



MEMORANDUM

DATE: May 12, 2022

TO: Planning Commission

FROM: Kevin Jackson, Planning & Building Director
Pierce Macdonald, Senior Planner

SUBJECT: Recommendation: Draft 6th Cycle Housing Element

AGENDA ITEM NUMBER 1

RECOMMENDATION:

Recommend City Council authorize staff to send the Draft Housing Element to California Department of Housing and Community Development (HCD) for its review.

EXECUTIVE SUMMARY:

Every 8 years, every city, town, and county in California must update the Housing Element of their General Plan and have it certified by the California Department of Housing and Community Development (HCD). The 6th Housing Element cycle under State of California law is for the time period of 2023 to 2031 (6th Cycle) in the San Francisco Bay Area region. This report provides background information on State of California requirements. This report includes analysis in support of staff's conclusion that the Planning Commission should recommend City Council support of the Draft Housing Element and Council authorization to send the Draft Housing Element to California HCD. Comments on this agenda item from members of the public are welcomed and encouraged.

For the meeting on May 12, 2022, City staff recommends that the Planning Commission organize Commissioner comments by the following groupings of the four sections of the Draft Housing Element:

- A. Introduction, Section I; and Projected Housing Need, Section II;
- B. Elimination of Housing Constraints, Goal 4 of Section IV; and Appendix C - Constraints;
- C. Sites Inventory, Section III, Housing Resources; and Appendix B - Housing Capacity and Analysis and Methodology;
- D. Remaining Goals, Policies, and Programs, Section IV, Housing Plan;
- E. All other Draft Housing Element Appendices.

A slide presentation on May 12, 2022, will augment the information in this staff report and will help facilitate the Planning Commission discussion.

BACKGROUND:

In March 2021, the City launched a citywide mailing, the Fair Housing Community Survey, and an online, interactive pinnable mapping tool, hosted on Social Pinpoint software. Response to the survey was robust, consisting of 877 survey participants and 90 map comments. Also in March, the City launched a Piedmont fair housing website at <https://Piedmontishome.org>. Public engagement in 2021 also included enthusiastic community participation in stakeholder interviews in July, pop-up information tables at local events in September, and the first Housing Element Community Workshop in December. This year, new public engagement strategies included direct correspondence with the owners of potential sites, the second Housing Element Community Workshop in March, installation of 30 banners on City streetlights, and the launch of the online Piedmont Housing Puzzle tool, hosted on Balancing Act software.

The City's engagement with Piedmont residents, property owners, business owners, and workers has encouraged participation in development of 6th Cycle Housing Element goals, policies, and programs. All public comments and ideas received by staff since the Housing Element Community Workshop on March 24, 2022, have been compiled and included as Attachment C of this staff report. Comments received on or before March 24, are included in the Draft Housing Element Appendix E. Public comments received after the Planning Commission meeting will be added to those in Attachment C and provided for City Council review and consideration.

On April 8, 2022, staff published the Draft Housing Element to the homepages of the City of Piedmont website homepage and the Housing Element update website, Piedmontishome.org

On April 19, 2022, the Piedmont Housing Advisory Committee held a virtual public meeting on the Draft Housing Element. The meeting was attended by 32 community members. Committee members expressed appreciation for the Draft Housing Element analysis, public engagement, and housing plan goals, policies, and programs. A summary of the Housing Advisory Committee meeting is provided as Attachment E to this report.

On May 4, 2022, the Park Commission held a public meeting in-person and in the Zoom virtual meeting format and received a staff report on the Draft Housing Element. The Park Commission discussed the sites inventory and other aspects of the housing plan. One member of the public addressed the Commission and raised issues regarding sustainability programs in the Draft Housing Element. A video recording of the meeting is available on the KCOM page of the City website, the link provided as Attachment F to this report.

At its core, a Housing Element is an opportunity for a community conversation about how to address local housing challenges and find solutions. The Housing Element addresses a range of housing issues, such as affordability, design, housing types, density, and location, and establishes goals, policies, and programs to address existing and projected housing needs. The Housing Element must be internally consistent with other parts of the General Plan and is critical to having a legally adequate General Plan.

State law does not require that jurisdictions *build* or *finance* new housing, but they must *plan* for it. It is in the community's Housing Element that local governments make decisions about where safe, accessible, and diverse housing could be developed to offer a mix of housing opportunities for a variety of household incomes. The Housing Element must identify how – through the adoption of policies and programs – the City of Piedmont will meet its share of the region's

housing need, called the Regional Housing Needs Allocation (RHNA).

Pursuant to state law and section 25.3 of the City Code, the role of the Planning Commission is to review amendments to the General Plan and “to investigate and make recommendations to the City Council concerning ... planning and zoning matters as may be in the best interest of the City.” The Planning Commission meeting also gives the public further opportunities to learn about the Housing Element update process and to give their input and feedback.

ANALYSIS:

Regional Housing Needs Allocation (RHNA) Process

Every city in California receives a target number of homes to plan for at various income levels. This is called the Regional Housing Needs Allocation (RHNA).

RHNA starts with the Regional Housing Needs Determination (RHND) provided by HCD, which is the total number of housing units the San Francisco Bay Area needs over the eight-year period, by income group. The Association of Bay Area Governments (ABAG) is tasked with developing the methodology to allocate a portion of housing needs to each city, town, and county in the region. After considering public comments, the ABAG Executive Board approved the RHNA methodology in January 2021. The State of California Department of Housing and Community Development (HCD) reviewed the RHNA methodology to ensure it furthers State-required objectives, and ABAG adopted a final methodology and allocations for every local government in the Bay Area in May 2021.

The RHNA allocations for the City of Piedmont are outlined in Table SR-1, as follows:

Table SR-1

2023-2031 RHNA Allocation	
City of Piedmont	
Income Level	
VERY LOW INCOME (<50% of Area Median Income)	163
LOW INCOME (50-80% of Area Median Income)	94
MODERATE INCOME (80-120% of Area Median Income)	92
ABOVE MODERATE INCOME (>120% of Area Median Income)	238
TOTAL ALLOCATION	587

Penalties for Noncompliance

Jurisdictions face a number of consequences if they do not have a certified Housing Element by the May 2023 deadline. Under legislation enacted in recent years, if a city does not comply with State law, the city can face litigation. In addition to facing significant fines, a court may limit local land use decision-making authority until the jurisdiction brings its Housing Element into compliance. Additionally, local governments may lose the right to deny certain projects.

Conversely, an HCD-certified Housing Element makes cities eligible for numerous sources of funding and grants, such as Local Housing Allocations, Affordable Housing and Sustainable Communities Grants, SB 1 Planning Grants, CalHOME Program Grants, Infill Infrastructure Grants, Pro-Housing Designation funding, Local Housing Trust Funds, and Regional Transportation Funds (such as MTC's OneBayArea Grants).

New State Requirements for the 6th Cycle Housing Element Update

Recent legislation resulted in the following key changes for this 6th cycle of RHNA and Housing Element updates:

- **Higher allocations** - There is a higher total regional housing need. HCD's identification of the region's total housing needs has changed to account for unmet existing need, rather than only projected housing need. HCD now must consider overcrowded households, cost-burdened households (those paying more than 30% of their income for housing), and a target vacancy rate for a healthy housing market (with a minimum of 5%). The RHNA for Piedmont for the 6th cycle is nine times more than the RHNA for the 5th cycle.
- **Affirmatively Furthering Fair Housing (AFFH)** - Local Housing Elements must affirmatively further fair housing. According to HCD, achieving this objective includes preventing segregation and poverty concentration, as well as increasing access to areas of opportunity. HCD has mapped Opportunity Areas and has developed guidance for jurisdictions to address affirmatively furthering fair housing in each Housing Element. The entire City of Piedmont is mapped as an area of highest resource for its low exposure to environmental hazards and access to very good schools and economic opportunities. AFFH was considered in relation to all sections of the Draft Housing Element. AFFH is addressed directly in the analysis in Appendix F, including supporting documentation and analysis from ABAG and the Urban Policy Lab of the University of California, Merced.
- **Limits on Sites** - Identifying Housing Element sites for affordable units is more challenging than in past years. There are new limits on the extent to which jurisdictions can reuse sites used in previous Housing Elements and increased scrutiny of small, large, and non-vacant sites, when these sites are proposed to accommodate units for very low- and low-income households.
- **Safety and Environmental Justice Element** - State law requires that the Safety Element of the General Plan be updated concurrently with the Housing Element. The Safety Element must address new wildfire risk, evacuation routes, and climate adaptation and resilience requirements in an integrated manner.

There are four bills recently passed by the California State Legislature and approved by the Governor that require certain changes to an Environmental Hazards Element when a municipality undergoes an update to their Housing Element, as follows:

1. **Senate Bill 99. Residential Emergency Evacuation Routes.** Senate Bill 99 requires all cities and counties, upon the next revision of the housing element on or after January 1, 2020, to update the safety element to include information identifying residential developments in any hazard area identified in the safety element that do not have at least two emergency evacuation routes.
2. **Senate Bill 1035 General Plans.** Senate Bill 1035 requires cities and counties to update their safety element during a housing element or local hazard mitigation plan update cycle,

but not less than once every eight years, if new information on flood hazards, fire hazards, or climate adaptation or resilience is available that was not available during the previous revision of the safety element.

3. **Senate Bill 1241. State Responsibility Areas and Very High Fire Severity Zones.** The bill requires review and update of the safety element, upon the next revision of the housing element on or after January 1, 2014, as necessary to address the risk of fire in state responsibility areas and very high fire hazard severity zones. The specific requirements are codified in GC § 65302(g)(3) and 65302.5(b) and included as an attachment to this memorandum.
4. **Assembly Bill 747. Evacuation Routes.** Assembly Bill 747 requires all cities and counties to identify evacuation routes in the safety elements of their general plans upon the next revision of their local hazard mitigation plan, beginning on or after January 1, 2022. The bill requires evaluation of evacuations route capacity, safety, and viability under a range of emergency scenarios.

Piedmont’s housing consultant team has prepared analysis of Piedmont’s current Environmental Hazards Element, including recommendations to expand and improve public engagement and planning for new wildfire risk, evacuation routes, and climate adaptation and resilience. These recommendations will guide the work of City staff and the housing consultant team as this and other elements of the Piedmont General Plan are amended to integrate the new 6th Cycle Piedmont Housing Element goals, policies, and programs, as stated on page 18 of Section I, Introduction, of the Draft Housing Element.

Draft 6th Cycle Piedmont Housing Element (2023-2031)

The Draft Housing Element begins with an executive summary, including Table ES-1, a summary of resulting housing units from recommended Housing Element programs, excerpted below. Table ES-1 compares the RHNA assignments to the recommended Housing Element housing sites inventory, projected increase in number of accessory dwelling units (ADUs), and pipeline projects. (The one pipeline project is no longer a viable design review approval because the building permit has expired. As reflected below, this vacant site will be added to the site inventory and the number of Approved/Entitled Projects will be 0 in the draft document sent to HCD.) The result is a moderate surplus of 71 housing units (12%), over and above the total RHNA of 587 housing units.

Table ES-1: Residential Development Potential and RHNA

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
RHNA	See Very Low	163	94	92	238	587
ADUs	See Very Low	7	42	70	21	140
Approved/Entitled Projects	-	-	-	-		
Site Inventory ^{1,2}		211 ³		81	225	517
Total Capacity		260		151	247	658
Surplus		3		59	9	71
<i>Source: City of Piedmont, LWC</i>						
1. See Table B-9 in Appendix B for the complete inventory						
2. See Section B.3.1 in Appendix B for information on the Specific Plan						
3. For calculation purposes, extremely low, very low, and low income totals were grouped.						

Key Components of a Housing Element

In compliance with State law, Piedmont's Draft Housing Element includes four sections and six appendices that cover the following required topics:

1. **Housing Needs Assessment:** Examine demographic, employment and housing trends and conditions and identify existing and projected housing needs of the community, with attention paid to special housing needs (e.g., large families, persons with disabilities, female-headed households, employee housing, and people of diverse social and economic backgrounds).
2. **Evaluation of Past Performance:** Review the prior Housing Element (2015 to 2023) to measure progress in implementing past policies and programs.
3. **Housing Sites Inventory:** Identify locations of available sites for housing development or redevelopment to ensure there is enough land zoned for housing to meet the future need at all income levels.
4. **Community Engagement:** Implement a robust community engagement program, reaching out to all economic segments of the community plus traditionally underrepresented groups.
5. **Constraints Analysis:** Analyze and recommend remedies for existing and potential governmental and nongovernmental barriers to housing development.
6. **Affirmatively Furthering Fair Housing:** Analysis of existing fair housing and segregation issues and plan to address any identified disparities in housing needs, displacement, or access to opportunity.
7. **Policies and Programs:** Establish policies and programs to be carried out during the 2023-2031 planning period to fulfill the identified housing needs.

Organization of the Draft Housing Element

The Draft Housing Element enables construction to occur. It does not require property owners to build or otherwise change the way they use their property. The organization of the Draft Housing Element begins with an executive summary and then the following four sections:

- Introduction
- Projected Housing Need
- Housing Resources
- Housing Plan: Goals, Policies, and Programs

There are six technical appendices that provide analysis of housing law, demographics, and other issues in greater detail, including:

- Appendix A, demographics data and analysis
- Appendix B, an analysis of sites and capacity in Piedmont
- Appendix C, constraints analysis
- Appendix D, evaluation of the 2015-2023 Housing Element
- Appendix E, the public engagement report
- Appendix F, an analysis of compliance with AB 686 and goals to affirmatively further fair housing in Piedmont

There are seven proposed Housing Element goals:

- **Goal 1:** New Housing Construction
- **Goal 2:** Housing Conservation
- **Goal 3:** Affordable Housing Opportunities
- **Goal 4:** Elimination of Housing Constraints
- **Goal 5:** Special Needs Populations
- **Goal 6:** Sustainability and Energy
- **Goal 7:** Equal Access to Housing

In order to implement the seven goals, the Draft Housing Element includes 56 policies and 64 programs. A list of the policies and programs is included as Attachment B to this staff report for the reference of the Planning Commission.

Housing Sites Inventory

The Draft Housing Element includes a recommended housing sites inventory for the review and consideration of the Piedmont community. Figure B-2, the Draft Housing Element’s Site Inventory map, is included on page B-15 and excerpted below, followed by tables of sites organized by income levels.

Figure B-2: Draft 6th Cycle Housing Element Site Inventory by Income Category

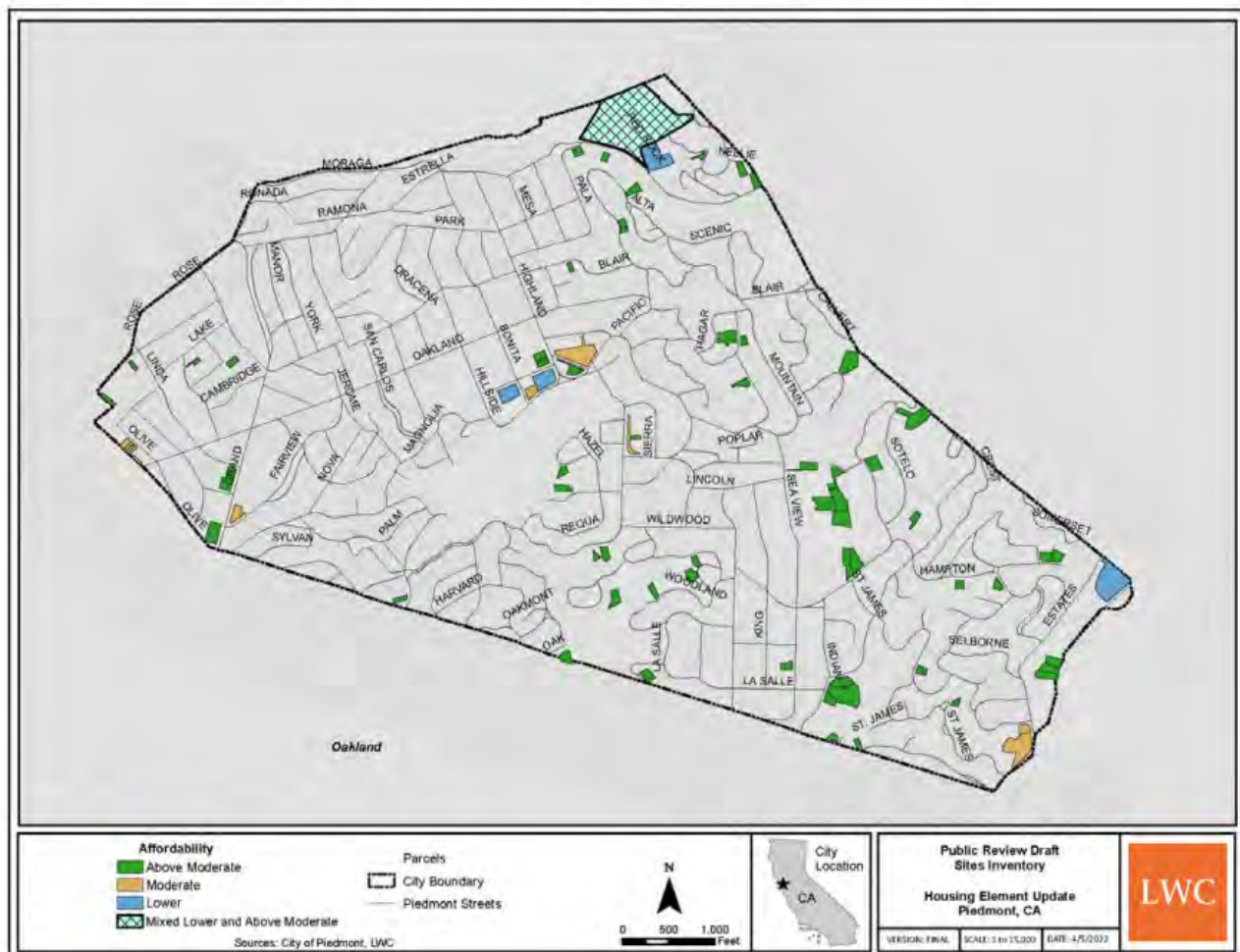


Table B-9: Draft 6th Cycle Housing Element Site Inventory by Income Category

APN	Address	Land Use	Zone	Acres	Existing Density	Proposed Density	Units Max	Units Realistic	Income	Infrastructure	In Previous Cycles?
050 086000400	1069 WINSOR AVE	Residential	A	0.19	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
050 092800400	770 KINGSTON AVE	Residential	A	0.19	1 unit per lot	1 unit per lot	1	1	Above Moderate	water/sewer extension needed	N
050 092801301	KINGSTON AVE	Residential	A	0.12	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
050 455001500	HOWARD AVE	Residential	A	0.11	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
050 455104100	NACE AVE	Residential	A	0.21	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
050 457100101	MORAGA AVE at Pala	Residential	A	0.21	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
050 457902001	MORAGA AVE owned by 261 Scenic	Residential	A	0.15	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
050 457903300	1 Maxwelton Road	Residential	A	0.26	1 unit per lot	1 unit per lot	1	1	Above Moderate	water/sewer extension needed	N
050 457904300	14 NELLIE AVE	Residential	A	0.27	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
050 457905601	1 ABBOTT WAY	Residential	A	0.13	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
050 460101802	156 SCENIC AVE	Residential	A	0.09	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
050 460102003	162 SCENIC AVE	Residential	A	0.16	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
050 460104400	279 SCENIC AVE	Residential	A	0.29	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
050 462104601	538 BLAIR AVE	Residential	A	0.13	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 466801934	REQUA PL	Residential	A	0.26	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 467603400	148 HAZEL LN	Residential	A	0.21	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 469301000	780 HIGHLAND AVE	Residential	A	0.11	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 469900902	551 MOUNTAIN AVE	Residential	A	0.17	1 unit per lot	1 unit per lot	1	1	Above Moderate		N

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APN	Address	Land Use	Zone	Acres	Existing Density	Proposed Density	Units Max	Units Realistic	Income	Infrastructure	In Previous Cycles?
051 470000500	415 PACIFIC AVE	Residential	A	0.60	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 471302300	14 LITTLEWOOD DR	Residential	A	0.83	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 473200400	117 WOODLAND WAY	Residential	A	0.20	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 473300702	WILDWOOD GARDENS	Residential	A	0.17	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 473301800	WISTARIA WAY	Residential	A	0.32	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 473600202	85 WILDWOOD GARDENS	Residential	A	0.37	1 unit per lot	1 unit per lot	1	1	Above Moderate	water/sewer extension needed	N
051 473602301	370 WILDWOOD AVE	Residential	A	0.11	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 473602307	WILDWOOD AVE	Residential	A	0.27	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 473902100	OAK RD	Residential	A	0.31	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 474502907	PORTAL AVE	Residential	A	0.31	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 478600800	62 FARRAGUT AVE	Residential	A	0.24	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 479100203	LA SALLE AVE	Residential	A	0.27	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 479100206	280 INDIAN RD	Residential	A	1.41	1 unit per lot	1 unit per lot	4	4	Above Moderate	water/sewer extension needed	N
051 479101200	280 INDIAN RD	Residential	A	0.28	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 479101300	280 INDIAN RD	Residential	A	0.23	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 480303700	403 HAMPTON RD	Residential	A	0.23	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 480901002	50 ST JAMES PL	Residential	A	0.14	1 unit per lot	1 unit per lot	1	1	Above Moderate		N

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APN	Address	Land Use	Zone	Acres	Existing Density	Proposed Density	Units Max	Units Realistic	Income	Infrastructure	In Previous Cycles?
051 480901900	22 VALANT PL	Residential	A	0.19	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 481302200	ST JAMES DR	Residential	A	0.14	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 481801600	111 SANDRINGHAM RD	Residential	A	0.21	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 481900100	490 HAMPTON RD	Residential	A	0.20	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 481902000	440 HAMPTON RD	Residential	A	0.20	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 482003300	PARK BLVD	Residential	A	0.37	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 482003500	PARK BLVD	Residential	A	0.37	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 482003700	PARK BLVD	Residential	A	0.46	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 482600600	HUNTLEIGH RD	Residential	A	0.32	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 482600700	145 LEXFORD RD	Residential	A	0.30	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 470104603	43 BELLEVUE AVE	Residential	E	0.26	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 472800104	26 SEA VIEW AVE	Residential	E	0.39	1 unit per lot	1 unit per lot	1	1	Above Moderate	water/sewer extension needed	N
051 472800401	26 SEA VIEW AVE	Residential	E	0.71	1 unit per lot	1 unit per lot	1	1	Above Moderate	water/sewer extension needed	N
051 472800502	GLEN ALPINE RD	Residential	E	0.71	1 unit per lot	1 unit per lot	1	1	Above Moderate	water/sewer extension needed	N
051 472800503	GLEN ALPINE RD	Residential	E	0.13	1 unit per lot	1 unit per lot	1	1	Above Moderate	water/sewer extension needed	N
051 472800604	74 SEA VIEW AVE	Residential	E	0.75	1 unit per lot	1 unit per lot	1	1	Above Moderate	water/sewer extension needed	N

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APN	Address	Land Use	Zone	Acres	Existing Density	Proposed Density	Units Max	Units Realistic	Income	Infrastructure	In Previous Cycles?
051 472802000	5 HAMPTON RD	Residential	E	0.55	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 472802100	5 HAMPTON RD	Residential	E	0.53	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 480201300	17 GLEN ALPINE RD	Residential	E	0.47	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 480201600	INDIAN GULCH RD	Residential	E	0.26	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
051 480300101	70 SOTELO AVE	Residential	E	1.06	1 unit per lot	1 unit per lot	1	1	Above Moderate		N
048A700200303	898 RED ROCK RD	Corporation Yard	B	11.90	5 du/ac	TBD/SP	0	32	Above Moderate		N
050 455701501	1221 GRAND AVE	mixed use	D	0.65	20 du/ac	80 du/ac	52	42	Above Moderate		N
050 455801502	1337 GRAND AVE	mixed use	D	0.63	20 du/ac	80 du/ac	50	40	Above Moderate		N
050 462300500	356 HIGHLAND AVE (terrace)	mixed use	D	0.04	20 du/ac	80 du/ac	4	4	Above Moderate		N
050 462300602	356 HIGHLAND AVE	mixed use	D	0.28	20 du/ac	80 du/ac	22	18	Above Moderate		N
050 462401000	333 HIGHLAND AVE	mixed use	D	0.22	20 du/ac	80 du/ac	18	14	Above Moderate		N
050 462401100	333 HIGHLAND AVE	mixed use	D	0.07	20 du/ac	80 du/ac	6	6	Above Moderate		N
050 462401200	345 HIGHLAND AVE	mixed use	D	0.15	20 du/ac	80 du/ac	12	10	Above Moderate		N
Subtotal Above Moderate								225			
051 482001118	5201 PARK BLVD	residential - house of worship	A	2.22	1 unit per lot	21 du/ac	46.6	37	Lower		N
048A700200303	898 RED ROCK RD	Corporation Yard	B	11.90	5 du/ac	TBD/SP	0	50	Lower		N
050 457906100	643 MORAGA AVE	Corporation Yard	B	1.50	5 du/ac	TBD/SP	0	50	Lower		N
050 462500103	120 VISTA AVE	Public	B	0.83	5 du/ac	60 du/ac	50	40	Lower		N
050 462600100	VISTA AVE	Public	B	0.70	5 du/ac	60 du/ac	42	34	Lower		N
Subtotal Lower								211			

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APN	Address	Land Use	Zone	Acres	Existing Density	Proposed Density	Units Max	Units Realistic	Income	Infrastructure	In Previous Cycles?
050 092700403	OLIVE AVE	residential - house of worship	A	0.16	1 unit per lot	21 du/ac	3	3	Moderate		N
050 092700500	OLIVE AVE	residential - house of worship	A	0.08	1 unit per lot	21 du/ac	2	2	Moderate		N
050 092700600	OLIVE AVE	residential - house of worship	A	0.08	1 unit per lot	21 du/ac	2	2	Moderate		N
050 092700700	OLIVE AVE	residential - house of worship	A	0.08	1 unit per lot	21 du/ac	2	2	Moderate		N
050 092701300	OAKLAND AVE	residential - house of worship	A	0.08	1 unit per lot	21 du/ac	2	1	Moderate		N
050 462300400	400 HIGHLAND AVE	residential - house of worship	A	1.50	1 unit per lot	21 du/ac	31	25	Moderate		N
051 463603500	1300 GRAND AVE	residential - house of worship	A	0.40	1 unit per lot	21 du/ac	8	7	Moderate		N
051 481201110	4925 PARK BLVD	residential - house of worship	A	1.49	1 unit per lot	21 du/ac	31	25	Moderate		N
051 481201700	SANDRINGHAM RD	residential - house of worship	A	0.27	1 unit per lot	21 du/ac	6	4	Moderate		N
050 462500301	801 MAGNOLIA AVE	Public	B	0.31	5 du/ac	21 du/ac	7	5	Moderate		N
051 469301300	HIGHLAND AVE	Park	B	0.32	5 du/ac	21 du/ac	7	5	Moderate		N
Subtotal Moderate							81				
Total Inventory							517				

Methodology To Select Publicly Owned Sites

Due to changes to State law that increase the scrutiny on sites identified for housing affordable to households with low incomes, as well as Piedmont's higher RHNA during this Housing Element cycle compared to previous cycles, the sites inventory in the Draft Housing Element was expanded to include opportunity sites in all zones, including City-owned properties, to meet the eligibility and feasibility criteria required by HCD. After careful review of all City-owned properties, the following were included in the Draft Housing Element for further review and consideration:

- Piedmont Public Works Corporation Yard
- City Hall and Veterans Memorial Building/Police Station
- Corey Reich Tennis Center
- Highland Avenue Grassy Strip (between Sierra Avenue and Sheridan Avenue)
- 801 Magnolia Avenue

These City-owned sites are suggested for the sites inventory for their size, proximity to arterial roadways and access to transit, fire and emergency services, schools, and a commercial district with multiple services. For example, the Corporation Yard and all of the sites listed above are within ½ mile of the nearest school, Havens Elementary School. The existing uses on these sites could be incorporated into a future redevelopment plan. In addition, the existing city-owned buildings, such as administrative offices, multi-use spaces, community rooms, and Police Department and Fire Department facilities, require modernization, improvement, and expansion to meet the City's needs. The inclusion of the Cory Reich Tennis Center as a potential site recognizes that it is possible to develop a structure with tennis courts atop.

