to engage with residents about the Housing Element process.
Further analyze development permit procedures to minimize constraints (pg7)	Staff and consultants are further describing the Site Development Review process, other development processes, and the Baker Tilly Report findings. Staff and consultants will add additional programs to minimize governmental constraints to development.
A variety of program changes, including earlier timelines, discrete timing, concrete commitments, changes to county reasonable accommodations policies, changes to zoning requirements around emergency shelters, permanent and transitional supportive housing, ADU programs, and others (pg8-10).	Staff and consultants are working to update programs listed in the main body of the Housing Element to comply with necessary changes, to speed up timelines, and to quantify more concrete commitments. This includes reflecting commitments made in the EJ Element.

The Draft Environmental Justice Element



Anticipated adoption by the BOS in June of this year
Commits the county to pursuing a variety of improvements in the Unincorporated areas including increasing access to public parks, improving communication and community engagement practices, and pursuing policies to decrease traffic violence and air pollution.

Housing Element Overlay

- Goal: create an overlay combining district to facilitate housing production in the sites inventory
- Applies to all sites in inventory not currently under development
- Permit streamlining at all density levels/all income levels
- The Administrative Modification: specific development standards such as building height, setbacks, open space, landscaping, and parking requirements can be altered to meet the projected number of units on a given site
- Will mitigate future need for additional rezonings to comply with the No Net Loss Rule.

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Sites Inventory

- State law requires each city and county to demonstrate that zoning & general plan designations allow enough housing development capacity to accommodate Regional Housing Needs Assessment (RHNA).
- Inventory sites have been identified in every Unincorporated Community.
- Alameda County does not construct housing; property owners decide whether to develop their properties.
- Applications for housing developments still need to go through an approval process.
- As required by State HCD, assigning properties to an income category is generally based on density, assuming higher density units will be more affordable.

Unincorporated Alameda County Residential Housing Need Assessment (RHNA) Allocation

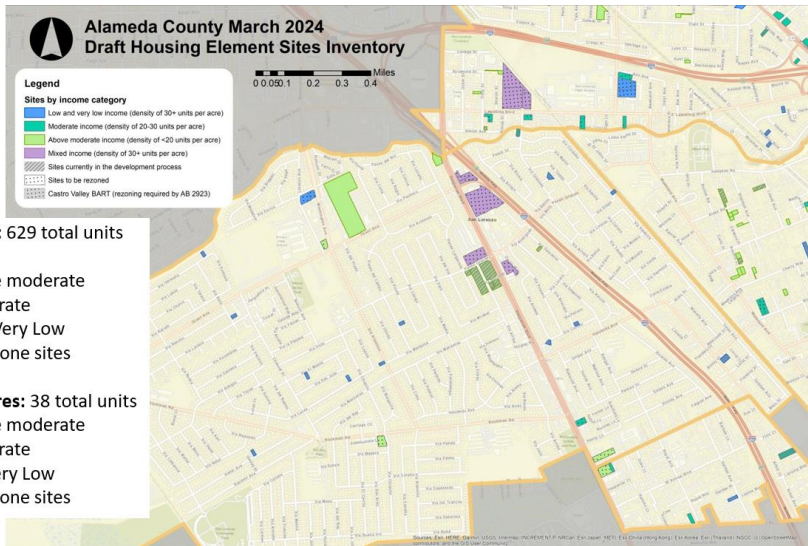
Housing Element Cycle	Very Low Income (<50% of Area Median Income)	Low Income (50-80% of Area Median Income)	Moderate Income (80-120% of Area Median Income)	Above Moderate Income (>120% of Area Median Income)	Total Required Units
2015-2023	430 units	227 units	295 units	817 units	1,769
2023-2031	1,251 units	721 units	763 units	1,976 units	4,711
% Increase	191%	218%	159%	142%	166%

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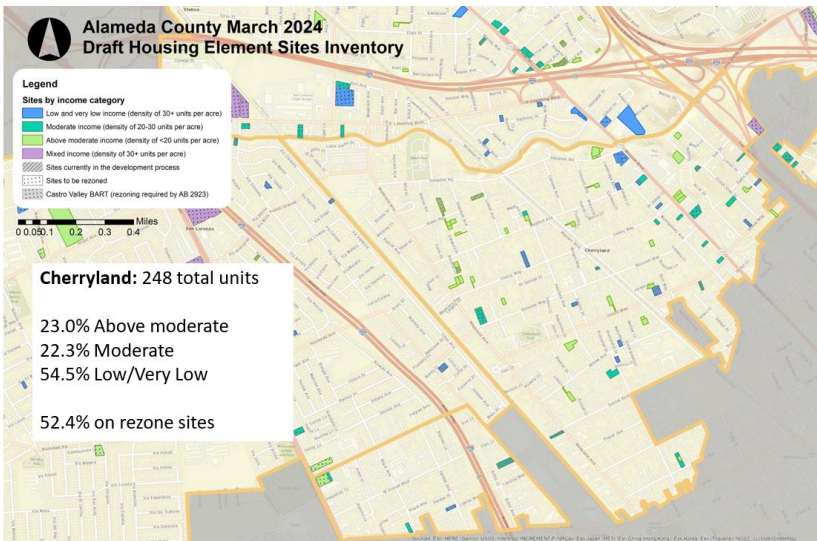
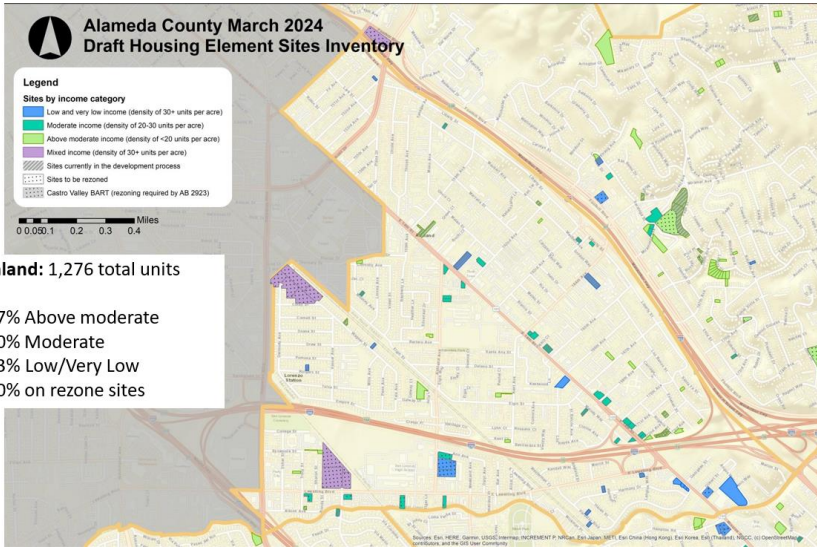
Sites Inventory by community

Communities	Total Housing Units		Above Moderate Income Units (<20 units/acre)		Moderate Income Units (20-30 units/acre)		Low and Very Low Income Units (>30 units/acre)		Units Currently Under Development		Units in Sites Proposed for Rezoning	
	Count	%	Count	%	Count	%	Count	%	Count	%	Count	%
Eden Area	2,191	45.5%	703	33.2%	467	55.9%	1,019	54.8%	334	37.2%	1,463	47.1%
Ashland	1,276	26.5%	295	13.9%	285	34.1%	696	37.4%	150	16.7%	900	29.0%
Cherryland	248	5.2%	57	2.7%	89	10.6%	100	5.4%	19	2.1%	130	4.2%
Hayward Acres	38	0.8%	13	0.6%	24	2.9%	1	0.1%	13	1.4%	18	0.6%
San Lorenzo	629	13.1%	338	16.0%	69	8.3%	222	11.9%	152	16.9%	415	13.4%
Castro Valley	1,875	38.9%	722	34.1%	351	42.0%	802	43.1%	318	35.5%	1,249	40.2%
Fairview	544	11.3%	494	23.3%	15	1.8%	35	1.9%	41	4.6%	395	12.7%
East County	204	4.2%	197	9.3%	3	0.4%	4	0.2%	204	22.7%	-	-
Total	4,814	100%	2,116	100%	836	100%	1,860	100%	897	100%	3,107	100%



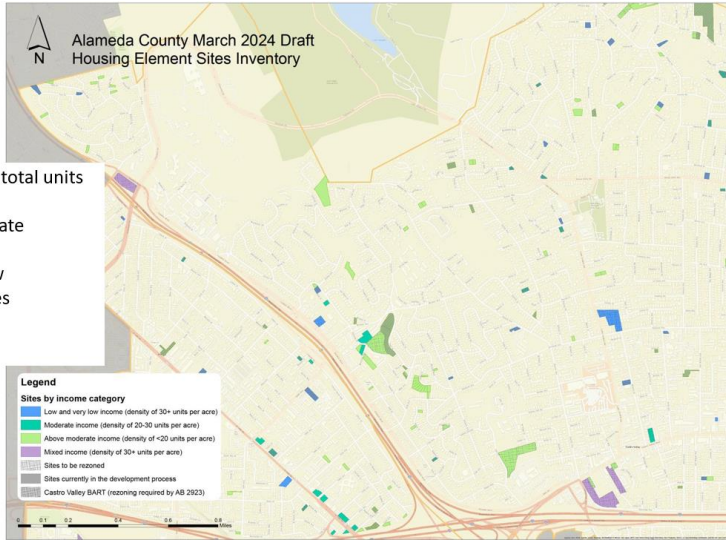
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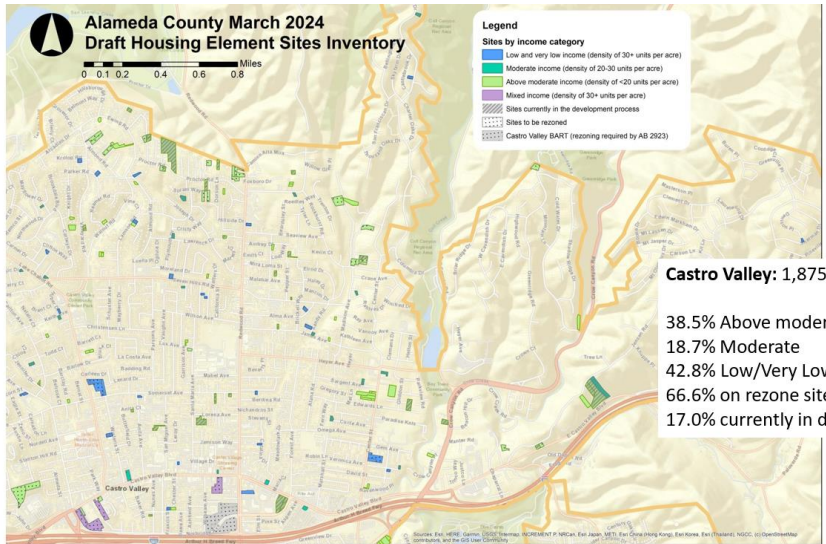
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Castro Valley: 1,875 total units

38.5% Above moderate
 18.7% Moderate
 42.8% Low/Very Low
 66.6% on rezone sites
 17.0% currently in development

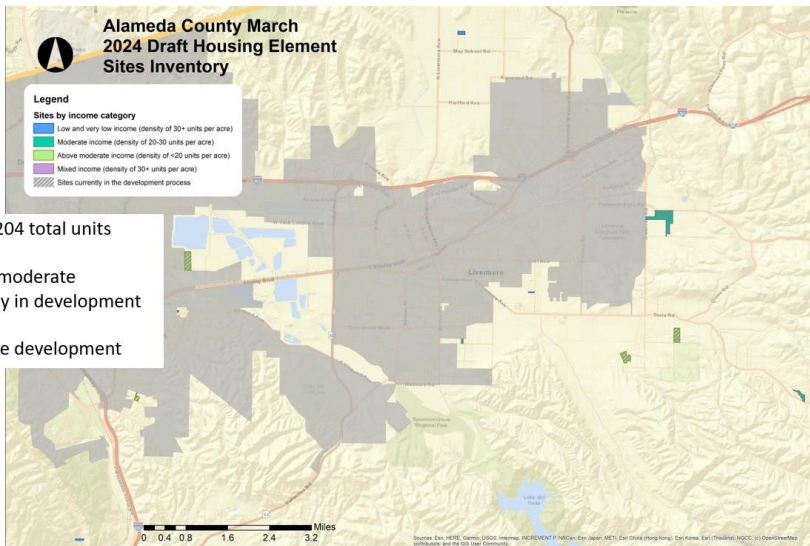
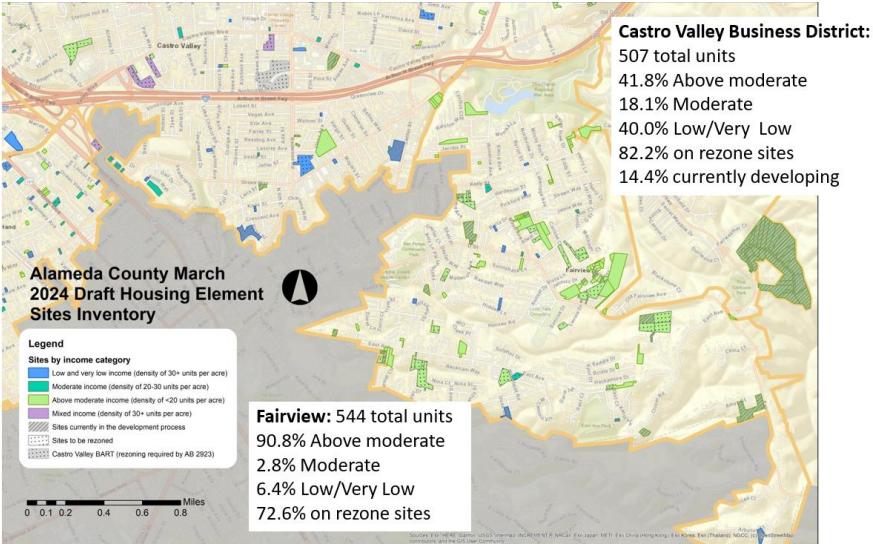


Castro Valley: 1,875 total units

38.5% Above moderate
 18.7% Moderate
 42.8% Low/Very Low
 66.6% on rezone sites
 17.0% currently in development

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Sites removed from the Inventory

Mission Boulevard and E 14th Street: There are now fewer sites, fewer units, and fewer proposed rezonings along the corridor. This is due to the loss of the Cherryland Place site (potential future sheriff substation) and in response to community and state comments.

	Number of parcels	Total # of Units	Above Moderate Units (Low Density Housing)	Moderate Units	Low and Very Low Income units (Higher Density Housing)	# of Parcels Proposed for Rezoning	Total # of Rezone Units
First Draft	43 sites	477 units	6 units	140 units	331 units	9 sites	216 units
Second Draft	26 sites	222 units	6 units	121 units	95 units	5 sites	86 units

Sites changed and removed in the Inventory

- Sheriff Station: staff were updated that the substation will be relocated, potentially to the corner of Mission Boulevard and Hampton Road, and that the building currently containing the Radio Dispatch facility will remain in use.
- Castro Valley BART: BART informed staff that they will not be able to develop this site before 2031.
- Rite Aid: Was not in the first Sites Inventory but is often asked about. Current owners have stated they do not intend to build housing and are pursuing different commercial/retail spaces at the site.

Additional rezonings: vacant lots in Castro Valley and Fairview

- 'Above moderate' housing require more land because there are fewer housing units per acre.
- State comments requested additional sites in High Opportunity areas (much of northern Castro Valley) and lower density areas (Fairview and much of northern Castro Valley).
- Staff selected the majority of currently vacant residentially-zoned lots in Fairview and northern Castro Valley to propose rezoning to allow 17 units per acre.
- Units at this density are considered above moderate housing.

Bay Fair BART

- AB 2923 and MTC's Transit Oriented Communities Policy require rezoning of BART sites to increase density and reduce development constraints.
- County staff are partnering with BART and City of San Leandro staff to pursue funding to move development forward.
- San Leandro will soon begin engagement for a plan for the Bay Fair BART site – stay tuned if you live in the area and want to participate!

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What happens next

- Staff anticipate publishing the second Housing Element draft in early April.
- There will be a minimum 7-day comment period.
- If you'd like to be informed about when that comes out, please add your email address to the form in the back!



Thank you!

Contact Us:

Albert Lopez, Planning Director: albert.lopez@acgov.org

Elizabeth McElligott, Assistant Planning Director:
elizabeth.mcelligott@acgov.org

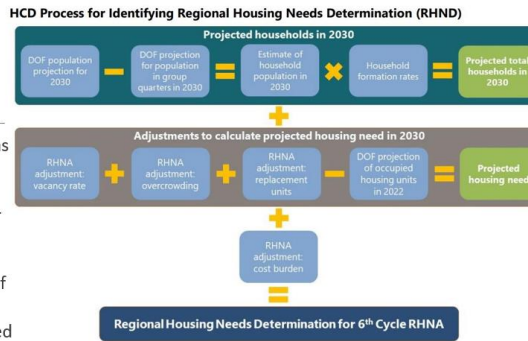
Olivia Ortiz, Planner 3: olivia.ortiz@acgov.org

Or: housing.element@acgov.org

Additional Background slides

RHNA

- Regional Housing Needs Assessment (RHNA) was a 2-year, multi-agency process.
- the most recent RHNA numbers are meant to account for previous unit needs that were never met.
- State HCD completed Regional Housing Needs Determination (RHND) with state Department of Finance (DOF) data.
- ABAG Housing Methodology Committee included representatives from every county, decided methodology for assigning RHNA to every locality.
- Only successful RHNA number change was a correction in county boundaries.
- No precedent for updating RHNA outside petition process.



For more information about ABAG's Housing Methodology Committee, see here: <https://bit.ly/4718gMk>

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Income Categories for Alameda County

Income Category	Percent of median income	Annual income (1-person household)	Annual income (3-person household)	Annual income (4-person household)
Extremely low-income	30%	\$28,800	\$37,000	\$41,100
Very low-income	50%	\$47,950	\$61,650	\$68,500
Low income	80%	\$76,750	\$98,650	\$109,600
Median income	100%	\$87,900	\$113,050	\$125,600
Moderate income	120%	\$105,500	\$135,650	\$150,700

Consequences of Not Fulfilling RHNA

- SB 35 (Weiner 2017) - Where construction of new housing units by developers has not met a jurisdiction's RHNA, cities and counties are required to offer a ministerial approval process for multi-family residential developments under certain circumstances:
 - 2/3 of the units must be residential
 - Must be located in urban area
 - Percentage must be affordable
 - Must comply with adopted "objective standards"
 - Subject to prevailing wage for construction workers
 - Must engage in Tribal Consultation
 - Public Hearings not required because a ministerial process

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For more details on the consequences of non-compliance with state Housing Element law,



<https://abag.ca.gov/sites/default/files/documents/2021-10/Consequences-of-Non-Compliance-with-Housing-Laws.pdf>

October 2021

New State Housing Unit Set to Enforce Local Housing Mandates



"A housing element is no longer a paper exercise - it's a contract with the state of housing commitments for eight years, and the Housing Accountability Unit will hold jurisdictions to those commitments," said Megan Kirkeby, deputy director for housing policy, California Housing and Community Development department in an October 2021 press release.

Local governments have much to lose if they fail to bring their housing elements into compliance with state requirements. With a staff of six in the new Housing Accountability Unit, California's Housing and Community Development (HCD) department is resourced and ready to enforce state mandates on local housing plans and policies. In April 2021 guidance to cities and counties, HCD stated that it is authorized to "review any action or failure to act by a local government that it finds inconsistent with an adopted housing element or housing element law. This includes failure to implement program actions included in the housing element. HCD may revoke housing element compliance if the local government's actions do not comply with state law." Noncompliant housing elements could also impact local general plans, as they are a required part of these foundational blueprints for land use planning. Locations that fail to comply are subject to a range of penalties, including:

Legal Suits and Attorney Fees: Local governments with noncompliant housing elements are vulnerable to litigation from housing rights' organizations, developers, and HCD. If a jurisdiction faces a court action stemming from its lack of compliance and either loses or settles the case, it often must pay substantial attorney fees to the plaintiff's attorneys

In addition to the fees paid to its own attorneys, potential consequences of lawsuits include: mandatory compliance within 120 days, suspension of local control on building matters, and court approval of housing developments.

Loss of Permitting Authority: Courts have authority to oversee local government residential and nonresidential permit processes to bring the jurisdiction's General Plan and housing element into substantial compliance with state law. The court may suspend the locality's authority to issue building permits or grant zoning changes, variances, or subdivision map approvals - giving local governments a strong incentive to bring their housing element into compliance.

Financial Penalties: Local governments are subject to court-issued judgments directing jurisdictions to bring a housing element into substantial compliance with state housing element law. If a jurisdiction's housing element continues to be found out of compliance, courts can fine jurisdictions up to \$100,000 per month, and if they are not paid, multiply that by a factor of six.

Court Receivership: Courts may appoint an agent with all powers necessary to remedy identified housing element deficiencies and bring the jurisdiction's housing element into substantial compliance with housing element law.

Streamlined Ministerial Approval Process: Proposed developments in locations that have not yet made sufficient progress towards their allocation of the regional housing need are now subject to less rigorous "ministerial" approvals in order to hasten the production of housing and bring a jurisdiction into compliance with its state-determined housing need allocation.

OVER ▼

How will new housing affect public safety and property values?

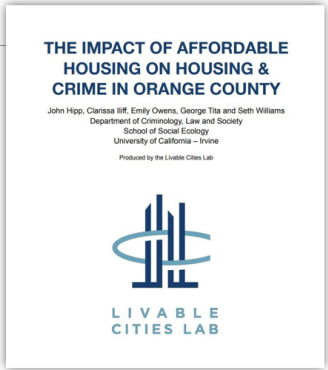
From the conclusion (page 12):

"The siting of affordable housing does not negatively affect housing prices in Orange County.

"In fact, we see modest increases in both sales prices and price per square footage county wide, with the most pronounced impact in places categorized with higher rates of poverty.

"The siting of affordable housing reduces most types of crime, especially violent crime. The overall impact is best described as 'null', as the changes in crime are measured in a fraction of a single crime per year.

"... The results from our analysis for Orange County add to what has been found elsewhere: The placement of affordable housing does not negatively impact the surrounding community, and in many ways, it enhances both local property values and increases public safety."



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AB 2923 requirements + TOC policies

For 'Neighborhood and Town Center' stations like Castro Valley and Bay Fair:

- Minimum 75 dwelling units per acre
- Minimum 5 stories allowable height
- Minimum FAR of 3.0
- No required vehicle parking
- Maximum residential vehicle parking of 1 space per unit
- Maximum office vehicle parking of 2.5 spaces per 1,000 square feet
- Minimum one bicycle parking spot per unit

Alameda County Housing Element [April 2024 Draft](#)

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[Below is an additional attachment on the All-MAC March 21, 2024 agenda. The same information was made available online.](#)

March 2024 Draft Sites Inventory for Unincorporated Alameda County Summary Analysis

March 14, 2024

Below is a brief analysis of the March 2024 Draft Sites Inventory for Unincorporated Alameda County. A few notes:

- Of the 228 sites listed in the sites inventory as under development, 129 include the construction of an ADU. Currently, planning staff rely on regional assumptions about the income level associated with an ADU. A regional study concluded that approximately 30% of all ADUs are affordable to very low income households, 30% of all ADUs are affordable to low income households, 30% of all ADUs are affordable to moderate income households, and the remaining 10% of ADUs are only affordable to above moderate income households. Staff have randomly allocated ADU income categories throughout the unincorporated areas and look forward to having better data in the future.
- All sites listed in unincorporated East County are under development.

Ashland

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- 1,276 units total
- This is an overall decrease from the first sites inventory, when there were 1,358 units proposed for Ashland.
- 869 units are in the Ashland Cherryland Business District (ACBD), or about 68% of all of the units in Ashland.
 - o The majority of units currently under development are in the ACBD (131 of 150 units).
 - o 542 units are on sites proposed for rezoning in the ACBD. A significant amount of these projected units are allocated to Crunch Fitness and the property behind it (396 units total)
- The ACBD is one of the few places in the jurisdiction that has existing zoning allowing for high density housing, which (on parcels at least .5 acres in size) CA State Department of Housing and Community Development (State HCD) expects us to assume will be low income. There are 505 low or very low-income units in the ACBD in Ashland.
- Outside the ACBD, there are 407 housing units. 358 of those units are anticipated to be built on the southern Bay Fair BART lot; the northern lot is in San Leandro and is also expected to develop. To comply with regional planning policy and ensure Public Works can receive future funding, staff has increased the proposed rezoning to up to 100 units per acre at the Bay Fair station southern parking lot.
- In response to both landowner request and a re-evaluation of nonvacant sites, 19 properties in Ashland were removed from the sites inventory list. This includes Cherryland Place. CDA has been told that the Sheriff's department is considering building a substation there.

Cherryland

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Alameda County Housing Element April 2024 Draft

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- 240 units total
- This is a slight increase from the first sites inventory, which proposed 215 units for Cherryland.
- The lower unit count compared to Ashland and San Lorenzo largely reflects a lack of land appropriate to rezone.

- The largest number of units (58 units) is on .99 acres of land owned by the same person at the corner of Mission and Hampton.
- The second largest number of units (31 units) is on a lot proposed for rezoning owned by the City of Hayward. County staff are in conversation with City staff regarding the property.
- The two sites mentioned above constitute the majority of the 130 units projected on rezone sites.
- In response to both landowner requests and a re-evaluation of nonvacant sites, 9 properties in Cherryland were removed from the sites inventory list.

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San Lorenzo

- 629 units total
- This is a slight increase from the first sites inventory, when there were 591 units proposed for Cherryland.
- About a quarter (152 units) of those are units under development now. This includes the Village Green project.
- 69.5% of San Lorenzo units are in the San Lorenzo Village Specific Plan area.
- One of the biggest changes between the rezonings proposed in the first Housing Element draft and this second Housing Element draft is that properties proposed for rezoning in the San Lorenzo Village area will be rezoned to up to 86 units per acre, not 60. This is in line with the 'high density residential' designation available in Ashland and Cherryland.
- County staff are in discussions with Bohannon Properties, who own significant amounts of land in the San Lorenzo Village, and they have not objected to an increase in density.

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Hayward Acres

- 38 units total
- This is a slight decrease from the first sites inventory, when there were 47 units proposed for Hayward Acres
- The low number of units reflects (1) limited existing vacant land and (2) limited underutilized commercial or residential land, based on our months of sites inventory research.

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Castro Valley

- 1,876 total housing units
- This is an overall decrease from the first sites inventory, when there were 1,978 units proposed for Castro Valley.
- Less than a third of these units (507 housing units) are projected for the Castro Valley Business District (CVBD). The overwhelming majority of these units are on sites proposed for rezoning.
- Since the first draft, 17 parcels were removed from the sites inventory. The majority of those are in the downtown area and include the BART station and the Sheriff's Radio Dispatch site
- 1,331 units are outside of the CVBD area. Of those, 18.2% (242 units) are units currently under development. 60% (799 units) of the units outside of the CVBD are proposed for rezoning.

Alameda County Housing Element [April 2024 Draft](#)

- There are 38 projected units in the Madison Avenue Specific Plan area, a reflection of 1 vacant residential site, 2 projects currently under development, and 3 vacant sites we're proposing to rezone to 17 units per acre.
- The majority of low and very low income units in Castro Valley are outside of the CVBD.

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- Some of the most dense sites in Castro Valley include:
 - o The First Presbyterian Church of Hayward affordable development, which would be next to the existing Trader Joes
 - o The sheriff substation, which we're proposing rezoning to up to 100 units per acre, matching densities allowed at the Bay Fair BART area.
 - o Lucky Supermarket's Parking lot
 - o The Ruby Street development
- The biggest changes since the first draft sites inventory include:
 - o Changing the density on a handful of downtown parcels from up to 40 units per acre to up to 60 units per acre.
 - o The Castro Valley BART site: staff need to rezone it to comply with state law. However, BART has informed staff that it won't be developed before 2031 so the County cannot count the potential units on the site toward our Regional Housing Needs Allocation.
 - o And increasing the allowed density on a number of parcels in northern Castro Valley to up to 17 units per acre. This is the same density as existing residential small lot zoning in Castro Valley. Staff are proposing this zoning change for 28 parcels, and it accounts for about 172 above moderate units.

