

From: [MTC-ABAG Info](#)
To: [Fred Castro](#)
Subject: Fwd: ABAG Administrative Committee Sept. 24, 2021 Hearing-Comments In Support of City of Alameda RHNA Allocation Appeal
Date: Thursday, September 23, 2021 4:33:19 PM

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From: Alameda Citizens Task Force [REDACTED]
Sent: Thursday, September 23, 2021 4:31:44 PM
To: MTC-ABAG Info <info@bayareametro.gov>
Cc: ANDREW THOMAS [REDACTED]
Subject: ABAG Administrative Committee Sept. 24, 2021 Hearing-Comments In Support of City of Alameda RHNA Allocation Appeal

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ACT

Alameda Citizens Task Force

Vigilance, Truth, Civility

Dear Administrative Committee Members:

ACT is a 501 (c) (4) Organization dedicated to good government policy including expansion of our affordable housing inventory. ACT strongly supports the City of Alameda's appeal of its 2123-2031 RHNA allocation.

Our primary objection to the current RHNA allocation to Alameda is the failure of ABAG to consider our unique natural hazard constraints. The July 9 appeal letter of our Planning, Building and Transportation Director, Andrew Thomas, expresses the impact on Alameda very well. However, there is an underlying issue which is the failure of ABAG to include natural hazards as part of the methodology for determining RHNA allocations.

Our reading of various comments made by ABAG staff indicates that their position is that the entire Bay Area is very much subject to natural hazards, making it impossible to differentiate between cities as part of the allocation methodology. Instead, they argue that each city is free to locate its RHNA housing sites outside of hazard zones.

The staff position is contradicted by the fact that the ABAG Methodology Committee did do a study to determine if natural hazards should be part of the allocation methodology and developed a template to include it in the allocation formula, that being the percentage of a city's urbanized area that is outside of a natural hazard zone. A link to a natural hazards map constructed by ABAG is included in Mr. Thomas's appeal letter. It demonstrates wide variations in that percentage from city to city and places Alameda in the most impacted

category of having less than 50% of its land outside of a natural hazard zone. Moreover, Mr. Thomas points out that most of our available vacant land is within the hazard zones.

Alameda is a high resource city and is located close to jobs and transportation, all of which are legitimate factors for placing a significant allocation on us. However, as demonstrated above and in Mr. Thomas's letter, Alameda has unique conditions that argue strongly for a significant tempering of that allocation.

Notwithstanding the above, ACT disagrees with Mr. Thomas's assertion that Measure A is a constraint on our RHNA allocation. While Measure A does prohibit "multi-family housing" the term is defined by city ordinance as a dwelling in excess of two units. Secondly. The Measure allows one dwelling unit per 2000 sq. ft. of lot space, thus allowing for unlimited dwellings depending on lot size.

More importantly, in 2012 our City Council approved multi-family overlays allowing 30 units per acre plus applicable density bonus for more than enough parcels to cover our current certified housing element. The city has already put in motion the process of adding more parcels to our overlay to meet whatever 2023-2031 RHNA allocation is finally approved by ABAG. This is being done on the basis that Measure A is pre-empted to the extent necessary to comply with State law. In nine years, no one has challenged this process. Therefore, Measure A is not a constraint and is, in fact, irrelevant to this proceeding.

We thank you for your efforts on behalf of housing in the Bay Area and hope that you will make appropriate reductions in Alameda's RHNA allocation.

Sincerely,

Alameda Citizens Task Force
Paul S Foreman
Authorized Representative

From: [MTC-ABAG Info](#)
To: [Fred Castro](#)
Subject: Fwd: to ABAG Administrative Committee
Date: Thursday, September 23, 2021 4:32:49 PM

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From: Karen Miller [REDACTED]
Sent: Thursday, September 23, 2021 2:20:47 PM
To: MTC-ABAG Info <info@bayareametro.gov>
Subject: to ABAG Administrative Committee

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Although I understand the need for more housing being built, I support the appeal of the RHNA numbers being required of Alameda. We are an island surrounded by water and have 4 bridges and a tube all of which could be damaged and unusable in a major earthquake that will occur. Adding the number of housing units that you are requiring will make it impossible for us to evacuate, if needed, even if one or all of these exits are still usable. Currently when one access is blocked by an accident or construction, traffic is at a standstill. According to the Natural Hazard reports of all the major companies all areas of Alameda are subject to liquefaction. Besides the earthquake hazard many parts of Alameda are also in a tsunami evacuation zone. It is incredibly irresponsible to ignore our unique situation in allocating the housing requirements. Almost every other city in the Bay Area has multiple access and egress points and is not subject to the both the kind of earthquake damage and flooding as Alameda. If a road is blocked in another City, you just go another way. That is not possible here. I urge you to lower our required housing units. Thank you.

Regards,

Karen Miller

[REDACTED]

[REDACTED]



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From: [MTC-ABAG Info](#)
To: [Fred Castro](#)
Subject: Fwd: ABAG Administrative Committee - Comment Re Alameda RHNA Appeal
Date: Thursday, September 23, 2021 4:37:53 PM

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From: margie [REDACTED]
Sent: Thursday, September 23, 2021 2:13:49 PM
To: MTC-ABAG Info <info@bayareametro.gov>
Subject: ABAG Administrative Committee - Comment Re Alameda RHNA Appeal

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I am an Alameda resident. I am very concerned about the effects of climate change and other natural factors on my personal safety. The additional housing demanded will exacerbate these effects to the point of immediate and present danger to the population.

Alameda is an island. There are 5 ways on and off: the Posey Tube (which I believe may not be seismically sound) the bridge to Harbor Bay (built on landfill and liable to liquefaction in an earthquake) and the Park Street, Fruitvale and High Street bridges (which I believe are all in need of renovation/replacement)

I have seen maps showing a 5 foot sea rise in the next 30 years in this area, putting large portions of the Island underwater. These include areas on the North Shore where developers are putting in housing developments. I believe water intrusion, and flooding will make these developments unusable in thirty years.

The Bay Area is overdue for an earthquake, and earthquakes causes fires. Alamedans now will have difficulty evacuating should that be necessary. I point to Paradise, California: evacuees fleeing fire were unable to leave, due to traffic bottlenecks, and died. Public safety demands that the numbers of people in Alameda be limited.