Should a developer express interest in a City-owned site at some point in the future, the City would be positioned to negotiate the terms of a possible development. The City would work with a development partner to develop units affordable to low- and very low-income households and meet

the number of units specified in the Housing Element. If fewer low and very low units than those specified in the Housing Element were approved, then the City must identify other sites to accommodate the remaining low and very low units elsewhere, pursuant to State housing element law (SB 330). The Draft Housing Element outlines a request for proposals (RFP) process to identify potential development partners for City-owned sites.

City Parks Considerations

City parks, such as Linda Dog Park and Blair Park, were not included in the sites inventory because parks are a very limited resource in Piedmont and cannot be replaced elsewhere. Parks are also vital to serve the needs of future population growth. As stated on page A-15 of Appendix A, according to the California Department of Finance, Piedmont had an average household size of 2.89 people in 2021, and approximately 52% of households contain three people or more.

The Draft Housing Element's housing plan could result in a significant increase in population, including additional families with children, with associated recreation needs. Because of Piedmont's land-locked relationship to the surrounding City of Oakland, there are no opportunities for Piedmont to annex additional public lands for new or expanded parks to serve Piedmont's growing population. The Draft Housing Element reserves parks like Linda Dog Park and Blair Park as crucial City resources. However, the Draft Housing Element identifies Blair Park as a potential alternate site for housing units planned for the Public Works Corporation Yard (12+ acres), described below, with provisions to ensure future recreational uses.

Proposed Specific Plan

As provided on page B-13, Appendix B of the Draft Housing Element proposes to prepare a specific plan (Government Code §65450 et. seq) for the area of the Public Works Corporation Yard to accommodate new housing development, incorporate existing amenities, and modernize current city functions. The portion of the site utilized for park and recreational uses, such as Coaches Field and Kennelly Skatepark, would remain as an amenity for the proposed specific plan area, with the existing vehicle parking reconfigured, as needed as part of the specific plan.

As proposed in the Draft Housing Element, the two largest proposed specific plan subareas, located and accessed from Moraga Avenue, provide the potential for the development of a number of affordable multifamily housing units. Utilization of the State's Density Bonus Ordinance (Government Code section 65915, et seq.) can increase yield, reduce development constraints, and contribute to greater affordability options. The Draft Housing Element proposes 100 units of high-density new housing along Moraga Avenue in the proposed specific plan area.

Proposed specific plan development north of Coaches Field, with its steeper topography, is anticipated to be lower density and yield units at above moderate income prices. Grading and access will be addressed during the specific plan process. The Draft Housing Element proposes zoning for 30 lower density housing units on the hillside above Kennelly Skatepark and Public Works buildings, with a realistic yield of 22 units.

Program 1.L in Section IV of the Draft Housing Element clarifies how the City will phase the project, ensure affordable housing development, and produce at least 100 units of low income housing and 22 units of above moderate income housing.

The City's Draft Housing Element has identified Blair Park, which is located on the south side of Moraga Avenue, as a potential alternate site for housing if the proposed specific plan for the Public Works Corporation Yard fails to yield 122 housing units. Blair Park is a 3.55-acre site, with the potential for 210 units if developed at 60 units per acre. If Blair Park is selected as an alternate site, the City would follow a similar process to that for the proposed specific plan. The City would request proposals from private development partners to develop housing, preserve existing open space functions, and integrate them into a multifamily housing development.

Potential Constraints

The Draft Housing Element investigated potential obstacles to the development of housing accessible to households of all income levels. Potential obstacles to development include governmental constraints (fees, development standards, and other regulations) and non-governmental constraints (market conditions, limited land supply, environmental setting, and other limits). For example, the non-governmental constraints analysis found that demand for homes and apartments in Piedmont is very high, resulting in high land costs. The Draft Housing Element includes programs to monitor and address potential governmental constraints due to the City Charter and zoning ordinance limits on allowable residential densities, as described below.

The Draft Housing Element notes that most of the land in Piedmont (772 acres) is zoned single-family residential, which allows detached single-family residences and ADUs by right at a maximum of 5 housing units per acre. As interpreted in section 17.02.010.C of the Piedmont City Code, Piedmont's City Charter requires voter approval to enlarge or reduce a zone or to reclassify land, but it does not prevent housing at greater densities within each zone (see proposed changes to Zones A through D, below). The proposed Draft Housing Element directs the City to continue to monitor the effects of the City Charter on the provision of housing at all income categories.

Proposed Zoning Amendments

The Draft Housing Element does not change the zoning classification of any properties in Piedmont. Nor does it propose any zones be enlarged or reduced. In order to meet the 6th Cycle RHNA target with Piedmont's limited available land. The Draft Housing Element's Goal 1, New Housing Construction, proposes future zoning ordinance amendments to increase the allowed residential density for housing affiliated with religious institutions in Zone A in accordance with California Assembly Bill 1851 (program 1.D, page 37) and increase allowed residential density in Zone B (program 1.F), Zone C (program 1.G), and Zone D (1.H), as follows:

Table S-R 2

Zoning District	Current Residential Density DU/ acre*	Proposed Residential Density DU/ acre*
Zone A	5	21
Zone B	5	60
Zone C	21	60
Zone D	20	80

*DU/acre means the dwelling units per acre ratio.

These proposed densities, outlined in the table above, permit the City's limited land resources to yield the required number of housing units mandated by the RHNA at all required levels of

affordability. The proposed zoning amendments are consistent with the City Charter. Proposed zoning ordinance amendments would be developed after adoption of the Housing Element and considered by the City Council at a future public hearing. Some proposed amendments would be considered within 1 year after adoption of the Housing Element, and some, like increasing permitted density in Zone D, would be implemented within 3 years.

Distribution of New Housing Units

The Draft Housing Element's first goal, new housing construction, includes programs to build new housing units at all affordability levels throughout the City of Piedmont. Zoning amendments to increase the maximum number of housing units are recommended in Zones A, B, C, and D. Non-profit affordable housing developers, the most likely developers of housing affordable to low and very-low-income households in Piedmont, have expressed to City staff that land costs severely limit affordable housing developments and that developments of 30 to 60 units are needed to achieve economies of scale. Some larger developments of up to 60 dwelling units on suitable publicly owned land are necessary to provide low and very low income housing in Piedmont.

The Draft Housing Element includes programs to encourage two affordable housing developments on City-owned land in the northern part of Piedmont, four affordable housing developments on City-owned land in Piedmont's central civic center, and one religious affiliated affordable housing development with Zion Lutheran Church, in the eastern part of Piedmont. In addition, 35% of the 140 new accessory dwelling units (ADUs) planned for in the Draft Housing Element (49 ADUs) in Zones A and E would be affordable to low- and very low-income households through a program of new incentives.

Feasibility Analysis

The State criteria for sites included in the Housing Element sites inventory are sites generally 1/2 acre or larger, up to 10 acres. Sites of this size in Piedmont are rare, and many are City-owned. In addition, non-vacant sites require further explanation to substantiate how these sites could be redeveloped within the planning period (2023 to 2031). The Draft Housing Element includes analysis of redevelopment in the neighboring jurisdiction, the City of Oakland, to show that the densities anticipated for the new housing plan could be achieved in the East Bay real estate market. The requirement for feasibility analysis is to determine if the owners of property included in the sites inventory would be willing to consider a development proposal. City staff has contacted the property owners to confirm their willingness to consider redevelopment within the Housing Element planning period. In addition, the Draft Housing Element includes a calculation of realistic capacity which reduces the projected growth under the proposed housing programs.

Accessory Dwelling Units

Staff estimates that there are more than 300 ADUs in Piedmont. Recent changes to State law have resulted in City approval of over 70 new ADUs in the last 8 years. Some of these ADUs have deed restrictions limiting who can occupy the ADU and how much rent can be collected. Most of the recent ADUs do not have rent or occupancy restrictions.

If rented, a property owner must obtain a business license for their ADU. If no rent is collected for the tenant, such as a parent, adult child, or friend living in the ADU as a separate household, then a business license is not required. However, the ADU is still meeting a critical housing need as

many seniors, adult children and family friends may be low-income or representatives of special needs populations. All ADUs increase the City's capacity to house more residents.

The Association of Bay Area Governments (ABAG) collected data for over 900 ADUs throughout California and prepared safe harbor assumptions for the affordability levels for ADUs. The Draft Housing Element uses the most conservative approach for ADU affordability provided by ABAG which was 5% very low income, 30% low income, 50% moderate income, and 15% above moderate income. ADUs are financed with private capital and located on private property. California HCD does not require that the City of Piedmont survey ADU owners and occupants, review the rents, or review occupants' incomes.

The Draft Housing Element recommends that ADUs are an important source of new housing to meet the RHNA but they are not, and cannot be, the only strategy. The Draft Housing Element includes a mix of high-density housing in new mixed-use apartment buildings on Grand Avenue and Highland Avenue, multifamily apartments in Zone C (Linda Avenue), affordable housing on Moraga, Vista, and Magnolia Avenues, and affiliated housing at religious institutions.

Public Comment

Written public comment received since March 24, 2022, is included as Attachment C. Public comment received to date expresses the diversity of opinions in the Piedmont community. Public comment also took the form of participation in the Piedmont Housing Puzzle, an online planning tool. Participants provided 173 housing plans and 120 written comments on different sites in Piedmont. A summary report of participation in the Piedmont Housing Puzzle is included as Attachment D to this report.

CEQA:

Due to the physical changes anticipated by the City's response to the Regional Housing Needs Allocation of 587 housing units, determined by the Association of Bay Area Governments (ABAG), the City has contracted with Rincon Consultants, Inc. to prepare an Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA). The scope of the EIR is comprehensive, including analysis of all of the potential environmental impacts listed in Appendix G of the CEQA Guidelines. A Draft EIR is expected later this year.

CONCLUSION:

The Draft 6th Cycle Piedmont Housing Element for 2023 to 2031, represents a significant investment of time and resources of City decision-makers, staff, and the hundreds of community members who have participated in public meetings, community workshops, surveys, comment letters, and online planning tools. This investment in a thoughtful, inclusive, and open planning process is critical to development of an optimal housing plan for Piedmont. Thoughtful planning can reduce potential harm and transform growth into a benefit for the community, as a whole. For the reasons outlined in the analysis above, this report recommends that the Planning Commission recommend City Council authorize staff to send the draft Housing Element to California Department of Housing and Community Development for review.

ATTACHMENTS:

- A *Online* Draft 6th Cycle Piedmont Housing Element
https://www.piedmont.ca.gov/government/city_news_notifications/draft_housing_element_released
- B Pages 16-19 Index and List of Housing Plan Policies and Programs
- C Pages 20-92 Public Comment, received since March 24, 2022
- D Pages 93-105 Piedmont Housing Puzzle Engagement Report, dated May 6, 2022
- E *Online* Housing Advisory Committee Meeting Summary, April 19, 2022
https://static1.squarespace.com/static/5fdea2c9d61098631976bacc/t/62745190de9b6a29481e4808/1651790224319/5.4.22_Piedmont_HEU_HAC%232_Summary.pdf
- F *Online* Park Commission Meeting Video, May 4, 2022
https://piedmont.granicus.com/MediaPlayer.php?view_id=3&clip_id=2526

MEMO

To: Pierce Macdonald, Senior Planner, City of Piedmont
 From: Lisa Wise Consulting, Inc.
 Date: May 6, 2022
 Subject: ADMINISTRATIVE DRAFT – List of Policies and Programs, 6th Cycle Housing Element Update

The purpose of this memo is to list the policies and programs in the Housing Element Update Public Review Draft for inclusion in the staff report for the May 12, 2022, Planning Commission meeting.

Goal 1 Policies

- Policy 1.1: Adequate Sites
- Policy 1.2: Housing Diversity
- Policy 1.3: Promoting Residential Use
- Policy 1.4: Context-Appropriate Programs
- Policy 1.5: Accessory Dwelling Units
- Policy 1.6: Accessory Dwelling Units in New or Expanded Homes
- Policy 1.7: Housing in Commercial Districts
- Policy 1.8: Mobile and Manufactured Housing
- Policy 1.9: Maintaining Buildable Lots
- Policy 1.10: Lot Mergers
- Policy 1.11: Intergovernmental Coordination
- Policy 1.12: Multi-family Housing City Service Fee
- Policy 1.13: Remediation Grants

Goal 1 Programs

- Program 1.A: Vacant Land Inventory
- Program 1.B: Market-Rate Accessory Dwelling Units
- Program 1.C: Public Engagement for Accessory Dwelling Units
- Program 1.D: Allow Religious Institution Affiliated Housing Development in Zone A
- Program 1.E: Require ADUs for New Single-Family Residence Construction
- Program 1.F: Increase Allowances for Housing in Zone B
- Program 1.G: Facilitating Multi-family Development in Zone C
- Program 1.H: Increase Allowances for Housing in Zone D
- Program 1.I: Lot Mergers to Facilitate Housing in Zone C and D
- Program 1.J: SB 9 Facilitation Amendments
- Program 1.K: City Services Impact Fee for Multi-family Housing
- Program 1.L: Specific Plan
- Program 1.M: Manufactured and Mobile Homes
- Program 1.N: Municipal Services Parcel Study Tax
- Program 1.O: Gas Station Remediation Study
- Program 1.P: General Plan Amendments

Goal 2 Policies

- Policy 2.1: Encouraging Private Reinvestment
- Policy 2.2: Public Funds for Housing Maintenance
- Policy 2.3: Availability of Small, More Affordable Homes
- Policy 2.4: Code Enforcement
- Policy 2.5: Use of Original Materials
- Policy 2.6: Preservation of Multi-Family Housing
- Policy 2.7: Home Occupations
- Policy 2.8: Conservation of Rental Housing Opportunities

Goal 2 Programs

- Program 2.A: CDBG Funding
- Program 2.B: Availability of Small Homes
- Program 2.C: Use of Original Materials and Construction Methods
- Program 2.D: Condominium Conversions

Goal 3 Policies

- Policy 3.1: Rent-Restricted Accessory Dwelling Units
- Policy 3.2: Occupancy of Permitted Accessory Dwelling Units
- Policy 3.3: Legalization of ADUs
- Policy 3.4: Accessory Dwelling Unit Building Regulations
- Policy 3.5: Density Bonuses
- Policy 3.7: Room Rentals
- Policy 3.8: Inclusionary Housing

Goal 3 Programs

- Program 3.A: Affordable Accessory Dwelling Unit Public Information Campaign
- Program 3.B: Increase Number of Legal Accessory Dwelling Units
- Program 3.C: Monitoring Accessory Dwelling Unit Missed Opportunities
- Program 3.D: Monitoring Additional Accessory Dwelling Unit Development Opportunities
- Program 3.E: Affordable Housing Fund
- Program 3.F: Incentives for Rent-Restricted ADUs
- Program 3.G: Inclusionary Housing

Goal 4 Policies

- Policy 4.1: Communicating Planning and Building Information
- Policy 4.2: Planning and Building Standards
- Policy 4.3: Expeditious Permitting
- Policy 4.4: Updating Standards and Codes
- Policy 4.5: Code Flexibility
- Policy 4.6: Housing Coordinator
- Policy 4.7: Infrastructure Maintenance
- Policy 4.8: Infrastructure Prioritization for Lower Income Housing
- Policy 4.9: Housing Finance Programs

Goal 4 Programs

- Program 4.A: Media Strategy
- Program 4.B: Home Improvement Workshops
- Program 4.C: Building Code Updates and Ongoing Enforcement
- Program 4.D: Fee Review
- Program 4.E: Temporary Staff Additions
- Program 4.F: Capital Improvement Plan (CIP) Updates
- Program 4.G: Monitoring the Effects of the City Charter
- Program 4.H: Consider Modifications to Charter Regarding Zoning Amendments
- Program 4.I: Health and Safety Code 17021.5 Compliance
- Program 4.J: Small Lot Housing Study
- Program 4.K: Small Lot Affordable Housing Study
- Program 4.L: Allow Parking Reductions for Multi-Family, Mixed-Use, and Affordable Projects
- Program 4.M: Facilitate Multi-Family and Residential Mixed-Use Projects by Right Subject to Objective Standards
- Program 4.N: Allow Transitional and Supportive Housing by Right in Zones that Allow Residential Uses
- Program 4.O: Allow Low Barrier Navigation Centers by Right in Zones that Allow Residential Uses
- Program 4.P: Residential Care Facilities
- Program 4.Q: Parking Reductions for Persons with Disabilities, Seniors, and Other Housing Types
- Program 4.R: Permit Streamlining
- Program 4.S: Prioritize Sewer Hookups for Residential Development for Lower-Income Housing
- Program 4.T: Establish Standards for Emergency Shelters

Goal 5 Policies

- Policy 5.1: Retrofits for Diminished Mobility of Piedmont Residents
- Policy 5.2: Accessory Dwelling Units, Shared Housing, and Seniors
- Policy 5.3: Reasonable Accommodation
- Policy 5.4: Extremely Low-Income Residents
- Policy 5.5: Regional Approaches to Homelessness
- Policy 5.6: Foreclosure
- Policy 5.7: Persons with Disabilities

Goal 5 Programs

- Program 5.A: Shared Housing Publicity and Media Initiative
- Program 5.B: Shared Housing Matching Services
- Program 5.C: Assistance to Nonprofit Developers
- Program 5.D: Accommodations for Disabled Persons
- Program 5.E: Housing Support for Families in Crisis
- Program 5.F: EveryOne Home
- Program 5.G: Faith Community Participation
- Program 5.H: Housing for Extremely Low-Income Individuals and Households

- Program 5.I: Housing for Extremely Low-Income Families
- Program 5.J: Developmentally Disabled Residents
- Program 5.K: Transitional and Supportive Housing for Extremely Low-Income Residents

Goal 6 Policies

- Policy 6.1: Energy-Efficient Design
- Policy 6.2: Energy-Efficient Materials
- Policy 6.3: Weatherization
- Policy 6.4: Renewable Energy
- Policy 6.5: Energy Retrofits
- Policy 6.6: Housing and Climate Change
- Policy 6.7: Water Conservation

Goal 6 Programs

- Program 6.A: Title 24 and Reach Codes
- Program 6.B: Green Housing
- Program 6.C: Renewable Energy Funding Assistance
- Program 6.D: Financial Assistance

Goal 7 Policies

- Policy 7.1: Housing Choice
- Policy 7.2: County Fair Housing Programs
- Policy 7.3: Fair Housing Enforcement
- Policy 7.4: Fair Housing Education

Goal 7 Programs

- Program 7.A: Public Information
- Program 7.B: Fair Housing Referrals
- Program 7.C: Housing Equity

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Online Feedback Form		I would like more retail besides a bunch of banks
Online Feedback Form		I support ADU's, but they should be small with height and dimension limits. They should not impact the homeowner, not the neighbors. Build close to the house not the back property line. Go below ground to keep height low on inclines. Make sure drainage issues are addressed during building and once built.
Online Feedback Form		Better public transportation and bike accessibility should come before an increase in housing, not the other way around. Piedmont is still very car dependent. If there were a grocery store bigger and more general than Mulberry's in the center of town that would be a step to less reliance on cars. Bring back the key line streetcars so we could take a trolley to Berkeley or Oakland. The added cars from a lot more housing would be detrimental to everyone living in Piedmont.
Online Feedback Form		leave existing open spaces alone
Online Feedback Form		I am very concerned that planners, architects and the like who stand to benefit from these changes are moving the conversation forward rather than non planning/housing professionals that will have to live near any new development.
Online Feedback Form		Please don't prioritize protection of rich people's views and 'architectural features', its racist
Online Feedback Form		Please don't dump new housing in Blair Park (on Moraga). We need open space. Let's find other options for additional housing. The state requirements for Piedmont are absolutely ridiculous.
Online Feedback Form		I am concerned about the possible development of housing in Blair Park or the reservoir location on Scenic Avenue. The additional traffic and parking issues seem insurmountable.
Online Feedback Form		I care deeply for our community. I come from a diverse background and believe I have a good understanding of what people are looking for in affordable housing. I am realistic.
Online Feedback Form		Use this to complete a meaningful City Master Plan. Use the Housing Demand to build a sense of place that enhances Piedmont.
Online Feedback Form		There is no space unfortunately for low income housing
Online Feedback Form		As much as I am a proponent of ADUs, I would strongly fight (NEPA and CEQA on my side) the real impact of increase density development on Piedmont.
Online Feedback Form		There should be far more existing community input
Online Feedback Form		I think adding more affordable housing could be one way to increase diversity in Piedmont. I support changes to our zoning and building code that will bring more affordable housing to Piedmont, and urge that action be taken soon. I also urge that the city think creatively about how they foster affordable housing on their own publicly owned property.

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Online Feedback Form		I would like to see the City use the Housing Element as an opportunity to create opportunities for families of diverse backgrounds to live in our community. The high cost of housing and limited range of housing types is a major barrier to our city becoming more diverse and equitable. I support changes to our zoning and building code that will bring more affordable housing to Piedmont.
Online Feedback Form		Housing is a social determinant of health. Resources need to be more equitably distributed from high resource areas to low resource areas.
Online Feedback Form		I believe housing can not be resolved independently of other planning issues: surrounding commercial, retail, & public uses. The (welcome & necessary) major housing changes require a model and vision for each neighborhood, and in fact the entire city.
		Housing Advisory Committee, Planning Commission and City Council,
		The draft Housing Element (HE) released by the Planning Department and its consultants is a bold, dramatic plan for affordable housing in Piedmont. For the past 30 years Piedmont has relied almost entirely upon Accessory Dwelling Units (ADUs) for its housing element plans. For the first time the city will plan for long term affordable housing large enough for new families to move into Piedmont. I applaud the collective effort to issue this draft and offer comments that I hope will make the plan even better.
Email	Randy Wu	In my opinion the draft HE does not yet meet the feasibility criteria issued by the California Department of Housing and Community Development (HCD) as guidance for the preparation of housing element plans. The primary reason for this is that Piedmont has no history of permitting and building the types of housing proposed in the draft HE. It has no track record for (1) multi-family affordable housing projects on public land, (2) mixed use housing projects in the commercial districts or (3) affordable housing projects based upon the State's density bonus law. Because there is insufficient data for Piedmont the draft HE instead has a list of projects in development on various sites in Oakland (see Table B-7). Without any past production to demonstrate plan feasibility Piedmont instead should follow the HCD approved housing strategy of over-zoning.
		As background, the draft plan relies upon 140 ADUs plus a Sites Inventory of Zone B public land sites, mixed use sites in Zone D, YIGBY (Yes in God's Backyard) projects in Zone A and primary home development on single family lots in Zones A and E. Added together the draft HE has a surplus of 71 units over the RHNA goal for Piedmont (see Table B-8). This surplus is illusory, and the proposed plan's Sites Inventory should be increased. This can be accomplished through over-zoning as explained below.
		Here are some observations on each housing component in the draft HE:

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Randy Wu	The primary reason for this is that Piedmont has no history of permitting and building the types of housing proposed in the draft HE. It has no track record for (1) multi-family affordable housing projects on public land, (2) mixed use housing projects in the commercial districts
Email	Randy Wu	ADUs are overstated at 140 units. While this number is based on past production in Piedmont from 2019-2021, HCD requires Piedmont to determine whether ADUs have been used as rentals or as guest quarters and home offices. The draft HE does not have this analysis estimating how many of the planned ADUs will be used as rentals. While it is commonly known that ADUs are not often rented in Piedmont this is not yet reflected in the draft HE. The 140 planned ADUs should be reduced by at least 50% to 70 ADU rental units. This would be a high aspirational goal for the Planning Department in the sixth housing cycle. This reduction would eliminate the 71 unit plan surplus, but it should comply with HCD required analysis for ADUs.
Email	Randy Wu	The 7 Zone B public land sites in the Sites Inventory are backed by Blair Park as an alternate site. This predisposition towards the Corporation Yard and the Civic Center area is not supported by an objective evaluation of public land sites. It also is a preliminary conclusion that should not be made before the draft programmatic EIR has been released and reviewed by the public. Blair Park is the largest, undeveloped and unused site owned by the city. It should be included in the Sites Inventory along with the Corporation Yard and Civic Center sites. This will increase the Sites Inventory capacity and could make the draft HE feasible based on HCD guidance. Over-zoning requires enough additional land for residential development to yield at least a 20% surplus above the city's RHNA goal. Blair Park is large enough to provide a 20% surplus by itself.
Email	Randy Wu	The 5 Zone D sites are designated as Above Moderate or market rate units. The only financial modeling disclosed by LWC in October last year had unrealistically low assumptions for construction and land costs. In addition, the October model inputs included a 15% low income inclusionary requirement which capped rent revenue at the affordable housing income limit. The proposed density of 80 dwelling units/acre for Zone D has not been shown to be feasible under a publicly disclosed financial model for a market rate project. A revised model run should be prepared to support the recommended density. As Piedmont has no track record or market trend for mixed use housing, financial modeling supporting this density should be disclosed.