Fairview

- 544 total units
- This is an increase from the first sites inventory, when there were 323 units proposed for Fairview.
- The majority of these units (395 units) are on sites proposed for rezoning. 341 units are projected for sites staff are proposing to rezone to up to 17 units per acre. Staff are proposing this for 27 vacant or majority vacant parcels.

For comments and questions, please reach out to Alameda County Planning staff at athousing.element@acgov.org or leave a voicemail at 510-670-6523.

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Other Public Outreach Activities and Events

Website

The County's website has hosted a dedicated Housing Element Update webpage (<https://www.acgov.org/cda/planning/housing-element/housing-element.htm>) to provide information on the Housing Element update process and timeline, resources (e.g., reference material, draft documents, etc.), meeting notices and materials, and County contact information. Any person could sign up to receive email notifications about upcoming meetings and availability of information.

Online Office Hours

From November 2022 to January 2023, County staff held online office hours to discuss Housing Element questions with a variety of groups. While the office hours were not well attended, staff was contacted by a resident of the Unincorporated Area who said she needed help finding adequate housing for her family who was living in an overcrowded unit. County Staff put her in contact with County HCD resources.

Public Workshop for Property Owners

On February 9, 2023, the County hosted a workshop for property owners of parcels in the sites inventory to explain what the Housing Element is and why their properties were included in the inventory. Workshop attendees were also encouraged to participate in the Housing Element survey, share their housing story, and to sign up for emails on the project website.

Summary of Comments Received at February 9, 2023 Property Owners' Workshop:

- Interested in rezoning property to allow residential development.
- County should coordinate contact with other property owners to facilitate joint development of adjacent properties.
- Concern regarding access to utilities.

Interviews

During the public comment period, staff specifically reached out to the school districts and utility providers who serve unincorporated Alameda County for comments and to discuss future capacity, largely in response to public comments concerning school and utility capacity. Staff met with Castro Valley Sanitary District (CVSan), Castro Valley Unified School District, and Hayward Unified School District. Staff also communicated with San Lorenzo Unified School District and EBMUD.

Affirmatively Furthering Fair Housing (AFFH)-Targeted Outreach

Ashland Cherryland Healthy Community Collaborative

The Ashland Cherryland Healthy Community Collaborative (ACHCC) has been a significant part of the creation of the concurrently written Environmental Justice (EJ) Element. Members represent a variety of organizations and government agencies that serve and/or represent people in the Eden Area. In 2021, the following agencies and organizations formed the “EJ Bucket” of the ACHCC to help inform the policies and programs of the EJ Element:

- AC Transit
- Alameda County Community Food Bank
- Alameda County Economic and Civic Development Department
- Alameda County Health Care Services Agency
- Alameda County Healthy Homes Department
- Alameda County Library
- Alameda County Office of Education
- Alameda County Planning Department, Code Enforcement
- Alameda County Probation Department
- Alameda County Public Health Department
- Alameda County Public Works Agency
- Alameda County Sheriff’s Office
- Alameda County Transportation Commission
- ALL IN Alameda County
- Bike East Bay
- Cherryland Elementary Family Resource Center
- Deputy Sheriffs’ Activities League
- Eden Community Land Trust
- Eden I&R
- Eden United Church of Christ
- Friends of San Lorenzo Creek
- Hayward Area Recreation and Parks District (HARD)
- La Familia
- Mandela Partners
- My Eden Voice!
- 100k Trees for Humanity
- Padres Guerreros
- REACH Ashland Youth Center
- Resources for Community Development
- San Lorenzo Unified School District
- Tiburcio Vasquez Health Center
- YMCA East Bay

Since many of the organizations participating in the “EJ Bucket” of the ACHCC work with and advocate for special needs groups identified in the Housing Element, amidst ongoing engagement for the EJ Element, staff presented information regarding the Housing Element at the November and December 2022 meetings of the ACHCC as a means of (1) educating attendees about the Housing Element process, 2) inviting attendees to further discuss their organizations’ needs in relation to housing, and (3) advertising open surveys.

Summary of Comments Received at November-December 2022 ACHCC Meetings:

- Questioned basis for high RHNA since County is losing population.
- Resources should be focused in burdened areas where more housing is planned.
- Affordable housing development planned in Ashland in partnership with new park is example of improving resources in low resource area.
- County Probation Office sees challenges for its clients.
- Contamination and habitat value should be considered on potential housing sites.
- School capacity should be considered.
- There should be a tax policy to disincentivize self-storage units.

Staff then returned to update ACHCC members on September 5, 2023, to let them know about specific programs in the Housing Element.

Interviews

In addition to those attending ACHCC meetings, County staff reached out to the following organizations while writing the Housing Element Draft:

- Eden Community Land Trust
- East Bay Housing Organizations (EBHO)
- The Supportive Housing Community Land Alliance (SHCLA)
- REACH Ashland Youth Center, sponsored by the Alameda County Health Care Services Agency
- Resources for Community Development (RCD)
- My Eden Voice (MEV)
- The Deputy Sheriffs' Activities League (DSAL)
- Community Resources for Independent Living (CRIL)
- The Alameda County Probation Department

More information about these organizations and their work with special needs populations is available in Appendix F, the Affirmatively Furthering Fair Housing Assessment. Staff successfully met for individual conversations with the following organizations: EBHO; SHCLA; REACH Ashland Youth Center; RCD; MEV; and the Alameda County Probation Department.

Summary of Public Comments Received for First Housing Element Draft

In response to the County's Housing Element outreach efforts, individual residents concerned with affordable housing and with housing access for people with disabilities reached out to staff.

Concerns heard by staff:

- Generally about housing and housing security and the disparities between homeowners and renters in urban unincorporated Alameda County.
- Lack of existing protections from yearly rental increases beyond state law
- Service providers can't help people with other problems in their lives when they're dealing with poor housing conditions or housing instability; whether or not they want to work in the housing sphere, providers are forced to because this problem is the age and state of housing structures; unregulated units
- Overcrowding, especially in Ashland and Cherryland. This goes on to effect other parts of peoples' lives.
- Residents especially in Ashland, Cherryland, San Lorenzo, and Hayward Acres have specific housing needs
- Between affordability and the size of units, there are people living effectively unsheltered in backyards or in storage units.
- Homelessness can look different in Unincorporated: more people couch-surfing or living in their cars, less people visibly sleeping outside than in other parts of Alameda County
- There are not enough services for people experiencing homelessness located specifically in Unincorporated.
- Alameda County needs to provide housing with services to people currently experiencing homelessness, ideally with some of the local medical providers involved.
- Can manufactured housing be a part of solving the housing crisis in Unincorporated Alameda County?
- Tiny homes at are just a temporary solution for people experiencing homelessness; we need mental health and substance use support
- Some residents have difficulty working with ECHO housing
- People with disabilities have wide needs for housing.
- Greater transparency with the Housing Element process
- South and Central County do not have the same kinds of resources for people re-entering society that Oakland does, and that makes it difficult for people in other parts of the county to access them. While this is true for all returning people, there especially are not resources for women.
- Existing housing options for people on probation do not accommodate family structures. They're generally communal, have little privacy, and do not include options for dependents, pets, or partners.
- Waitlists for housing-related resources for people on probation are so long that sometimes their probation period ends before they're able to take advantage of any of them.

Stated needs and ideas heard:

- An unincorporated-specific navigation and resources center
- Protections against rising rents
- Services in the Unincorporated County for people experiencing homelessness
- Additional affordable housing, specifically to help systems-impacted people stay housed
- A Universal Design policy like the City of Alameda

- Making it easier to navigate the jurisdictional divides in Central Alameda County by working with San Leandro and Hayward as much as possible

Online Survey 1

Community	Number of Responses	Percentage of Responses
Castro Valley	21	40.4%
Eden Area	24	46.2%
Ashland	7	13.5%
Cherryland	3	5.8%
Hayward Acres	3	5.8%
San Lorenzo	11	21.2%
Fairview	2	3.8%
Neighboring municipalities	5	9.6%
Total	52	100.0%

A housing needs survey was offered in Spanish and English on the County website while staff were drafting the Housing Element. Links to the survey were sent to the County's Housing Element listserv, posted to various online newsletters and in flyers in San Lorenzo Village and along the East 14th Street and Mission Boulevard corridor in Ashland and Cherryland.

The survey received 52 responses, as shown in Table F-3. In addition, 294 potential responders clicked through to the survey; while they did not complete the survey or did not intentionally click on the link, these 242 users read more about the Housing Element process.

Demographics of responders include the following:

- 40.4% of responses (21 people) have lived in the area for 5 years or less; 48.1% of responses (25 people) have lived in Unincorporated County for 11 or more years
- 32 responders (61.5%) identified themselves as a combination of one or more: American Indian and Alaska Native, Asian, Black or African American, Hispanic or Latine, Native Hawaiian and Other Pacific Islander.
- 40.4% (21 people) live in Castro Valley, and 46.2% (24 people) live in the Eden Area. 5 people (9.6%) live in adjacent cities or otherwise work in Unincorporated Alameda County.
- 40.4% of responses (21 people) said that the existing housing types available in Unincorporated Alameda County do not meet their needs.

When asked what housing issues the county should focus on solving in Unincorporated Alameda County, people responded in the following ways:

- 26 people (50%) of responders answered that "Affordability: rental housing is too expensive for people" was one of the 2 things the county should focus on.
- 13 people (25%) of responders answered that "Overcrowding: there are too many people living in one home" was one of the 2 things the county should focus on.
- 13 people (25%) of responders answered that "Housing quality and maintenance: housing needs repairs or significantly updated features" was one of the 2 things the county should focus on.

These responses are consistent with the housing needs analysis in Appendix A which found that 25 percent of renter households spend between 30 and 50 percent of their incomes on housing and 26 percent of renter household spend 50 percent or more of their income on

housing. The analysis also found that 8.5 percent of residents of the Unincorporated Area live in overcrowded conditions, with the highest levels of overcrowding in Cherryland (17 percent of residents) and Ashland (15 percent of residents).

When asked about the housing issues faced while living in Unincorporated Alameda County, people responded in the following ways:

- 36.5% of responders (19 people) said that they do not face housing issues in Unincorporated Alameda County.
- Of the 33 people who responded with having housing problems
 - o 18 people (54.5%) said that “Monthly rental housing costs are too expensive”
 - o 15 people (45.5%) said that “[they] cannot find affordable housing”

When asked about what amenities they’d like to see near more dense housing, people answered the following ways. Note that responders were allowed to choose up to 2 options

- 46.2% (24 people) answered that they’d like additional parks and play areas
- 42.3% (22 people) answered that they’d like additional grocery and shopping areas
- 30.7% (16 people) answered that they’d like additional open space and trails.

The following responses to open ended questions are arranged thematically:

On Needing Affordable Housing

- I would like to see more affordable housing for all types of populations. I would like to see more affordable housing all over not just in certain areas. ... Affordability is too high. Can't afford to live here. More affordable housing in unincorporated Alameda County would help a lot of people from displacement as well as provide better quality of life. I wish my rent was lowered. ... There are a lot of people against affordable housing in unincorporated communities and there has to be a way to still complete affordable housing in these communities. It's giving segregation and red lining.
- My brother moved to Texas because he cannot afford housing here, I am looking for housing to move out of my parent house.
- I would love to find a place of my own that I can afford (I have a full time job and work extra some weekends, but housing is still not attainable).
- [in response to why existing housing does not meet their needs] Unaffordable
- Rent to[o] expensive
- Las rentas son muy altas y piden muchos requisitos para poder rentar. Quieren 3 veces más de ingreso de lo que se pagaría de renta [*Rents are very high and they (landlords) have many requirements in order [for one] to be able to rent. They want three times more than what is paid for rent itself.*]
- Need help with rental assistance
- [I need] Stable suitable affordable housing in a decent area. ... Rent is too high and hard to find suitable stable housing
- Los precios en la renta están muy elevados [*The rental prices are raised very high.*]
- Currently renting a room for my daughter and I. Rent assistance is very helpful. ... I can't move out on my own because rent is expensive and I'm a single mom.

- [I need] Renters protection, affordability. ... I would like for community members to have access to safe, affordable, and healthy housing particularly for our African American and new-comer communities.
- Ayuda financiera para pagar mi renta, que es muy cara, ayuda para pagar gas y electricidad son muy caros ,se necesita Mas viviendas de costo accesible para no tener que compartir la casa con otras 2 familias ... Necesidad de ayuda para comparar un departamento a costos razonables. ... Necesidad de ayuda para comparar un departamento a costos razonables. O ayuda financiera para poder pagar renta. ... Hay muchas personas sin vivienda, y no hay suficientes viviendas y las rentas son exageradamente CARAS. *[Financial help to pay my rent, which is very expensive, help to pay for gas and electricity, which are very expensive, there is need for more housing with accessible costs to not have to share an apartment with 2 other families ... [There is] Need for help to compare [a higher cost apartment rental] [with] an apartment [rented] at reasonable costs ... Or financial help for being able to pay rent ... There are many people without housing (now), and there is not sufficient housing, and the rents are exaggeratedly HIGH.]*
- There should be more affordable homeownership types ... much more! Condos, community land trusts, etc...
- [I need] More affordable housing and assistance for low-income families.

On Transit and Housing:

- Building house near transit corridors. Do not put additional house in established neighborhoods.
- I fully support mixed use housing near the Castro Valley BART station. I live 0.5 miles from the station and would love for the surrounding area to be built up and include more diverse, modern dining and retail options along with housing. I 100% support a more pedestrian-friendly downtown, with more frequent and accessible public transit options.
- Please increase density near the business district and BART as a way to improve walkability/rideability/livability.
- Build affordable housing near transit centers and not in existing neighborhoods.
- We agree with redeveloping Castro Valley BART's parking lot into housing, but we drive to BART so some sort of parking structure would be best to enable BART accessibility (most folks in Castro Valley would drive and park at BART).
- We still need to build more low-income housing near transit centers.

On Overcrowding

- We need an housing of own that is able to accommodate the family size of 5
- Adult children living with us. Need extra private areas for family.

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Online Survey 2

During the public comment period, staff used the online survey tool 'Consider.It' to gain community perspectives on how to prioritize different programs and policies. This platform allows participants to both weigh in on existing ideas as well as post their own. The tool was promoted through public meetings and the email listserv. Community members with La Familia reached out to staff to ask for the survey to be rephrased in a less technical way so that it could be shared with their clients. Ultimately, no post received more than 15 responses, so the tool was not used to inform program prioritization.

The following is a summary of the responses provided:

- 8 participants agreed that Castro Valley has a disproportionate number of low income units compared to Fairview. This idea was submitted by a participant.
- 7 residents disagree with the sites inventory overall
- 8 participants agree with the development of the Sheriff Radio Dispatch site, and 7 agree with the addition of housing in the San Lorenzo Village area
- 13 participants were of mixed feelings regarding the development of BART station parking lots
- Participants generally agreed with staff prioritizing policies and programs that further fair housing
- 10 participants were of mixed opinion on allowing taller buildings in transit-oriented areas.

Public comments received during the housing element process are also provided in Section 1.E. of the main body of this housing element document, along with programs to address the comments listed, and in Appendix F, the Affirmatively Furthering Fair Housing Assessment.

Comments and Responses

The following [is a complete list of comments from community members, advocates, Municipal Advisory Council \(MAC\) Members, Planning Commission Members, and the Board of Supervisors as well as are county staff's responses to comments received during the public comment period.](#) ~~these comments.~~ Comments are listed in chronological order. The full text of some comments are included as additions to this Appendix.

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	<i>Commenter</i>	<i>Comment</i>	<i>Response</i>
1	Claudia Albano	Wanted to give you a comment on the draft housing element and ask a question. You describe the unincorporated area and it talks about the census designated communities, but I think that it should include a few sentences that there are non census designated communities in the unincorporated area, Ashland, Cherryland, Hayward Acres that have very high poverty rates and you know it's important I think to include them, I mean to call them out. otherwise it just focuses the readers attention that there's an unincorporated area and there's these census designated places, but it doesn't talk about the non census designated places. So that's my comment.	In response to this comment, staff and consultants added additional description of Hayward Acres in the program section of the Housing Element draft. Additionally, Hayward Acres is discussed alongside all other communities in Appendix F, which discusses AFFH.
		The second one was I'm wondering about. We have some overlap between the tenant protections that are being talked about and this document. and I'm wondering is there kind of, I know it's coming forward, but is there any kind of conscious effort to kind of think about some of those things. Like for example, I know that there's the demand for rental inspection but there isn't a proactive rental inspection. And so are you just waiting for that to be as well as other as whether other tenant protections or is that just really not covered in this document?	Staff are committed to accurately representing the County's commitment to renters in the Housing Element. This includes representing Code Enforcement's rental inspection pilot and future developments before the adoption of the 6th Housing Element, including Program 6.O: Renter Protections . The following programs pertain to tenants' rights: Program 2.K: Preserve At-Risk Housing, Program 2.L: Protect Existing Affordable Housing Units, Program 5.D: Rental Inspection Pilot, Program 5.E: Condominium Conversion, Program 6.B: Fair Housing Referrals (ECHO Housing), Program 6.C: Rent Review Program, Program 6.F: Displacement Protection, Program 6.G: Fair Housing Services, Program 6.I: Mobile Home Rent Stabilization Ordinance

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		And then the other question was there's the EJ element that is a draft form now. I'm wondering if any of those policies around housing, should be referenced at least you know should redo these metrics at least thought about it in the and maybe there asking about and maybe they should be referenced to an equity issue. And I do think the whole equity issue should be called out, and maybe that's part of my thinking and wanting to call out Ashland, Cherryland, Hayward Acre because you know they kind of get lost between the zip code stuff and not being sense of designated places and I don't want their needs because they are so great to get lost	Comments and policy ideas generated through the Environmental Justice Element process are reflected in the Housing Element. Implementing the Environmental Justice Element is now reflected in program 7.D: Environmental Justice Element Implementation . Equity and the differences between the Eden Area and other unincorporated communities are the primary topic of Appendix F, Affirmatively Furthering Fair Housing.
2	Serena Weed	In regard to putting low income housing in CV I have a few thoughts I would like to share: First and foremost I would be much more accepting of this if it was affordable housing for all and not just section 8. I imagine a facility where we can create jobs to make sure this is a safe and clean living environment. This would be beneficial to moms raising children, college students, middle aged and elderly. Almost everyone is a paycheck away from being homeless due to the increased costs.	Any household with an income that meets the low income threshold could qualify to live in the low income housing contemplated in the HE. No Section 8 voucher would be required. Section 8 vouchers provide a rent subsidy that allows the voucher holder to rent market rate housing.
		The increase of people living in CV would be dramatic and cause traffic (Streets and street lights would need to be altered to accommodate traffic)	Traffic considerations will be a part of each development, as is required by CEQA.
		Do these units have garages? I am against street parking meters.	Details of future units will be determined by the relevant design guidelines. However, parking management such as requiring some form of payment for parking is an important component of managing traffic and ensuring that there are available parking spots in high-traffic areas.
		Castro Valley needs places for teens and young adults to hang out and socialize. Some of the proposed sites could be used for this.	Thank you for your comments. They have been received.
		Rite Aide use to have a huge selection of fabrics, yarn and crafting materials. Now one has to travel outside of CV to find these items. These items are essential because they allow people of all ages to be creative and unique. These items are often required in school projects.	Thank you for your comments. They have been received. As of summer 2023, the Rite Aid is not a part of the sites inventory.

		<p>Furthermore I do not see low income housing having a positive impact for CV. Affordable housing for everyone. Thanks for taking the time to read this. I will think positive thoughts for the future of CV.</p>	<p>As discussed in Appendix F, there are current residents of Castro Valley who are rent burdened or mortgage burdened, meaning that they pay 30% or more of their monthly income to keep housing. Future low income housing will help these residents stay in Castro Valley.</p> <p>As discussed elsewhere in these responses, research on a variety of communities has shown that housing for lower income households has a neutral-to-positive impact on the community.</p>
3	M. A. Caruso	<p>Please preserve Lucky Castro Valley, it's the only good grocery store in Castro Valley. Safeway is overrun with crime and overcharging, the CV natural market has little in the way of essentials</p>	<p>Staff envision future development at this site as including both retail and housing.</p>
4	Ally Wilson	<p>Hi, We are residents of Castro Valley and we opposed reducing CV BART parking lot for housing. We rely on BART for work commute and leisure activities. Prior to pandemic, CV BART parking is full around 9:30am. This add to unfair burden on parents that have to drop off kids at school and cannot arrive at CV BART parking lot in time. As a result, I have to drive far away to another station or commute to work.</p> <p>CV should not have to solely burden 1/2 of Alameda unincorporated affordable housing quote, this responsibility should be spread out.</p> <p>Alameda planning department can also approve variance for increased density for the proposed affordable apartment. BART can be save by adding 2 stories to the proposed apartment, rather than making the whole community suffers by reducing the effectiveness of BART.</p> <p>Let's not create new problem with shortsighted strategies.</p> <p>Lastly, we request to view the Housing Element plan that is not available on your website.</p>	<p>Thank you for your comments. They have been received.</p> <p>Commenter was sent Housing Element draft completion of the draft.</p> <p>As of the March 2024 BART Transit Oriented Development Work Plan, the Castro Valley BART station will not be considered for development before 2031. However, Alameda County staff will be working on necessary predevelopment studies to ensure the station's development at a later date, as reflected in Program 1.O: Preparation of Castro Valley BART Station for future development</p>

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4	Kevin Burke	<p>My wife's grandparents are over 90 years old and live in a home on Sydney Circle in Castro Valley. There are no amenities in walking distance. They need to drive a car to get anywhere, which is becoming more and more precarious for them.</p> <p>I'm extremely concerned for their well being, as well as the well being of other people on the road.</p> <p>Smaller housing options for seniors near downtown, within walking distance of amenities would help them avoid being isolated.</p> <p>I am encouraged by the rezonings in downtown Castro Valley which would help facilitate this, and would encourage Alameda County to further reduce constraints (parking, setbacks, heights, egress requirements) to facilitate the development of housing that can increase mobility for seniors.</p> <p>Alternatively, Alameda County could consider permitting commercial development (corner stores, accessory commercial units) in single family zones.</p>	<p>Thank you for your comments. They have been received.</p>
5	Ann and John Fagliano	<p>I cannot believe what I have read about the housing element plan... are you crazy? We are all already dealing with high traffic, crowded schools, no bus transportation for our children in our community</p> <p>Wanting to add to our community more people, when we already cannot support what we have.</p> <p>Getting rid of Luckys supermarket and leaving us with just Safeway that is insane. Have any of you tried to shop at these stores now, you circle the parking lot forever to get a space.</p> <p>Parking will be insane. Just dropping off and picking up at any of the school sites is insane.</p> <p>Canyon Middle school has Heyer Street backed up to Redwood at any given morning or afternoon, that includes the high school also.</p> <p>Perhaps on paper it looks good but for our community it is not!!! I think our tax dollars can be spent more wisely of course being unincorporated our hands are tied.</p> <p>Hopefully we will pack your meeting on August 14, 2023 and speak our minds. It is a no vote for us to even consider dropping this on our community.</p> <p>I also see a massive amount of the yellow handicap curves being done oh yes great but then we have no sidewalks and have to go into the streets...Does that make sense....wasteful!!! Look at the whole picture don't just try and dump a mass of people into an area that services are not available. We do not have the capacity now to serve what our community needs, this will only add to congestion and probably increase our crime rate.</p>	<p>Thank you for your comments. They have been received.</p> <p>Please find comments from SLZUSD and CVUSD included in this document.</p>

		<p>I realize becoming our own city they say is too costly but we are a purse for you to use at your convenience. We should all stand up for our community and not let you push housing projects that we will not be able to afford in the future.</p> <p>Bart is another issue you want to build units there. There is not enough parking there now. When Bart was built it lacked in parking. What happened? All the Bart commuters started parking in the neighborhood. Owners of their homes could not park in front of their houses. Now the neighborhood has to buy passes to park in front of their house. Totally ridiculous and that was an Alameda County rule. They did not take into account the overflow of traffic and parking issues and now you want to add more housing ...learn from your mistakes.</p> <p>We will be over populated and how is security going to be addressed that's another issue. We are already beginning to face the backlash of crime with no end in sight and lack of support.</p> <p>My husband and I will be at the meeting on August 14, 2023 and hopefully a lot of our community memebers will be there. This is not a matter that you will just be able to slap onto our community and leave us will multiple problems in the years ahead.</p> <p>It is very easy for your committee to draw up a project and it looks pretty on paper but it's not reality.</p> <p>No one listened and took into account the community's concerns on your last decisions to place housing on bart's property that left a parking problem ,the community was left with over population in their neighborhood. Alameda County is able to dip into the unincorporated treasure chest and help themselves. We don't even have sidewalks in our community to access our town leaving us with dirt, gravel, rocks, uneven pavement and need to resort to walking in the street, our community needs a lot more than infusing our population with housing. Housing in the existing Bart parking was fought long and hard and in the end the neighborhood lost. The County found a solution to their error...PARKING PERMITS THAT THE HOME OWNERS PAY FOR!!!!</p> <p>Alameda County needs to take a closer look at our backyard before fencing us in.</p>	
6	Ann and John Fagliano	<p>I was online and commented on tonight's meeting. I found it quite disturbing. I feel the State of California is shoving this whole housing units down our throats. Of course the State of California can mandate these proposals but I do not think any impact on the community was even a thought on their minds. Over 200 people showed up for the meeting not including the online people. Once this hits the entire community there will be more. I do not feel we have the police force, schools, walking, sidewalks, grocery stores traffic concerns addressed. As far as the homes being out of reach that is not only in Castro Valley community that is everywhere. Homes are out of reach.</p>	<p>Thank you for your comments. They have been received.</p>

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	<p>Rentals are out of reach and what about jobs what will Castro Valley have to offer? What is Castro Valley benefit to these so called improvements that the states we have to have. We have people behind their desks making decisions and drawings that our community cannot support. It was questioned at the meeting how many of the low housing will be section 8, I do not think that was answered. I think there were alot of concerns from the community and hopefully our community will get them answered. It almost sounds like a done deal, but hopefully it can be toned down. The 5 story housing for the current Bart Station you are out of your mind. That state does not have to guarantee parking and where are those people going to park. The county already goofed on that one with the units they built. The home owners in the area have to pay for the permit. I believe the permit has a time limit so after that time expires they will again be drowning with park issues. Some one also commented that people should use public transportation, ride their bike or walk....really??? With crime as it is right now it is not safe to do any of that I would not even consider it. We are in a sad mess but hopefully we can comprise. I just feel putting more people here that we cannot support what is the state going to bring improve so our community will be able to prosper.. I do not see the State of California suppling us with new schools, upgrade transportation. I DON'T SEE IT HAPPENING .Only way this will happen is our tax dollars increasing. I do not think this is a win win for Castro Valley, it just seems like the State mandates need some amendments and your 2020-2021 statistics are flawed. There were very many concerns tonite at this meeting and it did not seem like the community was part of the State's attention. Its sad because if this proposal is approved The state will bring an increase in crime, traffic, understaffed schools, and the list goes on. And then and only then we will be at meetings to correct the problem that was created with no solution in sight. I cannot understand why is it that our state demands proposals but yet they do not consider the impact on people that live in our community. I do not think all of our questions were answered here tonight. We had plenty of concerned citizens tonight wondering how our community will be heavily impacted, that did not seem to be included in this housing equation. I feel there needs to be a lot more done to enable this project to move forward. Further studies into our traffic concerns, schools, transportation, crime, sidewalks, and shopping. We have been told that some of these properties are private so it is up to the owner what they want to do. Hopefully we will have a say in this matter or the state will come in here and steamroll the process and leaves with greater issues and problems. This is a sad mess .I hope the MAC board stays strong the communitny will strongly support them. I hope we can get this on the ballot. I feel we need to make a BIG STINK so the state of California will wake up to their insane ideas to what they feel we should do in our community.</p>	
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7	Amanda Liu	<p>To whom may read this,</p> <p>It bring our awareness that a new plan for land used was brought on the table for discussion. New construction will be built in the city of Castro Valley, CA.</p> <p>We are residents in the city for over ten years, and witness the growth of Castro Valley. Not only business but also population.</p> <p>Even tho there are many vacant buildings around the city that could turn into better usage for entertainment purposes, which are beneficial the city for prosperity. We would not agree that building more housing in the city will benefit who are already living in the neighborhood.</p> <p>Bring in more houses with denser the neighborhood not only by population, but will bring more stresses to the school district. There are currently two high schools, two middle school and nine elementary schools in the city. Whenever before school time and after school times, the streets where the schools are located are overloads. It is common to see cars not moving for ten minutes. If there are more population in the area, why don't the land planner think ahead and plan another school or better routes to help with traffic?</p> <p>Castro Valley High School is now becoming more populated than ever. Students are getting harder and harder to talk to their consaultor about their career or college plans. Classes are often unavailable due to too many students enrolled. These are red flags that needs to be addressed.</p> <p>If there are more housing will be planned for the city, at least the county/state need to address things right in the area. Think about why business vacant and not to use empty lot for more population.</p>	<p>Thank you for your comments. They have been received.</p> <p>Regarding the Castro Valley School District, County staff have met with them to discuss future capacity needs. As housing projects are proposed, school district staff will be contacted for comment regarding their ability to serve additional students. Please find comments from SLZUSD and CVUSD included in this document.</p>
8	Caleb Smith	<p>My name is Caleb Smith, and I am a resident of Alameda County who would like to comment on your draft Housing Element as a private citizen. I am grateful that your department is noting forward progress on this document, even though I remain gravely concerned by both the delay in the drafting process and with the content of the document itself. My feedback touches on several areas:</p> <p>Friendly warning now- the actions in your housing action plan lack adequate specificity in timeline, resources source, and outcome. If not amended you will likely be asked to do so by State HCD. This is a particular issue with programs 2.C, 2.E, 2.F and 2.I</p>	<p>Thank you for your comments. They have been received.</p>

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		<p>It should not require your department until 2025 to comply with state laws that were in effect in 2021 (action 2.A). There should be an action to come into compliance with ALL state laws for housing no later than February 2024.</p>	<p>Thank you for your comments. They have been received.</p>
		<p>I am seriously concerned that the proposed densities for the Bay Fair and the Castro Valley BART stations are too low to be prioritized by BART for development. If I read correctly, the proposal is to rezone to 75 dwelling units per acre. This would equate to a roughly 4-6 story building and would represent a tragic missed opportunity. The sites should instead be zoned for at least 200 dwelling units per acre. Alternatively, they could be zoned for a building envelope of at least 12 stories and allow unlimited density on site. The proposed timelines for the station developments are also far too slow. Alameda County should pursue station rezoning earlier in the plan cycle to provide BART with maximum flexibility. Finally, replacement parking should not be required via the zoning code- that is a business decision that should be left to BART alone.</p>	<p>Staff are committed to rezoning the Castro Valley and Bay Fair BART parking areas to facilitate housing construction in accordance with AB 2923 as well as the MTC/ABAG Transit Oriented Communities (TOC) policies.</p>
		<p>It is especially important to increase zoned densities at BART stations because of the serious AFFH issues raised by this draft Housing Element. The low-income housing appears to be primarily concentrated in Ashland, one of the most disadvantaged parts of unincorporated Alameda County, while it appears there is no low income housing envisioned for San Lorenzo (despite a major corridor suitable for upzoning) or Hayward Hills (which could be at least rezoned to allow fourplexes). The low level of low income housing in Castro Valley is of considerable concern- the area surrounding the Castro Valley BART station would be a better location than sites distant from transit in Ashland. Allowing moderate density projects in existing single-family neighborhoods in Castro Valley could also expand housing opportunities. I hope HCD examines the AFFH angle here further.</p>	<p>In response to community concerns, in the December 2023 mid-90 day review period update, staff removed 14 sites located in Ashland from the sites inventory. This corresponds to 125 low and very low income units and 143 units overall located on East 14th St, Mission Boulevard, and Lewelling Boulevard.</p> <p>As of the April 2024 draft inventory, rezone sites in San Lorenzo are proposed at densities of 43-86 units per acre. Sites in both the Castro Valley and Fairview hills are proposed for increased densities of up to 17 units per acre. Inclusionary zoning (Program 6.J: Inclusionary Housing), if adopted would ensure a percentage of affordability in specific new developments.</p> <p>Staff continue to implement SB 9 and ADU development through interim guidelines, in accordance with state law.</p>
		<p>Tenant protection language is inadequate. Program 6.5 lacks adequate detail to gauge the resources that will be devoted to it or their effectiveness. Otherwise there are a</p>	<p>Staff are committed to accurately representing the County's commitment to</p>

		<p>lack of adequate tenant protections to prevent displacement, homelessness, and substandard housing conditions. Alameda County should implement a proactive rental inspection program for all rental units and explore additional strategies to protect tenants.</p>	<p>renters in the Housing Element. This includes representing Code Enforcement's rental inspection pilot and future developments before the adoption of the 6th Housing Element. The writing of the Housing Element has concurred with significant political debates over tenants rights ordinances; this is being decided at the Board of Supervisors level.</p> <p>The following programs pertain to tenants' rights: Program 2.K: Preserve At-Risk Housing, Program 2.L: Protect Existing Affordable Housing Units, Program 5.D: Rental Inspection Pilot, Program 5.E: Condominium Conversion, Program 6.B: Fair Housing Referrals (ECHO Housing), Program 6.C: Rent Review Program, Program 6.F: Displacement Protection, Program 6.G: Fair Housing Services, Program 6.I: Mobile Home Rent Stabilization Ordinance, Program 6.N: Mobile Home Overlay, Program 6.O: Renter Protections</p>
		<p>The Housing Element would benefit from additional language explaining how development on the proposed sites would be ministerial or otherwise require minimal discretionary permitting</p>	<p>Staff are in the process of finalizing the Housing Element Overlay Combining District, which includes a streamlined permitting process. As of the April 2024 draft, details of the overlay combining district are discussed in Program 3.H: Housing Element Overlay Combining District.</p>
		<p>For community engagement, I would strongly encourage the County to hire a separate community engagement consultant to assist with its outreach effort if it has not already done so. Ideally, this group would already be active in unincorporated Alameda County rather than be a conventional planning firm.</p>	<p>Staff are committed to enacting the policies and programs described in the draft Environmental Justice Element, which include a variety of engagement protocols (see goal EJ7 and corresponding policies and actions).</p>

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9	Helena Lee	<p>We understand it's a state law, but is the existing infrastructure, schools and law enforcement adequate in Castro Valley to support the new housing? Our parents have been fighting traffic every day to bring their children to school. Our seniors are feeling isolated because there is no public transportation to bring them shopping. Our home owners, especially those who bought their houses in the last few years, are starting to feel the properties devalued due to the increase of crime. Everyone in Castro Valley wants to keep quality of life the same; what value do these 1979 new housing give to the city? We have no objection to building more affordable housing, but definitely not in the downtown areas. We need better planning to deal with the increased population before any new home is built.</p>	<p>Thank you for your comments. They have been received.</p> <p>Additional housing enabled through the Housing Element between 2023 and 2031 is explicitly to serve existing residents, ensuring they have choice in their housing. Additional lower income housing will ensure lower income residents of Castro Valley can afford to stay in their neighborhoods.</p> <p>The draft environmental analysis (Mitigated Negative Declaration) was made public on November 3, 2023. Comments were accepted through December 4, 2023. To account for changes in the Sites Inventory, additional analysis may occur.</p> <p>When a project for a parcel in the Housing Element Sites Inventory is proposed, depending on the size and location, there may or may not be additional environmental analysis required, and generally the State has provided exemptions for many types of projects, especially those that serve lower income households. Generally there would be site-specific traffic and parking analysis required in addition to overall site planning and design review. In compliance with SB 743 (2013), CEQA analysis (when required) is required to consider minimizing the vehicle miles traveled (VMT) not the ease of traffic movement (known as level of service, or LOS).</p> <p>Additionally, Alameda County Public Works has been asked for comments</p>
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			<p>regarding the Housing Element update, Policy EJ3.1 of the draft Environmental Justice Element, Prioritize Equitable Distribution of Public Facilities, states that “The County will accommodate areas of the Priority Communities that are underserved by public facilities through equitable investment in public facilities, public amenities, and public infrastructure.” Corresponding actions, if adopted, would direct county staff to be more transparent in infrastructure planning and to explore strategies to equitably fund public facilities in the Priority Communities.</p>
10	Stanley Stadelman	<p>If the Castro Valley BART Station parking area is to be used for housing where are BART users to park? Any development on this site should include parking for BART users at least equal to existing on-site parking. In the next five years people will be going back to the office. We will need more parking at the BART station not less. In addition, any housing element introduced to this site should provide parking equal to one space per living unit plus 10% for guests. There is no existing on-street parking available. If this means BART will need to provide a multi-level parking structure all I can say is “It’s about time”.</p>	<p>Development guidelines for the Castro Valley BART station must conform with state law AB 2923, which includes a maximum of 1 vehicle parking spot per housing unit. In accordance with program 1.C, further details regarding future development at this site, including the possible construction of replacement parking, will be a part of future engagement processes.</p>
		<p>I can envision the Lucky’s store and adjacent strip commercial becoming a single multi-use residential over commercial project with the Lucky’s or other as the primary tenant. I have always been impressed with the high use the strip commercial receives. This is a high use area. The Lucky’s store is old and needs to be replaced but not as housing only. The community needs a competitor / option to Safeway. Where will people shop if you remove the commercial and replace it with housing?</p>	<p>Staff envision future development at this site as including both retail and housing.</p>
		<p>I know the community strongly expressed a negative response to multi-level housing, but it is something to be considered. Hayward has remade itself not just residentially but probably also fiscally by providing multilevel housing over commercial and parking both within the CBD and down Mission Blvd. Dublin has also done this. Putting housing over parking at the BART station and the Lucky’s site could be a plus in the long term to the City. There are other sites on the Boulevard where this type of development should be considered. The Rite Aid site, several trailer courts, the very old commercial across the Boulevard from Pete’s hardware.</p>	<p>Thank you for your comments. They have been received.</p>

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		I think designating areas as low and very low is a mistake. I would rather see ALL projects with a 15% affordable housing requirement.	Designating sites by income category is a part of the Housing Element process, as required by the state department of Housing and Community Development. Alameda County has committed to pursuing an inclusionary zoning law, in accordance with program 6.J.
		I also think identifying 3 or 4 sites for low and very low housing within the existing CBD is a mistake. This is where we shop, dine, and meet friends for coffee. It needs to be the safest place in town. I suggest this housing element be spread out equally up and down the Boulevard as a part of other housing elements per comment #4 above. If attaining the required number of low and very low housing units requires increasing the number of moderate and high housing units so be it.	Thank you for your comments. They have been received.
11	Jeff Van	<p>My name is Jeff Van. I'm 26 years old and I'm an active member of the Castro Valley community. I went to school in Castro Valley from Kindergarten through high school and I currently spend the majority of my free time in Castro Valley. In fact, I'm more familiar with Castro Valley than I am of my own neighborhood in San Leandro. I was unable to attend the CVMAC meeting on 8/16/2023 and I would like to say that I very strongly support the current Housing Element Plan as it is drafted here.</p> <p>The Bay Area, along with the entirety of the United States, is currently in a dire housing shortage and we as a community have a social responsibility to have more transit oriented development and pedestrian oriented development. I believe that these projects are a huge opportunity for our community to rise to the occasion and build more housing.</p> <p>A 2016 Redfin study has shown that property values in neighborhoods actually increase with walkability, and I'm confident that the current Housing Element would increase the walkability of nearby properties by bringing more commercial spaces closer to the surrounding properties.</p> <p>Additionally, the future residents living in these new housing units will have the benefit of living in a very pedestrian-oriented environment, with grocery stores like Safeway and the CV Marketplace only a block or two away, the Castro Village (and all of its restaurants/businesses) right across the street, and healthcare facilities along with pharmacies right next door, not to mention the BART station that is only a few blocks away f. This level of walkability will breathe new life into the business district of Castro</p>	Thank you for your comments. They have been received.

		<p>Valley and the surrounding area, the area that encompasses and surrounds the Castro Village.</p> <p>I'd like to ask that we move forward with the current housing plan as it is written. The benefits of mixed-use development and multi-family housing will bring an unprecedented amount of wealth and vitality to the Castro Valley community and especially the commercial/business district, and I ask that you join the community in building a more inclusive and equitable future for Castro Valley.</p>	
12	Roxann Lewis	<p>I was glad to here that just because these vacant lots, or other areas have been identified it doesn't mean that they will all be built on! I do understand that this is mandated by the State of California and the Planning Department must submit a plan or developers can come in and have an easier time getting their developments approved.</p>	<p>Thank you for your comments. They have been received.</p>
13	Foster Wood	<p>I am a longtime resident of Castro Valley. Additional housing is needed in Alameda County and elsewhere in California and I have no problem with the proposal to increase the number of housing units in the county.</p> <p>However, your plan provides for 1,978 housing units to be built in Castro Valley, which represents 42 percent of all the proposed units in unincorporated Alameda County. I am not against building a number of housing units in Castro Valley.</p> <p>However, building 1,978 units in Castro Valley (and apparently all concentrated in the downtown area) will impose too great a strain on Castro Valley's infrastructure and its citizens. I can foresee our streets being clogged with the additional vehicles of the people living in these units, and our schools being overwhelmed with the children of the parents living in these units-among other things.</p> <p>In sum, I believe a more equitable distribution of these housing units is in order.</p>	<p>Thank you for your comments. They have been received. For an analysis of how the distribution of units relates to income levels, housing tenure, race, exposure to environmental harm, and other demographic details, please see Appendix F, Affirmatively Furthering Fair Housing.</p>
14	Vicki Stadelman	<p>It was obvious from the recent Castro Valley MAC meeting that the present housing policy document put forth by our Alameda County Planning Department is not in the best interest of Castro Valley as a community.</p> <p>It was pointed out again and again that these mandatory housing quotas from the state are not feasible considering limitations of infrastructure that are necessary for the health and welfare of the residents. Major considerations like water, traffic, schools, safety, crime, fire protection, neighborhood stability, are all being ignored completely. The Planning Department staff has spent much time and effort trying to identify sites and conditions for housing development required by the state, but the fact remains, these are not wanted or needed in Castro Valley.</p>	<p>Thank you for your comments. They have been received.</p> <p>The draft environmental analysis (Mitigated Negative Declaration) was made public on November 3, 2023. Comments were accepted through December 4, 2023. To account for changes in the Sites Inventory, additional analysis may occur.</p>

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	<p>It is naïve to think that cramming housing units into existing cities/municipalities will solve socio-economic problems. It is offensive to think that the state can override the local needs and purview of local planning departments. It is frustrating to think that the general consensus is that we have no say or control over this outcome... that it is inevitable.</p> <p>I, for one, don't want to stand by and see the idiocy of these projects go forward BEFORE infrastructure has been well researched and developed!!!! Please inform me of any meetings, petitions, or other means of legal protest that are available to us as community members.</p>	<p>When a project for a parcel in the Housing Element Sites Inventory is proposed, depending on the size and location, there may or may not be additional environmental analysis required and generally the State has provided exemptions for many types of projects, especially those that serve lower income households. Generally there would be site-specific traffic and parking analysis required in addition to overall site planning and design review. In compliance with SB 743 (2013), CEQA analysis (when required) is required to consider minimizing the vehicle miles traveled (VMT) not the ease of traffic movement (known as level of service, or LOS).</p> <p>Additionally, Alameda County Public Works has been asked for comments regarding the Housing Element update. Policy EJ3.1 of the draft Environmental Justice Element, Prioritize Equitable Distribution of Public Facilities, states that "The County will accommodate areas of the Priority Communities that are underserved by public facilities through equitable investment in public facilities, public amenities, and public infrastructure." Corresponding actions, if adopted, would direct county staff to be more transparent in infrastructure planning and to explore strategies to equitably fund public facilities in the Priority Communities.</p> <p>Finally, all utilities, Fire Departments, and school districts have been contacted and given the opportunity to comment on the Housing Element multiple times.</p>
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15	Patricia Lindsey	<p>Hello, I want you to know that until a complete environmental report is done on how the RHNA of 4,711 units affect the infrastructure of Castro Valley, I am opposed to it.</p> <p>Castro Valley is a small town. It was never meant to become a city. I have lived here for 30 years but will be leaving if this building takes place. I am already depressed about the number of rental units in my neighborhood and the noise from the rentals and the traffic going up and down Redwood Road.</p>	The draft mitigated negative declaration for the 6 th cycle housing element is currently available online. The comment period closed on December 4 th , 2023.
16	Daryl F. Camp, Ed.D. Superintendent San Lorenzo Unified School District	The San Lorenzo Unified School District would welcome students and families who move into these new housing options. Please let us know if you need more specifics about options and programs in our school district.	Thank you for your comments. They have been received.
17	Shannon Carlson	<p>I attended the Zoom meeting for the MAC meeting presenting the need for more housing in the unincorporated areas of Alameda County. There was a lot of information to cover: graphs, maps, State info, etc.</p> <p>I have a couple suggestions (should there be another such meeting), that might get more people on board. Perhaps it could have been stressed at the beginning by the speakers that the housing needs HAVE to be addressed because of State Mandate, that it's not something we can ignore. It would have helped to make it very clear, not just on the slides, but by the speaker(s) that this is a draft that has to be submitted by a certain date, that this is not the final. I feel that slides are wonderful to go back to to reread, but people need to hear bullet points: 1)This is the first draft, 2)There is no eminent domain involved, 3)If property owners do not wish to sell or improve their property, they do not have to, etc. Simple, concise information. Not everyone is a fast reader, perhaps eyesight is not good for reading from a distance or digesting all that printed information.</p> <p>I would have loved to have had the maps bigger and in more sections so it would be easy to see where these properties are actually located. I had trouble following the speaker's pointer on the map as the pointer was too small.</p> <p>I do want to be involved with what is going on in my Community and appreciated the chance to hear of these important issues.</p>	Thank you for your comments. They have been received. Staff appreciate feedback on how to better communicate on technical issues like the Housing Element.
18	Ann Maris	The issue of lack of trauma-informed care has come up several times during the past few years as I have attempted to participate with the affordable housing developers building and doing community outreach in my local neighborhoods. The county needs to require trauma-informed care training of commissioners, who have been abusive to the public, companies, which are paid by the county to interact with the public, and any	Thank you for your comments. They have been received.

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		<p>subcontractors who interact with the public. Particularly in neighborhoods or project areas which are known to include people of color or people of low income backgrounds, who may have been the subject of various types of abuse and crimes, and may not have had the resources to overcome historic traumas.</p> <p>For example, the county’s “food as medicine” program has an RFP out note that requires contractors to have training in trauma-informed care. This should be standard practice. Here is a link to San Francisco’s work on improving their trauma-informed practices. https://www.sfdph.org/dph/comupg/oprograms/TIS/default.asp</p> <p>As I understand it, one part of the SB 1000 environmental justice element involves getting people to participate who normally don’t participate in the government process. I have witnessed numerous times when county council members or commissioners, who are appointed by our elected supervisors, and who we expect to represent us, are abusive and degrading to the public participants. One particularCVMAC member is infamous for this. Instead of being relieved of his position, he was elevated to the planning commission. This rewards insensitive behavior and directly conflicts with acceptable trauma-informed care.</p> <p>In the years I have been participating regularly with the county processes and with county and affordable housing led organizations, I have seen improvement. I hope that community continues to experience improvements in how they are treated in order that they/we may flourish and live more joyfully even in difficult times.</p> <p>Please consider requiring trauma-informed care training throughout the county processes, perhaps by uplifting an ordinance, or otherwise modifying policies in General Plan elements.</p>	
19	Joan Lewis	<p>I am a little overwhelmed by the plan to build multilevel housing in certain areas of our community. I am especially concerned about new housing in the Castro Valley BART parking lot. This parking lot is critical to encourage people to use BART instead of driving on freeways! Taking away a large number of the BART parking lot makes no sense to me! The parking lot may not be full at present, but it’s availability for the future is just good planning for encouraging BART ridership!</p>	<p>Development guidelines for the Castro Valley BART station must conform with state law AB 2923, which includes allowing 4-6 story development. In accordance with program 1.C, further details regarding future development at this site, including the possible construction of replacement parking, will be a part of future engagement processes.</p>
20	Rick Kelley	<p>Pertaining to the 6th Housing Element Draft Plan for Castro Valley</p>	<p>The draft Environmental Justice Element includes many programs and policies</p>

	<p>1) The distribution of housing in the Alameda County Housing Element draft plan is in clear violation of the principles of Environmental Justice by which the County claims to abide. It forces many hundreds of new homes, thousands of new residents, and most of the low income residents into one small area in the middle of town, an area that is already disproportionately beset with air, noise and light pollution, traffic and crime. Most of the proposed housing, including the low-income housing, is to be built in or immediately adjacent to the only part of Castro Valley that is rated as significantly negatively impacted by environmental injustice per the CalEnviroScreen analysis (Census Tract 4310). These residents already suffer disproportionately from the systemic oppression of exposure to chemical and environmental stressors. This plan, if implemented as written, will make it much, much worse. In contrast, residents further up the hills will only be minimally impacted; residents in faraway Columbia and Palomares Hills (for example) will virtually be exempted. This is plainly unjust, irresponsible, and unacceptable.</p>	<p>regarding improving the quality of life in the Environmental Justice Priority Communities, which includes southern Castro Valley.</p>
	<p>2) The Castro Valley Unified School District cannot possibly manage the expected influx of hundreds or possibly thousands of new children, many low income or English learners possibly requiring additional support. Almost all of the grade school age children in these homes in central Castro Valley would normally attend Castro Valley Elementary or maybe Marshall schools, which is obviously impossible, these schools are full already. So what will happen--bussing to other schools up the hill? The District cannot even provide buses for existing students. Building new schools? That requires new bonds and higher taxes and Castro Valleyans are still paying off a huge school maintenance bond passed a few years ago. The result may be split sessions, overpacked classrooms, slashed enrichment and athletic programs and deterioration of the town's excellent school system. Meanwhile, Hayward has closed two of their schools in Castro Valley.</p>	<p>County staff have met with the Castro Valley School District to discuss future capacity needs. They have issued comments included in this document. As housing projects are proposed, school district staff will be contacted for comment regarding their ability to serve additional students.</p>
	<p>3) The tight packing of so many new homes, most likely without adequate off-street parking as is now legal (overriding Alameda County rules) will create a widespread parking nightmare. Castro Valley will require parking meters and 24 hour restricted parking in the large areas around the new homes. No local traffic or parking impact study has been conducted. See point #1, Environmental and Social Injustice.</p>	<p>Thank you for your comments. They have been received. Staff are currently reviewing MTC/ABAG's Transit Oriented Communities (TOC) policies, for which compliance will be necessary for the county to access specific funding. While this is outside the purview of the Housing Element, it will require minimizing parking requirements and implementing other Transportation</p>

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			<p>Demand Management (TDM) strategies. The policy, which is currently in draft form, can be read here.</p>
		<p>4) The County's nominally laudable goal to resurrect the bucolic "Streetcar Suburbs" of the 1890s, where everyone rides public transit, walks to stores, and cars do not yet exist, is wishful thinking. It might work if you were building a brand-new community from scratch (as is planned between Sacramento and Vallejo), but it cannot be readily retrofitted into a place like Castro Valley built around automobiles. Walkable downtowns in places like Walnut Creek are only possible because these cities have built high rise parking garages, an unlikely prospect in unincorporated Castro Valley.</p>	<p>Thank you for your comments. They have been received.</p>
		<p>5) Castro Valley has been disproportionately targeted for low/extremely low income housing projects. The percentage and absolute number of these is far higher than in any other unincorporated part of the County. Fairview, for example, has a mandate to build only a relative handful of low/extremely low income units. Further, most of the Castro Valley units, along with the mixed income housing, are crowded together tightly in one area, tending to recreate the failed "Housing Projects" design of the 1960s and 1970s.</p>	<p>As described in Appendix F, much of Castro Valley is considered a high opportunity area, especially when compared to other neighborhoods in the unincorporated areas.</p> <p>To be included in the sites inventory, a site must have access to sewer lines. This is not the case for many vacant tracts in Fairview.</p>
		<p>6) The Planners failed to consider the possibility of extending development outside of the so called "Urban Growth Boundary." The boundary has been established solely by Alameda County and thus can be modified by Alameda County. It may be time to reevaluate this designation. Measure D, for example, may have been a good idea in 2000, but now it is directly contributing to the destruction of older communities by forcing the erection of ultra dense housing.</p>	<p>Thank you for your comments. They have been received.</p> <p>In 2021, LAFCO published a study examining the Urban Growth Boundary's effectiveness. You can review the report here. Alameda County voters approved the Urban Growth Boundary in 2000. In order to change East County zoning to allow more housing construction in the unincorporated parts of East County, the voters of Alameda County would need to approve the changed zoning.</p> <p>Even if changing the Urban Growth Boundary received support, the State Department of Housing and Community Development (HCD) expects that viable sites for new housing have access to</p>

			<p>sewage. Most land in Unincorporated East County currently uses septic systems; significant investment would be required to expand these systems in order to make any theoretical housing construction viable enough to be counted as a site in the Sites Inventory.</p>
		<p>7) It is concerning that the planned low income housing is exempted from the Quimby Act and thus will not contribute to the expansion and maintenance of parks and recreational activities that will be needed for the new residents. It is unclear if these projects will fully contribute to the property tax base, which provides a portion of the funds to run the schools.</p>	<p>In 2004, the Alameda County Board of Supervisors passed the Park Dedication Ordinance. To limit the impact of increased fees on development in the unincorporated areas, the following kinds of projects were exempted, among others: affordable housing, housing for people with disabilities, senior housing, housing in Sunol, and group housing, as described in chapter 12.20 of the county municipal code. To change the Park Dedication Ordinance to apply to affordable housing or housing for other protected groups would mean making the construction of this housing more expensive. This would disincentivize its construction.</p> <p>Housing owners would pay their assessed property taxes, as all housing owners are required to.</p>
		<p>I make the following recommendations: A) I urge that this plan be revised to better balance the issue of social and environmental justice against the competing goals of a so called Transit Oriented District. The massive overcrowding in the Redwood Road/Castro Valley Boulevard intersection area is not viable. The roads, schools and stores cannot support this. It is an unjust imposition on the people living there who are already oppressed by traffic, air, noise and light pollution and BART parking. The new housing, including the low income housing, needs to be distributed throughout the community. B) I urge the County to work proactively with the CVUSD to identify funds for building additional schools for this massive influx of students. Two abandoned schools owned by Hayward are present in Castro Valley, soon to be repurposed—these may be needed for the CVUSD instead.</p>	<p>Thank you for your comments. They have been received.</p> <p>Regarding infrastructure: The draft environmental analysis (Mitigated Negative Declaration) was made public on November 3, 2023. Comments were accepted through December 4, 2023. To account for changes in the Sites Inventory, additional analysis may occur.</p>

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		<p>C) Consider designating some of the properties for seniors, as already exists at the BART station. This fulfills the County's responsibility under the Housing Element but greatly reduces the impact on Castro Valley, particularly on the schools. This seems to be a simple change that can be quite beneficial.</p> <p>D) I urge that the allocation of low and extremely low income units be reassessed and more equitably spread throughout the unincorporated area.</p> <p>E) I recommend examining the current urban growth boundary to determine if it is possible to build more than a mere 194 new high income homes in the hundreds of square miles of unincorporated Alameda County to the east of Castro Valley. It is time to revisit the matter, which is fully within the purview of Alameda County.</p> <p>F) I think it is too soon to write off BART and usurp half of its parking lot for housing, especially considering that the Flex bus has been cancelled by AC Transit. Do as Lafayette has done, let BART be for the 6th Housing Element cycle. If BART goes bankrupt, then the whole parking lot will be available for housing in the 7th cycle.</p> <p>G) I ask that your office fully explain and detail all of the federal, state, county and community service district laws and regulations that will not apply equally to the dedicated low/extremely low income projects, such as the aforementioned exemption from the Quimby Act "in lieu" requirement.</p>	<p>When a project for a parcel in the Housing Element Sites Inventory is proposed, depending on the size and location, there may or may not be additional environmental analysis required, and generally the State has provided exemptions for many types of projects, especially those that serve lower income households. Generally there would be site-specific traffic and parking analysis required in addition to overall site planning and design review. In compliance with SB 743 (2013), CEQA analysis (when required) is required to consider minimizing the vehicle miles traveled (VMT) not the ease of traffic movement (known as level of service, or LOS).</p> <p>Additionally, Alameda County Public Works has been asked for comments regarding the Housing Element update. Policy EJ3.1 of the draft Environmental Justice Element, Prioritize Equitable Distribution of Public Facilities, states that "The County will accommodate areas of the Priority Communities that are underserved by public facilities through equitable investment in public facilities, public amenities, and public infrastructure." Corresponding actions, if adopted, would direct county staff to be more transparent in infrastructure planning and to explore strategies to equitably fund public facilities in the Priority Communities.</p>
21	<p>Marc Crawford, Vice Chair Alameda County Planning Commission</p>	<p>Housing Sites Table Page B-40 I think is irresponsible for the Draft Housing Element to have gone on the road show without the Housing Sites Table attached to it. Now that the Housing Sites Table is completed the Draft Housing Element should go back on the road show so it can be fully evaluated by the communities that will have to live with it.</p>	<p>Appendix B, which includes all sites in the sites inventory in several tables, has been available on the Planning Department website since August 3rd, 2023, the beginning of the public comment period.</p>