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Randy Wu	The YIGBY sites rely upon implementation of the State's density bonus law in Zone A. This State law is among the most important incentives for affordable housing and has been used in many other jurisdictions. However, Piedmont's Chapter 17 only cross-references this law in Zones C and D. To date the Planning Commission has not granted a density bonus for an affordable housing project in either zone. To be a credible component of the draft HE the city should explain why introduction of this State law to Zone A will have a different result. The record to date is that no development has occurred under the city's cross-references of the State's density bonus law and the current densities for Zones C and D.
Email	Randy Wu	The draft HE's single family lot component also is devoted to Above Moderate housing. Needless to say there is not a track record or market trend in Piedmont for this component. Apart from ADUs new home construction in Piedmont has been limited in the current housing cycle to the seven townhouses on Linda Ave. The city will need to do more to make primary home development a feasible component of the draft HE. In summary the draft HE is a very good start, but it does not yet meet HCD guidance for plan feasibility. The ADU number should be reduced based upon HCD required analysis of rentals vs guest quarters and home offices. Due to the speculative nature of the new housing proposals, which are untested in Piedmont, the Sites Inventory should be increased through over-zoning to include Blair Park. Thank you very much for the detailed draft housing element, which reflects your hard work and countless hours of time. Also, thank you for the effort at outreach. The flags on the streets are great!
Email	Linda Loper	As a member of PREC, I would like to add a few points of emphasis to the PREC submittal: Relying on ADUs for the tally of affordable housing is not realistic without a regulatory structure that guarantees an ADU will be rented at affordable rates. If creating a database is the end of the effort on ADUs, then that doesn't help create dependable, predictable affordable housing. Counting ephemeral housing doesn't seem valid. The HE must be realistic. Otherwise, it's vulnerable to challenge. Choosing sites for development that are already developed does not make sense. Both Blair Park and the Corporation yard should be considered together as probably the most viable site in town for the development of affordable housing. As I've said before, the corp yard wastes so much valuable space. A more compact drive-through facility in Blair Park makes a lot of sense. Blair Park is lovely, visually. (I live close by.) Were we in a rural area, it would remain open and untamed. But it is crying out for a higher use. If it is seismically safe. Please include it in the Housing Element plan for developing affordable Thank you again for all the time and effort you have devoted to this very important project to develop real housing that is affordable.

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Deborah Leland	The DHE identifies four sites for the development of lower income multi-family rental housing: two 1.0-acre parcels along Moraga on either edge of Coaches Field, plus the City Hall site and the Corey Reich Tennis Center site. My questions and comments regarding this are as follows: I strongly believe that the Kennelly Skate Park site should be included in the sites inventory, especially if the City is considering development along Moraga downhill of Coaches Field that could provide direct access from Moraga to that site. The skate park does not appear to be well-used, and a skate park could be incorporated at multiple other locations throughout the City that would be more readily accessible (for example, the concrete/dirt lot adjacent to the Beach playground, or the grassy landscaped area adjacent to the fenced in Linda dog park, to name just a few options off the top of my head).
Email	Deborah Leland	While I understand the logic of the Specific Plan for the Corporation Yard area, I am concerned that the timeline for such planning is far too slow and would preclude use of Measure A-1 funding to facilitate development of any site along Moraga (since Blair Park is only to be considered as an alternate if the Corp Yard sites can't produce enough units). The timeline set out in the DHE contemplates issuing a development RFP in mid 2025, and entering into an agreement with development partners by early 2026. The timeline for Measure A-1, assuming the County grants an additional one-year extension as requested by the City, would require entering into a development agreement and committing funds to the project by December 2023.
Email	Deborah Leland	With regard to Measure A-1, I think it would make far more sense for the City to complete some basic feasibility analysis of the Corp Yard area and Blair Park now (and include Blair Park in the sites inventory in case that ends up being the most feasible site), and then promptly proceed with the planning necessary to issue an RFP for development of the most readily available site. Or perhaps the City intends to proceed with development of one of the Vista Ave sites for use of Measure A-1? In any event, now that the Draft Housing Element has been released and public comment on it underway, the City should re-initiate its discussion regarding Measure A-1 to allow the public discussion on this to proceed. As you likely recall, discussion regarding possible sites for Measure A-1 was effectively put on hold until the Housing Element was released.
Email	Deborah Leland	Regarding the Vista Ave sites selected, it would seem to me to make sense to do a Specific Plan for the City center/civic center. For example, one could then consider building parking under the tennis courts, with a number of spots designated for housing to be developed in the civic center, such as at 801 Magnolia. Parking below tennis courts could also be used for the City fleet instead of using prime central property near the exedra for parking and thereby free up that land for development. Piedmont Park could also be included in the Specific Plan, to maximize the open space, recreation resources, and arts/community space that could be provided in the park and community hall (for example, expanding the community hall to two stories to incorporate space for an arts center).

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Deborah Leland	<p>More generally, I believe more emphasis should be placed on prioritizing housing in the civic center, in closest proximity to schools, city offices, and transit.</p> <p>Proposed Multi-family development impact fee:</p> <p>Policy 1.12 on p.36, (ironically, under the heading of Goal 1: New Housing Production) states, "Multi-family Housing City Service Fee: Require developers of multi-family housing, including mixed-use multi-family housing, to contribute to the costs of City services and infrastructure." On p. 41, under Programs, the Draft HE expands upon this, and clarifies it is intended to be an Impact Fee on multi-family development: "1.K City Services Impact Fee for Multi-family Housing The City has high standards for provision of services to community residents. In order to maintain the level of service, City will study the nexus between the impacts of new multifamily development on City services and infrastructure and the costs to provide the services and infrastructure. If warranted, such study would provide the basis for impact fees for developers of multi-family housing including mixed-use multi-family housing. Fees received will help fund continuation of service to offset potential impacts of the increased population envisioned in the Housing Element. • Objective: To ensure new projects help pay for the cost of maintaining City services and infrastructure."</p>
Email	Deborah Leland	<p>Why are multifamily projects singled out for this expense? Wouldn't single family homes have the same impact? I am concerned that this Policy/Program will be an impediment to creation of multi-family housing. At a minimum, the DHE should include the caveat stated elsewhere (i.e. regarding a new tax on each new SF unit or ADU) that "Potential revenue enhancements will be measured against the possibility of creating new constraints to housing production." Furthermore, a carve-out should be included for affordable units.</p>
Email	Arjun Varma	<p>I am by no means a housing expert, but it seems like the current plan is to put a majority of the affordable housing on the outskirts of the city. I was wondering what might be involved in moving high density housing more to the center of town. It seems like converting/rezoning the existing retail/office space (what is currently around Mulberry's, the Piedmont Veterans Hall, Wells Fargo, the Piedmont Community Church, etc) into mixed use (preserving the ground level banks, markets, etc) could be a viable option that doesn't marginalize a good number of future residents to the city boundary near the cemetery. Would a Highland Ave location also provide for better access to public transit? I wasn't sure if there was already a parallel plan to handle the influx of traffic that would impact Moraga Ave with the current draft housing element.</p>
Email	Arjun Varma	<p>I realize any plans for change will likely involve hurdles/barriers, so I was just curious what those might be. It seems like historical preservation might need to be balanced with the needs of a growing community. I understand that it does make sense to develop in the proposed area since there is nothing there at the moment, but it seems like bringing future residents to other parts of the city might also be beneficial. It also seems like incorporating new residents throughout the city is more aligned with what seems to be the sentiment of the city that states they largely support DEI goals. I understand this is a long process and there might be many changes along the way, but I just wanted to get a better understanding of the current approach. We have been so happy since moving to Piedmont, and can imagine many happy years here, so I just wanted to share some thoughts.</p>

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Christiana Macfarlane	Thank you for sharing the draft housing element with Piedmont residents. The map included with the plan shows a very lopsided plan to put most of the new housing on the corporation yard on Moraga Ave. or Blair Park on Moraga. These locations are not near public transportation, in contrast to the sites on Grand Avenue or the center of the city. The increased cars resulting from the proposed housing would drastically alter the traffic on Moraga and nearby streets. The traffic of parents dropping off kids at school is already extreme. Have you considered what it would be like with 100+ more families living on Moraga Avenue?
Email	Christiana Macfarlane	There are many large lots on the Southeast side of town that the plan suggests should be above moderate income housing. It is not equitable to have such a great proportion of the density burden being borne by residents on the northwest side of town.
Email	Christiana Macfarlane	There are many undocumented apartments being rented in Piedmont that already result in increased pressure on traffic, parking and more children in our schools. Many of these apartments are affordable to low income individuals and families. These units should count toward our responsibility to provide housing to families at a variety of income levels.
Email with attached PDF	YIMBY Law and Greenbelt Alliance	We are writing to remind you of Piedmont's obligation to include sufficient sites in your upcoming Housing Element to accommodate your Regional Housing Needs Allocation (RHNA) of 587 units. In the Annual Progress Reports that Piedmont submitted to HCD, we observe the following trend of housing units permitted in the last three years: Year: Housing units permitted 2018: 14; 2019: 11; 2020: 24; Average, 2018-2020: 6.
Email with attached PDF	YIMBY Law and Greenbelt Alliance	To meet the 6th cycle RHNA target, the rate of new housing permits in Piedmont would need to increase from 16 units per year in 2018-2020 to 73 units per year in the next 8 years. This is a 349% increase from recent years. If the current pace were to continue, Piedmont would meet only 22% of its new housing target. Based on these trends, it is unlikely that Piedmont's existing realistic zoning capacity is sufficient to meet its 6th cycle RHNA target. According to HCD's Housing Element Sites Inventory Guidebook, housing elements must analyze the realistic capacity of their sites, which may include considerations of "[l]ocal or regional track records", "past production trends", and "the rate at which similar parcels were developed during the previous planning period". A housing element that does not include a significant rezoning component is therefore unlikely to be compliant with state law.
Email with attached PDF	YIMBY Law and Greenbelt Alliance	We urge Piedmont to include a major rezoning component in its Housing Element—a rezoning large enough to close the gap between recent housing production trends and the RHNA target. The rezoning should be within existing communities and should comply with the city's obligation to Affirmatively Further Fair Housing. We also urge Piedmont to ease any other constraints, such as discretionary approval processes or impact fees, that may impede the rate of development on your city's housing sites.

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Website Comment Form	Jerry Kennelly	<p>1. There are many unregistered "in-law" units and ADU's in the city. Declare an amnesty and allow people to register them without fine or fees. The City can then pick up 100+ housing units to meet the State quota requirement at essentially no cost to anyone.</p> <p>2. Use the vacant land known as "Blair Park" to build a multi-family apartment complex of 150 to 200 units and target 35% for low income residents. Many builders would step forward to do the development.</p> <p>Hello Kevin and Pierce,</p> <p>I'm sending information that I'm hoping will be useful to you during the city's Housing Element process. At MidPen Housing, where I work, we've created some case studies featuring our affordable home developments that demonstrate how cities have used the housing element process to make affordable housing possible and more feasible. I think it's got some great examples in it of effective city policies, some of which could be adopted in Piedmont. And at a minimum it helps to demonstrate what high quality affordable housing looks like!</p> <p>I'm going to also separately send this to the City Council members - if you think this is useful, could you also please send on to the Planning Commission members and the Housing Advisory Committee?</p> <p>Thank you,</p> <p>Alice Talcott</p>
Email with attached PDF	Alice Talcott	<p>The expense of housing hits senior citizens especially hard, as they are often on fixed incomes, unable to work, etc. Therefore, I feel a substantial portion, including any and all low income housing, of the new proposed housing element, should be devoted to persons at least 55 years of age. We should also give priority for housing to olderPiedmont residents, to the extent possible. This would encourage older residents to sell</p> <p>I'm writing to support this program. I'm glad to see our city pay back a little of all that we've reaped, especially from the years when there was redlining.</p> <p>Thank you for this, Agnes</p>
Email	Mike Richmond	<p>Please consider the use of the decommissioned reservoir area at the top of Dudley Ave. There would be room for a beautiful town home development. I did not see a place on the form to make suggestions. It would also be good to building housing above businesses on Grand, remove the gas station and build there as well. Could any of the gigantic Piedmont homes that are too large for one family be repurposed into flats?</p> <p>Sincerely, Susan Goldsmith</p>
Email	Agnes Lord	<p>Please consider the use of the decommissioned reservoir area at the top of Dudley Ave. There would be room for a beautiful town home development. I did not see a place on the form to make suggestions. It would also be good to building housing above businesses on Grand, remove the gas station and build there as well. Could any of the gigantic Piedmont homes that are too large for one family be repurposed into flats?</p> <p>Sincerely, Susan Goldsmith</p>
Email	Susan Goldsmith	<p>Sincerely, Susan Goldsmith</p>

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Philip Stein	With caveats, I'm all for a thoughtful approach to adding affordable housing units in Piedmont over time. The caveats are that: 1) those units are spread throughout every neighborhood in the City; 2) Zoning changes are enacted to enable 1); and 3) infrastructure, environmental and safety issues are addressed in any developmental plan.
Website Comment Form	Donna Tai	Philip Stein In the 24 years we have lived in the center of Piedmont it has already become much more crowded with traffic passing through and parking is difficult especially during school days but also when there are events at Piedmont Park etc. Overall this has a negative effect on quality of life for the residents. Putting more housing units in an already busy central space is not smart. I cannot begin to tell you how many episodes of near miss traffic accidents we have witnessed in front of our house in addition to people speeding when they hit the wide area of Highland Ave between Sierra and Sheridan. The police have a record of an incident a few months ago when 3? parked cars were sideswiped in front of our house and damaged at 9am in the morning. Increasing the population in the already busy and multi functional town center is just plain stupid and risky.
Email	Robin	We are the owner of 28 Olive in Piedmont and I would like to provide comments regarding the piedmont housing plan. Our neighbor brought this to our attention today. I was not aware of the project and more importantly that we can provide feedback to the city. Reviewing the plan, it sounds like there is a proposal for 1 or 2 houses on the Plymouth church lot on Olive between Oakland Avenue and Lake avenue. From the information I reviewed, it was quite difficult to understand what is the exact plan for this location. It looks like the density of 2 dwelling unit per acre proposed in the map is double the density of similar streets in our neighborhood. I'm not opposed to have new single family home in our street but I'm afraid the plan call for a multi units, such as or an duplex/condos or something bigger. I would appreciate getting clarity of this point and what is the decision making process. A single family house will have a positive impact on the neighborhood but any project involving a multi-units will have negative impact for our quiet street and will likely decrease our home values.
Email	Robin	Robin Giguere and Banafseh Rafii I would also like to stress that it is difficult to understand the information shared by the city regarding the housing plan. I don't recall getting any communication from the city regarding this project and today's deadline for feedback. I would appreciate getting written communication by mail from the city regarding this project in the future. We didn't heard anything from my other neighbors regarding this project and we are assuming we won't be the only one surprised by this project.

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Robert Saltzberg	<p>The Piedmont Housing Puzzle is confusing. As an initial comment, a number of neighbors and I have tried to use the Piedmont Housing Puzzle, but find it confusing. We cannot understand it or figure out how to use it. Use of the Puzzle may result in user input contrary to the users' intentions. For example, the website shows for Zone N (Plymouth Community Church) "1 housing unit" and "2 dwelling units per acre." What does this mean? The Help button does not clarify. Also, the difference between "housing unit" and "dwelling unit" is unclear. The circled "i" information button indicates that Plymouth Church owns 0.45 acres in Piedmont Zone A, asks whether new housing units could "be constructed as part of an expansion of this religious use," and enables clicking to add up to 9 housing units. Where is Zone A? The map shows the lot in Zone N. Does the information mean that only units dedicated to a "religious use" can be added? Also, adding even one unit would exceed the two unit per acre limit. Finally, adding a comment to a particular site/zone in the Puzzle may be interpreted as user endorsement of that site as a candidate for housing when, in fact, the user opposes designation of that site as a candidate.</p> <p>Sincerely,</p> <p>Robert Saltzberg</p>
Email	Robert Saltzberg	<p>Adding housing to Zone N (Plymouth Community Church) raises at least the following issues: Easement: Piedmont City Hall records indicate that a "30' [foot] GARDEN EASEMENT" attaches to the lot. Building on the lot could violate the easement. Density: Although the lot may be appropriate for a single family home, it is not appropriate for higher density. The street comprises single family homes. To my knowledge, the street includes no multi-unit buildings. Drainage / water quality: The drainage on the lot is insufficient. During rains, a stream of water spills onto the adjacent property. The lot is also upstream of houses on the other side of Olive Avenue. To my knowledge, those houses have had issues in the past with water flowing from higher ground. Addition of housing to the lot could exacerbate those issues. The builder of any unit on the property must also ensure water quality downstream and in the water table is not negatively impacted. Erosion and other impacts: The lot is hilly. Grading and removing vegetation can lead to soil erosion. Parking: At least before the COVID pandemic reduced commuting, cars would fill up much of the street parking space on Olive Avenue shortly before, during and shortly after the workday. The cars belonged to commuters who would walk 1-2 blocks to the nearby Transbay bus stop and casual carpool line on Oakland Avenue. Adding units to the lot would exacerbate the parking situation, especially if they did not include on-site parking. Traffic: Adding housing will increase traffic, at least incrementally. And, related to the parking issue, further limiting parking spaces may cause drivers to drive around more to find street parking. This is a family neighborhood, with small children playing on the sidewalks and sometimes crossing the street. Moreover, a nursery school is around the corner on Lake Avenue. Endangered species: The lot would need to be surveyed for any environmental impact (e.g., under CEQA), including impact on protected plant and animal species. Historic preservation: The lot should be surveyed to ensure any objects of a Native American or other historic nature are properly treated.</p>

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Jack	I completed the "Piedmont Housing Puzzle", which was informative and fun. Nice job! The puzzle identified many potential housing sites. However, I noticed the abandoned water reservoir near Blair and Scenic was not among them. What are the plans for this site? It's a large, essentially abandoned site, that doesn't seem to be generating any revenue for the city. This seems like an ideal place to develop some of the very-dense housing needed to satisfy the revised housing mandate. Developing it would not result in displacing much of anything. Was this site considered? If so, what was the reason to exclude it?
	Jack Preston	
Email	Patty Siskind.	Although I'm new to the planning process for increased housing I had one immediate reaction to the proposed low income housing. I don't think it's good to provide all the housing in one location. This will significantly impact traffic in one area versus spreading it throughout the town. Additionally with the state lifting restrictions on building on lots, it seems that duplexes or triplexes or division of larger lots could accomplish this as well. Coronado California has done this nicely. I also feel there may be some discrimination bunching housing on the perimeter of the city rather than including them in the neighborhoods. Patty Siskind
		I'm surprised that I had to be alerted by my neighbors that the city of Piedmont is planning to permit housing with twice the population density of New York all around Coaches Field. But I looked and saw it, it's buried pretty deep (page 156 of a 374 page document). I had seen the signs about town but I assumed the 500 new houses would be somewhat evenly distributed. Instead they are stacked up in our neighborhood.
		Moraga is already an extremely dangerous road. I and two other people that I know have been struck by speeding cars while biking there. The cities Safe Streets plan already leans pretty heavy on the bike symbols painted on Moraga to make it seem like a place where people can bike. When you throw in hundreds of new cars because there is absolutely no transportation near Coaches Field the bodies will stack up.
Email	Kyle Killion	I assume that this plan is just crazy high numbers put in place to satisfy a poorly written requirement by the state. In the case that a developer actually tries to build something with even half of the proposed density we'll have the rally as a neighborhood and most likely sue to stop it. That seems like a lot of work to put on citizens and a cost to the city to have to deal with the lawsuits.
		Instead I think the city should come up with a better plan.

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Scott & Rika Mortimer scottmort@yahoo.com	We have lived in the northern part of Piedmont on Abbott Way for over 20 years raising our family here with both our kids attending the local schools and enjoying all that the community and its location have to offer. We appreciate all the effort to date made by the city to respond to the challenge of this housing cycle and address the need to plan for the development of up to 587 new housing units to help alleviate the regional housing crisis. We particularly appreciate the city soliciting and incorporating input from all potentially affected neighborhoods to ensure that projects are appropriately conceived, prioritized and compatible with existing neighborhoods and infrastructure. In a project that is intended to be a city-wide response, we believe that efforts to make affordable housing should also be borne equitably across the community and the city should actively assess ways to integrate new housing in all areas of Piedmont. The current plan proposes to position the bulk of new low-income units in the northern part of the city near Coaches Field, and there are some concerns as well as opportunities that we would like to point out regarding the plan.
Email	Scott & Rika Mortimer scottmort@yahoo.com	First, allocating the large portion of affordable housing only on the northern edge of the city is not a thoughtful or equitable approach to development and is an ineffective way to promote diversity and integrate new residents into the Piedmont community. Making only residents of a couple specific zones endure construction noise and traffic congestion as well as the environmental impact from such large developments for years to come is clearly not equitable. Piedmont should take the time needed to carefully plan a more equitable distribution of all income unit types across the city and promote ways to truly welcome new residents to our community.
Email	Scott & Rika Mortimer scottmort@yahoo.com	We recommend first focusing large multi-unit development with an eye to leveraging synergies with existing public services (e.g., transportation and schools) and commercial areas. Isolating multi-unit residents in the northern edge of town with less services would create significant additional infrastructure needs to accommodate new residents. Currently, the northern part of the city is impacted by significant morning rush-hour traffic (especially around school start times) and narrow roads without consistent sidewalks that have the potential to become hazardous with major additional development. A large multi-unit building may substantially aggravate these problems, and such plans should not be considered without appropriate plans for street widening, sidewalk improvements, traffic safety improvements, and expansion of public transportation. In this regard, we advocate prioritizing development in the downtown core area where there is greatest access to existing public services as well as public properties that may be redeveloped.
Email	Scott & Rika Mortimer scottmort@yahoo.com	Second, we strongly support the development in the downtown area followed by distributed development in multiple areas across the city. For example, we encourage a city-wide building code update to enable multi-unit property development across all zones, enabling duplexes, triplexes and fourplex development as well as ADUs on lots throughout the city. On large lots, more extensive development may be possible as well and should be facilitated as part of the planning effort. With expansion of multi-unit properties, new units may be more seamlessly integrated throughout the Piedmont community and avoid creating a disproportionately targeted zone.