		<p>Government Constraints Page C-2 The Government Constraints section attempts to describe the entirety of constraints from the government as the General and Specific Plans. The second bullet point below Permits and Procedures is not even discussed. The County just spent over \$250,000 on a consultant to evaluate the permit process in the Planning, Fire and Environmental Health Departments and the Public Works Agency. The report from the consultant with recommendations was nearly 200 pages long due to the myriad of problems identified.</p> <p>Clearly, these four departments need to be listed as governmental constraints in this section of the Housing Element because they have the most substantial negative impact on housing production. The constraints that are encountered by the negligent and incompetent leadership of these departments are the greatest impediment to the production of housing in the County.</p> <p>Omitting this fact not only delegitimizes (rendering it nonconforming) the Housing Element document, but it also proves that county staff's intransigence will never allow for improvement to the current situation</p> <p>I recommend that the Planning Commission continue the item until such time as the Housing Site Table can be reviewed by each community.</p>	<p>Thank you for your comments. They have been received. The consultant's report is mentioned on page C-39 of the draft Housing Element. Additional discussion and analysis of the report as well as Program 3.J: Development Services Process Review Implementation have been added to the Second Housing Element Draft.</p>
22	Bruce King	<p>I have two written testimony comments on the draft Housing Element that will be presented at the September 5 Planning Commission (item J.1). Please forward these comments to the Planning Commissioners.</p> <p>Comment #1 - Parcel Group 9 The northernmost parcel on Caltrans/Hayward Parcel Group 9 is in the unincorporated county. The City of Hayward has not designated a use for this parcel in their last Parcel Group 9 presentation. See attached PG9 2020 presentation, and see an excerpted picture in this email. Verbally, the City of Hayward said they did not think this parcel was good for housing because of proximity to the freeway, but there's already a ton of people that live near our freeways. This parcel should be considered for inclusion in the Housing Element.</p>	<p>Thank you for your comments. They have been received. As of the second Housing Element Draft, the parcels owned by the City of Hayward referred to in your comment within the unincorporated County are now in the Sites Inventory.</p>
		<p>Comment #2 - BART Parking Area The Housing Element needs to include an assessment of the extent that parking is needed now and in the future at the CV BART station to enable BART ridership. In general, housing should not be placed in the Castro Valley parking lot area, unless there is a condition to replace the same amount of parking within new parking structures. Many people that live too far from BART won't use BART if there is not sufficient parking.</p>	<p>Development guidelines for the Castro Valley BART station must conform with state law AB 2923, which includes a maximum of 1 vehicle parking spot per housing unit. In accordance with program 1.60, further details regarding future development at this site, including the possible construction of replacement</p>

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			parking, will be a part of future engagement processes. Additionally, the land within ½ mile of the Castro Valley BART station will need to conform to MTC/ABAG's Transit Oriented Communities (TOC) policies for Alameda County to have access to certain funds in the future. These policies include additional residential, commercial, and parking requirements.
23	Liz Pionkett	Lived in Castro Valley close to 60 years. Do not want it to become a city. There is too much building to be on the Castro Valley Boulevard (Castro Valley Boulevard highriseshigh-rises //residential, now you're pulling parking areas, turning them into prospective housing? Do you really think Castro Valley Boulevard can handle all that traffic? It can't handle it now – I hope you receive enough letters to change your mind. Lets not think about money – lets think about people.	Thank you for your comments. They have been received.
24	EBMUD	(see attached)	Thank you for your comments. They have been received. Staff are committed to helping applicants comply with relevant utility design guidelines.
25	Blake Wellen	(see attached)	Thank you for your comments. They have been received.
26	Meliza Orcher	My name is Meliza Orcher and I'm a homeowner and mother in Central CV. We bought our home here for the proximity to the outdoors, for the convenience of public transport, for the great schools, and for the charming feel of downtown. While we came here for those services, what really captured me was the community. Immediately after moving into our home, we we drawn in and made welcome by our neighbors, who gifted us pastries from 7 Hills and olive oil from Amphora. CV, I've learned, is a place where you can go across the street and ask for a cup of sugar, and receive so much more — advice on pruning our rose bushes, an extra pipe wrench, the name of a trusted handyman. Which is why it's such a shame to see so many of my community members here arguing against boosting our local economy and community by opposing these additional units in town. Our home values We all love CV. It's a beautiful and charming place. But the argument that more housing will drive our home values lower is actually false in the Bay Area.	Thank you for your comments. They have been received.

	<p>The demand for housing where we live is huge. We all know that the pandemic drove a bunch of people out of the city and into the suburbs. If we can all dig into our altruism here, this town has the empty lots and underdeveloped plots in our town to make a tiny dent in the housing crisis in California.</p> <p>Increased homelessness = lower housing value; Increased poverty = lower housing value. And you know what, once you go past a certain point on CV Blvd, it's not as charming. There's such an opportunity here to use some of that space for increased development, whether it's housing or the economic development that will occur when more people live and work in this community. The lack of affordable housing in our community — coupled with inflation and increased poverty — will do even more damage to our housing values than building housing units.</p> <p>More people = more economic development</p> <p>While we're here, let's talk about economic development in our town. Who here goes to Hayward or Dublin or San Leandro to get services?</p> <p>There's such a dearth of mom & pop shops in our town today. If we want to buy local and support our local businesses, we need to have those businesses here in the first place, and fill up those empty buildings that are zoned for businesses. If we have more people here, we will have more businesses here, then we'll have more jobs here. All of that will increase the value and charm of this community.</p> <p>Who here is frustrated with how long it can take to get services here in town, because we're still so understaffed? Let the people who want to work here, live right here near downtown — instead of having those folks drive in from Hayward and San Leandro and increase traffic.</p> <p>A walkable town</p> <p>And since we're talking about traffic...</p> <p>My home is close enough to downtown that I walk most places — when I'm not in a boot or heavily pregnant. The proposal for the majority of these lots are right next to downtown and public transport. I'm looking forward to seeing how developers intend on addressing concerns for clogging up roads.</p> <p>I'm a huge advocate for complete streets efforts — and with public transport being as decimated as it has been since the pandemic, I'd love to see an increased presence in public transportation options, with increased demand for it — inclusive of your teenagers who all drive up redwood road to school.</p> <p>Diversity of culture</p> <p>I grew up in Lafayette, where the schools are just as good, but the people were and are not physically representative of me. After years of trying, I'm now pregnant with my first child. We bought a wonderful home in CV at the peak of the pandemic, at a price that, had my husband and I not been lucky and overeducated enough to find stable and well paying careers, is far too expensive for young people like me to buy. You are so</p>	
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		<p>welcome for helping drive up your equity. But we wanted to be in a place where our children can grow up around people that look like them and that represent the world — not just the white owners of it. The more we as a community restrict housing here, the more likely it is that our children won't be able to reap the benefits of different cultures and diversity of thought that changes the world for the better.</p> <p>I get it. Change is hard. But it happens and either you roll with it or you get stuck in the past. I want my unborn child to grow up experiencing the same loving and wonderful community that you all have had. In order to do that, we can't let our town die by preventing people like me and others from living here by blocking housing development. I want to see our community continue to be generous and share that cup of sugar for our neighbors, instead of closing our doors and locking them out in the heat and the cold and the rain. I want to see us thrive.</p> <p>We need to let this development happen if we want to combat homelessness and poverty on our streets. We need to let this development happen if we want to keep our small businesses open. We need to let this development happen so we can watch our children grow in a community that centers love over fear.</p>																									
27	Kelly Abrfar	<p>Ashland has the highest RHNA allocation — why doesn't the housing element call for higher density on Castro Valley Blvd parcels such as the RV encampment?</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th style="text-align: center;">RHNA allocation</th> <th style="text-align: center;">Population</th> <th style="text-align: center;">Units per 10,000 population</th> </tr> </thead> <tbody> <tr> <td>Ashland</td> <td style="text-align: center;">1,358</td> <td style="text-align: center;">24,000</td> <td style="text-align: center;">570</td> </tr> <tr> <td>Castro_Valley</td> <td style="text-align: center;">1,978</td> <td style="text-align: center;">66,000</td> <td style="text-align: center;">300</td> </tr> <tr> <td>Fairview</td> <td style="text-align: center;">323</td> <td style="text-align: center;">11,000</td> <td style="text-align: center;">290</td> </tr> <tr> <td>San Lorenzo</td> <td style="text-align: center;">591</td> <td style="text-align: center;">30,000</td> <td style="text-align: center;">200</td> </tr> <tr> <td>Cherryland</td> <td style="text-align: center;">215</td> <td style="text-align: center;">16,000</td> <td style="text-align: center;">130</td> </tr> </tbody> </table> <p>(Ashland has 1.8 sq mi versus Castro Valley's 17 sq mi.)</p>		RHNA allocation	Population	Units per 10,000 population	Ashland	1,358	24,000	570	Castro_Valley	1,978	66,000	300	Fairview	323	11,000	290	San Lorenzo	591	30,000	200	Cherryland	215	16,000	130	<p>In response to community concerns, in the December 2023 mid-90 day review period update, staff removed 14 sites located in Ashland from the sites inventory. This corresponds to 125 low and very low income units and 143 units overall located on East 14th St, Mission Boulevard, and Lewelling Boulevard.</p>
	RHNA allocation	Population	Units per 10,000 population																								
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28	EBHO (September 1)	<p>Dear Planning Commissioners,</p>	<p>Thank you for your comments. They have been received.</p>																								

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	<p>Thank you for the opportunity to comment on Alameda County’s Draft Housing Element. East Bay Housing Organizations (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 across Alameda & Contra Costa Counties. Many of our 400+ individual and organizational members live in, work, and provide affordable homes throughout the County.</p> <p>We appreciate all the work by County staff that has gone into producing this document. We offer our comments with the hope that the County will incorporate them to produce a final document that makes significant progress to achieve housing justice and meet all of the County’s current and future housing needs. While the County narrowly met its low-income RHNA, only 34%, 20%, and 40% of its very-low-income, moderate, and above moderate-income RHNA goals, respectively, were met in the last Housing Element Cycle. With a 200% increase in very low- and low-income needs for the 6th Cycle, Alameda County will have to do significantly more than it has in the past to meet the urgent needs of current and future residents and to comply with State requirements.</p> <p>We emphasize the County’s responsibility to advance programs and policies to bolster affordable housing production and identify new resources and funding to expand production and preservation. The County has a significant state mandate to affirmatively further fair housing throughout every part of the Housing Element Update. We hope to continue to collaborate with the County to make Alameda County a place for all to afford to call home, regardless of income and background.</p>	
	<p>Public Participation</p> <p>State law requires localities to make a “diligent effort...to achieve public participation of all economic segments of the community in the development of the Housing Element.” Despite being behind in the Housing Element Process, the County must continue to take intentional, proactive, and robust actions to solicit and incorporate input from community members, with a particular effort to include low-income people, people of color, non-English speakers, people with disabilities, and others who face regular systemic barriers to being heard in public decision making. We appreciate the outreach, stakeholder input sessions, community workshops, and surveys that staff has conducted so far, and look forward to more such events as this process moves forward.</p>	<p>Please see the section titled “Integration of Comments into the Housing Element” for information about how comments were integrated into the element. These sections have been updated with the Second Housing Element Draft.</p>

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	<p>We also look forward to Appendix E: Public Participation Summaries being further updated throughout the Housing Element Update as public participation continues. While we note the accounting of previous public meetings and the summary of public comments received at the meetings, we urge staff to supplement the summaries with a response describing how comments have been incorporated, or why they have not been incorporated along with a justification for not including them.</p>	
	<p>Housing Plan - Programs & Policies We strongly support many proposed policies across production, preservation, protection, and preventing displacement and ending homelessness. We call attention to the following issues, all of which HCD has consistently required other jurisdictions to address in their own Housing Elements, which are currently not sufficiently in compliance with State Housing Element Law.</p> <ul style="list-style-type: none"> - In many cases, program time frames lack definition or specific milestones; deadlines for completion should be described in greater detail, rather than noting a year or “Ongoing”, which is the case for a majority of the programs. - It is insufficient to commit to consideration or exploration of policies. The Housing Element should, at a minimum, commit to bringing concrete legislation putting into place any new policies proposed before the Board of Supervisors for adoption by a specific date. Moreover, these dates should be in the first few years of the housing element, as postponing these studies to the later years means that many of these new programs if implemented at all, will have minimal impact on the housing element cycle. - When identified, quantified outcomes are vague. Many of the action items lack detail, therefore it is unclear what outcomes are anticipated or how the effectiveness of these actions, particularly in addressing fair housing and equity issues, will be assessed in the future. - The demonstration of how each major goal, program, and policy addresses AFFH and priority factors for AFFH should be more explicit. We strongly urge the County to utilize a table, to call out any actions addressing AFFH, or devote another section of the Housing Element to summarizing AFFH actions, as other successful jurisdictions have done. The table, or something similar, should summarize each program, action, targeting, schedule, and metric toward direct and indirect beneficial impacts to AFFH. The requirement to affirmatively further fair housing must fully inform the program and policies, and while the County very likely considered this, it is not evident with the current structure of the Housing Plan. 	<p>Staff and consultants have constructed the proposed timelines to align with relevant departments' staffing capacity, as well as the capacity of County Counsel.</p> <p>Please see section IV.C Affirmatively Furthering Fair Housing Action Matrix of the main body document of the element for a table explicitly relating AFFH and programs and policies.</p> <p>Additional milestones and timelines have been added/edited in response to this and State HCD comments.</p>
	<p>Policy 1.1: Utilize Public Land for Affordable Housing to Provide a Range of Housing</p>	<p>Thank you for your comments. They have been received.</p>

	<p>It is encouraging that the County is signaling its intention to utilize public land for affordable housing. At a minimum, the County must follow the Surplus Land Act (SLA), which requires all local agencies to offer surplus land for sale or lease to affordable home developers and certain other entities before selling or leasing the land to any other individual or entity. We strongly believe the County should actively pursue and prioritize its Public Land for 100% affordable housing, to directly address the factor of disparity in unincorporated Alameda County identified on page 67 in Appendix F, of a limited supply of affordable housing in areas with access to opportunity. HCD has frequently required other jurisdictions this cycle to more fully outline their process to use the SLA as well as justify their assumptions regarding the development of publicly owned land.</p> <p>Program 1.C: Facilitate Housing at Bay Fair & Castro Valley BART Sites EBHO strongly believes that any development on the Bay Fair & Castro Valley BART sites should maximize affordable housing, especially considering BART’s commitment of at least 35% of new units to be affordable. We look forward to engaging in the community process as the County coordinates with BART and San Leandro staff to develop RFPs and enter ENAs with development partners. Additionally, we note that it has been a consistent piece of feedback from HCD for jurisdictions with BART sites that they include detailed plans including dates for specific milestones for the cooperation with BART on the development of these sites.</p> <p>Program 1.N: Allow Religious Institution-Affiliated Housing We strongly support the County amending the Zoning Ordinance to better facilitate development and allow religious institution-affiliated housing development projects by right. EBHO’s members include non-profit housing developers, communities of faith, and low-income residents of the County, where we’ve personally encountered increasing interest in faith-based affordable housing development.</p> <p>Program 2.F: Affordable Housing Trust Fund “Boomerang” Program We support the continuation of the Affordable Housing Trust Fund “Boomerang” Program to provide services to support low-income households and those experiencing homelessness with tenant legal support, a navigation center, expanded winter shelters, the AC affordable housing web portal, and more.</p> <p>Program 2.K: Preserve At-Risk Housing We support the County’s effort to continue preserving the affordability of housing at-risk of conversion to market rate, with a particular focus on at-risk renter and senior households and the at-risk developments in the next 10 years identified in Table A-24. We look forward to seeing the County collaborate with and provide assistance to</p>	
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nonprofit housing developers to preserve at-risk units.

Program 2.L: Protect Existing Affordable Housing Units

To enhance the vague action to study the legal and programmatic feasibility of amending the Zoning Code to limit the redevelopment of existing affordable housing projects to other uses, along with requiring that adequate replacement housing is provided when projects would result in substantive losses of low & moderate-income housing units, the County should add a quantified objective of bringing back the results and bringing forward an ordinance before the Board of Supervisors shortly after the study is completed.

Program 3.D: SB 35 Processing & Permit Streamlining

We support active encouragement and facilitation of the use of SB 35 to provide by-right approval for 100% affordable housing, including training and direction to Planning staff that this should be affirmatively pursued.

Policy 4.4: Permanent Supportive Housing Development & Programs 4.A, 4.B, 4.C: Emergency Shelters, Low Barrier Navigation Centers (LBNCs) and Supportive Housing

We strongly support the County amending its Zoning Code to allow for emergency shelters, LBNCs, and permanent supportive housing, which support "Housing First" principles, a proven highly effective approach to supporting those experiencing homelessness.

Program 4.G: Assist Seniors and Disabled Persons to Maintain and Rehabilitate their Homes

We support the creation of an ongoing list of resources to help seniors maintain and/or rehabilitate their homes, and the County's intention to create Universal Design standards to be usable by all. We urge that the time frame of January 2026 be more detailed, and indicate quantified outcomes through the development of the Universal Design standards, including gathering robust community input throughout the entirety of the process.

Program 5.C: Code Enforcement

It is important for the County to continue to enforce Code Enforcement to promote safe housing conditions, and we hope to see details in quantified outcomes as to how many households have been served in recent years. We strongly suggest that anti-retaliation protections for tenants who call Code Enforcement are considered, as well as the right to return after repairs protections, as proposed in the Just Cause Ordinance first presented to the Board of Supervisors on December 20th, 2022.

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	<p>Program 5.D: Rental Inspection Pilot We support the collection of data through a complaint-based rental inspection pilot, and look forward to seeing the yearly reports submitted to the Transportation & Planning Committee regarding the pilot's efficacy. While tenants can currently call the County's Code Enforcement program, many tenants opt to not report violations to the County for fear of landlord reprisal. Thus, EBHO supports the study, development, and adoption of a proactive rental inspection program.</p> <p>Program 6.K: Inclusionary Housing We support the adoption of an inclusionary housing ordinance to support new housing choices and affordability. Rather than the County "should also consider alternatives, such as land dedication and/or payment of an in-lieu fee", we strongly recommend the County commit to considering these alternatives, as part of the research into the development of the inclusionary housing ordinance. Therefore, the time frame and quantified outcomes for this program should be supported with more substance as to how the County plans to explore this strategy.</p>	
	<p>Policies & Programs to Protect Tenants The County is legally required to develop concrete, measurable, and realistic actions to address disparities identified in the assessment of Fair Housing, including displacement risk, which is especially pronounced for renters in unincorporated areas. While the Board of Supervisors previously considered a Fair Chance Housing Ordinance, a Just Cause Ordinance, and a Rental Registry Ordinance, no policies have been passed.</p> <p>To better protect tenants from displacement, as detailed in Program 6.G, we support the County's partnership with the legal service providers providing services through Alameda County Housing Secure, and strongly urge that funding continue to be prioritized to these organizations that provide essential legal services to low-income tenants and homeowners disproportionately impacted by the affordable housing crisis and vulnerable to displacement. This is paramount, given the end of the County's eviction moratorium earlier this year in late April, and the rapid increase in eviction cases filed since, with 243 lawsuits filed in the first 20 days following the expiration of the eviction moratorium. To date, the Eden Area, the communities of Ashland, Castro Valley, Cherryland, Fairview, Hayward Acres, and San Lorenzo, have no local tenant protection policies. It is estimated that at least 39% of Eden renters are not covered by any tenant protections, considering the limitations of the statewide Tenant Protection Act, also known as AB 1482 (2019). 4 Namely, AB 1482 exempts single-family homes, and with the existing housing stock in the County, nearly one-third of renters live in single-family homes. This results in renters being especially vulnerable to housing</p>	<p>Staff are committed to accurately representing the County's commitment to renters in the Housing Element. This includes representing Code Enforcement's rental inspection pilot and any future developments before the adoption of the 6th Housing Element. The writing of the Housing Element has concurred with significant political debates over tenants' rights ordinances; this is being decided at the Board of Supervisors level.</p> <p>The following programs pertain to tenants' rights: Program 2.K: Preserve At-Risk Housing, Program 2.L: Protect Existing Affordable Housing Units, Program 5.D: Rental Inspection Pilot, Program 5.E: Condominium Conversion, Program 6.B: Fair Housing Referrals (ECHO Housing), Program 6.C: Rent Review Program, Program 6.F: Displacement Protection, Program 6.G: Fair Housing Services,</p>

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	<p>insecurity when faced with rent increases, widespread and severe habitability issues, and unlawful evictions. As accounted in the County Wide Trends, evictions are a major concern throughout the County, and this is only magnifying the greater risk that lower-income communities face of losing housing and being displaced.</p> <p>Over half of renters in Unincorporated Alameda County are cost-burdened, and nearly 5% and 10% of renters experience severe and moderate overcrowding, respectively, compared to 3.7% for those who own.⁶ As described on page 51 in the Housing Needs Assessment, more households in Ashland and Cherryland, with 75% and 64% households, respectively, rent their home compared to other communities in Unincorporated Alameda County. These renters are often more cost-burdened, and more likely to live in overcrowded conditions and substandard housing than owner-occupied households. The Eden communities of Ashland, Cherryland, and Hayward Acres each have high poverty rates of 18%, some of the highest in all of Alameda County.⁷ Over 61% of people in the urban unincorporated areas are Black, Indigenous, or people of color (BIPOC), compared to just 53% of the total population of the County.</p> <p>In 2020, Alameda County became one of the first-ever recipients of a Partnership for the Bay Area's Future Challenge Grant, intended to be used for the study and development of tenant protection policies for the unincorporated areas, including proactive code enforcement inspections of rental housing, rent stabilization, and a local Just Cause for eviction ordinance. This, along with years of community input and advocacy from organizations and individuals for tenant protections for the urban unincorporated areas emphasizes the urgency and overdue need for basic tenant protections in the County, policies that many of the incorporated cities of the County have passed.</p> <p>In order to earnestly affirmatively further fair housing in Alameda County, the County must accept the regional consensus that tenant protections are a critical part of providing safe, stable, and affordable housing, mitigating displacement risk. As HCD notes in the AFFH Guidance Memo, the lack of tenant protections is a common investment barrier to AFFH and a contributing factor to fair housing issues of supporting patterns of segregation and racial concentrations of poverty.¹⁰ With this in mind, the Housing Element should commit to passing a package of tenant protections early in the planning period.</p>	<p>Program 6.I: Mobile Home Rent Stabilization Ordinance</p>
	<p>Affirmatively Furthering Fair Housing (AFFH) There is a need to strengthen the connection between the AFFH assessment and the housing element itself. The new statutory requirement to affirmatively further fair</p>	<p>Staff have consistently referred to all available HCD and MTC guidance</p>

		<p>housing requires more than the analysis of fair housing issues, it must fully inform the site inventory and Housing Plan. While the analysis identifies key factors contributing to segregation and disparities in housing conditions and opportunity throughout the County, the policies programs, and site inventory must be developed in response to address these factors, with clear metrics to determine whether these actions result in improvements.</p> <p>The requirement to affirmatively further fair housing must fully inform the site inventory and action plan, and HCD’s guidance on affirmatively furthering fair housing is clear that the Housing Plan must be clearly related back to the priority factors previously identified that support and maintain inequitable opportunities and outcomes, and segregation and displacement risk. We encourage the County to review HCD’s April 2021 Affirmatively Furthering Fair Housing Guidance, which includes detailed explanations of specific requirements for housing elements, to ensure it is fully meeting these requirements.</p> <p>Finally, we note that the current Site Inventory does not appear to satisfy AFFH requirements, as it concentrates the majority of planned lower-income housing in the areas of Ashland and Cherryland, without identifying adequate affordable sites in the higher-income and higher resources areas of Castro Valley and Fairview. HCD has consistently required that site inventories spread affordable housing into areas with higher resources, so while we appreciate the locating of some affordable projects in the areas where lower-income households will need it to avoid displacement, the Site Inventory should also add locations in the higher resource and income areas identified in the AFFH section of the Housing Element.</p>	<p>regarding the creation of the 6th Cycle Housing Element.</p> <p>In response to community concerns, in the December 2023 mid-90 day review period update, staff removed 14 sites located in Ashland from the sites inventory. This corresponds to 125 low and very low income units and 143 units overall located on East 14th St, Mission Boulevard, and Lewelling Boulevard.</p>
29	EBHO (September 19)	<p>Thank you for the opportunity to comment on Alameda County’s Draft Housing Element. East Bay Housing Organizations (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 across Alameda & Contra Costa Counties. Many of our 400+ individual and organizational members live in, work, and provide affordable homes throughout the County.</p> <p>We appreciate all the work by County staff that has gone into producing this document. We offer our comments with the hope that the County will incorporate them to produce a final document that makes significant progress to achieve housing justice and meet all of the County’s current and future housing needs. While the County narrowly met its low-income RHNA, only 34%, 20%, and 40% of its very-low-income, moderate, and</p>	<p>Thank you for your comments. They have been received.</p>

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	<p>above moderate-income RHNA goals, respectively, were met in the last Housing Element Cycle.</p> <p>With a 200% increase in very low- and low-income needs for the 6th Cycle, Alameda County will have to do significantly more than it has in the past to meet the needs of current and future residents and to comply with State requirements.</p> <p>We emphasize the County's responsibility to advance programs and policies to bolster affordable housing production and identify new resources and funding to expand production and preservation. The County has a significant state mandate to affirmatively further fair housing throughout every part of the Housing Element Update. We hope to continue to collaborate with the County to make Alameda County a place for all to afford to call home, regardless of income and background.</p>	
	<p>Public Participation State law requires localities to make a "diligent effort...to achieve public participation of all economic segments of the community in the development of the Housing Element." Despite being behind in the Housing Element Process, the County must continue to take intentional, proactive, and robust actions to solicit and incorporate input from community members, with a particular effort to include low-income people, people of color, non-English speakers, people with disabilities, and others who face regular systemic barriers to being heard in public decision making. We appreciate the outreach, stakeholder input sessions, community workshops, and surveys that staff has conducted so far, and look forward to more such events as this process moves forward.</p> <p>We also look forward to Appendix E: Public Participation Summaries being further updated throughout the Housing Element Update as public participation continues. While we note the accounting of previous public meetings and the summary of public comments received at the meetings, we urge staff to supplement the summaries with a response describing how comments have been incorporated, or why they have not been incorporated along with a justification for not including them.</p>	<p>Please see the section titled "Integration of Comments into the Housing Element" for information about how comments were integrated into the element. These sections have been further updated during the Second Housing Element Draft.</p>
	<p>Policy 1.1: Utilize Public Land for Affordable Housing to Provide a Range of Housing It is encouraging that the County is signaling its intention to utilize public land for affordable housing. At a minimum, the County must follow the Surplus Land Act (SLA), which requires all local agencies to offer surplus land for sale or lease to affordable home developers and certain other entities before selling or leasing the land to any other individual or entity. We strongly believe the County should actively pursue and prioritize its Public Land for 100% affordable housing, to directly address the factor of disparity in unincorporated Alameda County identified on page 67 in Appendix F, of a</p>	<p>Thank you for your comments. They have been received.</p>

	<p>limited supply of affordable housing in areas with access to opportunity. HCD has frequently required other jurisdictions this cycle to more fully outline their process to use the SLA as well as justify their assumptions regarding the development of publicly owned land.</p> <p>Program 1.C: Facilitate Housing at Bay Fair & Castro Valley BART Sites EBHO strongly believes that any development on the Bay Fair & Castro Valley BART sites should maximize affordable housing, especially considering BART’s commitment of at least 35% of new units to be affordable. We look forward to engaging in the community process as the County coordinates with BART and San Leandro staff to develop RFPs and enter ENAs with development partners. Additionally, we note that it has been a consistent piece of feedback from HCD for jurisdictions with BART sites that they include detailed plans including dates for specific milestones for the cooperation with BART on the development of these sites</p> <p>Program 1.N: Allow Religious Institution-Affiliated Housing We strongly support the County amending the Zoning Ordinance to better facilitate development and allow religious institution-affiliated housing development projects by right. EBHO’s members include non-profit housing developers, communities of faith, and low-income residents of the County, where we’ve personally encountered increasing interest in faith-based affordable housing development.</p> <p>Program 2.F: Affordable Housing Trust Fund “Boomerang” Program We support the continuation of the Affordable Housing Trust Fund “Boomerang” Program to provide services to support low-income households and those experiencing homelessness with tenant legal support, a navigation center, expanded winter shelters, the AC affordable housing web portal, and more.</p> <p>Program 2.K: Preserve At-Risk Housing We support the County’s effort to continue preserving the affordability of housing at-risk of conversion to market rate, with a particular focus on at-risk renter and senior households and the at-risk developments in the next 10 years identified in Table A-24. We look forward to seeing the County collaborate with and provide assistance to nonprofit housing developers to preserve at-risk units.</p> <p>Program 2.L: Protect Existing Affordable Housing Units To enhance the vague action to study the legal and programmatic feasibility of amending the Zoning Code to limit the redevelopment of existing affordable housing projects to other uses, along with requiring that adequate replacement housing is provided when projects would result in substantive losses of low & moderate-income</p>	
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	<p>housing units, the County should add a quantified objective of bringing back the results and bringing forward an ordinance before the Board of Supervisors shortly after the study is completed.</p> <p>Program 3.D: SB 35 Processing & Permit Streamlining We support active encouragement and facilitation of the use of SB 35 to provide by-right approval for 100% affordable housing, including training and direction to Planning staff that this should be affirmatively pursued.</p> <p>Policy 4.4: Permanent Supportive Housing Development & Programs 4.A, 4.B, 4.C: Emergency Shelters, Low Barrier Navigation Centers (LBNCs) and Supportive Housing We strongly support the County amending its Zoning Code to allow for emergency shelters, LBNCs, and permanent supportive housing, which support “Housing First” principles, a proven highly effective approach to supporting those experiencing homelessness.</p> <p>Program 4.G: Assist Seniors and Disabled Persons to Maintain and Rehabilitate their Homes We support the creation of an ongoing list of resources to help seniors maintain and/or rehabilitate their homes, and the County’s intention to create Universal Design standards to be usable by all. We urge that the time frame of January 2026 be more detailed, and indicate quantified outcomes through the development of the Universal Design standards, including gathering robust community input throughout the entirety of the process.</p> <p>Program 5.C: Code Enforcement It is important for the County to continue to enforce Code Enforcement to promote safe housing conditions, and we hope to see details in quantified outcomes as to how many households have been served in recent years. We strongly suggest that anti-retaliation protections for tenants who call Code Enforcement are considered, as well as the right to return after repairs protections, as proposed in the Just Cause Ordinance first presented to the Board of Supervisors on December 20th, 2022.</p> <p>Program 5.D: Rental Inspection Pilot We support the collection of data through a complaint-based rental inspection pilot, and look forward to seeing the yearly reports submitted to the Transportation & Planning Committee regarding the pilot’s efficacy. While tenants can currently call the County’s Code Enforcement program, many tenants opt to not report violations to the County for fear of landlord reprisal. Thus, EBHO supports the study, development, and</p>	
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	<p>adoption of a proactive rental inspection program.</p> <p>Program 6.K: Inclusionary Housing We support the adoption of an inclusionary housing ordinance to support new housing choices and affordability. Rather than the County “should also consider alternatives, such as land dedication and/or payment of an in-lieu fee”, we strongly recommend the County commit to considering these alternatives, as part of the research into the development of the inclusionary housing ordinance. Therefore, the time frame and quantified outcomes for this program should be supported with more substance as to how the County plans to explore this strategy.</p>	
	<p>To date, the Eden Area, the communities of Ashland, Castro Valley, Cherryland, Fairview, Hayward Acres, and San Lorenzo, have no local tenant protection policies. It is estimated that at least 39% of Eden renters are not covered by any tenant protections, considering the limitations of the statewide Tenant Protection Act, also known as AB 1482 (2019).⁴ Namely, AB 1482 exempts single-family homes, and with the existing housing stock in the County, nearly one-third of renters live in single-family homes. This results in renters being especially vulnerable to housing insecurity when faced with rent increases, widespread and severe habitability issues, and unlawful evictions. As accounted in the County Wide Trends, evictions are a major concern throughout the County, and this is only magnifying the greater risk that lower-income communities face of losing housing and being displaced.</p> <p>Over half of the renters in Unincorporated Alameda County are cost-burdened, and nearly 5% and 10% of renters experience severe and moderate overcrowding, respectively, compared to 3.7% for those who own.⁶ As described on page 51 in the Housing Needs Assessment, more households in Ashland and Cherryland, with 75% and 64% households, respectively, rent their home compared to other communities in Unincorporated Alameda County. These renters are often more cost-burdened, and more likely to live in overcrowded conditions and substandard housing than owner-occupied households. The Eden communities of Ashland, Cherryland, and Hayward Acres each have high poverty rates of 18%, some of the highest in all of Alameda County.⁷ Over 61% of people in the urban unincorporated areas are Black, Indigenous, or people of color (BIPOC), compared to just 53% of the total population of the County.</p> <p>In 2020, Alameda County became one of the first-ever recipients of a Partnership for the Bay Area’s Future Challenge Grant, intended to be used for the study and development of tenant protection policies for the unincorporated areas, including proactive code enforcement inspections of rental housing, rent stabilization, and a</p>	<p>Staff are committed to accurately representing the County’s commitment to renters in the Housing Element. This includes representing Code Enforcement’s rental inspection pilot and any future developments before the adoption of the 6th Housing Element. The writing of the Housing Element has concurred with significant political debates over tenants rights ordinances; this is being decided at the Board of Supervisors level.</p> <p>The following programs pertain to tenants’ rights: Program 2.K: Preserve At-Risk Housing, Program 2.L: Protect Existing Affordable Housing Units, Program 5.D: Rental Inspection Pilot, Program 5.E: Condominium Conversion, Program 6.B: Fair Housing Referrals (ECHO Housing), Program 6.C: Rent Review Program, Program 6.F: Displacement Protection, Program 6.G: Fair Housing Services, Program 6.I: Mobile Home Rent Stabilization Ordinance</p>

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		<p>local Just Cause for eviction ordinance. This, along with years of community input and advocacy from organizations and individuals for tenant protections for the unincorporated areas emphasizes the urgency and overdue need for basic tenant protections in the County, policies that many of the incorporated cities of the County have passed.</p> <p>To earnestly affirmatively further fair housing in Alameda County, the County must accept the regional consensus that tenant protections are a critical part of providing safe, stable, and affordable housing, mitigating displacement risk. As HCD notes in the AFFH Guidance Memo, the lack of tenant protections is a common investment barrier to AFFH and a contributing factor to fair housing issues of supporting patterns of segregation and racial concentrations of poverty.</p> <p>With all of this in mind, the Housing Element should commit to passing a package of tenant protections early in the planning period.</p>	
		<p>Affirmatively Furthering Fair Housing (AFFH) There is a need to strengthen the connection between the AFFH assessment and the housing element itself. The new statutory requirement to affirmatively further fair housing requires more than the analysis of fair housing issues, it must fully inform the site inventory and Housing Plan. While the analysis identifies key factors contributing to segregation and disparities in housing conditions and opportunity throughout the County, the policies programs, and site inventory must be developed in response to address these factors, with clear metrics to determine whether these actions result in improvements. The requirement to affirmatively further fair housing must fully inform the site inventory and action plan, and HCD's guidance on affirmatively furthering fair housing is clear that the Housing Plan must be clearly related back to the priority factors previously identified that support and maintain inequitable opportunities and outcomes, and segregation and displacement risk.</p> <p>We encourage the County to review HCD's April 2021 Affirmatively Furthering Fair Housing Guidance, which includes detailed explanations of specific requirements for housing elements, to ensure it is fully meeting these requirements.</p>	<p>Please see the section titled "Integration of Comments into the Housing Element" for information about how comments were integrated into the element.</p>
		<p>Site Inventory The requirements of AFFH extend to the Site Inventory, which insufficiently distributes housing throughout the community in a manner that addresses, let alone mitigates racial and socioeconomic segregation. The current Site Inventory concentrates the majority of planned lower-income housing in the areas of Ashland and Cherryland, without identifying adequate affordable sites in the higher-income and higher-resource areas of Castro Valley and Fairview.</p>	<p>Thank you for your comments. They have been received.</p> <p>Maps of the sites inventory with different demographics can be found in the later half of Appendix F as well as in Appendix B and the Housing Element landing page.</p>

	<p>In order to support public participation and engagement in analyzing the site inventory, a critical cornerstone of the housing element process, we recommend:</p> <ul style="list-style-type: none"> - The site maps should be overlaid on maps of key demographic indicators, particularly racial concentrations and concentrations of high- and low-income households. This includes layers for areas of opportunity and areas at risk, including both Racially and Economically Concentrated Areas of Poverty (R/ECAP) and Racially Concentrated Areas of Affluence (RCAA) <p>This would enable an overlay of the site inventory by affordability level and provide a better way to visualize the extent to which the County’s site inventory does or does not significantly alter existing patterns of segregation. This would bolster accessibility and ease of analysis for the community.</p> <p>HCD has consistently required that site inventories spread affordable housing into areas with higher resources, so while we appreciate the locating of some affordable projects in the areas where lower-income households will need housing to avoid displacement, the Site Inventory should also add locations in the higher resource and income areas identified in the AFFH section of the Housing Element, particularly the eight tracts in Castro Valley considered high and highest resourced - 4 of which are Racially Concentrated Areas of Affluence (RCAA).</p> <p>In Fairview, we call attention that only 26 out of 323 (8%) of units identified in Fairview are low and very low-income units. The County’s rationale is that “development is more constrained due to being in Very High or High Fire Severity Zone”, which we acknowledge is true for <i>some</i> areas of Fairview, but not most, therefore the draft fails to explain why areas with no fire risk in the western and central parts of Fairview fail to have more lower income identified sites.¹¹</p> <p>Finally, we note that the Sites Inventory does not appear to consider potential tax credit scoring when assessing whether or not a site is realistic from the perspective of affordable housing development. We, therefore, request that the County perform an analysis of potential tax-credit scoring towards very-low and low-income sites identified in Table B-23 of Appendix B. Considering the lack of local investment and appropriately zoned high-resource areas—both factors vital to the competitiveness of affordable housing projects for other funding, particularly tax credits—it is not realistic to assume that all of the sites identified for 100% affordable development will actually be built.</p> <p>We thank you, again, for the opportunity to comment on Alameda County’s Draft Housing Element and we look forward to working with the County as it continues to</p>	<p>on the CDA website. This includes a map with the RCAAs and the circa-2013 R/ECAP in Cherryland.</p>
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		revise and strengthen the document following HCD's review and further public participation.	
30	Alameda First 5	<p>Thank you for the opportunity to comment on the Draft Alameda County General Plan Housing Element. Our mission at First 5 Alameda County is to build an early childhood system of care that cultivates the community and family conditions needed to support children's kindergarten readiness; as a funder, partner, administrator, and advocate, we prioritize policies, programs, and investments that narrow disparities and improve the lives of children from birth to age five, their families, and their caregivers. As the County has recognized in previous General Plans, in the prior Housing Element, and through periodic use of community development funds to support early care and education programs:</p> <ul style="list-style-type: none"> - Early care and education is an essential part of our community infrastructure, just like housing, transportation and jobs. When child care is not included in community development, there are negative impacts on the community, such as congestion from additional vehicle miles traveled by parents who need to leave to find care in other communities. - In a high cost area like Alameda County, early care and education program administrators and family child care home providers find numerous obstacles to being sited and operating, and are in a site affordability and siting crisis that parallels the affordable housing crisis. The Fall, 2022 Alameda County Early Care and Education Licensed Facilities Assessment found that 85% of infants and toddlers in working families did not have access to a licensed child care space. Unincorporated Alameda County as well as Fremont and Oakland saw the most site closures during the pandemic, with family child care sites closing at a dramatically higher rate than centers. - Affordable housing is of paramount importance to families with young children. Our biennial Kindergarten Readiness Assessment (KRA) consistently finds that kindergarten readiness is strongly linked to family access to basic needs, with housing at the center. In 2022, after surveying over 3,000 people in the county – parents, early childhood educators, Transitional Kindergarten (TK) and kindergarten teachers, and with the guidance of our community-led Research Advisory Group, housing and basic needs emerged as a top priority. <ul style="list-style-type: none"> o According to the Department of Housing and Urban Development, the <i>first year of life is when people are most likely to enter shelter and transitional housing programs, followed by ages one to five</i>. Pregnant women and families with young children are particularly at risk when they face housing instability. Currently in our county, families with newborns cannot leave the hospital without a car seat, but they can leave without a home. 	In response to this comment, staff added Policy 4.10: Childcare Centers

		<ul style="list-style-type: none"> o In 2018, the homeless management information system showed 969 families with 2,917 members as homeless in Alameda County, including 433 children ages 0-5. We know these numbers do not reflect the true extent of the issue as many families do not come forward to ask for assistance out of fear and live in their vehicles or with friends instead. - Early childhood educators who are predominantly low-income women of color also need affordable housing options to continue to do their vital work in our County. Eighty-seven (87%) of ECE professionals, 79% of whom identify as Black, Indigenous, or other women of color, are considered very low-income for the county. <p>We recognize the legal and human urgency of complying with state mandates for affordable housing development and your efforts to reduce development barriers which are reflected in the Draft Housing Element. Since the early childhood field's dire and persistent lack of resources intensifies the need for coordinated land use and planning to facilitate development, below we recommend several basic, supportive policy revisions that elevate child care considerations when developing family housing, and maintain fidelity to prior Unincorporated County land use plans. We welcome your alternative or additional recommendations.</p> <p>Background on Child Care in Existing County General Plan Elements: Alameda County Housing Element (2015-2022)</p> <ul style="list-style-type: none"> - "Goal 4: To ensure a supply of sound housing units in safe and attractive residential neighborhoods. Policy 4.4: Provide adequate funding for maintenance and improvement of public facilities ...such as child care... ." <i>The staff update to the plan recommended carrying provisions of Goal 4 into the next Housing Element.</i> <p>East County Area Plan (Revised by the Board of Supervisors 5/5/1994)</p> <ul style="list-style-type: none"> - The East County Plan has almost 30 references to specific strategies on how child care should be included in land use, public facilities, commercial, infill and transit oriented development of all densities. It proposes that Infill developers contribute to costs of local infrastructure such as child care. - One example relevant to housing is Policy 189: "The County shall require major projects...to include features that promote the use of transit, bicycle and pedestrian systems. These features could include....pedestrian accessible features such as convenient local-serving retail and services uses (e.g. child care, neighborhood grocery stores, etc.) (p.51). 	
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	<p>Castro Valley General Plan (March, 2012)</p> <ul style="list-style-type: none"> - This plan includes child care references in Section 8 Community Facilities, Parks and Schools. Section 8.5 Child Care directs the County to revise the zoning code to include child care centers in residential areas, consider no cost leases of public buildings, impact fees, and siting child care in convenient locations for families (p.8-27). <p>Ashland and Cherryland Community Health and Wellness Element (2015)</p> <ul style="list-style-type: none"> - Action F.11. "Encourage co-location of child care centers and family child care homes with affordable housing, employment centers, and in Transit Oriented Development (p.21)." <p>Proposed Basic and Supportive Housing Element Modifications:</p> <ol style="list-style-type: none"> 1. Recommend how to carry Goal 4 provisions from prior Housing Element into this one as an overarching concept. For instance, for policy reasons and based on effective practice, the need for child care should be considered in Program 1.C (p.19) when developing affordable housing at Castro Valley and Bayfair BART stations and in the upcoming Community Benefits Agreement plan. Successful child care centers are operating at Ashby, Fruitvale, and Colma BART stations among other transit linked centers. Child care has been incorporated in Community Benefits Agreements in Los Angeles and Nashville as well as several Development Agreements in Alameda County. 2. Revise Section IV: Housing Plan, Goal 1 Policy 1.6 (p.17): "Support Mixed-Use Residential and Commercial Development" to detail child care inclusive examples of mixed-use residential/commercial development so that it reads: "Review and, as appropriate revise or create zoning districts and regulations, and site development and planned development district standards and guidelines to support appropriate mixed-use residential/commercial development which could include community amenities such as child care for residents and the community." 3. Revise Section IV, Housing Plan, Goal 7 Policy 7.4 (p.45): "Minimize the adverse environmental impacts of housing and encourage sustainability measures" to read: Policy 7.4 Development of Infill Housing and Related Community Amenities Such as Child Care. <p>Work with cities, community organizations and neighborhood groups to facilitate infill housing development in conjunction with neighborhood revitalization which could include adding or improving community amenities such as child care.</p>	
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		<p>Finally, there are proactive policies that could accelerate support for child care integration in the County. You could include policy to incentivize developers to build space for child care for families of all incomes and children of all ages through strategies such as increased height allowances, increases in floor area ratios, parking reduction, community benefits credit, traffic impact fee exemptions, expedited entitlements or modifications to zoning regulations and support inclusion of specially designed and located family child care housing units in multi-family projects. San Francisco has seen multiple affordable housing developers respond to a code change to exempt them from maximum density restrictions for family child care inclusion, for example.</p> <p>In closing, we urge the County to consider the needs of families with young children, the child care workforce, and child care programs in the 2023-2031 Housing Element and ongoing planning. We look forward to continued collaboration.</p>	
31	CVUSD	(See attached)	Thank you for your comments. They have been received.
32	East Bay for Everyone	<p>East Bay for Everyone is a network of people fighting for the future of housing, transit, tenant rights, and long-term planning in the East Bay. The proposed updates to the Housing Element are encouraging in seeing Alameda County finally moving to compliance with state law. We appreciate the work put into it and the significant information provided to the public, as well as the chance to comment. However, we are concerned that most large opportunity sites are less feasible than shown, the overall placement of housing does not affirmatively further fair housing, and the updates do not do enough to relax constraints to development in the unincorporated areas, as needed to meet HCD criteria for a compliant Housing Element.</p> <p>Parking Streamlining and simplification of off-street parking requirements is long overdue, considering that at least six different sets of standards currently exist in the unincorporated county. Off-street parking adds around \$50,000 of costs per space (structured), while centering development on cars and increasing total vehicle miles traveled. While the element makes a commitment to reduce off-street parking requirements by moving to the Residential Design Standards Guidelines, even these guidelines set parking minimums too high and constrain development. All per-unit guest parking requirements should be removed, and the requirements for units in multi-family developments should be removed within one mile of BART or other high-</p>	<p>Thank you for your comments. They have been received.</p> <p>Regarding Parking: while not in the scope of this Housing Element update, county staff are currently studying MTC/ABAG's Transit Oriented Communities (TOC) policies, which include minimizing residential and commercial parking within ½ mile of BART stations. Staff will bring relevant zoning changes to the Board of Supervisors for approval in early 2026.</p> <p>Regarding Fair Housing: the second Housing Element update includes more significant rezonings, including densities of up to 17 units per acre throughout Castro Valley and Fairview.</p> <p>The inclusion of El Portal Ridge, Fairmount Terrace, Fairmount, and Hillcrest Knolls in</p>

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	<p>quality transit. They should also be reduced to one space per two units within one half-mile of any bus stop.</p> <p>Fair Housing There is a major disparity of income and socioeconomic status versus Castro Valley and the other CDPs of Eden Area, with San Lorenzo in the middle: Ashland median household income \$71,000, Cherryland \$75,500, San Lorenzo \$95,900, Castro Valley \$124,200 (American Community Survey 2017-2021). The obligation to affirmatively further fair housing should imply more low-income housing planned for Castro Valley and San Lorenzo than elsewhere.</p> <p>It is helpful that the AFFH chapter goes further and divides Castro Valley into one "Main" area, the most exclusionary, and one "EJ Priority", although even the latter area is significantly higher-income and -opportunity than Ashland and Cherryland. However, the one low-income opportunity site in "Castro Valley (Main)", the sheriff's station, is only so grouped by an accident of mapping: the Census Bureau's decision to draw the boundary between CDPs at I-580. The sheriff's station is at the very corner of the whole CDP, separated from the main body of Castro Valley by hills and an extensive campus of county facilities including the county psychiatric hospital and juvenile detention center. It is far more like Ashland than like Castro Valley; no one striving for an exclusionary Castro Valley would feel threatened by it.</p> <p>The true percent of affordable housing projected in the exclusive portion of Castro Valley is 0%, and also 0% in San Lorenzo, versus 68% in Ashland, 29% in Cherryland, and 49% in the less exclusive portion of Castro Valley. This distribution does not affirmatively further fair housing and significant new affordable sites in Castro Valley proper will be needed to achieve this. The basic approach appears to start from a perspective of adhering closely to existing zoning designations; this has the result of concentrating affordable sites in areas that are already denser (and generally more affordable and lower-resourced).</p> <p>Although Castro Valley lots are smaller, the high land value makes missing middle (up to sixplexes) a viable AFFH strategy. The county should take as a model the rezoning of Rockridge in Oakland, which allowed 1 unit per 1,000 square feet of lot area, along with 35' height, 60% lot coverage, narrower setbacks, and 0.5 parking spaces/unit.</p> <p>Issues with Major Opportunity Sites The following barriers exist with the sites making up the vast majority of units in opportunity sites:</p> <ul style="list-style-type: none"> - BART parking lots are proposed for development, both Castro Valley and Bay Fair. However, in the BART TOD Workplan, both of these stations are listed in 	<p>Castro Valley instead of Ashland was of significant debate the last time unincorporated community boundaries were considered; while they are not geographically central to Castro Valley, their inclusion is not an 'accident.' Alameda County has the most land use control over land owned by Alameda County, and staff hope to maximize its potential.</p> <p>Staff have continued to work with BART and San Leandro staff regarding possible development at Bay Fair station. Expectations for the Castro Valley Station development have reflect BART's most recent workplan. This is reflected in changes to Program 1.C and 1.D.</p> <p>Staff have expanded the analysis of nonvacant sites, given the limits of analyzing 164 nonvacant parcels of land.</p> <p>Staff are pleased to share additional information about proposed rezoning categories as well as the proposed Housing Element Overlay Combining District. New zoning categories and the overlay are still in the drafting process.</p>
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		<p>the later portion of the planning period, for development between 2025 and 2030, and most of the projects slated for 2020-2025 in that workplan are not near completion. The early 2030s is a more optimistic idea of when the latter group can be developed. HCD has rejected inclusion of Orinda BART by the city of Orinda which is in the same 2025-2030 category. BART's input should be sought and included on how likely these developments are during the planning period—and what assistance the county would have to provide to make development likely. Finally, Bay Fair BART parking occupies both sides of the tracks, and the other side is in the city of San Leandro, which has included that parking area in its own element; the county should show why development at that station would necessarily use the majority of land on the unincorporated side, rather than the other, or a mix of both.</p> <ul style="list-style-type: none"> - The element discloses that the Sheriff Radio station will not be vacated by the sheriff's office until 2030. The county should explain how it is feasible to project that this site will be developed and occupied within the planning period— with all construction taking place in one year. Also, this site is immediately next to I-580—not to mention at a higher elevation than the roadway—and will cause health problems among those low-income households brought to live by it. Environmental health/justice concerns are likely to prove a barrier to development on this site. - The Castro Valley Lucky's parking lot is supposed to yield 96 units, of which 54 would be low- or very-low-income. This is the main Castro Valley affordable housing suggested other than the BART lot. However, while parking is not required under AB 2097 due to BART proximity, there is no evidence that Lucky's wishes to relinquish its parking lot to build housing on. (There is no evidence the owners or business proprietors are even theoretically interested in developing, even as "initial conversations".) Also, the parking lot is awkwardly wedged between many buildings, making housing development complicated. Some of the parking lot is owned as separate parcels (not included in acreage). Finally, the county should specify how much parking would be needed to replace the grocery store's if the business demanded that for business reasons, and what this would cost on top of development. - The Crunch Fitness site, the only San Lorenzo site with significant low-income housing, is on two parcels which add up to 4.22 acres. This would allow the slated 254 total units—if zoned HDR with maximum 86 units/acre, as stated on table B-12. However, the larger of the two parcels, 177 Lewelling which is 3.17 of those acres, is listed on table B-22 as to be zoned MDR, which only allows 22 units/acre and would not allow nearly that many units. This is probably a typo for HDR (which the other parcel is listed at) and should be fixed. Also, the evidence for its redevelopment should be more substantial than "initial 	
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	<p>conversations"—or if not, the site's potential should be significantly marked down. The separate ownership of the two parcels is also a barrier to development—per county rolls, one is owned by an entity at an address in South San Francisco, the other in Beverly Hills. It is unclear if both expressed interest in redevelopment, but 177 Lewelling is listed as meeting criterion 3 (30+ years old) and no others; 85 Lewelling, the smaller, criterion 1, low improvement-to-land-value ratio;</p> <ul style="list-style-type: none"> - 2490 Grove Way, Hayward (fairview) is slated for 260 units. It is 4.19 acres and proposed to be zoned RMU30-60. However, that multiplies out to only 250 units, not 260. - 2889 Kelly St, Hayward (Fairview) is slated for 26 units, all low- or very-low-income. However, it is 0.65 acres and proposed to be zoned for MDR which maxes 22 units/acre. It should be no more than 14 units, or be zoned RMU30-60 to match the projection. <p>For nonvacant sites among opportunity sites, while the standards laid out for site suitability on Page B-23 are specific and relatively objective, they may not tell the full story with regard to site suitability. As noted in specific sites in the bullets above, while the characteristics may point to development potential, they do not demonstrate there is a practical likelihood of development during the Housing Element planning period. A site with a low improvement-to-land-value ratio may have an owner utterly uninterested in development; a site with an owner interested in redevelopment may have a tenant with a long-term lease who has no interest in giving it up; and so forth. We ask for expansion of the evaluation of specific nonvacant opportunity sites, including discussion/explanation of factors such as recent capital improvements, lease terms, local demand for specific business categories, current barriers to development if known, and the success or failure of previous redevelopment proposals.</p> <p>Zoning clarity and other issues The element proposes making several new zoning designations for opportunity sites, all named for the housing element: HE-RSL, HE-MDR, HE-RMU40, etc. However, all that is specified for each zone is the upper limit of density. The county should guarantee in the housing element that it will institute setbacks, height, FAR, and other development standards on those sites that will not preclude the official density maximums on the actual sites being used. 60 units/acre is infeasible if combined with an 0.6 FAR or 35-foot height.</p> <p>We also note that the rezoning of sites is focused on downtown specific plan areas and individual large sites. This is a common strategy, but more will be necessary to achieve the goals. Experience shows in reality, most opportunity sites are not built on,</p>	
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	<p>and most sites built on are not opportunity sites. A broader approach, more likely to succeed, would apply higher densities of 20-30 units/acre in significantly larger areas of the unincorporated county, focusing on areas near high-quality transit and in high-resource areas, as well as densities of 100 units/acre within a half mile radius of BART, similar to San Leandro's Downtown strategy.</p> <p>We look forward to continuing to engage with Alameda County in the housing element process, and welcome the chance to speak with staff to discuss our concerns. Thank you for your consideration of our suggestions above.</p>	
<i>From commissioners during the September 5, 2023 Planning Commission</i>	Inquired how SB 9 was considered in the sites inventory	Per guidance from MTC/ABAG, staff did not consider SB 9 in county housing unit number projections.
	The item should be continued because the community did not have adequate opportunity to review the sites inventory during the public comment period.	The Housing Element sites inventory was available for review and comment during the 50 day comment period.
	The consultant's report regarding permit streamlining is not adequately addressed in the draft element.	In response to this comment, staff added additional reference to the Baker Tilly report in section C.2.4 of Appendix C.
<i>From members of the public during the September 5, 2023 Planning Commission</i>	Objected to loss of commercial uses in San Lorenzo if developed with housing. Supported keeping San Lorenzo suburban.	Thank you for your comments. They have been received.
	Expressed concern that Ashland is already overburdened and the sites inventory would continue to concentrate populations of poverty in the area.	In response to community concerns, in the December 2023 mid-90 day review period update, staff removed 14 sites located in Ashland from the sites inventory. This corresponds to 125 low and very low income units and 143 units overall located on East 14 th St, Mission Boulevard, and Lewelling Boulevard.
	Affordable housing developers should be required to pay park dedication fees since people living in their housing will use parks.	In 2004, the Alameda County Board of Supervisors passed the Park Dedication Ordinance. To limit the impact of increased fees on development in the unincorporated areas, the following kinds of projects were exempted, among others: affordable

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			housing, housing for people with disabilities, senior housing, housing in Sunol, and group housing, as described in chapter 12.20 of the county municipal code. To change the Park Dedication Ordinance to apply to affordable housing or housing for other protected groups would mean making the construction of this housing more expensive. This would disincentivize its construction.
		Expressed support for the housing element but noted concern about concentration of low-income housing along East 14 th Street.	In response to community concerns, in the December 2023 mid-90 day review period update, staff removed 14 sites located in Ashland from the sites inventory. This corresponds to 125 low and very low income units and 143 units overall located on East 14 th St, Mission Boulevard, and Lewelling Boulevard.
		The County should prioritize resources in the unincorporated areas, including a new Office of Unincorporated Services, expanding funding for housing by supporting the regional housing bond, and providing permanent supportive housing for the homeless.	Thank you for your comments. They have been received.
		The housing element should include more specific timeframes for implementation of the programs and should state explicitly how programs relate to AFFH findings.	In response to this comment and preliminary feedback from HCD, county staff added section IV.C Affirmatively Furthering Fair Housing Action Matrix
	<i>From Supervisors during July 26, 2023 Unincorporated Services Committee</i>	Stressed the need to encourage housing by keeping the cost of construction per unit low. Stressed the need to make the public aware of the consequences of not fulfilling the County's RHNA	Staff are pursuing streamlined permitting for development in the sites inventory, which will help minimize costs if adopted. Staff continued to explain the importance of fulfilling RHNA throughout the public comment period.