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Scott & Rika Mortimer scottmort@yahoo.com; 5 Abbott Way	Third, there is an opportunity to expand the ADU component of the plan by specifically allocating resources to promote ADU growth. The current passive assumption relying on historical trends should be reassessed. Please consider proactive strategies, including incentives, to encourage ADU development in the city, potentially modeling off jurisdictions who may have had success in positive ADU growth. Thank you for the significant work to date. We appreciate your consideration for a balanced approach to the housing crisis, using multiple tactics across all housing zones in the entire Piedmont community yielding an integrated outcome. Sincerely, Scott & Rika Mortimer
Email	Markus B. Niebanck, PG markus@amicusenv.com	<p>This memo follows our conversation of last week regarding the evaluation of Zion Lutheran Church (5201 Park Boulevard) as a potential opportunity site for housing development. During our conversation I shared my sense that the existing B.2.5 language misrepresented the use/health of our church property (it isn't of marginal economic viability and not at the end of its useful life). You indicated that Zion was identified because of its acreage and not for these other reasons. It feels as if the other relatively large parcels were chosen based on size as well.</p> <p>For the sake of accuracy, please consider the verbiage modification shown in redline as follows:</p> <p>B.2.5 Suitability of Nonvacant Sites Since residential land in Piedmont is generally built out, the sites inventory includes nonvacant sites. Nonvacant sites are relied on to accommodate more than 50 percent of the City's lower income RHNA. Therefore, the City conducted an analysis to determine if substantial evidence exists to support the premise that housing can be accommodated on these sites and/or existing uses on these sites will be discontinued during the planning period (2023-2031). Nonvacant parcels primarily include relatively large properties (over 0.50 acres) irrespective of current use, underutilized sites with surface parking and commercial buildings where the existing uses are of marginal economic viability, or the structures are at or near the end of their useful life. Screening for potential sites considered market conditions and recent development trends throughout the Bay Area and the State and utilized conservative assumptions in projecting units well below observed densities for residential and mixed-use projects.</p>

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Rami and Daphne Albert	<p>We are residents of Abbott Way in Piedmont, and we are excited at the prospect of being part of the solution of California's unprecedented housing crisis. However, the current proposal to locate 132 units in one neighborhood by the corporate yard by Coaches Playfield creates more problems than it solves for both new and existing residents.</p> <p>The spirit of the housing plan is to abolish patterns of segregation and racially concentrated areas of poverty, however when the bulk of affordable housing is designated for the farthest corner of Piedmont, it seems that we are only perpetuating economic, social, and often racial segregation and not advancing integrated and balanced living patterns. The current plan does little to affirmatively further fair housing as required under the law since low-income housing is segregated in one location at the Piedmont/Oakland border and not truly integrated into Piedmont.</p> <p>Piedmont shirks its responsibility to provide access to education, transportation and employment with the current proposal to place half of the low-income housing in an area with no sidewalks and which is not walkable for most people to any of those categories. With distance as a barrier and no sidewalks in this neighborhood, cars will be required for residents which will add traffic and congestion and pose a safety hazard for pedestrians, especially for children in the neighborhood.</p> <p>We are also concerned that the current plans overall are unrealistic and urge the City to consider spreading low income housing across all of Piedmont by changing zoning laws to allow ADUs and multiplex housing (especially in Zones A and E) across the city and revising zoning laws on Grand Avenue to allow units that are higher than 30 feet. Grand Avenue currently has the infrastructure that this neighborhood lacks like sidewalks, wide streets, traffic lights, public transportation and access to employment/commercial zones. We also urge the City to consider re-zoning the City center to allow increased occupancy housing.</p>
Email	Rami and Daphne Albert Abbott Way, Piedmont	<p>The current plan will contribute to inefficient resource allocation and poor housing outcomes. Will there be compensatory damages for affected property owners? What is the plan to scale up public services like sanitation, sewers, pollution reduction and public education? If new housing attracts new residents, then the city must have the finances and a plan to adequately expand municipal services to avoid perpetuating historical discrimination in the provision of municipal services to low income communities.</p>
Email	Rami and Daphne Albert Abbott Way, Piedmont	<p>Raising property taxes to finance incremental municipal services should not be an option, especially for those of us who are retirees and/or have limited income. Most Californians have their savings in property value, and our immediate neighborhood will certainly experience a disproportionate negative impact on the values of our homes due to the increased density of low-income housing in one small neighborhood on the outskirts of Piedmont. There are studies that support how low-income housing DOES lower surrounding property values when it is aggregated in one location within a city.</p>

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Rami and Daphne Albert Abbott Way, Piedmont	<p>Wildfire & Earthquake Risk and the economic and human cost to the Community: Evacuation</p> <p>We live in a populous community where the highest density of new housing is being proposed for the riskiest wildfire zone in Piedmont. In fact, some of the proposed new homes are located where the Oakland Firestorm occurred in 1991! See attached map.</p> <p>This is an area of the community that is at highest risk from wildfire compared to the rest of Piedmont. So many California wildfire evacuations turn into deadly traffic jams, and I am not seeing enough roads (nor are the current roads sized) to lead so many neighbors to safety. Our narrow roads have restricted access, and these road conditions could lead to problems for emergency responders as well as people evacuating.</p> <p>We need realistic and publicly available evacuation plans with route maps and zones. There were at least 10 deaths in the Paradise Camp Fire of people who died in their vehicles trying to escape. The Cedar Fire in San Diego (2003) also claimed 10 lives of people trying to escape in their cars. Large, undeveloped meadows can oftentimes serve as a refuge from wildfires. The City and State should be making it harder to build in open spaces on fire lines and should look to infill the city center instead.</p> <p>To ignore or downplay the risk when the fire season has been extended to an all-year round event is a tragedy waiting to happen. It's not a question of "if" but "when" a major fire will hit our area. Ratio of people to limited evacuation routes should be a major concern.</p>
Email	Rami and Daphne Albert Abbott Way, Piedmont	<p>Earthquake Risk: The proposed location of half of low-income housing is closest to the Hayward Fault line. The Hayward fault has a relatively short recurrence time for earthquakes, so the expectation is that we are due for a big one. There is a 72 percent likelihood of a 6.7 earthquake or larger happening along the Hayward fault, which is considered the most dangerous in the US.</p>

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Rami and Daphne Albert Abbott Way, Piedmont	<p>Homeowners' Insurance</p> <p>Building new structures (wildfires jump from structure to structure) will create an undue burden on existing homeowners that the City is forcing on us. Increased insurance costs or not being able to get insurance at all is a foregone conclusion. Our insurance is already so expensive, and premiums are on the rise for homeowners in areas at risk of wildfires (my premium when up 33% last year), and some insurers are refusing to renew policies for people in our area as happened to us in 2012 and many of my neighbors more recently.</p> <p>The current proposal is building in our wildland-urban interface. Building in this area places the burden of paying for increased wildfires solely on the residents who live near these fire lines. The State and the City need to mitigate climate risk for the existing homeowners, not encourage reckless building in high risk fire areas.</p> <p>I am a resident of Piedmont and wish to express my strong objection to the Low-Income housing plan. I currently reside at a small enclave of about 30 homes. More specifically, there are about 6 homes above Spring Trail. The plans to add 50 homes on Spring Trail (seems rather difficult) is, therefore, a potential disaster for us as it would increase density by 20 fold where as several other possible sites (including the business center) are untouched. It is clear this plan did not seriously consider other options in Piedmont and assumes that we are not going to resist this plan with all available tools. Our neighbors purchased their home last year. That is, they put up their life savings to come up with a 20 percent down payment. This plan will effectively wipe them out and severely diminish their ability to enjoy their most precious investment. I have discussed this matter with an experienced attorney and plan to bring suit against the city given the concentration of housing in a small enclave in town without serious consideration to other sites.</p> <p>I learned at a young age that causing financial harm to people is an act of violence. I want you to know, that as a group, we will not ignore this act of violence and will fight this plan with every legal avenue we can manage. The alternative (substantial and un-equal loss in value and enjoyment) is far more costly.</p>
Email	Rabin Nabizadeh Abbott Way, Piedmont	<p>We are writing first to commend the goal of Piedmont to provide more affordable housing and diversify the demographics of our city. Second, although we are in favor of this goal, we have specific concerns about the proposed plan. We live at When we purchased this house, we knew it would be our "forever" home--a place where we will raise our sons (ages 4 and 2) and take part in the vibrant Piedmont community. We were drawn in by the tranquility of our little neighborhood, the quiet streets, and the friendly neighbors. Our part of town encompasses a small area of <50 homes where neighbors walk their dogs in the streets, kids run between houses and we can enjoy the trees, birds and beauty of our surroundings - much like other areas in Piedmont. Looking at the proposal, it seems a disproportionately high concentration of denser, more affordable housing (132 units) would be added to our neighborhood. While we welcome the increase in housing, and would definitely welcome new neighbors, this specific proposal is concerning to us.</p>
Email	Raj Sodha and Anne Newcomer	<p>We are writing first to commend the goal of Piedmont to provide more affordable housing and diversify the demographics of our city. Second, although we are in favor of this goal, we have specific concerns about the proposed plan. We live at When we purchased this house, we knew it would be our "forever" home--a place where we will raise our sons (ages 4 and 2) and take part in the vibrant Piedmont community. We were drawn in by the tranquility of our little neighborhood, the quiet streets, and the friendly neighbors. Our part of town encompasses a small area of <50 homes where neighbors walk their dogs in the streets, kids run between houses and we can enjoy the trees, birds and beauty of our surroundings - much like other areas in Piedmont. Looking at the proposal, it seems a disproportionately high concentration of denser, more affordable housing (132 units) would be added to our neighborhood. While we welcome the increase in housing, and would definitely welcome new neighbors, this specific proposal is concerning to us.</p>

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Email	Raj Sodha and Anne Newcomer	First, we are concerned with safety. We do not have the infrastructure to support ~4x the number of homes in the area. Our streets are narrow, with blind turns. There are no sidewalks, nor is there room to build them. With so many young kids around (some of whom walk in the road to take the Spring Path on their way to school), we fear they would not be able to safely navigate the neighborhood with the inevitable increase in car traffic on the roads. Furthermore, with wildfire posing a real threat to our hillside, adding so many more homes without careful attention to potential emergency egress options would be a terrible mistake.
Email	Raj Sodha and Anne Newcomer	Second, by increasing the number of homes so drastically, it would detract from the tranquility and natural surroundings that brought us to this part of Piedmont. All neighbors - old and new - would experience more traffic and noise, and enjoy less green space.
Email	Raj Sodha and Anne Newcomer	Third, despite a purported focus on diversity, equity and inclusion in our community, this plan would functionally not achieve these goals. Rather than integrating folks of different backgrounds and income levels across Piedmont, the plan would segregate the majority of all proposed low-income housing into one neighborhood. While we'd welcome the addition of new neighbors at any income level, we don't feel this plan achieves "integration" in any real way and certainly does not reflect the shared Piedmont value of welcoming new neighbors into all parts of our community.
Email	Raj Sodha and Anne Newcomer	Again, we are in favor of increased housing, especially affordable housing. So, we'd like to share some additional thoughts we feel should be considered: While opposed to 132 units in our immediate neighborhood, we are open to a reduced number of units in our neighborhood, and therefore a better distribution of total units throughout Piedmont. Blair Park should also be considered as an option. We'd like to avoid extending the Abbott Way cul de sac as this would minimize the traffic, congestion and safety issues in our immediate neighborhood.
Email	Raj Sodha and Anne Newcomer	Zones A & E should be allowed to build duplexes and fourplexes, theoretically increasing the number of units that could be built in other geographical areas of Piedmont. Areas like Grand Ave that currently have the infrastructure to support increased housing should be reviewed, and zoning changed, to allow for increased housing units. Thank you for taking our considerations into your decision and we look forward to being an active part of this decision and solution.
Email	Marilena Scott	Thanks for all the work you are doing for us. Please extend the time until November for the public comment period on the additional units. The document is very thorough, and it's a lot to read. There's so much to consider. Does anyone have a summary of the 300+ pages with maps to show where the projects are? I see them in the document, but I need something simpler to get an overview. Thanks so much.
Email	mike mcconathy	Re: Housing Element Comments for 5/12/22 Planning Commission Meeting After reviewing the "Draft" Housing Element report from April 2022 (and hearing/seeing comments so far), it appears there are some glaring issues which have been ignored:

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Email	mike mcconathy	<p>The Housing Element Conflicts with the City Charter Within the 374-page Housing Element, just 3 pages seem to provide an actual plan. Pages B-12 to B-14, in Appendix B (Housing Capacity Analysis and Methodology), describe the City's solution: build the very low and low income affordable housing behind Coaches Field and/or in Blair Park. These parcels are currently designated ZONE B (Public Facilities), which permits parks, city buildings, certain ADUs, public and single family/ZONE A use. (Municipal Code 17.22). But the Housing Element proposes that duplex and multi-family units be constructed on ZONE B land. (Appendix B, B-13). The proposal suggests that the Coaches Field site would have 132 units, and Blair Park would include 210 units. Such construction would exceed ZONE B, and would fall under ZONE C (Multi-Family Residential) or D (Commercial & Mixed Use). The Housing Element suggests that the City can just make "zoning amendments" to allow multi-family construction in ZONE B areas. (Housing Element, Section IV.1.F). Housing Advisory Committee members and PREC representatives have all stated that such zoning amendments need only be approved by the City Council. But this ignores the 2018 Piedmont City Charter which provides that no zone shall be reclassified, or reduced/enlarged without a public vote. (Section 9.02; Zoning System). Unless Piedmont intends to own/operate these public housing facilities on its own lands, it would appear that allowing ZONE C/D construction on ZONE B parcels will require a ballot measure. Otherwise, what is the point of even having a City Charter? Remarkably, the Housing Element concludes that the City can simply edit the 2018 City Charter to "eliminate" those pesky voter-approval requirements needed for zoning changes which are currently contained in Section 9.02. (Housing Element, Section IV.4.H). In other words, the City Council would just unilaterally rescind the ballot requirement for zoning reclassifications to fit its needs. Such a plan to revoke public rights is arbitrary and capricious, and would certainly face legal challenge.</p>
Email	mike mcconathy	<p>The Housing Element will Apparently Donate Piedmont's Parks and Open Space Missing in the Housing Element is exactly how the City's open space and parks will be transferred to build affordable housing. Piedmont parks have long been targeted by certain groups as the so called "easy solution" for more housing. The fact that no land transfer plan is explained in the Housing Element suggests that the City intends to simply donate its property to satisfy current social demands. Even the Surplus Land Act suggests that fair compensation can be received for parcels sold or leased. Is the City planning to sell off its parks or just give them away? Piedmont residents have paid property taxes and made donations for 100 years to maintain and preserve these lands. Informing residents how their municipal facilities will be eliminated by the City should be made clear.</p>

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Email	mike mconathy	The Proposal Seeks to Isolate Low-Income Housing to a Remote Piedmont Border The "Specific Plan" in the Housing Element provides that at least 100 low and very low income housing units will be placed in the Coaches Field area, and a much larger but unspecified number in Blair Park. (Appendix B, Section B.3.1). This proposal would isolate nearly all the lowest income housing to a single location on the Piedmont border. RHNA and the Housing Element have an underlying requirement to maintain equity and fairness in the housing planning process. How does ostracizing low income residents to a remote portion of the City accomplish this? Visit Marin City and see what happens when multi-family low-income housing is concentrated in this way. Is that really what the City and the PREC want from this process?
Email	Patrick Lang	I strongly support extending the comment period out to November so that the community has more time to process the enormously impactful housing-related proposals.
Email	Jill Lindenbaum	It is clear that the City of Piedmont staff has been working hard to create a viable Housing Element, and I appreciate all of the progress that's made in the draft to date. I support many of the ideas outlined in the plan, especially proposals to increase allowable density in the multifamily and commercial zones, to explore publicly owned land for affordable housing development, to include home sharing in the Housing Element proposed programs, and to create a Housing Fund. There are few areas in which I believe the Housing Element can be improved: The City should amend the zoning for Zones A and E to allow duplexes, triplexes, and small multifamily buildings. We know these can work in Piedmont, as there are many good examples throughout the city. 1) This will yield more types of housing throughout the city in a more integrated and balanced manner. 2) It is time to abolish a policy born from racist sentiments. By carrying these policies forward (i.e. doing nothing to amend them), we are continuing to create negative impacts and continue to uphold racist policies.
Email	Jill Lindenbaum	- The City should create policies to enable affordable housing throughout all of Piedmont, in all the zones, rather than planning for it in just one or two areas. This is creating unnecessary constraints. - The City should proceed with affordable housing on publicly owned land by increasing the number of Zone B (Public Facilities) sites under consideration to include Blair Park and Kennelly Skate Park and doing feasibility studies of all these sites. By citing one proposed site, as is currently in the Housing Element, the City is creating more unnecessary constraints. Our City should research and analyze as many sites as possible to ensure results that are the best for the community.
Email	Jill Lindenbaum	- The City has relied too heavily on parcels owned by faith-based organizations. Churches and synagogues, which are well attended and dearly valued by members of our community. In all likelihood, these community-based faith institutions are not selling land to the degree in which the City has accounted for in the Housing Element. I believe HCD will recognize this as an unrealistic plan to create more affordable housing, which is the utmost goal.

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Email	Jill Lindenbaum	<p>5. The City's proposed Housing Fund should not be tied only to the ADU/Habitat for Humanity program. There should be an evaluation of several potential uses, first, before the Funds are tied to any one program. For example, the Fund could support the acquisition of small sites for affordable rentals, support small remodel projects to create JADUs in seniors' home, provide rental assistance for extremely low, very low and low income renters in Piedmont (Apartments, ADUs, JADU and Room renting) among other programs.</p> <p>Again, thank you for your work and commitment to our City. And, thank you for considering the above amendments to Piedmont's Draft Housing Element.</p>
Email	Julie Watters	<p>We are residents of Abbott Way in Piedmont, and we are excited at the prospect of being part of the solution of California's unprecedented housing crisis. However, the current proposal to locate 132 units in one neighborhood by the corporate yard by Coaches Playfield creates more problems than it solves for both new and existing residents.</p>
Email	Julie Watters	<p>We are residents of Scenic Avenue and just celebrated 16 years in our home which overlooks Moraga Canyon and Blair Park. We are happy to be part of the solution to our state's housing crisis. First, we would like to incorporate by reference all of the excellent points raised below by our friends Rami and Daphne Albert of Abbott Way as we are in agreement with them and there is no need to reinvent the wheel. However, there are still other points the committee should consider. In 2009, the city faced a crisis when it had to rebuild Havens Elementary School to meet earthquake safety codes and needed a temporary location for a school. Blair Park was considered and rejected as the traffic on Moraga Avenue, which was a major artery for Oakland Fire Trucks during the Oakland Hills Fire, was already an issue and the idea of adding more traffic and having children playing near and crossing Moraga Avenue was deemed unsafe. We also had the misguided idea of building a large soccer complex on Blair Park in 2009. I, along with many members of the Friends of Moraga Canyon, spent many nights attending City Council meetings into the early hours of the morning explaining to the Council why this was a very bad idea. The Environmental Impact Report that was done at that time showed that on many levels the soccer complex idea was unsound and unsafe and the project was thankfully scrapped.</p>
Email	Julie Watters	<p>The Blair Park/Corporation Yard area sits on part of the Hayward Fault which is worth considering when we're talking about building high density housing. Has this even been considered? It's also the only undeveloped park land in Piedmont that does not have an annual maintenance budget; this fact seems more than coincidental to many. Blair Park and the Corporation Yard are always trotted out any time there is a need for land on which to develop in Piedmont. I cannot think of more unsafe area to put high density housing that will likely house families with many children than along that stretch of Moraga Avenue. If it was a safe area to develop, houses would have been built there almost 100 years when all the other homes on Moraga Avenue near Highland Avenue were built. Traffic studies done in 2009 when the soccer complex was being considered bear out how dangerous it is. And one accident/fatality on Moraga Avenue involving a small child would result in a huge liability lawsuit against the City of Piedmont. We truly hope that this misguided idea of placing high density housing near the Corporation Yard or in Blair Park will be abandoned due to all the safety issues raised by placing housing in such an unsuitable area.</p>

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Email	Deepti Sethi	As a resident of Piedmont, I am excited about efforts addressing the lack of affordable housing in Piedmont and California's housing crisis overall. However, the housing element put forward by the City of Piedmont places an undue burden on a small population of current homeowners and results in a lack of integration of any new residents to the detriment of the community as a whole. There are two issues, both obvious when looking at the draft housing element and the aggregation of high-density units in one section of town. Placing these units in a central location or having multiple units over a larger geographic reach would ameliorate the concerns noted in these comments.
Email	Deepti Sethi	The first issue is the perpetuation of historic exclusionary practices through a new mechanism by the segregation of low to mid income individuals within Piedmont. The proposed development plans are not significant, meaningful, or sufficient to affirmatively further fair housing to the benefit of Piedmont as a whole. The realization of the existing benefits to living in Piedmont is key for integration of new residents. Maintaining use and access to these benefits for both new and existing residents through the proposed development can enrich the lives of current residents and facilitate individuals welcoming necessary changes in their immediate surroundings and lives. Having low- and moderate-income households in proximity to more than one park, close to public transportation, close to schools, accessible to City amenities and services and in a walkable area would be ideal and is actually feasible with an amended specific plan that looks to the City's center as the location for building high density housing units. Perhaps these are built in tandem with the current site(s) off Moraga, but a meaningful distribution throughout the City is required for integration and acceptance. Other sites that are currently slated for higher income homes should be revisited to allow for mixed income development
Email	Deepti Sethi	The current location of the specific plan is in an area that cannot bear additional traffic, is not walkable, has no public transportation, is on the edge of the City and is harder to access than other areas of Piedmont. The location would require significant infrastructure planning (including additional roads) and increase traffic in a high fire zone which serves as the solitary evacuation corridor for the adjacent community. In addition, this aggregation and concentration of low- moderate income housing units in one location (both the identified site and the alternate site lie within a quarter mile of each other or less) creates a high risk of perpetuating the legacy of bias by absolutely failing to address prior exclusionary practices via integration. This plan indirectly thwarts efforts to diversify our schools, services and other parts of the City as BIPOC individuals and immigrants could look at this deliberate placement of a population that is likely more racially diverse than Piedmont currently is, and rationally choose other townships and cities that are perceived as more welcoming to work in and to live in for generations to come. This potential outcome negatively impacts current residents who seek vibrant engagement with a range of people.

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Email	Deepti Sethi	<p>The second issue is the disproportionate impact of this plan on one neighborhood within Piedmont. Studies have found that affordable housing does not depress neighboring property values except in certain circumstances. It has been shown that large concentrations of affordable units are best avoided due to the potential to depress nearby property values. The potential for negative property value impact is greater when those units are clustered in one neighborhood instead of dispersed throughout the community. The point of comparison to gauge what is "large" and what constitutes a single geographic neighborhood is the current housing pool in Piedmont and the natural biogeography and streets that separate and define neighborhoods.</p> <p>Ensuring that access to resources, including the accrued savings represented by home ownership, remain level or enriched by development for Piedmont residents should be a priority of the City. Any negative impact does not have to be by design, but at this juncture it will occur through neglect or a negation of any sense of duty to current residents should this specific plan move forward without concurrent high-density development in other areas of the City.</p> <p>Unfortunately, the current proposed housing element for Piedmont perpetuates racially and ethnically concentrated areas of poverty and affluence. It has the potential of subjecting one discrete neighborhood to disproportionate impacts of construction, probable negative impacts on property value, and a significant increase in population density and change of environmental habitat. These units could be placed in already developed areas of the City and/or in the Moraga area (coupled with high density developments in other areas of the City) thus mitigating the extent of the impact on a single area of town.</p>
Email	Deepti Sethi	<p>Equitable development and enhancement throughout the City is fair, environmentally sound, and can rectify generational tolerance of discrimination and bias within Piedmont</p> <p>The specific plan for housing should be located in the City center with a reimagination of the area around Veteran's Hall, a hard look at the underutilized Arts Center on Magnolia, and with strong incentives to capitalize on the stagnant business center of banks by the gas station on Highland. The results would be greater integration of new residents, minimal impacts on traffic and leveraging of this opportunity to upgrade services and infrastructure of the City as a whole. Dense housing development in the center of town, in conjunction with housing located at other areas around the City (including the current proposed sites around Corporation Yard and underutilized level area near Coaches Field and, as an alternative to this build on one side of Moraga, the site of Blair Park or other recreational facilities), changing height restrictions and building on Grand Avenue and putting forth feasible development plans are key. This equitable distribution of housing across the City makes sense and facilitates a fair distribution of housing impacts while integrating new residents by design.</p> <p>The City has invested in efforts to foster civic engagement and communication between neighbors as a means to enrich the fabric of our community and create strong neighborhoods. This "small town" feel is absolutely achievable with multifamily housing developments dispersed throughout the City. However, under the current draft housing element, retaining the best aspects and character of the City is unattainable for residents directly adjacent to the current specific plan site and out of reach for new residents.</p>

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Email	Hugh Louch	<p>I am writing to provide comments on the draft housing element. First, I want to commend City staff, Council leadership, and the resident volunteers of our committees who have embraced the need for more housing in Piedmont and have been willing to objectively consider all feasible options for Piedmont to do its part to address the crushing housing crisis in our region and state.</p> <p>I was pleased to see a long list of potential sites included in the housing element and would encourage the City to develop a housing element that has as large a buffer for potential sites as possible. While HCD has recommended a 15-30% buffer, the likelihood of development within the RHNA cycle for any one site in Piedmont is likely to be low. To make sure we are doing our part, I recommend the City come up with at least 50% more housing units than are required by RHNA to make sure that we see housing production in the City. To do our part, Piedmont needs to support more housing, all across the City, for everyone.</p>
Email	Hugh Louch	<p>One part of the City where I think there is significant opportunity for housing development is around Highland Avenue considering both the civic and commercial buildings in this area, as well as the road itself. This is an area that is well served by local (33 bus) and regional (P bus) transit, that is walkable to schools, businesses, and parks, and has land that could be better used for development. In the recently updated Piedmont Safer Streets Plan that the City recently adopted (I was the chair of the committee overseeing its development), we requested that the Highland bend be incorporated into the proposed road diet for Highland Avenue. There is a huge opportunity to take the acre plus of asphalt in the center of town and turn it into a safer place for people walking and bicycling and a significant number of new housing units. I encourage the City to incorporate some of the existing road space into the available land as part of the housing element and to develop a master plan for this area that maximizes these two goals.</p>
Email	Schiller	<p>Notice The final Housing Element is due for submission May 2023. The deadline for public comment should be extended to November 2022. The May 5 comment due date for the May 12 PC meeting are buried in p9 of the April 19, 2022 Staff Report; more public outreach is required.</p>
Email	Schiller	<p>Blair Park The consideration of using Blair Park for low-income housing seems appropriate given the many issues at play. Blair Park is the single largest open area in town and is a little used area. The elimination of recreational areas, should Blair Park not work out (Housing Element Draft p42), is an undesirable alternative that would affect the entire Piedmont community. All efforts should be made to see if Blair Park and the near-by land currently used by the Corporation Yard can be utilized for housing. I am mindful of the Moraga Canyon neighbor concerns, however thoughtful planning can create a low-impact solution to Piedmont's RHNA that can be significantly met in Moraga Canyon. Coaches Field The Draft includes a projection for 50 units in the Coaches overflow lot. The lot is small and this projection seems unrealistic as it would create a very tall building right next to the roadway and not be aesthetically pleasing. The Draft includes a projection for 50 units in the slope below the 3rd base line. I doubt this is possible and again would be aesthetically questionable. Exploring Blair Park use for multi-units is more realistic and retains the recreational use of Coaches Field.</p>

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Email	Schiller	Zone A Lot size: 4,000 sf. The current 8,000 minimum is excessive. There are zone A homes on lots of 2,000, 2,250, 3,212f (31, 34 and 35 Blair). About 400 homes are on lots smaller than 4,000 ft. Going to a smaller lot size in Zone A allows lot splits of larger zone A lots. These small homes will likely qualify for low-income RHNA. New homes are subject to Piedmont's robust design review guidelines thereby retaining Piedmont's desirable character. No City wide vote is required as there is no use change.
Email	Schiller	SB9 The Draft HE does not sufficiently explore what is possible under SB9; thoughtful projections will lead to significant satisfaction of Piedmont's RHNA. Specifically: (1) include a site-specific inventory of sites where SB 9 projections are being applied. (2) Include undeveloped sites analysis demonstrating the effect of development. (3) Identify any governmental constraints to the use of SB 9 in the creation of units (including land use controls, fees, and other exactions, as well as locally adopted ordinances that impact the cost and supply of residential development), and (4) include programs and policies that establish zoning and development standards early in the planning period and implement incentives to encourage and facilitate development. The element should support this analysis with local information such as local developer or owner interest to utilize zoning and incentives established through SB 9.
Email	Schiller	Small homes may be more affordable than large homes and more small homes will help satisfy the low income RHNA requirements. The City should put more emphasis in allowing duplexes and a 2nd small home on lots that can accommodate such development. Adding a 3rd unit as an ADU is desirable. This philosophy spreads the RHNA requirements throughout the City rather than unrealistic suggestions of developing City Center sites into low-income multi-family buildings. 1.M Manufactured and Mobile Homes Subject to GC65852.3 and because of reduced cost of these types of home, this seems viable if objective standards can be maintained.
Email	Schiller	City Charter Amendment The Draft HE suggests a revision to the City code and eliminating the currently required City wide vote to change uses within zones. This is undesirable and frankly in the past the City moved to allow commercial use in Zone B where previously it was not allowed so that the Piedmont Post could rent space at 801 Magnolia. This was done without a City wide vote and was clearly a use change though questionably declared a "use modification" by the City.

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Email	Tim Tam	<p>I am writing to you regarding the Piedmont Affordable Housing project proposal. My name is Tim Tam. My wife, Charlotte, our 2 kids, Ivan (9) and Katy (7), and I live in here in Piedmont. Here is a picture of our family: Firstly, I would like to acknowledge the need for affordable housing in the Bay Area. And we wholeheartedly support Piedmont's initiatives in creating affordable housing and diversity in our community. Nonetheless, I would like to request that you consider preserving the spaciousness, serenity and soothingness of our small neighborhood when working on the next stage of planning. My request has nothing to do with property values. Data and research have shown that building affordable housing has no financial impact on nearby houses. I'm requesting to retain the openness and serenity of the hill side next to our house because of my daughter's and my personal mental health concerns. Below is a picture of the area I am referring to. Both my daughter and I are autistic. For the past many years, I have struggled with severe depression and anxiety. Although I'm currently on the maximum dose of daily anti-depressant, on a daily basis I still struggle with some symptoms of depression. And on some bad days, even with the prescription, I struggle with severe depression and the symptoms. Typically my depression peaks at night when my wife and kids are asleep. Staring into the darkness, spaciousness, calmness, and quietness of the hillside really helps me get through each night. Here are pictures of our windows and patio facing the hillside. My biggest concern is having houses built on the hillside. With all the houses, street lights, lights from the houses, cars, garage door sounds, car exhaust, doors opening and closing, people talking to each other, etc., not only I'm concerned with no longer having this soothingness of our surroundings, but also having the added stress and anxiety from the feeling of crowdedness, commotions, and less privacy. Because we don't have window shadings, both my daughter and I will be paranoid and anxious that someone can be watching us when we're even in our own home. Out on the streets, because of this anxiety, my daughter has told strangers not to stare at her. At her age, it can be cute and those people typically think it's funny. But as she gets older, it will be an issue. I have trained myself to manage this anxiety when I'm outside of the house. But I still get very anxious and paranoid when I think someone can be watching when I'm inside the house. And putting shades on these windows will make the rooms darker and more depressing. I have always hoped that my daughter and I can escape from these stimulations, stress, and anxiety when we're home. We also have three dogs. Our German Shepherd Dog and Toy Poodle will bark when they see someone from our house. This creates a lot of stress and anxiety for me knowing neighbors can complain. I can train them not to bark but we do want them to bark if someone is too close to our house. One time my mom's dog was here and barked excessively and a neighbor complained. Her complaint triggered major depression episodes for me for weeks. My greatest worry is that this added stress and anxiety will make my depression a lot worse leading to a mental breakdown. My kids are young. They really need a dad around to care for them.</p>

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Email	Tim Tam	<p>Additionally, I would like to also express some concerns with building 132 new units on this side of town. Currently during the morning commute, congestions on Moraga can be pretty bad. Because parents need to get kids to school on time, many cars are already making illegal left turns on Monte and Mesa. After making those illegal turns, cars normally speed up to beat the cars turning left onto Highland Ave. On a really bad traffic day, some cars will turn left onto Pala Ave - which is a one-way street. In short, morning traffic on Moraga right now can be hectic and unsafe for some families. Building 132 units on Moraga will undoubtedly make traffic even more unsafe. We have to assume that those who want to live in Piedmont are those who have kids and want to attend Piedmont schools. It is unrealistic to conclude any assumptions on how many families will be walking to school vs. driving, which means we have to assume there will be an additional 132 cars on Moraga in the morning within a 5 -10 minute window. More traffic means more illegal turns and more aggressive drivings. In a community that values education, parents will take desperate measures to get kids to school on time. Public transportation is also an essential need for affordable housing. The significant increase in the numbers of cars, public transportation needs, and additional bus lines will tremendously worsen driving conditions, traffic, and pedestrian safety. Also, adding an additional 132 units in an already moderately dense, small neighborhood will undoubtedly makes it extremely hazardous for residents during emergency evacuations with only one main road. One final thought. We are concerned that the current proposed plan with the affordable housing concentrating in a certain parts of town can project an image of discrimination and segregation. We all know Piedmont is not like that. We also know there is enough space in Piedmont to allow development of duplexes and quadplexes so that these affordable housing families can be better integrated into the Piedmont community.</p> <p>Firstly, I want to express my sincere admiration for your effort — and actual plan! — to reimagine how Piedmont evolves over the coming decade. I'm energized by the idea of accommodating more residents and increasing our ethnic and socioeconomic diversity, and making Piedmont more inclusive and accessible. Adding nearly 600 units is no small feat in Piedmont's footprint, and takes real creativity. I wanted to take this opportunity to express my support for PREC's three main points of consideration: 1. The City should move forward with affordable housing on publicly owned land by expanding the number of Zone B (Public Facilities) sites under consideration to include Blair Park and Kennelly Skate Park and doing feasibility studies of all these sites.</p>
Email	Dan and Jill Saper	<p>The City should amend the zoning for Zones A and E (the Single Family and Estate zones) to allow duplexes, triplexes, and small multifamily buildings. These types of housing already exist in the middle of Piedmont's single-family zones and fit in well: We should allow more of them to be built.</p>
Email	Dan and Jill Saper	<p>The City should create policies to enable affordable housing throughout Piedmont, in all the zones, rather than planning for it in just one or two areas. I've seen some of the photos of examples for #2 that I had no idea existed! I believe many Piedmonters have "limiting beliefs" on what small multifamily units might look like, and it's clear to me that we can allow far more of those units without compromising the physical beauty of our neighborhoods — and in turn, improving the vibrancy of our community and residents.</p>
Email	Dan and Jill Saper	<p>Thanks again for all that you do. You have a HARD job, and this is certainly chess and not checkers, so I'm grateful for your commitment to this wonderful community.</p>

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Anu and Jateen Joshi	My name is Anu and I'm a resident in Upper Piedmont. We have 2 young kids and moved here 2 years ago. We love it here but are so disheartened by how much empty space is available, when so many people are working so hard to find homes for themselves and their children. I am a huge advocate of increasing our housing density. I'd love to put an ADU on even our plot to help with this issue (chewing on this as we speak)! hope we build more housing in Upper Piedmont and make this a more welcome community for families and children. AND I hope that by building more homes and apartments, and increasing our density, we are forced to address the accessibility issue of our community and the lack of community gathering spaces and tot lots. If you live in Upper Piedmont, there is very little in the way of easy access hang out spots, to meet other moms and other children. Hampton park has one play structure for 0-5. The sidewalks to get there are steep/uphill, non existent and often difficult to navigate because many of them don't have a ramp runoff to the street that you can use with a stroller or bike.
Email	Anu and Jateen Joshi	Regarding the housing element survey and plan for increasing housing, I hope the city considers rezoning + buying some of the large plots of land in Upper Piedmont to build large apartment complexes on them. Some of this land is so under- utilized and should be partly public. Case in point- ?280 Indian road (I think? Someone owns that giant underutilized gulch down there). And 26 SeaView Avenue is for sale. It's 3 acres in the middle of nowhere! What is the city's stance on buying it and just redeveloping it or giving clearance to some developers to do the same?! A lot of the newer neighbors agree with me that they'd love to see more development happening in the Upper Piedmont area, and change the feeling of it to a more inclusive community. I know a lot of the proposed building is slated for Lower Piedmont, but please save some development and improvement for Upper Piedmont—we're so excited for it and we actually have the space (but may need a few zoning tweaks). Thanks for hearing me out!
Email	Chris Read	See attachment 1
Email	Dai Meagher	I appeal to you to extend the public review and public comment period for the housing element revision cycle 6. There's a lot to read and evaluate. I believe that with the extension, we'll can help ensure that we have an outstanding plan. Seeing as the deadline for submission of the plan is not until May 2023, it seems prudent to extend the time for public evaluation.
Email	Irene Cheng	I am writing to offer feedback on Piedmont's Draft Housing Element. I would like to congratulate the City's Planning staff and Lisa Wise Consulting for an excellent plan that contains numerous solid proposals for helping our city build more housing. Planning for more housing is how we who are lucky enough to live in Piedmont make room for others—including many folks who are already members of our community: teachers, Schoolmates employees, police and firefighters, grandparents, and adult children who would like to return to raise their own kids in the community.

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Irene Cheng	I want to offer two main thoughts or suggestions: First, I strongly support the City's proposal to explore building affordable housing on publicly owned land (Zone B). Given the market realities—especially the astronomical cost of land and skyrocketing cost of construction—building affordable housing on privately owned land is extremely challenging. That's why we need to prioritize moving forward intentionally and expeditiously with planning for housing in Zone B. I urge the City to explore concrete plans for several sites in Moraga Canyon—including the Corporation Yard, Blair Park, and the underutilized skate park—as well as the Civic Center sites identified in the Site Inventory.

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Irene Cheng	<p>Second, I believe the City's Draft Housing Element has left an important strategy off the table—namely, increasing the allowable density in Zones A and E. These occupy 68% of the City's total land (and something like 93-95% of its residential areas.) We should be enabling the construction of duplexes, triplexes, and quadplexes in all of these zones—with appropriate restrictions for height, open space, objective design standards, and so on, if desired. Adding this kind of "gentle density" would really be just an incremental change, since current state laws allow three units on every single-family lot (and four or more under SB9). But the aforementioned state laws restrict the configuration of these units: they don't allow, for example, the kinds of innovative small lot projects that are being done in Oakland and Berkeley—which put two or three townhouses on a single lot—or the kinds of duplexes or triplexes that are common in Rockridge and Elmwood.</p> <p>Piedmont already has many beautiful examples of "plexes" nestled into our single-family zones. If you want to see how the introduction of such "gentle density" might affect a city, come to my neighborhood in Piedmont: I live in a beautiful 1910s Craftsman house near the Linda Ave. dog park, next door to a legal two-story duplex with upstairs and downstairs units. The owners of the duplex lived in the upstairs for over a decade, raising their kids in Piedmont. After their kids graduated from high school, the owners moved elsewhere, and started renting both units. In the decade that I've lived in my home, the tenants have included a couple with a baby, a single parent and child, and two working professional-roommates in their 30s—including a queer African American woman. All of them have been wonderful neighbors. Around the corner from me is a fourplex on Linda Ave. (across from Beach school). And a couple blocks away is a multi-family apartment on Linda Ave., where one of my son's best friends live. The residents of these buildings are cherished neighbors; most of them probably could not afford the \$2.4 million median home price (according to realtor.com) in Piedmont. Our neighborhood is tight-knit, quiet, peaceful, and diverse (by Piedmont standards). It offers evidence that adding a duplex or a triplex here and there will have few if any adverse effects, while creating several positive ones, such as making space for a wider range of families and households than the city's building stock currently supports.</p> <p>To be clear, any new duplexes or small multifamily conversions that might be enabled if we relax the restrictions in Zones A and E will be scattered, and the vast majority will be market-rate and therefore will not necessarily help Piedmont meet its state-mandated targets for housing accommodating low- and very-low income families. (Hence the need to also plan for affordable housing in Zone B.) Our housing strategies must be "both-and" not "either-or." But -plexes could help us meet our above-moderate goals, and most will be more "affordable by design" simply by being smaller than the typical 2400+ sf single-family home. And with some creativity, my hope is that some units may be able to be converted to below-market-rate housing (for example, by working with a community land trust or small-site affordable housing developer).</p> <p>Thank you for allowing me to offer these thoughts, and as always, thank you to staff and our city leaders for their hard work and commitment to building a more diverse, inclusive, and sustainable community.</p>

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Lucas Tomsich and Mojdeh Tomsich	We live at, and read the Public Review Draft of the 6th Cycle Housing Element for the City of Piedmont. We certainly agree that more people, and especially city employees, fire fighters, police, and teachers and school staff should be able to afford to live in the city of Piedmont, to say nothing of making Piedmont more accessible to a diverse community beyond the largely white and asian professionals that currently live here.
Email	Lucas Tomsich and Mojdeh Tomsich	However, we have several comments regarding the proposal to make land available for affordable housing units in either Blair Park, or on the hillside above Coach's Field. We certainly think these sites have potential for housing some of the hundreds of proposed units, but have concerns that these sites are not appropriate for all 180+ units. In particular, the land above Coach's Field is a very steep hillside, and would likely be extremely expensive to develop. This may be one of the least attractive places for affordable housing developers to build in the entire city. Similarly, Blair Park, while relatively level, may work for a smaller number of units but is not appropriate for building hundreds of units. It would also potentially create the impression of Piedmont segregating lower-income housing into a single concentrated area, near the border of Piedmont, in a canyon with no views, little daylight, and near a busy and dangerous road. The civic center of Piedmont is the logical place to build multi-family housing, as it is level, close to essential services, centrally located, and next to public transportation. It appears several parcels of land that would be the most attractive to developers were eliminated from consideration, such as gas stations (see Appendix B-6). Given the rapid shift to electric vehicles, the public utility of gas stations has already significantly decreased, and is likely to continue to dramatically decrease over the next 5 years, especially in Piedmont. The percentage of homes in Piedmont with an electric vehicle is significant, and growing. We strongly urge the City to re-evaluate the gas station at the corner of Highland Ave. and Highland Way. We further strongly urge the City to think more creatively about ways to incentivize private businesses, such as the Wells Fargo on Highland Ave and Highland Way, to sell their location (or at least the rights above their location) to a developer. Surely there must be a way by waiving or reducing taxes to incentivize Wells Fargo to sell their location. Many brick and mortar retail locations have seen significantly lower traffic due to the pandemic, and may be looking for opportunities to sell. My wife Mojdeh worked at Wells Fargo in San Francisco in 2019, and was aware that Wells Fargo was looking for reasons to close branches, even before the pandemic. We strongly urge the City to come up with a creative approach for this key location.
Email	Lucas Tomsich and Mojdeh Tomsich	If the City of Piedmont is serious about encouraging developers to build, and actually getting affordable housing built within the city, it should consider more creative or alternative locations that would be more attractive to developers. As it currently stands, the land proposed gives the impression the City of Piedmont is more interested in meeting the state requirements but not actually getting housing built. Piedmont can do better than it has in the past, using ADU's to meet the state requirements in letter, but not spirit. Thank you for all your hard work putting together the detailed Housing Element, and for allowing us to comment.

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Claire Parisa	<p>As a member of the Housing Advisory Committee, Piedmont resident, and housing professional I have eagerly combed through Piedmont's Draft 6th Cycle Housing Element. I commend City staff (particularly Kevin Jackson and Pierce Macdonald-Powell) and Lisa Wise Consulting (LWC) for capturing so much of what the community has requested in the Draft Element ("Draft"). The City and LWC have drafted a state-of-the-art housing element full of incentive programs, code and regulation changes, and creative ideas to help us meet our RHNA target of 587 units. Bravo to the team for this impressive first draft.</p> <p>I am grateful for the opportunity to share thoughts and recommendations on the Draft in writing. Below are the priority items I would like to see addressed: 1L - Specific Plan (p. 41)</p> <p>I applaud Staff & LWC's vision for identifying excess City-owned land in Piedmont where we can site new housing, specifically in Moraga Canyon where our town has the most realistic opportunities for development, especially for low-income multifamily. Both during the 5/19 HAC meeting and afterward I heard from members of the Moraga Canyon neighborhood about their concerns for siting over 130 homes in their neighborhood. While this community is not opposed to welcoming new housing and new neighbors, they are concerned that they will lose valuable amenity space and want to have a voice in how the corporation yard, Blair Park, and future housing will be considered. I urge the Planning Commission and City staff to host at least two in-depth community meetings with the neighbors of Moraga Canyon to discuss their preferences for how the area might be redeveloped before the Housing Element is finalized. Instead of building housing alone we as a City should consider a "both and" approach which would pair a new multi-family affordable housing development with park enhancements at Blair Park. If we are to be successful in our efforts to build housing in Piedmont we need to welcome everyone into the tent.</p> <p>Simultaneously I urge us to add Blair Park to the Specific Plan. From a site feasibility perspective Blair Park is a much more logical location for housing development than some of the other sites listed in the draft Specific Plan for Moraga Canyon. For example, the hill behind the Corporation Yard (currently shown as able to accommodate 30 homes) is steep and challenging to develop. By comparison, Blair Park is a gently sloping site and already has street frontage. We should consider all the public land in Moraga Canyon, then work with developers and neighbors to land at a solution that is both feasible and neighbor supported. Moraga Canyon is our town's most valuable resource for new housing development. I would like to see us make a formal commitment to building a 100% affordable multifamily development in Moraga Canyon, financed with Alameda County A1 funding and a de minimis ground lease.</p> <p>The Draft is missing a bold statement committing City resources, land, and support to develop a 100% affordable housing development in town. As our own City staff has said in past public meetings, we are not going to get to 587 without at least one multifamily development. As already identified in the Draft Element, certain multifamily housing is permitted in Zone B. We need not wait for charter amendment to move forward with multifamily on this site. Let's commit to making that happen in Moraga Canyon, informed by neighborhood input.</p> <p>As we further develop the plan for Moraga Canyon I hope that we can explore plans not just to build low-income housing (which should be on the flattest and most accessible site) and market rate but also "missing middle" housing. I recognize that it is a challenge to develop and finance missing middle income housing, but public land may unlock this opportunity.</p> <p>Summarized recommendations:</p> <ul style="list-style-type: none"> • Host at least two community meetings with the Moraga Canyon community • Pair a new multi-family affordable housing development with neighborhood amenity enhancements at Blair Park • Incorporate Blair Park into the Specific Plan • Commitment to building a 100% affordable multifamily development in Moraga Canyon.
Email	Claire Parisa	<p>Summarized recommendations:</p> <ul style="list-style-type: none"> • Host at least two community meetings with the Moraga Canyon community • Pair a new multi-family affordable housing development with neighborhood amenity enhancements at Blair Park • Incorporate Blair Park into the Specific Plan • Commitment to building a 100% affordable multifamily development in Moraga Canyon.

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Claire Parisa	<p>3E - Affordable Housing Fund (p. 50) I was pleased to read about the proposed creation of an Affordable Housing Fund (AHF). This brings us in-line with other municipalities in California that financially support affordable housing development. However, as written the AHF is too restrictive and does not effectively leverage our City's resources. Currently the AHF monies would be used to support the development of ADUs in partnership with Habitat for Humanity. A multitude of other funding programs (both State and local) already exist to subsidize ADU development, but outside of Alameda County A1 we have no resources set aside for multifamily affordable housing development in town. We should commit the AHF to the creation of 100% permanently affordable multifamily housing development.</p> <p>Additionally, we should further study the implementation of an inclusionary housing zoning ordinance to leverage in-lieu fees and other contributions to fund the AHF. I suggest the City either hold and administer their own affordable housing fund or contract with another regional entity (such as the Bay Area Housing Finance Agency - BAHFA) to administer the funds.</p>
Email	Claire Parisa	<p>3F - Incentives for Rent-Restricted ADUs (p. 51) Piedmont has been successful in encouraging ADU development in town, and we have largely met our previous RHNA goals through this critical gentle density. I commend the City and LWC for continuing to explore options to ramp up ADU creation in town. However, we must implement a monitoring system to ensure that the promised public benefits (affordable rents for low-income tenants) are being delivered. We should implement a two-step monitoring program that would ensure public benefit without being overly onerous for homeowners and the City: 1) require annual homeowner self-reporting; and 2) mail annual letters from the City to tenants in rent-restricted ADUs informing them of the rent-restricted nature of their rental unit.</p>
Email	Claire Parisa	<p>Please add: Fair Housing In April Sara Lillevand and Carol Galante hosted a truly fantastic panel of realtors on real estate best practices for building a more inclusive community. The panel included concrete recommendations for homeowners, realtors, and the general public on how to reduce bias in the real estate market. I encourage the City to consider adding a continuing education and engagement campaign on fair housing education for residents and realtors to the Housing Element.</p>

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Claire Parisa	<p>As highlighted by the two public comment letters received by the Housing Advisory Committee in advance of their 5/19 public meeting, the Draft omits perhaps the most feasible (from a development feasibility standpoint) site in town. We need to add Blair Park to the Site Inventory, not as a back-up but as a main site to consider for the Specific Plan Goal 1L. It is one of the few undeveloped sites in the City and is primed for development of both housing and improved amenity space for the community.</p> <p>I appreciate that it is incredibly challenging to find opportunities to site 587 new homes in town given the lack of undeveloped land in town. Many of the sites currently listed in the Draft are already developed, and well-loved, parcels (City Hall, the PCA, etc). These sites are unlikely to be redeveloped into housing. Because of the challenges presented by these sites I recommend we aim for an even higher surplus than the current buffer of 71 units.</p> <p>Please consider increasing options to densify Zones A & E through incentives that bolster the power unlocked by SB9 to introduce gentle density through duplexes and split lots. Much like Piedmont's success in taking statewide ADU laws a step further to encourage additional units, we can augment and expand SB9's scope to create a uniquely Piedmont solution to encouraging gentle density.</p> <p>Finally, a small request - the site inventory map (B-15) in the Housing Element is hard to read because it is small and relatively pixelated. Can we produce a larger City-wide map as well as "key site" maps that focus in on some of the finer grained areas (Moraga Canyon, the center of town, Grand Avenue, etc)?</p> <p>Congratulations again to City staff and Lisa Wise Consulting on a bold Draft Housing Element. I look forward to listening to community feedback and continuing the discussion in the months to come.</p>
Email	Courtney Murphy	<p>We want to express our concern about some of the plans to develop Moraga Ave as affordable housing. We are concerned that putting all or most of the units in one place segregates those residents which is something that should be avoided if we are attempting integration. That area in particular is long and slow as it is with winding narrow roads, adding more congestion during school hours could be a challenge. I know this is not an easy issue to solve, and we want to help, but consolidating housing in one area doesn't seem like the best option.</p>