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<p><i>From members of the public during the July 26, 2023 Unincorporated Services Committee</i></p>	<p>Expressed concern about fear of displacement among renters and the lack of a safety net.</p>	<p>Staff are committed to accurately representing the County's commitment to renters in the Housing Element. This includes representing Code Enforcement's rental inspection pilot and future developments before the adoption of the 6th Housing Element. The writing of the Housing Element has concurred with significant political debates over tenants' rights ordinances; this is being decided at the Board of Supervisors level.</p> <p>The following programs pertain to tenants' rights: Program 2.K: Preserve At-Risk Housing, Program 2.L: Protect Existing Affordable Housing Units, Program 5.D: Rental Inspection Pilot, Program 5.E: Condominium Conversion, Program 6.B: Fair Housing Referrals (ECHO Housing), Program 6.C: Rent Review Program, Program 6.F: Displacement Protection, Program 6.G: Fair Housing Services, Program 6.I: Mobile Home Rent Stabilization Ordinance</p>
	<p>Expressed the need to address equity and fair housing issues in the Eden Area.</p>	<p>Staff are committed to enacting the policies and programs described in the draft Environmental Justice Element. The writing of the Housing Element has concurred with significant political debates over tenants' rights ordinances; this is being decided at the Board of Supervisors level.</p> <p>Staff are committed to accurately representing the County's commitment to renters in the Housing Element. This includes representing Code Enforcement's rental inspection pilot and future developments before the adoption of the 6th Housing Element.</p> <p>The following programs pertain to tenants' rights: Program 2.K: Preserve At-Risk Housing, Program 2.L: Protect Existing Affordable Housing Units, Program 5.D: Rental Inspection Pilot, Program 5.E: Condominium Conversion, Program 6.B: Fair Housing Referrals (ECHO Housing), Program 6.C: Rent Review Program, Program 6.F: Displacement Protection, Program 6.G: Fair Housing Services, Program 6.I: Mobile Home Rent Stabilization Ordinance</p>

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	Opposed the potential loss of commercial sites in San Lorenzo to housing.	Thank you for your comments. They have been received.
<i>From council members during August 8, 2023 Eden Area MAC</i>	Voiced concern about proposed increased density in Eden Area, specifically Ashland and San Lorenzo Village	In response to community concerns, in the December 2023 mid-90 day review period update, staff removed 14 sites located in Ashland from the sites inventory. This corresponds to 125 low and very low income units and 143 units overall located on East 14 th St, Mission Boulevard, and Lewelling Boulevard. Staff are committed to enacting the policies and programs described in the draft Environmental Justice Element.
	Voiced concern about assignment of additional low-income housing in Eden Area, especially Ashland	In response to community concerns, in the December 2023 mid-90 day review period update, staff removed 14 sites located in Ashland from the sites inventory. This corresponds to 125 low and very low income units and 143 units overall located on East 14 th St, Mission Boulevard, and Lewelling Boulevard.
	Voiced concern about net export of jobs and possible replacement of commercial areas with housing	Thank you for your comments. They have been received.
	Desire to have commercial first floors, specifically at former Cherryland Place	State Housing Element law requires jurisdictions to allow up to 100% residential projects on sites labeled as low income, such as the Cherryland Place site.
	Voiced concern about affordable and senior housing projects being exempt from Park Fee (Program 2.D)	In 2004, the Alameda County Board of Supervisors passed the Park Dedication Ordinance. To limit the impact of increased fees on development in the unincorporated areas, the following kinds of projects were exempted, among others: affordable housing, housing for people with disabilities, senior housing, housing in Sunol, and group housing, as described in chapter 12.20 of the county municipal code. To change the Park Dedication Ordinance to apply to affordable housing or housing for other protected groups would mean making the construction of this housing more expensive. This would disincentivize its construction.
	Noted that regional population is in decline	Thank you for your comments. They have been received.

	Desire for additional tenant rights to be present in the Housing Element	<p>Staff are committed to accurately representing the County's commitment to renters in the Housing Element. This includes representing Code Enforcement's rental inspection pilot and future developments before the adoption of the 6th Housing Element. The writing of the Housing Element has concurred with significant political debates over tenants' rights ordinances; this is being decided at the Board of Supervisors level.</p> <p>The following programs pertain to tenants' rights: Program 2.K: Preserve At-Risk Housing, Program 2.L: Protect Existing Affordable Housing Units, Program 5.D: Rental Inspection Pilot, Program 5.E: Condominium Conversion, Program 6.B: Fair Housing Referrals (ECHO Housing), Program 6.C: Rent Review Program, Program 6.F: Displacement Protection, Program 6.G: Fair Housing Services, Program 6.I: Mobile Home Rent Stabilization Ordinance</p>
<i>From members of the public during August 8, 2023 Eden Area MAC</i>	Against the possibility of Crunch Fitness (APNs 413-15-33-5 and 413-15-34-3) being rezoned to enable housing	Thank you for your comments. They have been received.
	Against removal of housing cap in San Lorenzo Village area	<p>The San Lorenzo Village Center Specific Plan has been in place for almost 20 years. In that time, there has not been adequate development to meet the previously adopted housing cap.</p> <p>Zoning, by virtue of limiting the number of housing units that can fit on a given parcel of land, provides an implicit 'cap' for housing development.</p>
	Against addition of high-density housing in Ashland; for the addition of high-density housing in Castro Valley	In response to community concerns, in the December 2023 mid-90 day review period update, staff removed 14 sites located in Ashland from the sites inventory. This corresponds to 125 low and very low income units and 143 units overall located on East 14 th St, Mission Boulevard, and Lewelling Boulevard.
	Expressed desire to maintain the suburban nature of existing community, particularly San Lorenzo	Thank you for your comments. They have been received.

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<i>From council members during Fairview Municipal Advisory Council, August 10, 2023</i>	Voiced concern about additional housing in Fairview overall (323 proposed units of housing)	The number of units projected to be developed in Fairview is approximately 7% of all units projected over the course of the planning period in the unincorporated areas of the county.
	Voiced concern over constrained access to water and parking	
	Voiced concern over minimum public notice period for development projects	Thank you for your comments. They have been received.
	Voiced support for the development of the Castro Valley and Bay Fair BART sites	Thank you for your comments. They have been received.
	Disappointed in program to limit use of site development review to only noncompliant projects (see Program 3.B)	Thank you for your comments. They have been received.
	Expressed desire for Fairview to remain a rural place	Thank you for your comments. They have been received.
<i>From members of the public during Fairview Municipal Advisory Council, August 10, 2023</i>	Voiced concern about additional housing in Fairview overall	The number of units projected to be developed in Fairview is approximately 7% of all units projected over the course of the planning period in the unincorporated areas of the county.
	Voiced concern over constrained access to water	PG&E, Castro Valley Sanitation District, the Oro Loma Sanitation District, and EBMUD have been contacted for comments regarding the Housing Element. Additionally, EBMUD is in the process of updating its 2050 Demand Study, which will support the upcoming 2025 Urban Water Management Plan and infrastructure sizing. Staff have confirmed that they are aware of the expected number of new housing units and geographic spread of housing units based on the Housing Element sites inventory.
	Voiced concern over the impact on traffic in Fairview and access to surrounding communities	
	Voiced concern over possible development at the Bayhill Foods location (note: staff are currently reviewing an application for a development with 19 units and several commercial spaces for this site)	Thank you for your comments. They have been received
	Voiced concern over minimum public notice period for developments	Thank you for your comments. They have been received
<i>From council members during Castro</i>	Voiced concern about Unincorporated Alameda County's RHNA (4,711) and the percentage allocated in Castro Valley (42%)	Thank you for your comments. They have been received

<p>Valley Municipal Advisory Council, August 14, 2023</p>	<p>Voiced desire for RHNA process to be redone with more recent data</p>	<p>The RHNA process is completed once per planning cycle at the state and regional level. The ability to comment on or appeal RHNA allocations ended in 2021.</p>
	<p>Expressed desire to move the Urban Growth Boundary in order to allocate new units to East County</p>	<p>Thank you for your comments. They have been received</p>
	<p>Expressed desire to hear from school districts, the Sheriff's office, and various utility providers in relation to the Housing Element</p>	<p>Staff had previously notified the Sheriff's office of the Housing Element update. Staff have contacted all school districts and utility providers. Staff communicated with all school districts, EBMUD, and CVSan. Their comments, when received, are included in these comments.</p>
	<p>Voiced concern about how the existing infrastructure in Castro Valley could support additional housing</p>	<p>The draft environmental analysis (Mitigated Negative Declaration) was made public on November 3, 2023. Comments were accepted through December 4, 2023.</p> <p>When a project for a parcel in the Housing Element Sites Inventory is proposed, depending on the size and location, there may or may not be additional environmental analysis required, and generally the State has provided exemptions for many types of projects, especially those that serve lower income households. Generally there would be site-specific traffic and parking analysis required in addition to overall site planning and design review. In compliance with SB 743 (2013), CEQA analysis (when required) is required to consider minimizing the vehicle miles traveled (VMT) not the ease of traffic movement (known as level of service, or LOS).</p> <p>Additionally, Alameda County Public Works has been asked for comments regarding the Housing Element update. Policy EJ3.1 of the draft Environmental Justice Element, Prioritize Equitable Distribution of Public Facilities, states that "The County will accommodate areas of the Priority Communities that are underserved by public facilities through equitable investment in public facilities, public amenities, and public infrastructure." Corresponding actions, if adopted, would direct county staff to be more transparent in infrastructure planning and to explore strategies to equitably fund public facilities in the Priority Communities.</p>
	<p>Expressed concern about higher crime levels and lower property values in relation to new housing</p>	<p>Many studies about many different communities have shown that affordable housing has a neutral-to-positive impact on neighboring home values. Similarly, studies have shown that affordable</p>

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		<p>housing can have no impact on the crime rate; in some instances, affordable housing has decreased the crime rate. Other factors, like the quality of property management, have been shown to impact neighboring properties more than the affordability level of the development.</p> <p>Albright, Len, Elizabeth S. Derickson, and Douglas S. Massey. "Do Affordable Housing Projects Harm Suburban Communities? Crime, Property Values, and Taxes in Mount Laurel, NJ." <i>City & Community</i> 12, no. 2 (June 2013): 89–112. link.</p> <p>Diamond, Rebecca, and Tim McQuade. "Who Wants Affordable Housing in Their Backyard? An Equilibrium Analysis of Low Income Property Development." <i>Journal of Political Economy</i> 127, no. 3 (December 2017). link</p> <p>Hipp, John, Clarissa Iliff, Emily Owens, George Tita, and Seth Williams. "THE IMPACT OF AFFORDABLE HOUSING ON HOUSING & CRIME IN ORANGE COUNTY." University of California – Irvine: Livable Cities Lab, 2022. link.</p> <p>Nguyen, Mai Thi. "Does Affordable Housing Detrimentially Affect Property Values? A Review of the Literature." <i>Journal of Planning Literature</i> 20, no. 1 (August 1, 2005): 15–26. link.</p> <p>Woo, Ayoung, Kenneth Joh, and Shannon Van Zandt. "Unpacking the Impacts of the Low-Income Housing Tax Credit Program on Nearby Property Values." <i>Urban Studies</i> 53, no. 12 (September 1, 2016): 2488–2510. link.</p>
	<p>Multiple county departments should be considered constraints for Appendix C</p>	<p>Thank you for your comments. They have been received</p>
	<p>Voiced concern about affordable and senior housing projects being exempt from Park Fee (Program 2.D)</p>	<p>In 2004, the Alameda County Board of Supervisors passed the Park Dedication Ordinance. To limit the impact of increased fees on development in the unincorporated areas, the following kinds of projects were exempted, among others: affordable housing, housing for people with disabilities, senior housing, housing in Sunol, and group housing, as described in chapter 12.20 of the county</p>

		<p>municipal code. To change the Park Dedication Ordinance to apply to affordable housing or housing for other protected groups would mean making the construction of this housing more expensive. This would disincentivize its construction.</p>
<p><i>From members of the public during Castro Valley Municipal Advisory Council, August 14, 2023</i></p>	<p>Both support and protest of higher densities in the Castro Valley Business District, specifically near BART and the Lucky grocery store. Reasons for include: increased walkability, more foot traffic, lower greenhouse gases, increased efficiency, and supporting public transit. Reasons against include all other concerns listed in this section.</p>	<p>Thank you for your comments. They have been received.</p>
	<p>Both support and protest of future development at the Castro Valley BART site, particularly at the density set by AB 2923</p>	<p>Development guidelines for the Castro Valley BART station must conform with state law AB 2923, which includes allowing 4-6 story development and maximum 1 parking spot per unit. In accordance with program 1.C, further details regarding future development at this site, including the possible construction of replacement parking, will be a part of future engagement processes.</p>
	<p>Voiced concern about existing Castro Valley infrastructure being able to support new housing. Infrastructure included: parking capacity; road capacity for future traffic; Castro Valley and Hayward USDs' respective capacities; and the sidewalk network.</p>	<p>The draft environmental analysis (Mitigated Negative Declaration) was made public on November 3, 2023. Comments were accepted through December 4, 2023. To account for changes in the Sites Inventory, additional analysis may occur.</p> <p>When a project for a parcel in the Housing Element Sites Inventory is proposed, depending on the size and location, there may or may not be additional environmental analysis required, and generally the State has provided exemptions for many types of projects, especially those that serve lower income households. Generally there would be site-specific traffic and parking analysis required in addition to overall site planning and design review. In compliance with SB 743 (2013), CEQA analysis (when required) is required to consider minimizing the vehicle miles traveled (VMT) not the ease of traffic movement (known as level of service, or LOS).</p> <p>Additionally, Alameda County Public Works has been asked for comments regarding the Housing Element update. Policy EJ3.1 of the draft Environmental Justice Element, Prioritize Equitable Distribution of Public Facilities, states that "The County will</p>

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		<p>accommodate areas of the Priority Communities that are underserved by public facilities through equitable investment in public facilities, public amenities, and public infrastructure.” Corresponding actions, if adopted, would direct county staff to be more transparent in infrastructure planning and to explore strategies to equitably fund public facilities in the Priority Communities.</p> <p>The San Lorenzo, Hayward, and Castro Valley Unified School Districts have all been notified about the public Housing Element draft and have been asked for comments. Please find comments from SLZUSD and CVUSD included in this document.</p>
	Voiced desire for RHNA process to be redone with more recent data	The RHNA process is completed once per planning cycle at the state and regional level. The ability to comment on or appeal RHNA allocations ended in 2021.
	Voiced desire for county staff to focus on job creation before housing creation	Thank you for your comments. They have been received.
	Supported addition of housing so that existing and future residents can afford to stay in Castro Valley	Thank you for your comments. They have been received.
	Expressed concern about higher crime levels and lower property values in relation to new housing	<p>Many studies about many different communities have shown that affordable housing has a neutral-to-positive impact on neighboring home values. Similarly, studies have shown that affordable housing can have no impact on the crime rate; in some instances, affordable housing has decreased the crime rate. Other factors, like the quality of property management, have been shown to impact neighboring properties more than the affordability level of the development.</p> <p>Albright, Len, Elizabeth S. Derickson, and Douglas S. Massey. “Do Affordable Housing Projects Harm Suburban Communities? Crime, Property Values, and Taxes in Mount Laurel, NJ.” <i>City & Community</i> 12, no. 2 (June 2013): 89–112. link.</p> <p>Diamond, Rebecca, and Tim McQuade. “Who Wants Affordable Housing in Their Backyard? An Equilibrium Analysis of Low Income Property Development.” <i>Journal of Political Economy</i> 127, no. 3 (December 2017). link</p>

		<p>Hipp, John, Clarissa Iliff, Emily Owens, George Tita, and Seth Williams. "THE IMPACT OF AFFORDABLE HOUSING ON HOUSING & CRIME IN ORANGE COUNTY." University of California – Irvine: Livable Cities Lab, 2022. link.</p> <p>Nguyen, Mai Thi. "Does Affordable Housing Detrimentially Affect Property Values? A Review of the Literature." <i>Journal of Planning Literature</i> 20, no. 1 (August 1, 2005): 15–26. link.</p> <p>Woo, Ayoung, Kenneth Joh, and Shannon Van Zandt. "Unpacking the Impacts of the Low-Income Housing Tax Credit Program on Nearby Property Values." <i>Urban Studies</i> 53, no. 12 (September 1, 2016): 2488–2510. link.</p>
	Expressed concern about the future quality of life in Castro Valley with additional housing	Thank you for your comments. They have been received.
	Expressed desire to maintain suburban quality of Castro Valley community	Thank you for your comments. They have been received.
	Called for a financial study to determine impact on property values or impact on county tax revenues with addition of new housing	Thank you for your comments. They have been received. Property value is outside the scope of the Housing Element; however, ample studies sited during the engagement process have shown that additional lower income housing has a neutral-to-positive impact on existing home values.
<i>From attendees of August 21, 2023 public workshop</i>	Voiced support for inclusionary zoning and universal design policies	Thank you for your comments. They have been received. County staff are committed to bringing these policies to the Board of Supervisors within the timelines set in this Housing Element draft.
	Voiced support for the Housing Element as part of the County's response to climate change	Thank you for your comments. They have been received.
	Voiced support for more lower income housing to support families and workers	Thank you for your comments. They have been received.
	Voiced desire for higher densities (fourplexes) to be allowed in single family zoning by right	Thank you for your comments. They have been received. While the Housing Element does not propose this, a number of vacant residential sites proposed for rezoning in the northern Castro Valley and Fairview communities are proposed for rezoning to densities of up to 17 units per acre, allowing for higher density above moderate income housing.

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	<p>Voiced concern over disjointed planning processes of Hayward Unified School District and the county regarding community growth and school closures</p>	<p>Thank you for your comments. They have been received.</p>
	<p>Against the development of the Bay Fair BART station, especially in relation to parking</p>	<p>Development guidelines for the Bay Fair BART station must conform with state law AB 2923, which includes a maximum of 1 vehicle parking spot per housing unit. In accordance with program 1.C, further details regarding future development at this site, including the possible construction of replacement parking, will be a part of future engagement processes. As County staff begin working with the city of San Leandro to complete pre-development work for development of the entire Bay Fair BART, we look forward to finding solutions to parking needs for the station and surrounding community.</p>
	<p>Voiced concern over removal of commercial in downtown San Lorenzo and general lack of commercial to support new housing</p>	<p>Thank you for your comments. They have been received. Our staff have spent more than 8 months trying to find possible housing sites in the unincorporated areas. To ensure the regionally necessary number of housing units could be constructed in unincorporated Alameda County without removing existing housing, we were forced to consider existing commercial and mixed-use areas for housing. The current San Lorenzo Village Specific Plan has been in place for almost 20 years, and in that time 79 units of the possible 580 units of housing described as possible by the 'cap' have been constructed. Staff determined it was necessary to further incentivize housing construction in the area because so little has been built compared to what the specific plan described. The Village Green project and the rezonings proposed in the Housing Element come to about 437 units of housing, which still sums below the 'cap.'</p>
	<p>Voiced concern over the amount of above moderate-income level housing required and the large cost to build it</p>	<p>Alameda County is required to find sites for 1,976 units of 'above moderate' housing. As the most lucrative type of housing, housing for higher income households requires the least financial support from government; generally, it receives none. As of the April 2024 Housing Element draft, a number of vacant residential sites proposed for rezoning in the northern Castro Valley and Fairview communities are proposed for rezoning to densities of up to 17 units per acre, allowing for higher density above moderate income housing.</p>

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	Voiced concern over insufficient commitment to change over AFFH findings.	Thank you for your comments. They have been received.
Sandra Frost December 22, 2023	Good afternoon, I would like correction to be made that the Eden Community Land Trust is an actively operating nonprofit organization specifically serving unincorporated county and nearby underserved communities. We educate and advocate for tenant ownership and nondisplacement. Our mission is to act as intermediary with government agencies and funders to bridge housing inequities and keep communities intact through stable affordable housing. Since we are all volunteers with no office space, we rely on our relationships with County staff and Supervisors to acknowledge that we do in fact exist. Several of our board members belong to various other nonprofits, commissions, boards and service organizations. We try to be as descriptive as possible when we are asked about our community work that includes all of the above. We are gaining our bearings post pandemic, have a solid board and candidates to expand our organization. We are close to securing our first real estate acquisition, and have plans and drafts for upcoming opportunities. We appreciate the hard work done by staff on these various elements. Please correct the language describing the ECLT as vaguely existent and could not be reached. This isn't true.	In response to this comment, staff amended initial description of ECLT for draft 1.5 of the Housing Element, who at the time of initial contact were not responsive to staff. CDA looks forward to building our relationship with the Community Land Trust.
EBHO December 22, 2023	(see attached)	Thank you for your comments. They have been received. Please see the section titled "Integration of Comments into the Housing Element" for information about how comments were integrated into the element. These sections have been further updated during the Second Housing Element Draft. Staff are committed to accurately representing the County's commitment to renters in the Housing Element. This includes representing Code Enforcement's rental inspection pilot and any future developments before the adoption of the 6th Housing

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		<p>Element. The writing of the Housing Element has concurred with significant political debates over tenants rights ordinances; this is being decided at the Board of Supervisors level.</p> <p>The following programs pertain to tenants' rights: Program 2.K: Preserve At-Risk Housing, Program 2.L: Protect Existing Affordable Housing Units, Program 5.D: Rental Inspection Pilot, Program 5.E: Condominium Conversion, Program 6.B: Fair Housing Referrals (ECHO Housing), Program 6.C: Rent Review Program, Program 6.F: Displacement Protection, Program 6.G: Fair Housing Services, Program 6.I: Mobile Home Rent Stabilization Ordinance</p> <p>Maps of the sites inventory with different demographics can be found in the later half of Appendix F as well as in Appendix B and the Housing Element landing page on the CDA website. This includes a map with the RCAAs and the circa-2013 R/ECAP in Cherryland.</p>
<p>Ann Maris, December 23, 2023</p>	<p>(see attached)</p>	<p>In response to this comment, staff amended initial description of ECLT for draft 1.5 of the Housing Element, who at the time of initial contact were not responsive to staff. CDA looks forward to building our relationship with the Community Land Trust.</p>
<p>Tyler Dragoni, Member of the Eden Area MAC, December 22, 2023</p>	<p>(see attached)</p>	<p>Thank you for your comment. Since its receipt, staff have made significant changes to the Sites Inventory. While Ashland continues to play an important roll, staff have increased densities in San Lorenzo, Castro Valley, and Fairview.</p>
<p>Elizabeth Plunkett, Castro Valley resident, November 25 2023</p>	<p>DEAR MS. MCELLIGOTT LIVED IN C.V. CLOSE TO 60 YEARS. DO NOT WANT IT TO BECOME A CITY.</p> <p>THERE IS TOO MUCH BUILDING TO BE ON THE C.V. BLVD (CASTRO VALLEY BLVD HIGHRISES/RESIDENTIAL. NOW YOUR PULLING PARKING AREAS, TUNING THEM INTO PERSPECTINB HOUSING? DO YOU REALLY THINK C.V. BLVD CAN HANDLE ALL THAT TRAFFIC? IT CAN'T HANDLE IT NOW – I HOPE YOU RECEIVE ENOUGH LETTERS TO CHANGE</p>	<p>Thank you for your comment; it has been recorded. The rezonings proposed in the Housing Element Sites Inventory are meant to create housing choice for current and future residents of the unincorporated communities. The incorporation of Castro Valley into a city is not a component of the Housing Element. Since receipt of your comment, several sites in the Castro Valley Downtown have been removed from the Sites Inventory. Housing density near the Castro Valley BART stations will provide a unique opportunity to create a more walkable commercial area.</p>

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	YOUR MIND. LETS NOT THINK ABOUT MONEY – LETS THINK ABOUT P[IEOPLE.	
Karen C. April 22, 2024	On page 273 you list address as 2637 E avenue. Correct address is 2637 East Avenue. Please make correction in report and online so residents will not be mislead. Thank you.	In response to this comment, the typo in Appendix B was corrected.
Roxann Lewis, March 14, 2024	<p>A large parcel on Madison ave is marked for re-zoning which is in the Madison Area Specific Plan.</p> <p>What is the proposed re-zoning for this parcel?</p> <p>Will creek set-backs and road set-backs still be enforced?</p> <p>This is a private single lane road with limited sewer capacity and has had huge flooding issues in the past.</p> <p>Does this mean the Madison Area Specific Plan will not be enforced?</p>	The Madison Specific plan will be amended on a limited number of parcels to the HE Overlay District, 17 units per acre. While creek setbacks will be maintained pursuant to County ordinances, we'll have to rezone so that the desired density is attainable, and that could impact other development standards. We are looking at changing as little as possible in the MASP, and will know more once the State approves our draft inventory.
Gerald and Winifred Thompson March 17, 2024	<p>Two parcels proposed for rezoning in the Alameda County Housing Element Update 2023-2031 are within the Madison Area Specific Plan (MASP).</p> <p>- 84C-895-40 Proposed 9 Units 84C-955-9-8 Proposed 18 Units</p> <p>- <u>This proposed high-density housing cannot be supported within the MASP.</u></p> <p>- Excerpts from the 2006 MASP:</p> <p>- <u>"The narrow access roads, the natural creek and the alternation of spaciousness and constriction of the valley combine with generous amounts of natural vegetation and quiet isolation brought about by the basic land form to make this a unique area. These are all to be protected."</u></p>	<p>Thank you for your comment.</p> <p>The Madison Specific plan will be amended on a limited number of parcels to the HE Overlay District, 17 units per acre. While creek setbacks will be maintained pursuant to County ordinances, we'll have to rezone so that the desired density is attainable, and that could impact other development standards. We are looking at changing as little as possible in the MASP, and will know more once the State approves our draft inventory.</p>

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“The present condition of the roads precludes much additional development. Both roads are single, paved lanes that are privately maintained.”