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Ilene Sandler	<p>We are residents on Maxwellton Road in Piedmont and have lived and loved this neighborhood for 12 years. We have some concerns about possible building sites that have been concentrated in our neighborhood. 1. Narrow roads, steep terrain, fire risks and fire breaks:</p> <p>We are very opposed to the idea of building new housing off the end of Abbott Way and off of Maxwellton Road at the cemetery gate. We are not opposed to low income housing. But we are opposed to adding to the density of a neighborhood that really does not have the infrastructure or terrain to support it. Insurance is difficult to get in this neighborhood because of the fire risk and narrow, twisty and steep roads. There is a fire break in the area off of Abbott and Maxwellton that would be best to maintain without buildings. This area has a fairly high fire risk, in general and is only a few blocks from where the Oakland Hills Firestorm of 1991 burned down huge swathes of homes. We've had two auto accidents on Maxwellton Road in the years we've lived here even with the traffic we have now. There is really not a way to support more traffic and density. Biking and walking are also treacherous, with no sidewalk or curbs, you have to walk or bicycle in the steep roads with blind turns. There is no public transportation which means there will be a lot more cars on the roads. Most children are driven to and from school 1.5 miles away.</p>
Email	Ilene Sandler	<p>2. Open spaces, wildlife and nature:</p> <p>We are on the border of nature where wildlife is just barely able to survive. We have deer, coyotes, lots of turkeys, hawks and other birds, skunks, an occasional red tail fox and other beautiful creatures. By building in their habitat, it would reduce their survival. Reducing the open spaces all of Piedmont enjoys would be a tragedy. We love this neighborhood and the city of Piedmont in a large part because of these open spaces. By building in them, it would be removing one of the city's best qualities, resources and beauty. For example, we regularly use Blair Park and the Spring Trail. It makes much more sense to build higher density and taller buildings in flat parts of the city that have curbs, sidewalks, wider roads, bike lanes and buses to support more people, like off Grand Avenue or in the center of Piedmont, where low rise buildings could more easily and more cost effectively be replaced with higher rise buildings. We understand the need for additional housing, but it would be better to see it spread throughout the city or located in easier to build locations that have the needed infrastructure already in place.</p>
Email	Irene Cheng and Deborah Leland Co-Chairs, PREC Housing Committee	See attachment 2
Email	garrett keating	See attachment 3

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Amber and Chris Brumfiel	<p>As a Park Commissioner, I attended the excellent Housing Element presentation last night at the Park Commission hearing. After reflecting overnight, I wanted to share a new comment from my husband, Chris Brumfiel, and me (as a member of the public, not a Commissioner): We appreciate the deference to preserving open space. However, if there is a possibility that Blair Park will be developed, we strongly urge that the City consider the dog run area at Linda/Beach. Blair Park is not near transit and Moraga is very narrow, so cars would be required and getting to any manor artery would be difficult and impact traffic and bike and pedestrian routes. Blair Park is beautiful open space. However, the dog run area at Linda/Beach has a very limited use: as a relatively unsightly dog run. The grassy area is being redone and is not very usable. Two other very large dog runs are available not far away in Dracena and Piedmont Parks. With excavation and shoring, the space could be developed. There is ample transit available on Oakland Avenue. Plus, easy access to 580, etc. Consideration of this area also seems vastly preferable to development in the center of town.</p>
Email	Richard Saykally	<p>A concern that has emerged in my research and discussions on the matter, involves the requirements for and availability of the respective utilities required for the proposed 580 new units to be added to the Piedmont community. Noting that natural gas will not be available for these new units, and that provision for electric charging stations will be a necessity, a considerable additional burden on our electrical grid will clearly emerge. My question to the committee and associated engineers, is ...How serious will this burden be??</p> <p>The committee needs to identify the sources of our electrical generation, how far the power must be transmitted (often through badly aging and deteriorating overhead power lines), and whether the power generation and transmission will be capable of sustaining our community at a reasonable level (noting that within the last two years, there have been serious outages that resulted both from wind damage and from auto accidents involving power poles).</p> <p>Generally less vulnerable, but similarly vital, is our water distribution system-particularly given the predictions for extended and severe drought. And perhaps our sewer system as well.</p> <p>I would appreciate it if the committee could discuss these issues with the appropriate engineers and respond to these questions.</p>

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Marjorie Blavkwell	<p>I understand the enormous task ahead of you to analyze, reach consensus and recommend your conclusions for the draft Piedmont Housing Element to the City Council. I am writing regarding the proposal to develop 132 low – and moderate-income housing units in the Corporation Yard, or if that proves infeasible, to build 200 low-income units in Blair Park. I urge you to weigh carefully the impact of both of these proposals. While Moraga Canyon may seem like a great solution to Piedmont’s scarcity of developable land, there are serious drawbacks to these sites.</p> <ul style="list-style-type: none"> • Moraga Ave. is the City’s busiest thoroughfare in the City, with speeding traffic in both directions 24/7. There is no safe place for a pedestrian crossing on Moraga Ave. from Blair Park. A traffic study done 10 years ago concluded there are insufficient sight-lines for a traffic light. • Moraga Canyon is over a mile from central Piedmont, schools, services and major bus routes. Putting half or more of the City’s requisite low-income housing in Moraga Canyon is not equitable and likely would not meet HCD’s requirement that housing be integrated into the community. • To quote the Housing Element draft: “Wildfire is Piedmont’s most significant environmental hazard. Over a third of the City’s residential area is located in a Fire Hazard Severity Zone, with increased exposure in the southeast where over nine percent of the City is in a Very High Fire Hazard Severity Zone (VHFHSZ). Parts of Piedmont have similar landscape character as the area burned in the devastating 1991 Oakland Hills Fire, the southern extent of which nearly reached the City’s open spaces along Upper Moraga Canyon.” I can assure you this is completely accurate. Moraga Ave. was total gridlock during the 1991 firestorm, with people from the hills trying to flee the encroaching flames. Imagine the scene with the addition of 200 more households trying to escape. In addition, Moraga Canyon is less than a mile from the Hayward Fault.
Email	Marjorie Blavkwell	<ul style="list-style-type: none"> • Perhaps most important of all, taking parkland for housing would set a precedent. No other city has proposed doing this, and it could lead to unfortunate consequences. If Blair Park is developed, what about other Piedmont parks – Crocker, Linda Beach, and more? Further, as Piedmont’s population increases with potentially several thousand more residents, local parks and open space will become all the more valuable. Blair Park is a designated park in the City’s General Plan. It is a wildlife corridor, an oak woodland, the site of a designated Heritage Tree, an off-leash dog park and a quiet retreat for those who want to sit or stroll through and enjoy its peacefulness. It could be far more attractive and usable if the City funded the landscape plan. Parking could be improved, picnic benches installed, and more. • I agree there is some potential for housing in the area behind the Corporation Yard, perhaps half of the 111 units proposed in the draft Housing Element. <p>Thank you for your consideration and for all of your efforts and hard work on behalf of Piedmont.</p>

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Lawrence Siskind	<p>We have lived in Piedmont for 36 years, first on Manor Drive and for the past few years on Maxwellton Road. We appreciate your hard work in creating the housing element proposal. There is no question that you are making a good faith effort to reconcile many different, and often conflicting interests. But it appears to us that you are failing to give due attention to the effect of segregating a disproportionate amount of low-income housing in the area adjacent to and north of Moraga Avenue.</p> <p>One of the sad lessons of the urban renewal plans of the 1950s and 1960s was the harmful effect of segregating neighborhoods by constructing highways through urban areas. Of course, there are no highways in Piedmont, but Moraga Avenue is analogous. For most of its length, it is a high speed thoroughfare, lacking stop signs or traffic lights. It separates the Corporate Yard and a residential area from the rest of the City. It is dangerous to cross.</p> <p>Locating most of the low-income housing on one side of Moraga Avenue will not only segregate the new residents, it will also expose their children to traffic hazards. There is no public transportation connecting the area north of Moraga to the rest of the City. The new resident children will have to cross Moraga to attend Piedmont's public schools. Or they will have to be driven, which will add to the already heavy traffic volume.</p> <p>The City has long recognized the dangers posed to cyclists and pedestrians attempting to cross Moraga Avenue. The City's October 28, 2021 Safer Streets Plan noted: "Moraga Avenue presents a special danger to cyclists because of the hills and curves, and to pedestrians at several intersections, especially at Coaches Field." (P. 22) The Plan designated Moraga Avenue for improvements "because of a long history of speed-related collisions causing property damage and near-misses." (P. 37) It also noted that "Moraga Avenue is particularly challenging for cyclists and pedestrians." (P. 58)</p> <p>When we mention these traffic dangers, we are not doing so abstractly. Our daughter and her husband were hit by a car while making a legal turn off Moraga onto Maxwellton Road. Their car was totaled and our son-in-law suffered a concussion. The police at the scene, and a neighbor residing at that corner, told us that such accidents are common in that locale.</p> <p>The current plan proposes to situate the majority of the new residents in an area adjacent to Moraga Avenue, thus exposing them and their children to daily risks.</p>
Email	Musik Lover	<p>I'm writing to request that Piedmont extends the time for public comment on the housing plan update. State of Calif doesn't require the update until 1 year from now, so we're not served by rushing it.</p>
Email	Liz O'Neil	<p>Thank you for your time and attention in the creation of the housing element proposal. We are glad that Piedmont seeks to address the issue of providing a range of housing options for a range of incomes. We were surprised that your proposal designated only one location for low-income housing. There are impacts and solutions that we urge you to address.</p> <p>Grouping all low-income housing in Corporate Yard means all low-income families live on the outskirts of town, all in one area, and separated from the rest of Piedmont. Integration of low-income families throughout Piedmont is essential and can be achieved by spreading affordable housing throughout Piedmont and decreasing the amount of units in Corporate Yard.</p>

Public Comment / Questions / Responses		
Method of Communication (Email, phone call, etc.)	Commentor	Comment/ Question
Email	Liz O'Neil	<p>Additionally, the current plan of all low-income housing in one location disproportionately impacts the nearby area. We are happy to welcome new neighbors and feel that more zones in Piedmont need to allow for low-income housing. This is important to support integration of new residents rather than the current proposal which segregates our lowest income residents in one location away from the rest of Piedmont. Additionally, studies have shown that low income housing does not lower surrounding property values unless it is aggregated in one location within a city (as the current proposal does). This can be remedied by spreading affordable and low income housing amongst other Piedmont locations.</p> <p>a. Blair Park (though this will not address the serious concern of the segregation of low- and moderate-income housing given close proximity to Corporation Yard) b. Rezone city center area to allow for increased occupancy housing. This area is especially appealing as it means children could easily and safely walk to school. There are many locations with great potential.</p> <p>i. Bank of America is underutilized</p> <p>ii. Relocate tennis courts to either the roof of a low-income housing structure or to the Corporate yard area.</p> <p>iii. Center for the Arts</p> <p>c. Allow for units that are higher than 30 feet on Grand Avenue. Grand Avenue currently has the infrastructure to support additional housing (sidewalks, wide streets, traffic lights, public transportation) that the Corporate Yard area lacks. d. Look again at church site possibilities.</p> <p>e. Zoning changes in zones A & E to allow for duplex and fourplex housing. Given the sizes of many lots and structures in these zones, there are likely creative ways to secure low- and moderate-income units.</p>
Email	Louis Wu	I am writing to request that the City of Piedmont extend the time for public comment on the housing plan update. State of California doesn't require the update until 1 year from now, so we're not served by rushing it.
Email	Michael Henn	See attachment 4

PIEDMONT HOUSING PUZZLE COMMENTS - March 24 to May 1, 2022

Comment	Item	Change	Date
Lots of great options and the #2 place to place units (Zone D is best location). This is absolutely the #1 place to put units. I'd add retail at the ground floor. Great access to public transportation and easy walk to commercial.	C - Properties in Zone C, Multi-family Zone	96.15	5/2/2022 18:16
Great area to add units. Ideally the Blair Park (L) gets turned into a park with soccer fields (desperately needed).	D - Zone D - Ace Hardware, Sylvan Learning Cen K - Redevelop City Corporation Yard	210.53 166.67	5/2/2022 18:16 5/2/2022 18:16
I think it's important to develop this area into a park with soccer fields. Piedmont desperately needs more soccer fields! Given that I needed a few more units, I added some to this location...hoping that still allows for space for soccer.	L - Blair Park, 930 Moraga Avenue	24.24	5/2/2022 18:16
Deprioritize for housing - maintain quiet nature of city center	B - Piedmont Community Church Property, 400	0	5/2/2022 16:09
Close access to school, transportation, retail shops and restaurants	C - Properties in Zone C, Multi-family Zone	96.15	5/2/2022 16:09
Access to transportation and retail shops, grocery and restaurants	D - Zone D - Ace Hardware, Sylvan Learning Cen	210.53	5/2/2022 16:09
Close access to Park Ave transportation and retail shops and restaurants	F - Corpus Christi School Property	31.25	5/2/2022 16:09
Close access to school, public transport and shops	G - Linda Dog Park, 333 Linda Avenue	23.81	5/2/2022 16:09
Deprioritize for housing - surrounded by single family homes	I - Grassy Strip and Median along Highland Aver	0	5/2/2022 16:09
Offering new commercial options would be interesting but not housing. Prioritize needs of surrounding single family homes (quiet, parking)	J - Zone D - Gas Station, Mulberry's, Bank of Am	0	5/2/2022 16:09
Housing could make sense here (along Moraga thoroughfare) as along as Coaches Field is not disturbed. Piedmont already has too few rec fields / spaces	K - Redevelop City Corporation Yard	166.67	5/2/2022 16:09
Would love to turn this into soccer fields which we are desperately in need of	L - Blair Park, 930 Moraga Avenue	0	5/2/2022 16:09
Like the idea of supporting emergency and rec uses but not additional housing	M - City Hall, Veterans Hall, Corey Reich Tennis	0	5/2/2022 16:09
Close access to Park Ave and Montclair for public transport and shops	Z - Zion Lutheran Property	40	5/2/2022 16:09
Super congested already---bad city planning	B - Piedmont Community Church Property, 400	0	5/1/2022 20:52
Close to public transit and retail best for dense living.	D - Zone D - Ace Hardware, Sylvan Learning Cen	210.53	4/30/2022 3:24
it would be great if in development the density could be varied so there were different housing types - townhomes, apartments, etc.	C - Properties in Zone C, Multi-family Zone	86.54	4/29/2022 22:53
Mixed -use zoning to allow business uses to remain with housing above. Since housing almost always is more profitable to develop, require mixed-use with business/not-for-profit tenancy, not just vacant space. Consider affordability as well. Does Piedmont work to house its teachers and first responders, etc.?	D - Zone D - Ace Hardware, Sylvan Learning Cen	210.53	4/29/2022 22:53
has Piedmont considered housing for teachers and first responders who work in Piedmont? any consideration of affordability? locations like this one could be a good opportunity for lovely townhouses	I - Grassy Strip and Median along Highland Aver	4.94	4/29/2022 22:53
keep businesses - mixed-use zoning	J - Zone D - Gas Station, Mulberry's, Bank of Am	20.41	4/29/2022 22:53

<p>this could be a great place for Piedmont to add some new multi-family housing with greater density than is typical in the city - and to consider affordability could be a very interesting venture - lots of unique opportunities with the Church and school and the location on Park with access to bus, etc. Like the newer condos below the dog park, this could be high end but smaller unit style condos and townhouses. Good transportation and walkability score. Good for the senior set and city employee preference housing, teachers, fire dept, rec center, city admin, etc The corporation yard seems a good area to put the multi unit type development. There is a main road already in place, public transportation route, and in walking distance for someone who is fit to school and to area's of interest. IT will also not negatively affect the main part of the community with added traffic because of normal commute.</p>	<p>K - Redevelop City Corporation Yard</p>	<p>166.67</p>	<p>4/29/2022 22:53</p>
<p>How will public transportation be delivered to this area? What would be the main routes drivers would take to this community? Why is this area not already open to the Piedmont community and public as a park?</p>	<p>Z - Zion Lutheran Property</p>	<p>40</p>	<p>4/29/2022 22:53</p>
<p>Adding some housing here would change the nature of the Piedmont City Center. Perhaps the city buildings in place could be reidentified for community need. My comments are in the specific areas. Actually, why is the maximum 183, each house could turn their garage into an ADU according to CA state law Redeveloping a park into housing is quite a drastic step compared to allowing more ADUs in the AE zone or redeveloping a larger area of the corporation yard into usable space Do we need giant banks downtown? An ATM seems sufficient Honestly, do we need the public works facilities to be inside city limits? What about acquiring or leasing land in Oakland and developing the corporation yard into high-density housing? Has the advantage of easy access to CA-13 and frankly the nearby neighbors may prefer a well designed housing complex to an ugly corporation yard (I could be wrong) This park is really underutilized and could be a good spot for townhomes, with easy access to CA-13 Please convert this useless Bank of America into some kind of restaurant or cafe please!</p>	<p>G - Linda Dog Park, 333 Linda Avenue</p>	<p>31.75</p>	<p>4/29/2022 18:01</p>
<p>How will public transportation be delivered to this area? What would be the main routes drivers would take to this community? Why is this area not already open to the Piedmont community and public as a park?</p>	<p>K - Redevelop City Corporation Yard</p>	<p>166.67</p>	<p>4/29/2022 18:01</p>
<p>Adding some housing here would change the nature of the Piedmont City Center. Perhaps the city buildings in place could be reidentified for community need. My comments are in the specific areas. Actually, why is the maximum 183, each house could turn their garage into an ADU according to CA state law Redeveloping a park into housing is quite a drastic step compared to allowing more ADUs in the AE zone or redeveloping a larger area of the corporation yard into usable space Do we need giant banks downtown? An ATM seems sufficient Honestly, do we need the public works facilities to be inside city limits? What about acquiring or leasing land in Oakland and developing the corporation yard into high-density housing? Has the advantage of easy access to CA-13 and frankly the nearby neighbors may prefer a well designed housing complex to an ugly corporation yard (I could be wrong) This park is really underutilized and could be a good spot for townhomes, with easy access to CA-13 Please convert this useless Bank of America into some kind of restaurant or cafe please!</p>	<p>L - Blair Park, 930 Moraga Avenue</p>	<p>181.82</p>	<p>4/29/2022 18:01</p>
<p>Adding some housing here would change the nature of the Piedmont City Center. Perhaps the city buildings in place could be reidentified for community need. My comments are in the specific areas. Actually, why is the maximum 183, each house could turn their garage into an ADU according to CA state law Redeveloping a park into housing is quite a drastic step compared to allowing more ADUs in the AE zone or redeveloping a larger area of the corporation yard into usable space Do we need giant banks downtown? An ATM seems sufficient Honestly, do we need the public works facilities to be inside city limits? What about acquiring or leasing land in Oakland and developing the corporation yard into high-density housing? Has the advantage of easy access to CA-13 and frankly the nearby neighbors may prefer a well designed housing complex to an ugly corporation yard (I could be wrong) This park is really underutilized and could be a good spot for townhomes, with easy access to CA-13 Please convert this useless Bank of America into some kind of restaurant or cafe please!</p>	<p>M - City Hall, Veterans Hall, Corey Reich Tennis</p>	<p>25.86</p>	<p>4/29/2022 18:01</p>
<p>Adding some housing here would change the nature of the Piedmont City Center. Perhaps the city buildings in place could be reidentified for community need. My comments are in the specific areas. Actually, why is the maximum 183, each house could turn their garage into an ADU according to CA state law Redeveloping a park into housing is quite a drastic step compared to allowing more ADUs in the AE zone or redeveloping a larger area of the corporation yard into usable space Do we need giant banks downtown? An ATM seems sufficient Honestly, do we need the public works facilities to be inside city limits? What about acquiring or leasing land in Oakland and developing the corporation yard into high-density housing? Has the advantage of easy access to CA-13 and frankly the nearby neighbors may prefer a well designed housing complex to an ugly corporation yard (I could be wrong) This park is really underutilized and could be a good spot for townhomes, with easy access to CA-13 Please convert this useless Bank of America into some kind of restaurant or cafe please!</p>	<p>RHNA Allocation</p>	<p>0</p>	<p>4/29/2022 18:01</p>
<p>Adding some housing here would change the nature of the Piedmont City Center. Perhaps the city buildings in place could be reidentified for community need. My comments are in the specific areas. Actually, why is the maximum 183, each house could turn their garage into an ADU according to CA state law Redeveloping a park into housing is quite a drastic step compared to allowing more ADUs in the AE zone or redeveloping a larger area of the corporation yard into usable space Do we need giant banks downtown? An ATM seems sufficient Honestly, do we need the public works facilities to be inside city limits? What about acquiring or leasing land in Oakland and developing the corporation yard into high-density housing? Has the advantage of easy access to CA-13 and frankly the nearby neighbors may prefer a well designed housing complex to an ugly corporation yard (I could be wrong) This park is really underutilized and could be a good spot for townhomes, with easy access to CA-13 Please convert this useless Bank of America into some kind of restaurant or cafe please!</p>	<p>AE - Private single-family properties throughout</p>	<p>182</p>	<p>4/29/2022 17:52</p>
<p>Adding some housing here would change the nature of the Piedmont City Center. Perhaps the city buildings in place could be reidentified for community need. My comments are in the specific areas. Actually, why is the maximum 183, each house could turn their garage into an ADU according to CA state law Redeveloping a park into housing is quite a drastic step compared to allowing more ADUs in the AE zone or redeveloping a larger area of the corporation yard into usable space Do we need giant banks downtown? An ATM seems sufficient Honestly, do we need the public works facilities to be inside city limits? What about acquiring or leasing land in Oakland and developing the corporation yard into high-density housing? Has the advantage of easy access to CA-13 and frankly the nearby neighbors may prefer a well designed housing complex to an ugly corporation yard (I could be wrong) This park is really underutilized and could be a good spot for townhomes, with easy access to CA-13 Please convert this useless Bank of America into some kind of restaurant or cafe please!</p>	<p>G - Linda Dog Park, 333 Linda Avenue</p>	<p>0</p>	<p>4/29/2022 17:52</p>
<p>Adding some housing here would change the nature of the Piedmont City Center. Perhaps the city buildings in place could be reidentified for community need. My comments are in the specific areas. Actually, why is the maximum 183, each house could turn their garage into an ADU according to CA state law Redeveloping a park into housing is quite a drastic step compared to allowing more ADUs in the AE zone or redeveloping a larger area of the corporation yard into usable space Do we need giant banks downtown? An ATM seems sufficient Honestly, do we need the public works facilities to be inside city limits? What about acquiring or leasing land in Oakland and developing the corporation yard into high-density housing? Has the advantage of easy access to CA-13 and frankly the nearby neighbors may prefer a well designed housing complex to an ugly corporation yard (I could be wrong) This park is really underutilized and could be a good spot for townhomes, with easy access to CA-13 Please convert this useless Bank of America into some kind of restaurant or cafe please!</p>	<p>J - Zone D - Gas Station, Mulberry's, Bank of Am</p>	<p>96.94</p>	<p>4/29/2022 17:52</p>
<p>Adding some housing here would change the nature of the Piedmont City Center. Perhaps the city buildings in place could be reidentified for community need. My comments are in the specific areas. Actually, why is the maximum 183, each house could turn their garage into an ADU according to CA state law Redeveloping a park into housing is quite a drastic step compared to allowing more ADUs in the AE zone or redeveloping a larger area of the corporation yard into usable space Do we need giant banks downtown? An ATM seems sufficient Honestly, do we need the public works facilities to be inside city limits? What about acquiring or leasing land in Oakland and developing the corporation yard into high-density housing? Has the advantage of easy access to CA-13 and frankly the nearby neighbors may prefer a well designed housing complex to an ugly corporation yard (I could be wrong) This park is really underutilized and could be a good spot for townhomes, with easy access to CA-13 Please convert this useless Bank of America into some kind of restaurant or cafe please!</p>	<p>K - Redevelop City Corporation Yard</p>	<p>166.67</p>	<p>4/29/2022 17:52</p>
<p>Adding some housing here would change the nature of the Piedmont City Center. Perhaps the city buildings in place could be reidentified for community need. My comments are in the specific areas. Actually, why is the maximum 183, each house could turn their garage into an ADU according to CA state law Redeveloping a park into housing is quite a drastic step compared to allowing more ADUs in the AE zone or redeveloping a larger area of the corporation yard into usable space Do we need giant banks downtown? An ATM seems sufficient Honestly, do we need the public works facilities to be inside city limits? What about acquiring or leasing land in Oakland and developing the corporation yard into high-density housing? Has the advantage of easy access to CA-13 and frankly the nearby neighbors may prefer a well designed housing complex to an ugly corporation yard (I could be wrong) This park is really underutilized and could be a good spot for townhomes, with easy access to CA-13 Please convert this useless Bank of America into some kind of restaurant or cafe please!</p>	<p>L - Blair Park, 930 Moraga Avenue</p>	<p>48.48</p>	<p>4/29/2022 17:52</p>
<p>Adding some housing here would change the nature of the Piedmont City Center. Perhaps the city buildings in place could be reidentified for community need. My comments are in the specific areas. Actually, why is the maximum 183, each house could turn their garage into an ADU according to CA state law Redeveloping a park into housing is quite a drastic step compared to allowing more ADUs in the AE zone or redeveloping a larger area of the corporation yard into usable space Do we need giant banks downtown? An ATM seems sufficient Honestly, do we need the public works facilities to be inside city limits? What about acquiring or leasing land in Oakland and developing the corporation yard into high-density housing? Has the advantage of easy access to CA-13 and frankly the nearby neighbors may prefer a well designed housing complex to an ugly corporation yard (I could be wrong) This park is really underutilized and could be a good spot for townhomes, with easy access to CA-13 Please convert this useless Bank of America into some kind of restaurant or cafe please!</p>	<p>J - Zone D - Gas Station, Mulberry's, Bank of Am</p>	<p>0</p>	<p>4/28/2022 20:36</p>

<p>We need to focus on the Estates Zone. These are large lots, and mansions could be remodeled as condos and new multi-unit housing built on excess land. An outreach effort needs to be made to homeowners in this zone. It is not inconceivable that many will see the justice and benefit of their property being sold to a developer who can convert it into multifamily housing. This is especially possible in cases where the homeowners' heirs live elsewhere and understand the inequities brought about by intergenerational wealth transfer and the unprecedented levels of wealth concentration we are experiencing in this country.</p>	<p>AE - Private single-family properties throughout</p>	<p>182</p>	<p>4/28/2022 18:05</p>
<p>This should be recreation space, if you're talking about the space between the Oakland Ave bridge and Linda Beach field</p>	<p>C - Properties in Zone C, Multi-family Zone</p>	<p>0</p>	<p>4/28/2022 18:05</p>
<p>What happened to the idea of the owner of the Shell station to convert that to multi-unit housing?</p>	<p>D - Zone D - Ace Hardware, Sylvan Learning Center</p>	<p>78.95</p>	<p>4/28/2022 18:05</p>
<p>Not sure if there's any room here, but Kehilla would be disposed to the social justice angle</p>	<p>H - Kehilla Synagogue Property, 1300 Grand Avenue</p>	<p>6.91</p>	<p>4/28/2022 18:05</p>
<p>No. This needs to be maintained and improved as open space -- for both the human and animal populations of the area. Piedmont has less open park space than surrounding areas, and I believe we're below the national standard. If the tennis courts in the center of town are being proposed, why not the City of Oakland owned Davie Tennis Stadium (within Piedmont city limits)? Eminent domain that place and let Oaklanders ironically complain about Piedmont building affordable housing instead of letting them keep a tennis stadium. Oakland has plenty of other property to build a tennis stadium.</p>	<p>L - Blair Park, 930 Moraga Avenue</p>	<p>0</p>	<p>4/28/2022 18:05</p>
<p>This is very confusing. I'm just adding these here to account for housing created by ADUs and letting people split parcels to build additional homes. There could be more.</p>	<p>M - City Hall, Veterans Hall, Corey Reich Tennis</p>	<p>34.48</p>	<p>4/28/2022 17:44</p>
<p>This just seems dumb to include this. We're not tearing down our community church in the center of town for housing. Why do you even have non-starters on here?</p>	<p>AE - Private single-family properties throughout</p>	<p>182</p>	<p>4/28/2022 1:05</p>
<p>Again! Why are we even suggesting getting rid of a thriving church and school? This is dumb.</p>	<p>B - Piedmont Community Church Property, 400</p>	<p>0</p>	<p>4/28/2022 1:05</p>
<p>No! It's offensive to even be suggesting this.</p>	<p>F - Corpus Christi School Property</p>	<p>0</p>	<p>4/28/2022 1:05</p>
<p>Ditto. Stop with the anti-religious suggestions. It's really offensive.</p>	<p>H - Kehilla Synagogue Property, 1300 Grand Avenue</p>	<p>0</p>	<p>4/28/2022 1:05</p>
<p>If a church decides it can no longer function, it will sell its property and then we can have these discussions. Until then, it's offensive to suggest getting rid of them.</p>	<p>N - Plymouth Church Properties on Olive Avenue</p>	<p>0.45</p>	<p>4/28/2022 1:05</p>
<p></p>	<p>Z - Zion Lutheran Property</p>	<p>0</p>	<p>4/28/2022 1:05</p>

<p>This has always seemed like the most realistic place to build new housing, especially multi-unit housing</p>	<p>L - Blair Park, 930 Moraga Avenue</p>	<p>193.94</p>	<p>4/28/2022 0:42</p>
<p>Important that the HE include more than the needed number of housing units as it is unlikely that all of the locations will develop and not providing excess capacity for development will mean the City has not successfully authorized the amount of development needed to meet our RHNA numbers. Please don't treat this like a check the box exercise - Piedmont must do its part.</p>	<p>AE - Private single-family properties throughout</p>	<p>182</p>	<p>4/26/2022 22:31</p>
<p>Lots splits in Zone E should be encouraged. ADUs that are rented may be counted but not those used for other purposes.</p>	<p>AE - Private single-family properties throughout</p>	<p>63</p>	<p>4/26/2022 16:52</p>
<p>Displacement of current tenants should be avoided</p>	<p>C - Properties in Zone C, Multi-family Zone</p>	<p>19.23</p>	<p>4/26/2022 16:52</p>
<p>Public land should be used only for affordable housing. Market rate units or above moderate should be built on privately owned land.</p>	<p>K - Redevelop City Corporation Yard</p>	<p>121.21</p>	<p>4/26/2022 16:52</p>
<p>Given the history at Blair Park some open space for an enclosed dog run and heritage trees should be preserved.</p>	<p>L - Blair Park, 930 Moraga Avenue</p>	<p>60.61</p>	<p>4/26/2022 16:52</p>
<p>It is important to allow increased density in Piedmont's historically single family neighborhoods. This could be through ADUs, duplexes, triplexes etc.</p>	<p>AE - Private single-family properties throughout</p>	<p>147</p>	<p>4/26/2022 14:17</p>
<p>These are well located sites with transportation where we should zone for increased housing density. But because they have existing economically viable uses, they are unlikely to be actually redeveloped quickly. We should not count on these to meet a significant portion of our RHNA obligation.</p>	<p>D - Zone D - Ace Hardware, Sylvan Learning Cen</p>	<p>105.26</p>	<p>4/26/2022 14:17</p>
<p>This is a great site and our best opportunity to build a feasible affordable housing development soon. this is one of the few sites in Piedmont that can build a community that is large enough to be financially feasible and meet our ELI/VLI goals</p>	<p>K - Redevelop City Corporation Yard</p>	<p>75.76</p>	<p>4/26/2022 14:17</p>
<p>this site is one of two sites large enough to build an affordable project capable of meeting our ELI/VLI goals- it must be considered. The site could be developed in a way to retain and improve park land. Without these larger sites it is simply impossible to actually meet the goal of building our ELI/VLI RHNA requirement</p>	<p>L - Blair Park, 930 Moraga Avenue</p>	<p>72.73</p>	<p>4/26/2022 14:17</p>
<p>These are great sites, close to schools and services. These are likely to take a long time to redevelop, however-- but let's start planning!</p>	<p>M - City Hall, Veterans Hall, Corey Reich Tennis</p>	<p>68.97</p>	<p>4/26/2022 14:17</p>
<p>I did not even realize the church had a parking lot. This seems like a great option for housing with parking underground.</p>	<p>B - Piedmont Community Church Property, 400</p>	<p>29.85</p>	<p>4/26/2022 4:02</p>
<p>I support housing along Grand Avenue and adjacent lots, including this intersection.</p>	<p>C - Properties in Zone C, Multi-family Zone</p>	<p>96.15</p>	<p>4/26/2022 4:02</p>

<p>Grand Avenue is one of the most logical places for multiunit housing. The Ace Hardware parking lots are a total pain - I have even been in a car accident in the hardware parking lot. This space could be easily redesigned to include the current hardware and garden stores, parking and housing above that. It is accessible to transit and in a very walkable location too.</p>	<p>D - Zone D - Ace Hardware, Sylvan Learning Center 210.53 4/26/2022 4:02</p>
<p>This is probably the least attractive dog parks in Piedmont. This site could be nicely reconfigured to provide housing and some park area for dog walkers at the same time. The one unknown is how this would affect traffic by Beach School. Perhaps the parking lot could be repurposed to include housing with parking underground. This section of the street could be reconfigured to incorporate housing.</p>	<p>G - Linda Dog Park, 333 Linda Avenue 103.17 4/26/2022 4:02</p> <p>H - Kehilla Synagogue Property, 1300 Grand Avenue 6.91 4/26/2022 4:02</p> <p>I - Grassy Strip and Median along Highland Avenue 30.86 4/26/2022 4:02</p>
<p>This is an area prime for an update. The BofA is currently unused. Gas stations will soon be obsolete as we transition to electric vehicles to address climate change before it's too late. This area combined with the police station and veterans building could be redesigned together to include the banks and Mulberry's in a visually appealing way that also features substantial affordable housing.</p>	<p>J - Zone D - Gas Station, Mulberry's, Bank of America 96.94 4/26/2022 4:02</p>
<p>The city's owned site are the easiest and biggest opportunity for adding housing because the land would not cost money. The city should seriously consider the corporation yard as well as the skatepark.</p>	<p>K - Redevelop City Corporation Yard 166.67 4/26/2022 4:02</p>
<p>Blair Park, the city's largest owned property, is the most logical place for affordable housing. This is highly underutilized open space. I regularly drive by and see one person or nobody using this space. Affordable housing could be designed for this space in a way that includes open space that gets far more use than what is there now and even has more appealing greenery. It can be done in a way that would not hurt neighbors who live above the park and it could be done in a way that minimizes traffic impacts on Moraga, for instance by widening part of the road by this property.</p>	<p>L - Blair Park, 930 Moraga Avenue 193.94 4/26/2022 4:02</p>
<p>It makes total sense to consider the tennis courts especially for housing. The housing could be designed in a way that retains the tennis courts, perhaps on the roof. It also makes sense to look at the veterans hall and city hall as part of the plan. Finally, while we are considering tennis courts, why not look at the ones by Hampton Field and off Highland behind the dog park too.</p>	<p>M - City Hall, Veterans Hall, Corey Reich Tennis 112.07 4/26/2022 4:02</p>
<p>we should be promoting ADUs while being realistic about affordability and production numbers. Owners of large lots should be able to subdivide their properties to create additional legal lots, and duplexes/triplexes/fourplexes should be allowed on the larger and the smaller lots.</p>	<p>AE - Private single-family properties throughout 42 4/26/2022 3:33</p>

<p>If the Church wants to add housing I'm supportive. I am adding units here because of the way the "puzzle" is structured, which requires 587 units. I object to this - people should be able to contribute whatever input they have, even if it is partial.</p>	<p>B - Piedmont Community Church Property, 400</p>	<p>29.85</p> <p>4/26/2022 3:33</p>
<p>Yes I support multifamily on Linda.</p>	<p>C - Properties in Zone C, Multi-family Zone</p>	<p>96.15</p> <p>4/26/2022 3:33</p>
<p>Redevelopment of the Sylvan learning center building seems very feasible in light of what appear to be relatively low value tenants and a relatively low value building. I support a 5-6 story apartment building on that block and I'd support a variance enabling 100% residential, in light of how little demand there is for retail space. Ace hardware, I suspect, isn't changing.</p>	<p>D - Zone D - Ace Hardware, Sylvan Learning Cen</p>	<p>118.42</p> <p>4/26/2022 3:33</p>
<p>I don't think this is a feasible housing site.</p>	<p>G - Linda Dog Park, 333 Linda Avenue</p>	<p>0</p> <p>4/26/2022 3:33</p>
<p>why maximum of 8? This is a great housing site.</p>	<p>H - Kehilla Synagogue Property, 1300 Grand Ave</p>	<p>6.5</p> <p>4/26/2022 3:33</p>
<p>I support multifamily housing on Blair park with up to 5/6 stories - whatever is needed to create a project feasible and with some level of affordability. I think Blair Park has much better potential than the sites across Moraga.</p>	<p>L - Blair Park, 930 Moraga Avenue</p>	<p>181.82</p> <p>4/26/2022 3:33</p>
<p>Yes!! Veterans building and tennis courts especially should be considered as sites. Veteran's building is probably near the end of its useful life, and community hall/police/fire could be below residential in a 4/5/6 story building. Tennis courts could be on the roof of a multifamily building.</p>	<p>M - City Hall, Veterans Hall, Corey Reich Tennis</p>	<p>60.34</p> <p>4/26/2022 3:33</p>
<p>Slope of site appears to make it unsuitable for housing, but I'd be happy to see housing there if feasible.</p>	<p>N - Plymouth Church Properties on Olive Avenu</p>	<p>7.17</p> <p>4/26/2022 3:33</p>
<p>only more than 3 units with low income. Up to 8 units if design of building is consistent in style with neighborhood like 1001 Warfield avenue.</p>	<p>AE - Private single-family properties throughout</p>	<p>7</p> <p>4/26/2022 2:52</p>
<p>6 stories max</p>	<p>B - Piedmont Community Church Property, 400</p>	<p>13.43</p> <p>4/26/2022 2:52</p>
<p>up to 10 stories high</p>	<p>D - Zone D - Ace Hardware, Sylvan Learning Cen</p>	<p>184.21</p> <p>4/26/2022 2:52</p>
<p>make same zone as D</p>	<p>H - Kehilla Synagogue Property, 1300 Grand Ave</p>	<p>6.91</p> <p>4/26/2022 2:52</p>
<p>up to 6 stories</p>	<p>M - City Hall, Veterans Hall, Corey Reich Tennis</p>	<p>25.86</p> <p>4/26/2022 2:52</p>
<p>It would be great to see a variety of housing types that would allow a broader range of people with different needs welcomed to Piedmont.</p>	<p>AE - Private single-family properties throughout</p>	<p>70</p> <p>4/24/2022 15:19</p>
<p>Please consider this site even including the skatepark, which wasn't well designed and is not accessible to kids that would use it anyways. Seems like a great place for housing!</p>	<p>K - Redevelop City Corporation Yard</p>	<p>151.52</p> <p>4/24/2022 15:19</p>
<p>I'd love to see housing here...seems like an under utilized resource and has great proximity to nearby amenities.</p>	<p>L - Blair Park, 930 Moraga Avenue</p>	<p>193.94</p> <p>4/24/2022 15:19</p>
<p>We should allow duplexes, triplexes, and small apartment buildings in Zones A and E, especially on larger lots. We need to think beyond single-family homes and ADUs.</p>	<p>AE - Private single-family properties throughout</p>	<p>182</p> <p>4/23/2022 15:47</p>

I'd love to see apartments over retail and buildings up to 6-7 stories on Grand Ave. Strongly support exploring the Corp Yard for affordable housing. We should add the skate park site too for consideration.	D - Zone D - Ace Hardware, Sylvan Learning Cen	78.95	4/23/2022 15:47
Blair Park is a great opportunity site. We should definitely explore. Could put housing and some park / recreational space there, such as a playground.	K - Redevelop City Corporation Yard	166.67	4/23/2022 15:47
We should do a master plan for the Civic Center that integrates some of these facilities and puts affordable housing over community and city facilities. Strongly support putting affordable housing in the Civic Center so it is well integrated and close to transportation.	L - Blair Park, 930 Moraga Avenue	193.94	4/23/2022 15:47
It makes sense to have housing where there are services and community resources.	M - City Hall, Veterans Hall, Corey Reich Tennis	112.07	4/23/2022 15:47
This area would help benefit lower income families due to ease of access to local businesses and transportation.	M - City Hall, Veterans Hall, Corey Reich Tennis	0	4/22/2022 21:20
Blair park should be maximized. It is only used by a few residents. Perfect area for development.	C - Properties in Zone C, Multi-family Zone	96.15	4/22/2022 21:09
This is a wonderful central location and I would advocate upzoning this area to incentivize housing in this area, especially low and moderate income housing	L - Blair Park, 930 Moraga Avenue	193.94	4/22/2022 18:42
97 units in this small area with small lots seems unlikely, given the high cost of construction and the fact that properties in this zone are already developed	B - Piedmont Community Church Property, 400	29.85	4/21/2022 18:11
I think significant upzoning will be needed to make redevelopment of private businesses in this area financially feasible, but it would be great to have higher density housing in this area	C - Properties in Zone C, Multi-family Zone	38.46	4/21/2022 18:11
This seems unlikely to me given the existing use of the church and school property probably too small to be feasible	D - Zone D - Ace Hardware, Sylvan Learning Cen	78.95	4/21/2022 18:11
Central locations seem like the best place for new housing, given proximity to schools, city jobs, and transit	F - Corpus Christi School Property	0	4/21/2022 18:11
Central locations seem like the best place for new housing, given proximity to schools, city jobs, and transit. 60 du/acre seems like a reasonable maximum	H - Kehilla Synagogue Property, 1300 Grand Ave	0	4/21/2022 18:11
This site is less connected to city services (schools, jobs, transit) but could still accommodate some housing, with efforts to improve traffic safety and integrate the neighborhood	I - Grassy Strip and Median along Highland Aver	24.28	4/21/2022 18:11
This site is less connected to city services (schools, jobs, transit) but could still accommodate some housing, with efforts to improve traffic safety and integrate the neighborhood	J - Zone D - Gas Station, Mulberry's, Bank of Am	61.22	4/21/2022 18:11
	K - Redevelop City Corporation Yard	60.61	4/21/2022 18:11
	L - Blair Park, 930 Moraga Avenue	60.61	4/21/2022 18:11

The city center is the best place for new housing given proximity to schools, jobs, transit and recreation resources	M - City Hall, Veterans Hall, Corey Reich Tennis	112.07	4/21/2022 18:11
I'm not in favor of converting any city land/parks into housing.	G - Linda Dog Park, 333 Linda Avenue	0	4/18/2022 3:42
I'm not in favor of converting any city land/parks into housing.	I - Grassy Strip and Median along Highland Avenue	0	4/18/2022 3:42
I'm not in favor of converting any city land/parks into housing.	K - Redevelop City Corporation Yard	0	4/18/2022 3:42
I'm not in favor of converting any city land/parks into housing.	L - Blair Park, 930 Moraga Avenue	0	4/18/2022 3:42
I'm not in favor of converting any city land/parks into housing.	M - City Hall, Veterans Hall, Corey Reich Tennis	0	4/18/2022 3:42
This is too many units, but because it's on the city's borderline it would be less disruptive.	F - Corpus Christi School Property	31.25	4/14/2022 22:05
This is a very condensed area, and therefore I believe there should be 0 units placed here.	I - Grassy Strip and Median along Highland Avenue	0	4/14/2022 22:05
This seems to be the least obtrusive place for new housing of all the locations offered.	K - Redevelop City Corporation Yard	166.67	4/14/2022 22:05
This seems like too many units for one location, but too many of the other locations shouldn't have any new units.	L - Blair Park, 930 Moraga Avenue	193.94	4/14/2022 22:05
These zones should be upzoned to allow 2-6 units per property by right.	AE - Private single-family properties throughout	182	4/12/2022 1:50
I don't believe it's likely that the maximum buildout would actually be possible as many landowners may not be interested.	D - Zone D - Ace Hardware, Sylvan Learning Center	118.42	4/12/2022 1:50
I live near here and this area desperately needs revitalization and increased density! Ground floor retail with space for hardware store, coffee shops, karate place, sandwich shop etc etc would be ideal. Hard to picture how many stories these buildings would have to be to accommodate this housing though, so I'm not sure what is reasonable number of units here.	D - Zone D - Ace Hardware, Sylvan Learning Center	105.26	4/7/2022 3:46
I don't have a dog but it seems this space is heavily utilized - would need to preserve some dog-park area.	G - Linda Dog Park, 333 Linda Avenue	0	4/7/2022 3:46
This area so needs to be reimaged! Less space for cars, and more for people. See Mill Valley for inspiration of a charming downtown with a plaza (both downtown Mill Valley, and the recent redevelopment of the Mill Valley Lumbar Yard). It would be ideal to have ground level retail and apartments above. Mulberry's, an ATM, and a few other shops/cafes around a small plaza with tables/outside eating area, with housing above. Remove the banks and lawyer/real estate offices. Make Highland Way a small pedestrian-only walkway, or remove all together? It's hard as a lay person to know how different number of housing units would feel here, but I think apartments above more (non-chain) businesses would be a wonderful transformation.	J - Zone D - Gas Station, Mulberry's, Bank of America	25.51	4/7/2022 3:46
Empty lot behind 216 Howard.	C - Properties in Zone C, Multi-family Zone	38.46	4/6/2022 6:19
Why is this the only park listed? There are many other parks in Piedmont. Why are we listing parks at all?	L - Blair Park, 930 Moraga Avenue	0	3/25/2022 1:30

Testing	F - Corpus Christi School Property	4.69	3/25/2022 1:22
This is a park. It is not zoned for residential. Do not take away our parks!	L - Blair Park, 930 Moraga Avenue	0	3/25/2022 1:22

May 4, 2022

Dear Commissioners,

I am concerned about the sites chosen for the mandated new housing in Piedmont. I was disappointed that the "Housing Puzzle" did not allow Piedmont citizens sufficient input. I'm sure that Piedmont can be more creative than placing all of the high density, low income housing on the edge of town. After conversations with a city planner, it is clear that most of the suggested sites (Figure B-2: Draft 6th Cycle Housing Element Site Inventory by Income Category) for high density housing are not realistic, e.g. the churches are unlikely to give up their property for housing.

Attached are 10 suggested sites that should be investigated further to assimilate new occupants into Piedmont. One site that did seem quite realistic on the Figure B-2 map, was the Piedmont Community Tennis Courts at the corner of Vista Ave and Bonita. The courts are centrally located, viz. a short walk to food shopping, banking, schools, parks, a church and bus stops. That location, along with a few other sites that are centrally located (see my attachments) should be an easy build, with existing streets, utilities and multi-story buildings already in place. I was skeptical about Piedmont relinquishing tennis courts for housing until I was told by a city planner that the courts could actually be located on top of the building! Hence, since tennis courts can go on top of housing units, should we not consider other tennis courts around town for housing? Another site in the central Piedmont area that should be considered for housing is the Piedmont Center for the Arts. A replacement building could have the Piedmont Center for the Arts on ground level, with high density housing above it. Another convenient location for housing is the parking lot at Piedmont Park. I was told by a City planner that this was not possible because it is part of the park. It's not a park, it's a parking lot! The parking lot at Coaches Field is slated to be housing, so why not the parking lot at Piedmont Park?

Some other possible locations for our new housing requirements are shown in my attachments. Townhouse-style housing could be located in the medians of Fairview, Grand Ave, San Carlos, and Inverleith Terrace. There are also large street intersections throughout town that could be redesigned to acquire additional buildable lots for housing. This may seem improbable, but with 400 sq ft allocated for single occupancy units and 700 sq ft for family units, it should be investigated. When the old Havens School needed to be replaced because of earthquake hazards, Mark Becker came in with a beautiful design at a price that most Piedmonters did not think possible. Why doesn't Piedmont try embracing our new housing requirements by integrating new residents throughout our community, rather than concentrating them all on the edge of town? SOME housing in the Coaches Field area may be reasonable, but not MOST of it, which is the reality of Figure B-2: Draft 6th Cycle Housing Element Site Inventory by Income Category map.

Many homeowners in our neighborhood bought in this location because of the open spaces, which comprise one of the few wildlife areas left in Piedmont. The steep, hilly wildlife corridor above the Corporation Yard will be difficult and therefore expensive to build high density housing on; it should be left for the deer, turkey, fox and coyote, as well as the people of Piedmont to use. This area of town in 1884 was the original historic Blair's Park, a 75 acre amusement park (historyofpiedmont.com). Some of the historic trails and fantastic view points are still there and could easily be revived for general use by Piedmonters!