“It is uncertain how much development could be increased within the Madison-Common valley without overloading the creeks and requiring major construction to increase the capacity.”



Photo of Madison Ave Jan 1, 2023. Fern Lodge Convalescent Hospital was evacuated for a month. Runoff from surrounding streets drain into Castro Valley Creek. The creek cannot handle the increased runoff from 9 to 18 new units.

- Because MASP residents maintain the roads, Alameda County would be placing an undue burden on property owners due to increased traffic.

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- Maintaining the current zoning designation of MASP R1-B40-CSU-RV is critical to preserving creeks and roads. Poor planning decisions have already

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	<p><u>compromised the safety of our residents and creeks. Please don't make it worse.</u></p>	
<p><u>Evan Lyall</u> <u>March 18, 2024</u></p>	<p><u>I'm a resident and property owner at 17627 Madison Ave, Castro Valley, CA 94546 (parcel # 84C-955-9-9) and I would like to voice opposition to the plan to rezone parcels 84C-955-9-8 and 84C-895-40 to 17 units an acre. I did not make comments during previous periods as I support the properties being developed under current zoning regulations. I sadly cannot attend Thursday's meeting due to a work commitment.</u></p> <p><u>I live 4 doors past parcel 84C-955-9-8 on our single lane private road that has 22 parcels. Both parcels are on neighboring single lane private roads that suffer from the same problems:</u></p> <ul style="list-style-type: none"> <u>• Our road is so narrow for stretches that pedestrians and cars cannot pass each other (pedestrians will step into the nearest driveway which can be as infrequent as less than 1 per 0.1 mile).</u> <u>• On more than half of my drives I pass a car such that one of us has to pull into a bulb out (2 exist) or a neighbor's driveway so that the other can pass.</u> <u>• Adding an estimated 18 units to our street will greatly hamper traffic flow. Beyond being a daily nuisance, it becomes particularly worrisome in case of evacuation since we're in a high fire risk zone (due to our close proximity to Anthony Chabot Regional Park) as well as a flood zone (due to Castro Valley Creek passing through our parcels). Multiple homes and the 1 commercial convalescent home were flooded and evacuated just last year during the 1/1/23 storm.</u> <u>• All new tenants will be car bound due to the dangers imposed by the narrowness of</u> 	<p><u>Thank you for your comments. They have been recorded.</u></p> <p><u>The first Housing Element sites inventory put greater emphasis on housing closer to public transit, specifically in the CVBD and ACBD areas, with the argument that this land was more suitable for higher densities (generally between 43 and 86 units per acre) because of its greater access to transit and commercial areas. In response, staff were told to find more housing opportunities in lower density areas and higher 'opportunity' areas. This is what led us to propose 17 units per acre on lots throughout northern Castro Valley and Fairview.</u></p> <p><u>Redwood Rangers' Horse Pasture is technically outside of the county's Urban Growth Boundary. I also wanted to let you know that the owner of 84C-955-9-8 has requested its removal from the sites inventory, so it is no longer in consideration for rezoning.</u></p>

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	<p><u>our private road, and because we are not served well by last mile public transit. The nearest bus stop is 0.65 miles from 84C-955-9-8, passes only once per hour, and has poor ridership such that I worry public transit will only get worse in the future.</u></p> <p><u>Beyond my concerns with traffic, I believe haphazardly upzoning almost all vacant parcels in north Castro Valley to 17 u/a is a poorly thought out approach. These parcels tend to be vacant for a reason as they are often not very buildable. For instance parcel 84C-955-9-9 is in a liquefaction zone with Castro Valley Creek passing through a large chunk of it: their developed neighbors were flooded by the creek over running its banks during the 1/1/23 storm, and I'm told it wasn't the first time for the neighbor directly downstream. Parcel 84C-895-40 is mostly hillside of 30% slope or greater that was attempted to be developed in 2007, and 84C-885-34-2, another nearby vacant parcel included in the draft Housing Element, is <40% buildable after road easements and Castro Valley Creek is taken into account, and that's before even considering setbacks. Building multi-unit, dense housing on such parcels will often be a risky and fraught endeavour. Upzoning these parcels is also not fair and rewards land squatters. Neighboring parcels are often more buildable and upzoning these neighbors to 17 u/a would greatly increase our land's value. So why should a select few, negligent landowners be "rewarded"? At the same time, upzoning all parcels in the north Castro Valley area to 17 u/a would cause chaos on the local infrastructure and is not realistic. A more reasoned approach could include upzoning parcels based on relevant metrics (e.g. access to transit, natural disaster risks, size, slope, etc.) and not irrelevant metrics like vacancy, upzoning all parcels by a little bit, or laying out a roadmap by which all</u></p>	
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	<p>parcels are upzoned drastically in a progressive, long timeframe fashion.</p> <p>I understand the difficulty you all are placed in after losing Bart's numbers and the sheriff station numbers to our quota, and given the pressure being applied to you by the state. However, solving this issue with short sighted, broad brush strokes like upzoning almost all vacant parcels in north Castro Valley to 17 units per acre is a quick, unreasonable cop out that will cause serious problems, particularly for everyone living on Common Rd. and the section of Madison Ave. north of Seaview Ave.</p> <p>I'm pro dense development near public transit, particularly light rail, so I'm all for building lots of mixed use development near Castro Valley Blvd. and Redwood Rd. which I see as a High Opportunity Area. Finally, with the areas you're looking at why isn't the Redwood Rangers' Horse Pasture on your list? There's got to be a decent amount of underdeveloped, buildable land there.</p>	
<p>Edna Nado, March 20, 2024</p>	<p>See attached</p>	<p>Thank you for your comments, and apologies for scheduling the meeting at a time the Association's Board is unable to make!</p> <p>Our staff have spent more than 8 months trying to find possible housing sites in the unincorporated areas. To ensure the regionally necessary number of housing units could be constructed in unincorporated Alameda County without removing existing housing, we were forced to consider existing commercial and mixed-use areas for housing. The current San Lorenzo Village Specific Plan has been in place for almost 20 years, and in that time 79 units of the possible 580 units of housing described as possible by the 'cap' have been constructed. Staff determined it was necessary to further incentivize housing construction in the area because so little has happened compared to what the</p>

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		<p><u>specific plan described. The Village Green project and the rezonings proposed in the Housing Element come to about 437 units of housing, which still sums below the 'cap.' While staff do intend to remove the housing 'cap' through the Housing Element rezoning process, there is always an effective maximum amount of housing possible because our zoning categories have maximums.</u></p> <p><u>We look forward to working with the Village Homes Association when our department begins the process to more fully update the San Lorenzo Village Specific Plan after the adoption of the Housing Element (exact timing to be determined) and hope you'll continue to engage in the Housing Element process.</u></p>
<p><u>Latrel Powell, Public Advocates, Castro Valley resident. Written at March 21, 2024 All-MAC Meeting.</u></p>	<p><u>The County is still over a year past the compliance deadline for its Housing Element and it STILL has not made any meaningful commitments to housing programs that will protect renters and low-income communities of color. Tenant anti-harassment, strong just cause, and rent stabilization has passed in jurisdictions around the state and throughout the Bay Area region, and have been proven to increase housing stability for vulnerable groups. There has been an increase of minority, low-income renters in the unincorporated areas over the past decade. By neglecting to commit to robust programs that would secure housing preservation for renters, it becomes increasingly unfeasible for renters to have a dignified experience in our neighborhoods without fear of displacement. Renters without these protections are more likely to face harassment, rent increases and evictions than those with them. AFFH requires the County to address the historical disparities attributed to redlining, segregation, and disparities in opportunity. The current circumstances have Black, Latino, disabled, low-income, and senior residents vulnerable to the same conditions that they have been historically exposed to when formal</u></p>	<p><u>Thank you for your comment. The writing of the Housing Element has concurred with significant political debates over tenants' rights ordinances within the county; this is being decided at the Board of Supervisors level.</u></p>

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	<p>discriminatory policy was permissible in the 20th century. In order to change this, as required by Housing Element law, the County should adopt rent stabilization, tenant anti-harassment, and just cause for the unincorporated areas in the same way that those policies exist for several major cities within the county already.</p>	
<p>From the Fairview MAC members attending the March 21, 2024 All-MAC Meeting</p>	<p>Concerned about what happens if Alameda County's Housing Element update does not receive certification from State HCD and generally how late the update is</p>	<p>Staff have been working consistently on the draft for 2 years and will continue to work with the state to ensure compliance. If a Housing Element does not receive compliance, the following could happen: _General Plan inadequacy: If the General Plan is found inadequate, local governments can no longer make permitting decisions. _Litigation: Noncompliance leaves a locality open to lawsuits from housing rights' organization, developers, and HCD. Lawsuits could result in mandatory compliance with Housing Element laws within 120 days, suspension of local control on building matters, and court approval of housing developments. _Loss of Permitting Authority; courts can take local government residential and nonresidential permit authority away in order to achieve Housing Element compliance. More can be read here and here.</p>
	<p>Concerned about what happens if property owners request removal from the Sites Inventory</p>	<p>Property owners can request removal from the Sites Inventory. If enough sites have been removed from the inventory such that it cannot accommodate the remainder of Alameda County's Residential Housing Needs Allocation (RHNA), the County is responsible for adding additional sites to the Sites Inventory and/or rezoning land. This is addressed in programs 1.A and 1.L. At the time of writing, Alameda County has 4,391 units left to accommodate, or about 93.2% of RHNA.</p>
	<p>Concerned about how the Housing Element draft meshes with the concurrent Castro Valley Central Business District (CVCBD) Specific Plan</p>	<p>Key staff are involved in both update processes, and the same consultant firm is aiding both processes. The Housing Element will take precedence, and staff are ensuring that the CVCBD Specific Plan Update will reflect the Housing Element.</p>
	<p>Could existing vacant housing fulfill RHNA?</p>	<p>Jurisdictions are required to enable new housing to fulfill RHNA. Vacant housing cannot count towards RHNA. In rare</p>

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		<p>circumstances, substantial rehabilitations of units can count towards RHNA as well.</p>
	<p>MAC members expressed concern that permit streamlining amounted to staff not reviewing their proposals and that the Housing Element process was a means for developers to further cheat residents and take advantage of the County</p>	<p>The intention of streamlined review is to lower housing production times and costs to enable more housing sooner and faster. The reasons that a housing project could be streamlined varies and may be a result of existing state laws. Housing projects that receive streamlined review through the Housing Element Overlay Combining District will be reviewed in comparison to the adopted Objective Design Standards, which went through a public review process.</p>
	<p>Stated that all higher density housing is inherently low-value housing with negative impacts on neighbors.</p>	<p>Thank you for your comment; this is factually incorrect. Research demonstrating the neutral-to-positive impacts of affordable housing on its neighborhood was presented concurrent to this comment being made as well as at other presentation.</p> <p>Many studies about many different communities have shown that affordable housing has a neutral-to-positive impact on neighboring home values. Similarly, studies have shown that affordable housing can have no impact on the crime rate; in some instances, affordable housing has decreased the crime rate. Other factors, like the quality of property management, have been shown to impact neighboring properties more than the affordability level of the development.</p> <p>Albright, Len, Elizabeth S. Derickson, and Douglas S. Massey. "Do Affordable Housing Projects Harm Suburban Communities? Crime, Property Values, and Taxes in Mount Laurel, NJ." <i>City & Community</i> 12, no. 2 (June 2013): 89–112. link.</p> <p>Diamond, Rebecca, and Tim McQuade. "Who Wants Affordable Housing in Their Backyard? An Equilibrium Analysis of Low Income Property Development." <i>Journal of Political Economy</i> 127, no. 3 (December 2017). link</p> <p>Hipp, John, Clarissa Iliff, Emily Owens, George Tita, and Seth Williams. "THE IMPACT OF AFFORDABLE HOUSING ON HOUSING & CRIME IN ORANGE COUNTY." University of California – Irvine: Livable Cities Lab, 2022. link.</p>

		<p>Nguyen, Mai Thi. "Does Affordable Housing Detrimentially Affect Property Values? A Review of the Literature." <i>Journal of Planning Literature</i> 20, no. 1 (August 1, 2005): 15–26. link.</p> <p>Woo, Ayoung, Kenneth Joh, and Shannon Van Zandt. "Unpacking the Impacts of the Low-Income Housing Tax Credit Program on Nearby Property Values." <i>Urban Studies</i> 53, no. 12 (September 1, 2016): 2488–2510. link.</p>
	<p>"This whole process is destroying California."</p>	<p>Thank you for your comment.</p>
	<p>Members repeated concerns about the lack of infrastructure to support additional housing, specifically water pressure and traffic mitigation.</p>	<p>The draft environmental analysis (Mitigated Negative Declaration) was made public on November 3, 2023. Comments were accepted through December 4, 2023. To account for changes in the Sites Inventory, additional analysis may occur.</p> <p>When a project for a parcel in the Housing Element Sites Inventory is proposed, depending on the size and location, there may or may not be additional environmental analysis required, and generally the State has provided exemptions for many types of projects, especially those that serve lower income households. Generally there would be site-specific traffic and parking analysis required in addition to overall site planning and design review. In compliance with SB 743 (2013), CEQA analysis (when required) is required to consider minimizing the vehicle miles traveled (VMT) not the ease of traffic movement (known as level of service, or LOS).</p> <p>Additionally, Alameda County Public Works has been asked for comments regarding the Housing Element update. Policy EJ3.1 of the draft Environmental Justice Element, Prioritize Equitable Distribution of Public Facilities, states that "The County will accommodate areas of the Priority Communities that are underserved by public facilities through equitable investment in public facilities, public amenities, and public infrastructure." Corresponding actions, if adopted, would direct county staff to be more transparent in infrastructure planning and to explore strategies to equitably fund public facilities in the Priority Communities.</p>

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		<p><u>Finally, all utilities, Fire Departments, and school districts have been contacted and given the opportunity to comment on the Housing Element multiple times.</u></p>
<p><u>From the Castro Valley MAC members attending the March 21, 2024 All-MAC Meeting</u></p>	<p><u>Members in attendance repeated concerns about how local schools will accommodate additional students as well as the idea that additional housing will create overcrowding.</u></p>	<p><u>The school districts serving the urban unincorporated communities have been contacted for comment multiple times. Generally, decisions about how a school may or may not be able to support additional students are made when actual projects are proposed, not during the Housing Element. As noted elsewhere in this list of comments, the San Lorenzo Unified School District welcomes new students. The Castro Valley Unified School District issued a statement of concern regarding whether they could accommodate all new students associated with possible development in the first sites inventory; their staff are currently considering the sites inventory proposed in this second Housing Element Draft. Ultimately, Planning staff cannot remove Sites Inventory sites based on school district capacity, per state guidance.</u></p>
	<p><u>Repeated request for a traffic study specific to the Housing Element.</u></p>	<p><u>When a project for a parcel in the Housing Element Sites Inventory is proposed, depending on the size and location, there may or may not be additional environmental analysis required beyond the Mitigated Negative Declaration, and generally the State has provided exemptions for many types of projects, especially those that serve lower income households.</u></p> <p><u>Generally there would be site-specific traffic and parking analysis required in addition to overall site planning and design review. In compliance with SB 743 (2013), CEQA analysis (when required) is required to consider minimizing the vehicle miles traveled (VMT) not the ease of traffic movement (known as level of service, or LOS).</u></p>
	<p><u>Prefer density when the necessary infrastructure is already in place.</u></p>	<p><u>The draft environmental analysis (Mitigated Negative Declaration) was made public on November 3, 2023. Comments were accepted through December 4, 2023. To account for changes in the Sites Inventory, additional analysis may occur.</u></p> <p><u>When a project for a parcel in the Housing Element Sites Inventory is proposed, depending on the size and location, there may or may not be additional environmental analysis required, and generally the State has provided exemptions for many types of projects, especially those that serve lower income households. Generally</u></p>

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		<p>there would be site-specific traffic and parking analysis required in addition to overall site planning and design review. In compliance with SB 743 (2013), CEQA analysis (when required) is required to consider minimizing the vehicle miles traveled (VMT) not the ease of traffic movement (known as level of service, or LOS).</p> <p>Additionally, Alameda County Public Works has been asked for comments regarding the Housing Element update. Policy EJ3.1 of the draft Environmental Justice Element, Prioritize Equitable Distribution of Public Facilities, states that “The County will accommodate areas of the Priority Communities that are underserved by public facilities through equitable investment in public facilities, public amenities, and public infrastructure.” Corresponding actions, if adopted, would direct county staff to be more transparent in infrastructure planning and to explore strategies to equitably fund public facilities in the Priority Communities.</p>
	<p>Request for Planning staff to determine how numbers of units reflects numbers of students or the number of schools needed to serve them</p>	<p>This kind of demographic analysis is an important component of how school districts calculate whether they will be able to serve residents of newly constructed developments. Please contact the relevant school districts for Castro Valley – the Hayward Unified, San Leandro Unified, and Castro Valley Unified School Districts – for this information.</p>
<p>From the Eden Area MAC members attending the March 21, 2024 All-MAC Meeting</p>	<p>Request to apply Park Fees to affordable projects</p>	<p>In 2004, the Alameda County Board of Supervisors passed the Park Dedication Ordinance. To limit the impact of increased fees on development in the unincorporated areas, the following kinds of projects were exempted, among others: affordable housing, housing for people with disabilities, senior housing, housing in Sunol, and group housing, as described in chapter 12.20 of the county municipal code. To change the Park Dedication Ordinance to apply to affordable housing or housing for other protected groups would mean making the construction of this housing more expensive. This would disincentivize its construction.</p>
	<p>How can staff ensure that lower-income units are generally larger and ‘nice?’</p>	<p>As is required by state laws, Alameda County is increasingly shifting to using objective standards to evaluate newly proposed housing, to minimize the amount of time and subjectivity involved in projects’ review.</p>

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		Housing that priced as affordable for households below Area Median Income (AMI) relies heavily on additional funding sources to ensure that the project can 'pencil.' While staff want all housing in the unincorporated areas to be of good quality, adding additional requirements to housing that is already difficult to construct would further constrain development.
	How are tenant protections included in the Housing Element? The Just Cause Eviction proposal is a very important part of tenant protections	The writing of the Housing Element has concurred with significant political debates over tenants' rights ordinances; this is being decided at the Board of Supervisors level.
	There has not been adequate community engagement in the Housing Element process.	Planning staff have tried their best to engage with community members given the limits of funding and staffing. Staff are committed to enacting the policies and programs described in the draft Environmental Justice Element, which include a variety of engagement protocols (see goal EJ7 and corresponding policies and actions).
	Strong dislike of the proposed move of the Sheriff Substation to Cherryland Place (a development that was never built)	Thank you for your comment.
	Why is the Village Green Development included as a pipeline project in the Housing Element sites inventory?	The Village Green Development, while announced as postponed, still has active building permits. In accordance with Program 1.1: Monitor and Facilitate Pipeline Housing Projects, in 2027 if the County determines that the project is not anticipated to be completed in the planning period, staff will add additional sites to the Inventory or initiate additional rezonings within 18 months to maintain adequate RHNA capacity at all income levels
	Concern over lack of infrastructure to support new housing, particularly bike lanes and parking.	The draft environmental analysis (Mitigated Negative Declaration) was made public on November 3, 2023. Comments were accepted through December 4, 2023. To account for changes in the Sites Inventory, additional analysis may occur. When a project for a parcel in the Housing Element Sites Inventory is proposed, depending on the size and location, there may or may not be additional environmental analysis required, and generally the State has provided exemptions for many types of projects, especially those that serve lower income households. Generally there would be site-specific traffic and parking analysis required in addition to overall site planning and design review. In compliance with SB 743 (2013), CEQA analysis (when required) is required to consider minimizing the vehicle miles traveled (VMT) not the ease of traffic movement (known as level of service, or LOS).

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		<p>Additionally, Alameda County Public Works has been asked for comments regarding the Housing Element update. Policy EJ3.1 of the draft Environmental Justice Element, Prioritize Equitable Distribution of Public Facilities, states that “The County will accommodate areas of the Priority Communities that are underserved by public facilities through equitable investment in public facilities, public amenities, and public infrastructure.” Corresponding actions, if adopted, would direct county staff to be more transparent in infrastructure planning and to explore strategies to equitably fund public facilities in the Priority Communities.</p>
	<p>Request for longer comment period than 7 days on the second Housing Element draft</p>	<p>In response to this request and others, staff established a 2 week comment period on the Second full Housing Element Draft. Staff also published a 5 page summary document during the comment period to better aid people interested in understanding the document.</p>
	<p>Why did East County receive so little housing in the sites inventory?</p>	<p>There is an Urban Growth Boundary in place that covers the majority of the unincorporated East County. You can review a report analyzing the impact of the Urban Growth Boundary in its first 20 years here. Alameda County voters approved the Urban Growth Boundary in 2000. In order to change the zoning to allow more housing construction in the unincorporated parts of East County, the voters of Alameda County would need to approve the changed zoning. The Sites Inventory projects in the East County are currently underway.</p>
	<p>Why are there any units at all in Hayward Acres?</p>	<p>The project housing units in Hayward Acres in the Sites Inventory are as follows: 13 units are associated with projects currently in the development pipeline; 7 units are associated with a paved lot where housing is currently an allowed use in the zoning; and 18 units are associated with 2 proposed rezonings, one of a restaurant with a large parking lot, another of backyard that has been converted into commercial parking. 38 units is a significant decrease from the previous Housing Element cycle, when 335 units were projected for Hayward Acres. Additionally, in the urbanized unincorporated communities, the average Census Tract included in the Sites Inventory has 134 units assigned to it, and the median Census Tract has 65 units assigned to it. Hayward Acres, which is a single Census Tract, has</p>

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		<u>less than both the median and average tract in urban unincorporated.</u>
	<u>Expedited housing review bypasses community voices.</u>	<u>The intention of streamlined review is to lower housing production times and costs to enable more housing sooner and faster. The reasons that a housing project could be streamlined varies and may be a result of existing state laws. Housing projects that receive streamlined review through the Housing Element Overlay Combining District will be reviewed in comparison to the adopted Objective Design Standards, which went through a public review process.</u>
	<u>How feasible is the Housing Element? Suggestion that Housing Element is imaginary.</u>	<u>Staff are committed to enacting the Housing Element to the fullest extent. However, housing production is influenced by much larger factors than any that local government can control and ultimately controlled by the private market and private decision makers.</u>
	<u>How does the County incentivize development through this document?</u>	<u>The County proposes higher densities to allow for more housing and possibly higher profits for developers. The County also proposes lowering different housing constraints like lowering parking requirements (which adds to housing costs) and streamlining review processes (which hastens the production process, resulting in lower costs).</u>
	<u>Units are not divided in a reasonable way between different communities</u>	<u>The Housing Element Sites Inventory process began from a place of determining where vacant land was located, where underutilized land (land that could have a better and more valuable use as housing) is located, and where land owned by the County or other public bodies are located. The reality is that the majority of land in the urban unincorporated communities is already developed as housing. The Housing Element process does not allow staff to presume that existing residents will leave their current housing so that the land will be redeveloped.</u>
<u>Comments from members of the public at March 21, 2024 All-MAC meeting. Summarized for clarity.</u>	<u>Disagrees with any additional density along Madison Ave due to being near the creek. The area lacks good infrastructure or much riparian buffer.</u>	<u>The neighborhood surrounding Madison Avenue is considered, as discussed throughout Appendix F, high resource. High resource areas have little environmental harm, successful school districts, and high income households. Additional housing in high resource areas will ensure more families have access to some of these same opportunities.</u>
	<u>Request from the owner of a property along Madison Ave to have his site removed from the Sites Inventory.</u>	<u>This site has been removed from the Sites Inventory.</u>
	<u>Calls to support affordable housing via mobile home preservation through a zoning overlay that supports</u>	<u>In response to these comments and additional activism from the public, planning staff have added Program 6.N: Mobile Home</u>

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	their existence. Single family housing should be covered under the Just Cause Eviction ordinance	Overlay to the programs list, to be proposed for adoption by the end of 2024.
	Call for a strong Mobile Home Overlay and strong closure ordinance	In response to these comments and additional activism from the public, planning staff have added Program 6.N: Mobile Home Overlay to the programs list, to be proposed for adoption by the end of 2024.
	Madison Avenue experiences horrible flooding and should not have additional housing. Things come down the hill into the creek.	The neighborhood surrounding Madison Avenue is considered, as discussed throughout Appendix F, high resource. High resource areas have little environmental harm, successful school districts, and high income households. Additional housing in high resource areas will ensure more families have access to some of these same opportunities.
	Concerned about how they heard about the meeting [via email listserv]. Why has no one discussed preserving the ratio of greenspace in the community? States that the planning department staff are pushovers and that the Housing Element update is evidence that staff prioritize corporate interests and are mouth pieces for developers.	Thank you for your comments. Listservs and the county website are the primary means the Planning staff have of reaching residents, as we do not have fulltime communications staff or the capacity to run Planning-specific social media accounts. Staff will continue to work to better promote engagement events within the limits of existing funding and staffing. The Housing Element process requires that staff assume that lower density housing is 'above moderate income' and higher density housing is 'low income.' These assumptions, however, are not binding. Please see the draft Environmental Justice Element for a discussion of and commitments regarding greenspace access.
	Mentions parallel struggles of mobile home communities in Petaluma. Requests the expansion of closure requirements and the need to have relation help for closing mobile home communities	In response to these comments and additional activism from the public, planning staff have added Program 6.N: Mobile Home Overlay to the programs list, to be proposed for adoption by the end of 2024.
	The Alameda County population is shrinking. None of this will help us build more. Corporate transfer taxes, vacancy taxes, protections against foreign investors are what's needed. It is absurd to increase densities without sidewalks. This plan is a doomsday scenario that destroys the quality of life for current residents.	Alameda County is required to enable at least 4,711 units of housing before 2031. Additionally, Alameda County Public Works has been asked for comments regarding the Housing Element update. Policy EJ3.1 of the draft Environmental Justice Element, Prioritize Equitable Distribution of Public Facilities, states that "The County will accommodate areas of the Priority Communities that are underserved by public facilities through equitable investment in public facilities, public amenities, and public infrastructure."

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		<p><u>Corresponding actions, if adopted, would direct county staff to be more transparent in infrastructure planning and to explore strategies to equitably fund public facilities in the Priority Communities.</u></p>
	<p><u>A strong Just Cause Eviction ordinance is necessary. We need affordable housing everywhere in the unincorporated areas. The Eden land Trust needs additional support. Against the idea of the Sheriff Substation moving to Cherryland. We need housing with greenspace access that supports multimodal transportation.</u></p>	<p><u>Staff are committed to accurately representing the County's commitment to renters in the Housing Element. The writing of the Housing Element has concurred with significant political debates over tenants' rights ordinances, including Just Cause Eviction. This is being decided at the Board of Supervisors level.</u></p>
	<p><u>Tenant protections are critical. We also need to protect and care for existing housing.</u></p>	<p><u>Staff are committed to accurately representing the County's commitment to renters in the Housing Element. This includes representing Code Enforcement's rental inspection pilot and future developments before the adoption of the 6th Housing Element. The writing of the Housing Element has concurred with significant political debates over tenants' rights ordinances; this is being decided at the Board of Supervisors level.</u></p> <p><u>Additionally, the Housing Element does include programs to support the preservation of existing affordable housing.</u></p> <p><u>The following programs pertain to tenants' rights and housing preservation: Program 2.K: Preserve At-Risk Housing, Program 2.L: Protect Existing Affordable Housing Units, Program 5.D: Rental Inspection Pilot, Program 5.E: Condominium Conversion, Program 6.B: Fair Housing Referrals (ECHO Housing), Program 6.C: Rent Review Program, Program 6.F: Displacement Protection, Program 6.G: Fair Housing Services, Program 6.I: Mobile Home Rent Stabilization Ordinance</u></p>
	<p><u>Corporate investors are harming mobile home communities, and additional protections can help protect existing mobile home communities</u></p>	<p><u>In response to these comments and additional activism from the public, planning staff have added Program 6.N: Mobile Home Overlay to the programs list, to be proposed for adoption by the end of 2024.</u></p>
	<p><u>Expressed concern over higher densities in Fairview as well as how ADUs are labeled on the sites inventory map</u></p>	<p><u>In response to this comment and subsequent conversations with the commenter, ADUS are now marked as small dots to minimize people's ability to misinterpret the map.</u></p>

		Staff were directed by state HCD to find additional housing opportunities in Fairview.
	Fairview is a rural community with slopes and agriculture. There is no public transit. Did staff move units from one community to another between drafts?	As described in Appendix B, staff have taken the slope of lots into consideration. Staff were directed by state HCD to find additional housing opportunities in Fairview. This edit coincided with additional edits required by changes in the sites inventory.
	There are lots of people who would be excited to live here. People who could spend money here. New development could help build new waterlines and other infrastructure. Landowners are excited about the possibility of developing things.	Thank you for your comment.
	No one knew about this meeting. The people at this meeting are a very specific perspective. Why is low-income housing only in the hood? These people only care about their property values, not the community	Staff will continue to work to better promote engagement events within the limits of existing funding and staffing. The Housing Element process requires that staff assume that lower density housing is 'above moderate income' and higher density housing is 'low income.' These assumptions, however, are not binding.
	Tried to request interpretation, and staff were unable to provide it. Angry about how poorly advertised the meeting was. This element does not imagine the future of our communities equitably. All the neighborhoods have infrastructure issues, not just Fairview or Castro Valley. Their perspective cannot be prioritized. The County should do more engagement!	The draft environmental analysis (Mitigated Negative Declaration) was made public on November 3, 2023. Comments were accepted through December 4, 2023. To account for changes in the Sites Inventory, additional analysis may occur. When a project for a parcel in the Housing Element Sites Inventory is proposed, depending on the size and location, there may or may not be additional environmental analysis required, and generally the State has provided exemptions for many types of projects, especially those that serve lower income households. Generally there would be site-specific traffic and parking analysis required in addition to overall site planning and design review. In compliance with SB 743 (2013), CEQA analysis (when required) is required to consider minimizing the vehicle miles traveled (VMT) not the ease of traffic movement (known as level of service, or LOS). Additionally, Alameda County Public Works has been asked for comments regarding the Housing Element update. Policy EJ3.1 of the draft Environmental Justice Element, Prioritize Equitable Distribution of Public Facilities, states that "The County will accommodate areas of the Priority Communities that are underserved by public facilities through equitable investment in


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		<p>public facilities, public amenities, and public infrastructure.” Corresponding actions, if adopted, would direct county staff to be more transparent in infrastructure planning and to explore strategies to equitably fund public facilities in the Priority Communities.</p>
	<p>Supportive of dense housing but worried about development interruption continuous greenspaces, like near Madison Ave</p>	<p>The Planning Department agrees that access to greenspace is an important component of the quality of life in Alameda County. However, greenspace needs to be balanced with the need for additional housing. The neighborhood surrounding Madison Avenue is considered, as discussed throughout Appendix F, high resource. High resource areas have little environmental harm, successful school districts, and high income households. Additional housing in high resource areas will ensure more families have access to some of these same opportunities.</p>
	<p>The County needs to do more engagement, expand the comment period for the 2nd draft, and commit to more robust actions regarding AFFH.</p>	<p>In response to this comment and others like it, staff committed to a 2 week comment period upon the publication of the Second Housing Element draft.</p>
	<p>Against the proposal by the General Services Agency to move the new Sheriff Substation to the would-be location of Cherryland Place</p>	<p>Thank you for your comment.</p>
	<p>The County should further support the Eden Community Land Trust</p>	<p>Thank you for your comment. County HCD staff are currently working with members of the Eden Community Land Trust.</p>
	<p>Shared story of fire truck not being able to successfully navigate Madison Avenue during an emergency.</p>	<p>Staff are aware of the current infrastructural limits in the Madison Avenue area. At the same time, the neighborhood surrounding Madison Avenue is considered, as discussed throughout Appendix F, high resource. High resource areas have little environmental harm, successful school districts, and high income households. Additional housing in high resource areas will ensure more families have access to some of these same opportunities.</p>
	<p>Alameda County needs tenant protections, including lowering the rent increase cap. The Just Cause Eviction ordinance moving forward should not exclude so many renters, such as those in single family homes.</p>	<p>Staff are committed to accurately representing the County’s commitment to renters in the Housing Element. This includes representing Code Enforcement’s rental inspection pilot and future developments before the adoption of the 6th Housing Element. The writing of the Housing Element has concurred with significant political debates over tenants’ rights ordinances; this is being decided at the Board of Supervisors level.</p> <p>The following programs pertain to tenants’ rights: Program 2.K: Preserve At-Risk Housing, Program 2.L: Protect Existing</p>

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		<p>Affordable Housing Units, Program 5.D: Rental Inspection Pilot, Program 5.E: Condominium Conversion, Program 6.B: Fair Housing Referrals (ECHO Housing), Program 6.C: Rent Review Program, Program 6.F: Displacement Protection, Program 6.G: Fair Housing Services, Program 6.I: Mobile Home Rent Stabilization Ordinance</p>
<p>Maureen, March 30, 2024.</p>	<p>We are the resident owners of 3361 East Ave and 3375 East Ave, Hayward, CA. Our property ownership includes the private access driveway for the above-referenced residences. The vacant lot is landlocked. Please tell us where the access for the proposed development is planned. Thank you.</p>	<p>Apologies for my delayed response! The head of our development planning staff was out last week, and I wanted to check with him before responding to your email.</p> <p>In 2011, there was a lot line adjustment (Boundary Adjustment BA 06 -06) to give the parcel frontage. I've screenshot the existing parcel lines (in blue) from our internal mapping system, copied below. The empty lot next to 3358 East Ave has a small flag that extends towards the street; this is its frontage. I'm not sure how it happened that 3358 East Ave's driveway is partially in the other lot, but that appears to be the case. If development were to happen on any of parcels 425-90-44 (the one nearest 3358 East Ave), 425-90-45 (directly across from 3375 East Ave), or 425-90-46-2 (the eastmost of the 3 parcels), it would likely require a driveway connecting to East Ave parallel to yours.</p> 
<p>Maureen, April 29, 20204.</p>	<p>is the estimated amount of cement and concrete to be used in building 4,711 residences, sidewalks and common areas. Has an analysis been completed? If so, where would it be available for public review?</p>	<p>Thank you for your comment. It has been recorded. Because the County does not construct the possible housing discussed in the Housing Element, the document does not consider what specific building materials should be used or how much may be needed to achieve the 4,711 units. Because the document does not get into</p>

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		<p>the specifics of how any individual housing unit may look, it would be difficult to make assumptions about how much of any given material would be necessary. These are the kinds of details that would be addressed by building contractors and the Public Works Agency at the time of development, when someone applies to build a specific project, instead of in the Housing Element.</p>
<p>Maureen, April 29, 20204.</p>	<p>Why is housing not being expanded with more units planned in the vacant lands of East County? Instead of jamming up Castro Valley and Ashland, (as "identified sites"), why has this proposed Element not been spread as evenly as possible across the entire County. Why? The number of units proposed for CV is utterly outrageous at 1,800+. Yet, at the same time, there is a project that is being considered (with the County's recommendation for approval), to be built on the 5 1/2 acre Rite Aid site. It is to be a "high-end" Chinese Restaurant and Banquet Hall, with 30-50 employees, and available commercial lease space. Current zoning allows for housing to be built on part of that huge lot, yet there is no mention of it in the proposal. It should be a requirement that any and all new construction proposals include housing. Why is there no such requisite?</p> <p>I do not live in CV or Ashland, but I was nevertheless appalled when I read about this. Unfortunately, the mere fact that this proposal is being considered, does not align with, and renders hollow, the claims that racial and other inequities are actually being addressed in the Second Draft of the Housing Element. It demonstrates clearly the ways in which inequities continue in perpetuity. If the housing units are not distributed more fairly and evenly, and if this restaurant project is approved without requiring mandatory housing, it will be a major set-back, a move in the wrong direction, and further away from achieving the equity to which every person has the same right.</p>	<p>Thank you for your comment. It has been recorded. There is an Urban Growth Boundary in place that covers the majority of the unincorporated East County. You can review a report analyzing the impact of the Urban Growth Boundary in its first 20 years here, Alameda County voters approved the Urban Growth Boundary in 2000. In order to change the zoning to allow more housing construction in the unincorporated parts of East County, the voters of Alameda County would need to approve the changed zoning. Even if changing the Urban Growth Boundary received support, the State Department of Housing and Community Development (HCD) expects that viable sites for new housing have access to sewage. Unless cities like Dublin, Pleasanton, and Livermore were willing to substantially extend their sewage systems or a developer was willing to invest in significant infrastructure, most land in unincorporated East County would only have access to septic systems. It's my understanding that the Alameda County's Environmental Health department require a housing unit to have multiple acres of land to support a septic field. At such a low density, new housing in unincorporated East County would only be affordable to high income households, given the current housing market.</p> <p>At a previous part of the Housing Element process (before we published our first draft), staff had included the Rite Aid site in the Housing Element sites inventory. The owners of the site then requested it be removed from the inventory, stating that they were uninterested in pursuing housing development for the foreseeable future. When a landowner explicitly requests that their site be excluded, we cannot consider their site in the inventory. That said, housing construction is still an allowed use at the site; it just can't be anticipated in the Housing Element.</p> <p>While our department is very committed to enabling more housing throughout the unincorporated areas, there are still areas in the unincorporated communities where only commercial uses are allowed.</p>

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		<p>I have spoken with the planners who have worked on the restaurant project, and our department does not have a formal recommendation to support or oppose it. The staff report just analyzes how the project conforms to what is currently allowed at the site.</p>
<p>Martin Inderbitzen, representing the Greek Orthodox Church of the Resurrection.</p>	<p>See attached</p>	<p>In response to this comment, staff agreed to lower the proposed rezoning on the site to 17 units per acre (RSL-17-HE).</p>
<p>Lori Taylor, May 1, 2024</p>	<p>Hi, I have reviewed the latest draft of the Alameda County Housing Element from April 2024, most specifically the Site Inventory and Methodology and I have concerns.</p> <p>I note that you have included multiple church-owned parcels located on Somerset and Lake Chabot Road. I believe it is referred to as G42 and is 5 parcels and approximately 3 acres. I agree that this site could be a strong candidate for residential development, however, I am very concerned about the potential rezoning it to very high density with 40-60 units. This parcel is surrounded by primarily single-story, single-family homes. These are a few two story-homes in the neighborhood, but primarily they are very small and low-profile homes.</p> <p>Very high density does not align with the prevailing characteristics of the neighborhood. I can see that medium density up to 22 acres could work at the site, but do believe that the proposed zoning is too intense for this site. I noticed in the draft Element, that other sites (879 Grant in San Lorenzo and 23420 Maud Avenue) have site narratives that address surrounding residential uses and these sites (one of which shows surrounding two-story homes) was suggested to get zoned as Medium Density up to 22</p>	<p>Thank you for your comment; it has been recorded.</p> <p>Staff considered a number of factors when proposing rezoning the G42 parcels to this higher density.</p> <ul style="list-style-type: none"> - Per state comments received in January 2024, we needed to allocate additional units to higher 'resource' areas. Within the unincorporated communities, Castro Valley outside the downtown area and East County are considered higher resourced (Appendix F contains additional analysis of this). Since East Alameda County is within the Urban Growth Boundary, that leaves Castro Valley. - The Housing Element, per state guidance, is charged with interrupting historic patterns of socio-economic segregation. Smaller, denser housing has a greater possibility of being affordable to more people. - We wanted the landowners to be able to take advantage of recent state laws that help streamline affordable housing development on land owned by religious entities. We are required to assume that low income housing must be at least 30 units per acre. Our sites inventory assumes that about 70% of any given site could become housing (allowing for outside space, parking, etc), so the 40-60 unit/acre category would ensure that the housing could be affordable development. <p>We're proposing a lower density at the San Lorenzo site you mentioned in part because the neighborhood there is considered lower resource, and there are other high density (up to 86 units/acre) sites in San Lorenzo. Additionally, per the Eden Area</p>

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	<p><u>units/acre because of “compatibility and coherence in the built environment.” I wish that that same consideration was shown for this site. If you drive in any direction for multiple blocks you will not find anything more dense than two-story developments. The hospital and some medical offices uses near Eden are a bit taller but there is not more intense residential development anywhere near the site.</u></p> <p><u>I am not suggesting that the single-family designation is the correct zoning for the site, but I am suggesting that Very High Density is not the right zoning as it is too dense and something more moderate should be selected to maintain “the compatibility and coherence in the built environment” and align with the prevailing characteristics of the neighborhood.</u></p> <p><u>Thank you for recording my concerns and I am available should you have any questions. I live in the neighborhood and am happy to answer any questions.</u></p>	<p><u>General Plan and the 'school' zone in the zoning ordinance, unneeded school land can be developed into housing at a density that reflects the surrounding neighborhood. The proposed rezoning would just reflect this fact.</u></p>
<p><u>Ally Wilson, May 4, 2024</u></p>	<p><u>Dear Alameda County Planning Department, Alameda County Community Agency, CVMAC, Supervisor Nate Miley and Congressman Eric Swalwell,</u></p> <p><u>We are residents of Castro Valley and we are deeply concerned on losing the main Business district in Castro Valley by replacing /rezoning 5 existing business parcel to Apartments under the Housing Element Plan. CV will lost 5 business along the only Main Street - Castro Valley Blvd. CV does not have any industry/office park/major attractions, the only main business district is located on the Castro Valley Blvd. The most devastating lost would be the retail space (Lucky grocery+ parking) at 3443 Castro Valley, that is the DOWNTOWN of Castro Valley, it is the 2nd largest retail area in town, replacing the retail with apartment is inappropriate and inconsistent of a well planned General Plan for CV. The Lucky store</u></p>	<p><u>Thank you for your comments. They have been recorded. I have attempted to respond to them in order.</u></p> <p><u>Regarding the number of housing units mentioned in the Housing Element: the Housing Element calls for a total of 4,711 housing units to be enabled in all of the Unincorporated County between now and 2031 (an 8 year period) through the Housing Element. As of my most recent site inventory edits, there are 1,806 units enabled in Castro Valley, not 3,000. 500 of these housing units are located in the Castro Valley Central Business District Specific Plan area. 319 housing units in the Sites Inventory in Castro Valley are currently under way. These include ADUs, duplexes, single family homes, and a handful of apartments. Another 309 housing units in Castro Valley's part of the Sites Inventory reflect what is already possible on the land with the current zoning and general plan designations. The remaining 1,178 housing units are associated with about 41 acres of land (53 individual parcels) proposed for rezoning.</u></p>

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	<p><u>parcel shall remain a retail space, the store could easily house ethnic grocery stores or other grocery/retail. (Spout had intentions to open in CV). In order to have a thriving CV, preserving a central business district is critical, and saving the Lucky location for future anchor retail would further solidify the business district. Taking away the parking lot doesn't take into account of the existing lack of parking in the business district. Alameda County should not air drop 3000 housing units on CV without considering the long term growth of CV.</u></p> <p><u>Further, if housing needs to be build in these 5 business parcels that front CV Blvd and Redwood Rd, it is essential to preserve the ground level for retail, M, or business.</u></p> <p><u>The 2nd draft still have mention on using CV Bart parking lot for future housing use. We opposed reducing CV BART parking lot for housing. We rely on BART for work commute and leisure activities. Prior to pandemic, CV BART parking is full around 9:30am. This add to unfair burden on parents that have to drop off kids at school and cannot arrive at CV BART parking lot before 9:30am. As a result, we have to drive far away to another station or commute to work. Taking away Bart parking by air-dropping 3000 units in CV is a short sighted approach.</u></p> <p><u>CV should not have to take on such outsized burden of Alameda unincorporated affordable housing quote, this responsibility should be spread out. CV currently lacks the basic infrastructure to sustain its current population. CVUSD lacks funding, Canyon Middle School is overcrowded and do not have funding for sport and music programs. There are constant flights due to lack of school resources.</u></p> <p><u>Sewage system lacks capacity especially during annual rain storm where all CV citizens are advices to</u></p>	<p><u>County government does not build housing. Through changes to zoning and permitting processes, we endeavor to support members of the public in building housing. Even housing projects that will receive permit streamlining from one or more permitting bodies (such as Planning or Public Works) take time to be permitted, constructed, and approved for occupancy.</u></p> <p><u>Significant portions of the Castro Valley downtown area already allow for multifamily housing. The current rezonings proposed in the draft element will expand what's allowed on specific parcels of land. The Housing Element does not consider the specific site planning for any of the 566 parcels of land included in the Sites Inventory. It is entirely possible that landowners with existing businesses on site will choose to develop in a way that both enables new housing and preserves existing businesses. One possible model for higher density development in Castro Valley's downtown could be this new development in Fremont: https://www.fremont.gov/Home/Components/News/News/906/1067.</u></p> <p><u>Regarding the BART station and possibility of future development: the BART parking lot must be rezoned to enable housing to comply with a state law from 2017 (AB 2923). County Planning staff are acutely aware of concerns regarding resident's ability to drive to the station, especially given the general lack of bus coverage in Castro Valley. In the current Housing Element draft, staff are committing to preparing for future development; this includes activities such as determining how much replacement parking is feasible through the construction of a parking structure, where that funding could come from, and the like.</u></p> <p><u>Per state guidance, planning staff cannot use school district over-enrollment as a reason to exclude communities from the Sites Inventory. Planning staff have reached out to relevant school district and utility staff throughout the Housing Element process for comments, and we have met with staff from both CVSan and CVUSD. All are aware of the necessity to plan for new housing through the Housing Element. Ultimately, whether utilities or school districts can serve additional households will be decided on a project-by-project basis (ie, when individuals or development companies submit applications to construct new housing).</u></p>
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	<p><u>not operate non essential appliances. How does Alameda County plan to fund the infrastructure upgrade?</u></p> <p><u>A large portion of CV is in high wildfire area, especially the eastern part and the Greenridge park. How does Alameda County plan to address the risk when increasing the population with 3000 units.</u></p> <p><u>CV just lost the CHP center and the Sheriff center on Foothill, we do NOT have any police/sheriff presence. How does Alameda county plan to address the public safety concerns?</u></p> <p><u>Providing only 2 weeks of Public comments for this 2nd draft of Housing Element is unfair and create Hardship for general public to read 760 pages of dense material. The draft is hard to read with no legends on the definition of the zoning / rezoning proposed.</u></p> <p><u>Let's not create new problem with shortsighted strategies.</u></p>	<p><u>CVUSD's most recent comments will be included in our submission to the state later this week; they acknowledge that their student population is already growing without the Housing Element's changes and request that our Housing Element include their need for additional school sites.</u></p> <p><u>Staff are aware of the wildfire areas; we've included some analysis of this fact in Appendix F. State comments on the first Housing Element draft included the need for more housing in 'high opportunity' areas. The hills of Castro Valley are the highest opportunity areas in the urban unincorporated communities. Enabling more housing in unincorporated' s high opportunity areas requires enabling housing in areas with greater wildfire risk, given the location of existing developable land. For additional information on high and low opportunity areas, please see Appendix F. There are 214 housing units proposed for sites in Castro Valley in the High or Very High fire risk areas. 84 of these units are already possible, given current zoning; 130 units are associated with sites proposed for rezoning.</u></p> <p><u>I encourage you to review our Safety Element update, which considers fire risk more directly. It is available here: https://www.acgov.org/cda/planning/ccapse-public-draft.htm</u></p> <p><u>I agree that the draft is a very large and dense document. Our rezonings are discussed most in Appendix B, which includes a table describing the densities associated with each proposed new zone on page as well as a list of every site proposed for rezoning with the new proposed zones listed next to them. Given that there are 33 new zones and 127 different parcels proposed for rezoning, we have not created a concise map showing the new zones for all locations at this time, but I will endeavor to update the document to include such before submitting it to the state. In the future, please feel free to reach out to our staff with any questions you have when navigating our planning documents.</u></p> <p><u>A one week comment period for subsequent Housing Element drafts is required; in an effort to balance the need to expand the comment period with the fact that the County is currently out of compliance with our Housing Element and is under pressure to</u></p>
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		<p>complete the process, we expanded it to 2 weeks. The sites inventory was first provided to the public in March 2024, and comments were accepted on it and the document overall at an All-MAC meeting that month.</p> <p>Thank you for taking the time to review our document and send us your comments.</p>
<p>Castro Valley Unified School District, May 3, 2024</p>	<p>The Castro Valley Unified School District (CVUSD) is commenting on the second full draft of the Alameda County Housing Element Update to follow up on prior public comments in light of changes to the document over the last few months. Previous comments regarding CVUSD's student enrollment trends and the potential impact that the new housing identified in the Housing Element will have on CVUSD schools and students remain valid and will be restated as appropriate here.</p> <p>In the context of the growth identified and enabled by housing site identification in the County Housing Element, it is crucial to acknowledge that since 2021, every CVUSD school site has increased in enrollment except for Creekside Middle School, Roy A Johnson High School, and the CVUSD Virtual Academy. In total, CVUSD's enrollment in the 2023-24 school year is the highest ever for the District, and additional enrollment growth is projected even without the potential for additional and denser development in the Castro Valley area.</p> <p>This is important to acknowledge because the latest version of the Housing Element identifies 926 new housing units that could be added to the area served by CVUSD during this Housing Element cycle. The "pipeline sites" representing projects already underway are accounted for in CVUSD's baseline enrollment projections, but the additional hundreds of</p>	<p>In response to this comment, staff added references to the need for additional and updated facilities to the Main Body, Appendix E, and Appendix F.</p>

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	<p><u>new units represent an unprecedented level of potential new development relative to the recent history of CVUSD. Even without these additional new housing units, CVUSD's most recent baseline enrollment projection indicates the District's enrollment will continue to increase above already record-high levels. By 2030, CVUSD is expected to enroll more than 10,500 students even if no other housing units are developed outside of the "pipeline sites". This represents an 11% increase as a baseline projection, which already presents a considerable challenge for the District's planning and facilities construction efforts.</u></p> <p>▲ <u>CVUSD has built on the analysis performed in its most recent Enrollment Projections and Development Impact Report to detail various scenarios of additional impact from the potential new housing units identified in the Housing Element. These assumptions quantify a range of potential impacts based on how much of the potential housing is built during the Housing Element cycle and how much of the affordable housing sites can accommodate families.</u></p> <p>▲ <u>Depending on these variables, the additional impact from new homes built and the corresponding students who would be generated for CVUSD was calculated in tiers of Low Impact, Moderate Impact, High Impact, and Maximum Impact above the District's baseline projections. The table below summarizes CVUSD's findings, indicating the potential for hundreds of additional students to be added to the baseline enrollment projection. Even with the reduction in housing units since the previous version of the Housing Element, CVUSD is expecting to see hundreds of new students over the next several years who will live in new housing made possible by the new Housing Element. Every single student generated in this way will be enthusiastically welcomed by CVUSD, but they will also represent an</u></p>	
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<p>EBHO May 3, 2024</p>	<p>Thank you for the opportunity to comment on Alameda County's Draft Housing Element. We appreciate all the work thus far in the Housing Element process and offer additional comments with the hope that the County moves to achieve significant progress toward housing justice and makes Alameda County a place for all to afford to call home, regardless of income and background.</p> <p>East Bay Housing Organizations (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 across Alameda & Contra Costa Counties. Many of our 400+ individual and organizational members live in, work, and provide affordable homes in the County.</p> <p>The County's latest draft makes several significant changes. We want to express our appreciation that the County has noticeably increased its efforts to engage and respond to public participation and input, including the two-week public review period to respond to the revised Housing Element draft, a summarized reader's guide to changes in the revised Draft, and providing the redlined copy of the document. We also appreciate the revisions to programs and policies to specify more detailed milestones and metrics on the County's actions and commitments. Lastly, we recognize the significant detail added in most appendices, particularly Appendix B: Sites Inventory and Methodology, Appendix C: Housing Constraints, and Appendix F: Fair Housing Assessment.</p> <p>We support the notable addition of a Housing Element Overlay Combining District (Program 3.H), a tool to encourage the development of all housing types, especially for affordable housing development</p>	<p>Thank you for your comment! It has been recorded. As you know, the writing of the Housing Element has concurred with significant political debates over tenants' rights ordinances within the county; this is being decided at the Board of Supervisors level. Staff will continue to update all program timelines as needed before adoption. Please see the draft Environmental Justice Element (now anticipated to go for adoption in July) for commitments the County will be making to improve the quality of life in the EJ Priority communities, including Ashland.</p> <p>Additionally, I have amended the portion of the History section you referred to to include your comment.</p>
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	<p><u>servicing very low and low-income households. The implementation of this policy, along with the policies in Goals 2 and 3 is paramount since the County must make up for a significant period of underproduction, failing to meet its very-low-income, moderate, and above-moderate income RHNA goals in the last Housing Element Cycle. We support the intention to propose the Overlay Combining District for adoption at the same time as the proposed site inventory rezonings. Relatedly, we also support the revisions to the rezoning proposals to include slightly increased densities of up to 17 units per acre in Fairview and Castro Valley (Program 1. A), particularly since the Census tracts in northern Castro Valley are high-resource RCAAs, as well as larger vacant lots in the same areas. We appreciate the added detail to specific parcels and existing zoning realities towards the concentration of low and very low-income units in Ashland, however, we remain concerned that the current site inventory will continue to concentrate poverty populations in Ashland and the Eden Area. This is particularly alarming, given the clear acknowledgment of the current high risk of displacement in the neighborhood, and the current state of no tenant protections to protect the renters from housing insecurity, widespread habitability issues, and evictions and displacement living in Ashland and the Eden Area.</u></p> <p><u>We call attention to and reaffirm our previous comments regarding the lack of tenant protection ordinances to meaningfully protect unincorporated Alameda County residents. HCD has stated that the lack of renter protections is a common investment barrier to AFFH and a contributing factor to fair housing issues by supporting patterns of segregation and racial concentrations of poverty. We appreciate that there has been more summary added regarding the history and current conversations surrounding renter protections in Appendix F, however, the draft</u></p>	
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	<p><u>remains without remedy to the significant fair housing issues present in the County when it comes to the needs of renters, over half of which are cost-burdened in the County. Moreover, we are very concerned that each time the Board of Supervisors has considered tenant protection ordinances, including Just Cause for Eviction, Rental Registry, a Proactive Rental Inspection Program, the ordinances have been amended with greater exemptions and more narrow scopes, ones that recently have excluded the majority of renters, people and families of color most cost-burdened and at risk of displacement – and this context is not entirely captured on pages 190-192. We echo the numerous community voices and concerns for years that meaningful actions to address significant housing disparity and access to opportunity include clear commitments to adopt and implement the specific tenant protection policies called for for years. Given this timeline, it is more appropriate for the metrics for Program 6. O: Renter Protections be defined to include more than passing “relevant ordinances in summer 2024” - as the Draft itself notes that “it is not clear at the time of writing what that will entail” and should instead include follow-up analysis and commitment to revisit any ordinances and provisions not included in summer 2024 to comprehensively protect renters in the unincorporated area.</u></p> <p><u>Thank you and we look forward to continuing to work towards a comprehensive Housing Element that ensures that the County can be, and is a place for all to afford to call home.</u></p>	
<p><u>Karen Carey May 8, 2024</u></p>	<p><u>When reading the Full Second draft for 2023-2031 I noticed on page 120 of Appendix B that the address is incorrect. It is shown as 2637 E Avenue. The correct address is 2637 East Avenue. Additionally in the description it is stated that there is “potential of a beginning of a swale/creek”. I live next door. In the early 1980’s Alameda County had a dissipator</u></p>	<p><u>Thank you for your comment; it has been recorded. I appreciate you reminding me about the typo – it has been fixed, and I will be updating the version available online. We do not mean to dispute the existence of the swale/creek located in this area. Rather, staff were directed by state HCD to enable additional housing in existing low density neighborhoods, such as Fairview, and this landowner is interested in development. Our department looks</u></p>

	<p><u>installed on my property due to high flow of water. This water continues behind 2637 East Avenue. It is a creek that I have known about for the 65 years I have lived here. It is a tributary of South Sulfur Creek. If any development is done to 2637 East Avenue I hope the Planning Department will make certain it is protected. Deer and other wildlife use it and the trees that grow along it daily. I watched a deer take her twins into the den they have under the trees two days ago.</u></p>	<p><u>forward to working with them and other developers to enable more housing while maintaining the creek.</u></p>
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