Chris Read

Abbott Way



Piedmont City Hall

Piedmont Center for the Arts

Piedmont High School

Bonita Ave

Magnolia Ave

Piedmont Community Tennis Courts

Dress Best For Less-Donations Thrift store

Piedmont Recreation Department

Vista Ave

Magnolia Ave

Hillside Ave

342

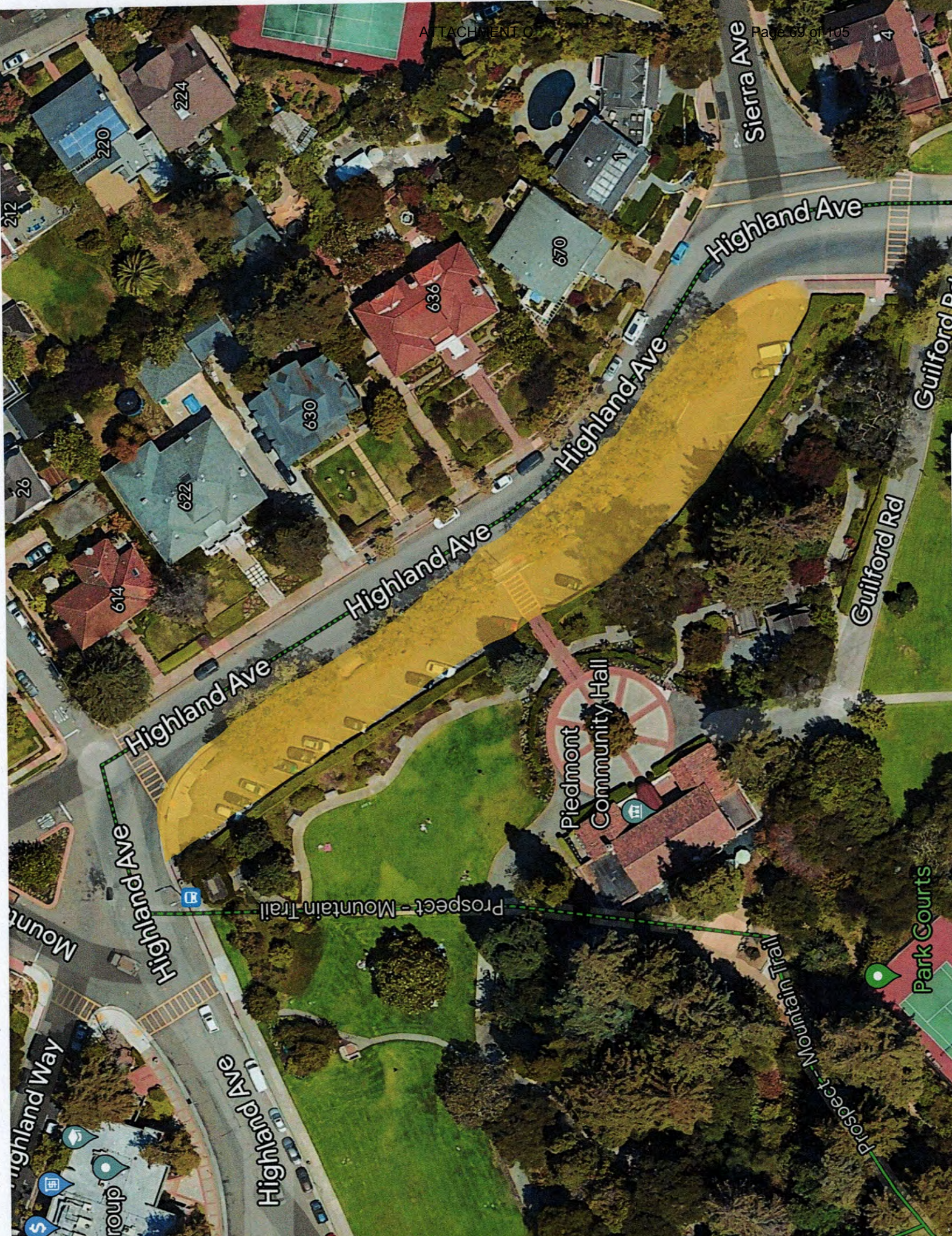
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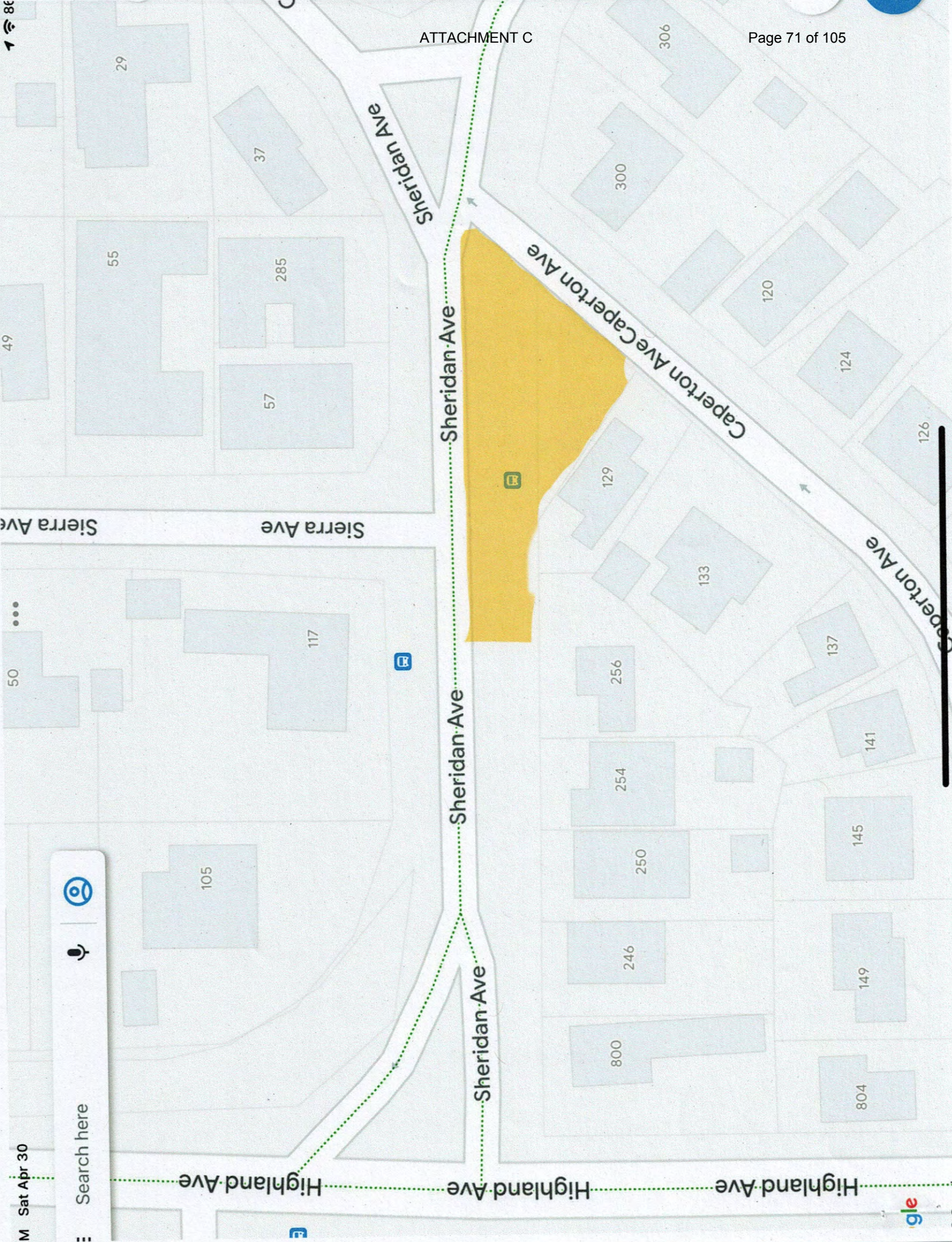
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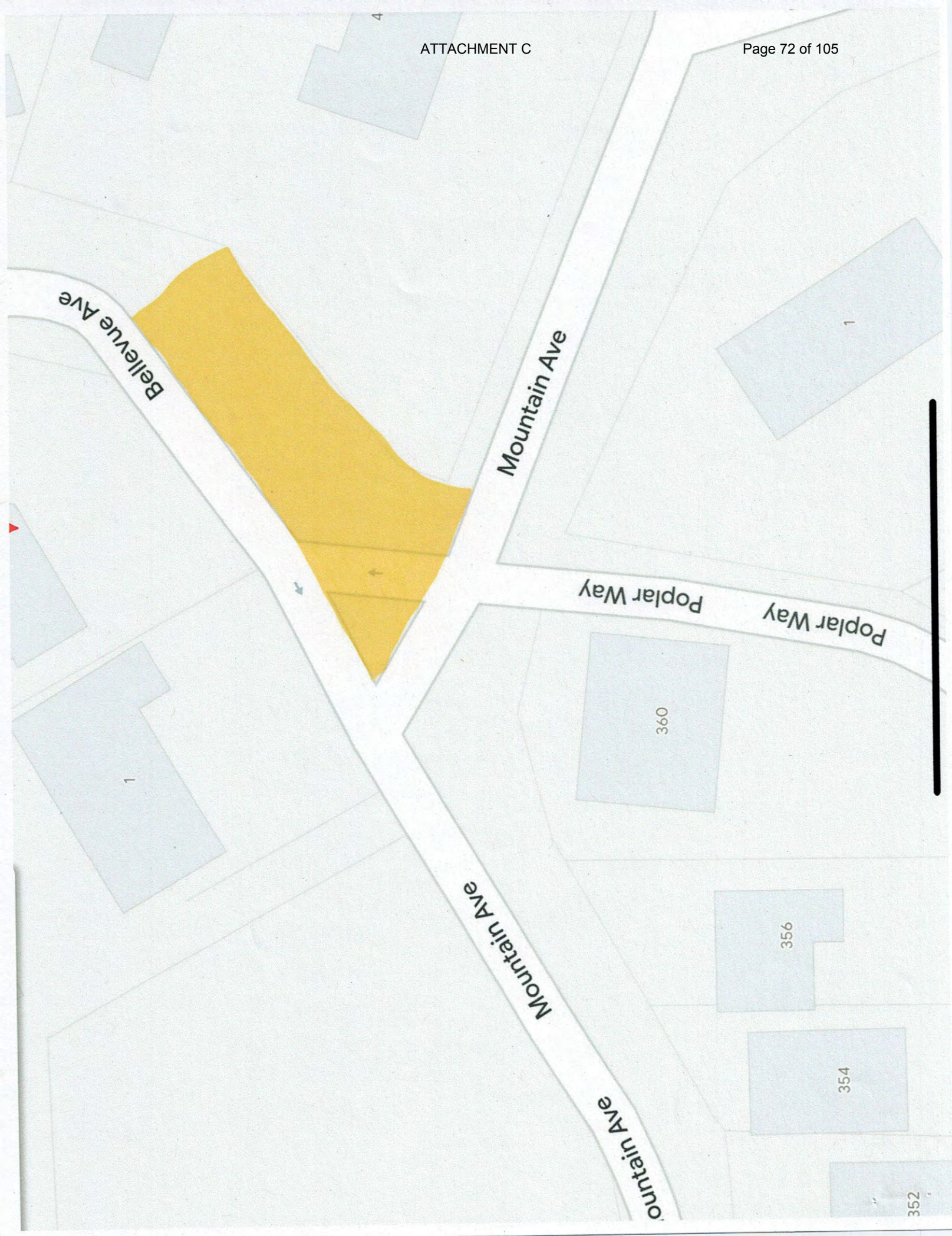
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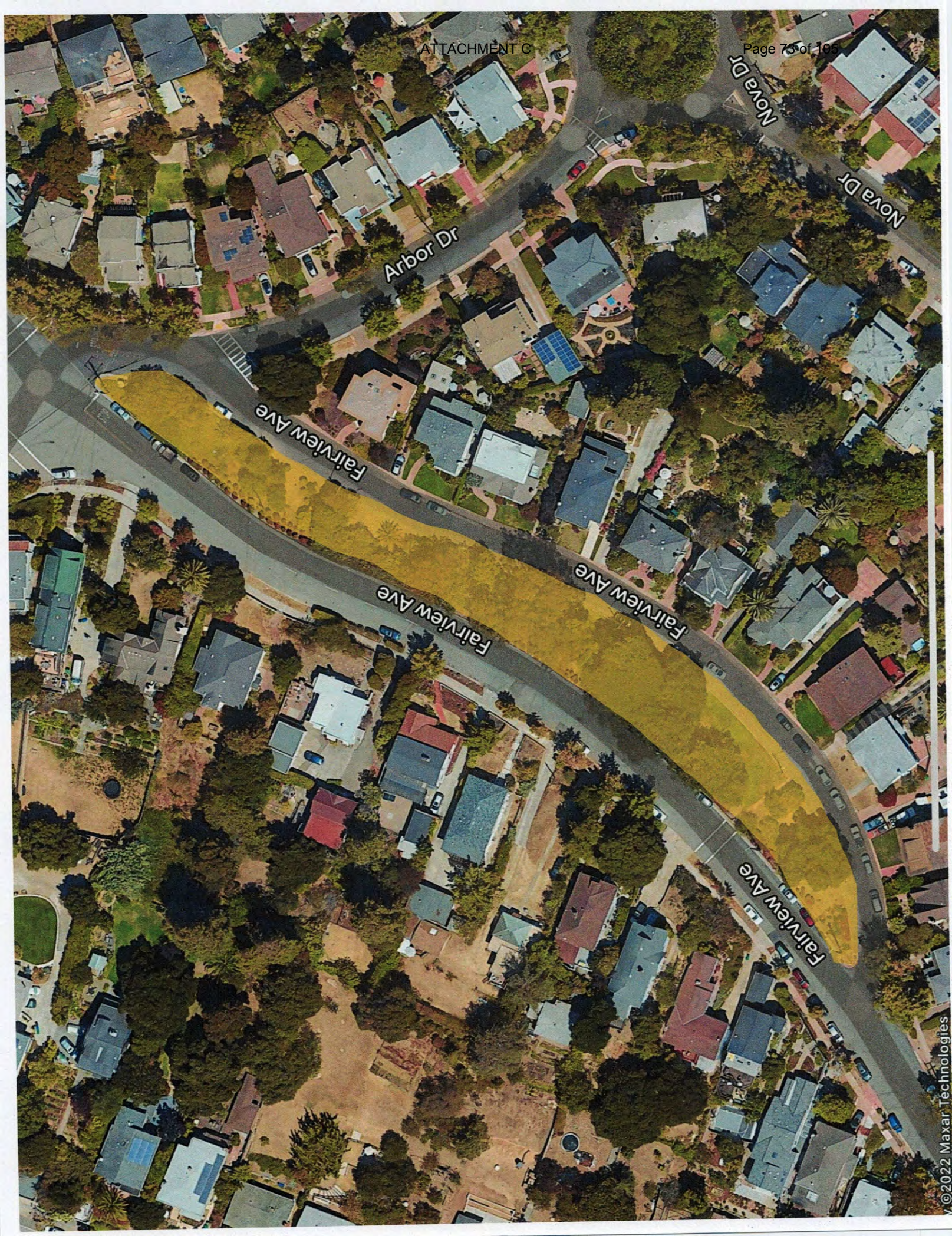
17













1685

1687

1689

1691

1693

1693

1695

1695

1688

Grand Ave

Arroyo Ave

Lower Grand Ave

Lower Grand Ave Lower Grand Ave

1680

1682

1684

1686

21

17

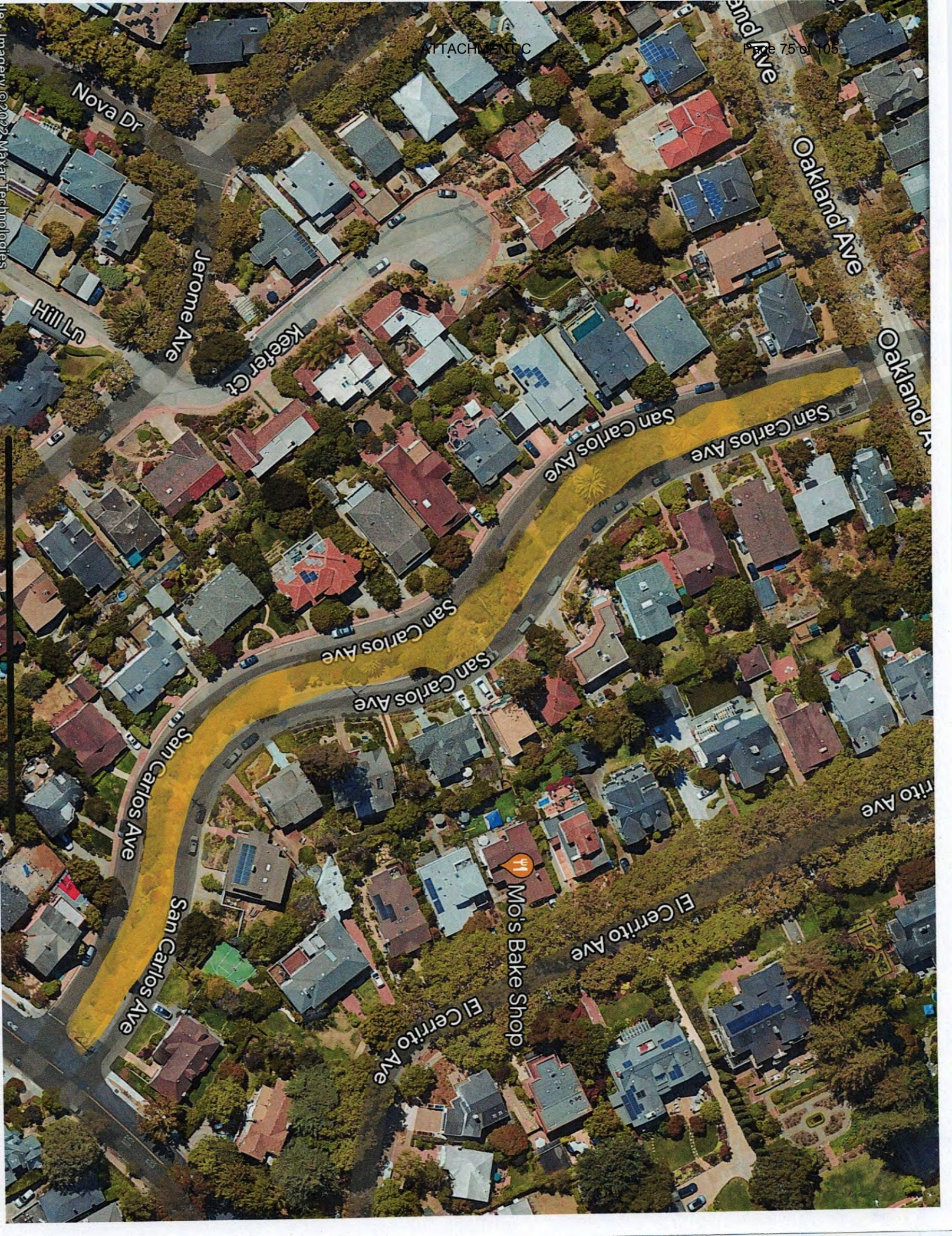
Manor Dr

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Arroyo



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10

40

Harvard Rd

Lakeshore Ave

Lakeshore Ave

1007

1004

1005

Winsor Ave

Harvard Rd

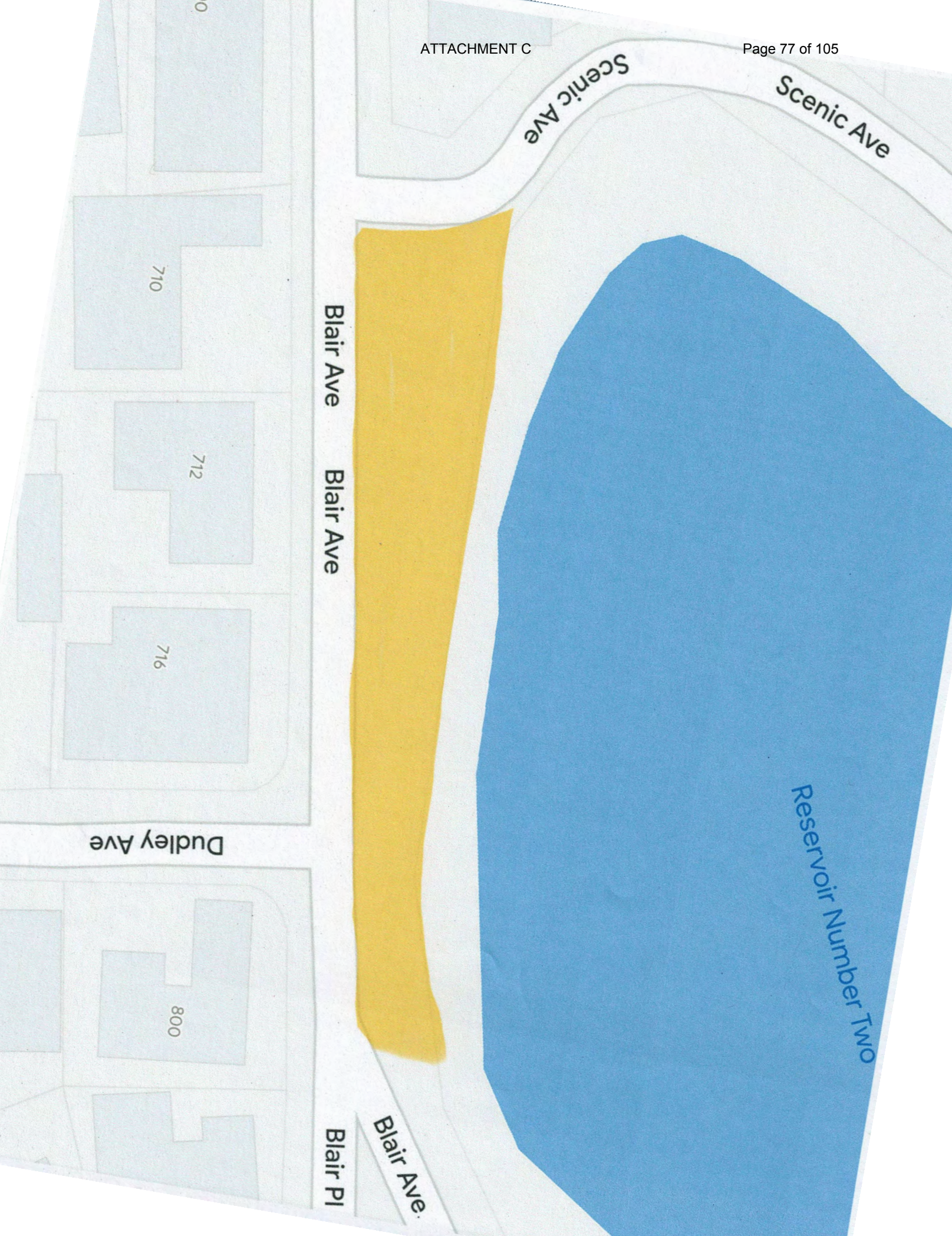
Winsor Ave

1009

1001

3917

Lakeshore Ave



Scenic Ave

Scenic Ave

Blair Ave

Blair Ave

710

712

716

Dudley Ave

800

Blair Pl

Blair Ave

Reservoir Number Two



Piedmont Racial Equity Campaign

Date: May 5, 2022

To: City Council, Planning Commission, Housing Advisory Committee, Piedmont Planning Staff and City Manager

Re: Feedback on the Draft Housing Element

Dear Members of the Planning Commission, Housing Advisory Committee, and City Council:

The Piedmont Racial Equity Campaign (PREC) Housing Committee has reviewed Piedmont's recently released draft 6th Cycle Housing Element (HE). We want to thank the City for its positive, constructive approach to the Housing Element, and commend the City staff and Lisa Wise Consulting for their hard work putting together such a comprehensive and thoughtful draft. We generally think the City has done a great job identifying sites, policies, and programs to facilitate housing production. In particular, we applaud the City for proposing to increase the allowable density in selected areas and outlining steps to build affordable housing on city-owned land. Many of these policies will help our community do its part in helping address the regional housing crisis while also furthering fair housing and equity. Beyond meeting a state legal requirement, the Housing Element offers an exciting and welcome opportunity to help make Piedmont a more diverse, equitable, culturally rich, and inclusive community. By building more housing, we also help ensure that current and future members of our community—including seniors, adult children, teachers, and nurses—can afford to live in Piedmont.

To achieve this vision, we believe the City must take an “all of the above” approach to housing. We must build **more housing, for everyone, everywhere**. In accord with those principles, we have several suggestions for improving the draft, which are enumerated below. We want to call attention to three proposed changes in particular:

- 1) **Strengthen strategies for producing affordable housing in Zone B (Public Land) by expanding the number of Zone B sites under consideration, allowing affordable multifamily uses in this zone, and coordinating the timeline for development to match the requirements of Measure A1**, among other steps. Building on public land is the City's most realistic path to creating real affordable housing and we should make sure the Housing Element will enable thoughtful and sustainable change in our community.
- 2) **Commit to exploring policies that introduce “gentle density” in Zones A and E (the Single-family and Estates zones) through allowing duplexes, triplexes, and fourplexes, as well as subdivision of large lots and mergers of lots** if conducive to

the development of -plexes and other small multifamily buildings. These types of housing already exist in the middle of Piedmont's single-family zones and fit in well: We should allow more of them to be built.

- 3) **Create policies that enable and incentivize the development of affordable housing throughout Piedmont.** Housing that is affordable should be located in all the different zones (residential, commercial, and mixed use) to support an integrated community. Our call for the distribution of affordable housing *everywhere* should not be confused with opposition to building *somewhere*, on a specific site. Rather, our position is that we should build affordable housing in multiple areas of the City--in other words, more, not less.

Additional details about these and other recommendations are laid out below.

General recommendations / suggestions:

- We commend the City for producing a Site Inventory that lists sites accommodating 658 units, 71 over the goal of 587 units. However, many of the sites in the inventory are highly unlikely to yield the numbers of units listed, either because they are already built out, steep, or have other hurdles. (For example: The Site Inventory includes the Piedmont Community Church--an Albert-Farr designed complex from 1916--as well as the Piedmont City Hall. Both would appear unlikely to be redeveloped to include housing in the next eight years.)
- Moreover, many of the housing ideas in the draft Housing Element are untested in Piedmont. Without any track record of mixed-use development, density bonus projects on church/temple parking lots or development of public land in Zone B for multi-family housing, the city needs to add more potential sites to its inventory to ensure there will be a good chance of meeting its RHNA goal. Following HCD recommendations, **we believe the City should "over-zone" by 20%, to ensure we meet our targets, aiming for a Site Inventory that identifies sites for 704 units.**
- The draft plan includes a policy to "monitor the effects of the City Charter," and another one to "consider modifications to Charter regarding zoning amendments." (See policies 4.G and 4.H, at pages 56-57). We welcome these policies and the City's willingness to consider amending the Charter to facilitate housing production, but want to emphasize that under the Charter a vote *is required only* to "reduce[] or enlarge[] with respect to size or area" the different zones, and to "reclassif[y]" any zone, and *is not required* to carry out other changes to the various zones. (See Charter, Section 9.02). The Planning Code confirms this interpretation, stating that "in Section 9.02, the prohibition not to reduce, enlarge, or reclassify a zone without a vote is understood to mean the city may not change the zone boundaries, or change (reclassify) a property from one zone to another." (See Planning Code, Section 17.02). **All of the changes identified in the draft plan--as well as others not identified there now but that would be highly**

desirable, like allowing for “gentle density” in Zones A and E—could be undertaken by the City Council without a vote of the people, since they leave the zone boundaries unchanged and increase density in moderate amounts, while adding flexibility to the applicable zoning and building controls.

Suggestions regarding Zone B (Public Facilities):

- We welcome Program 1.F, which proposes that the City consider expanding residential development in publicly owned lands. In order to ensure that these properties are available for affordable development, the HE draft proposes to amend Zone B to accommodate a density of 60 units per acre. However, the program doesn't explicitly state that **Zone B will be amended to allow for multifamily housing**, beyond the currently allowed uses of single-family, supportive, transitional, and emergency housing. We understand this to be implicit in the language of the program, but to avoid ambiguity we ask that the City please rephrase Program 1.F.
- **Additional Zone B sites should be added to the Site Inventory**, including underutilized spaces such as Blair Park and Kennelly Skate Park, and all such sites should be included in the programmatic EIR.
- **Basic site feasibility analysis should be conducted in the near term to prioritize development of Zone B sites.** All sites should be studied simultaneously to determine which are viable for affordable housing development. The City should then establish a timeline and process to seek Requests for Proposals from developers for viable sites.
- The schedule for development of Zone B sites does not contemplate an Exclusive Negotiating Agreement (ENA) with a developer for a specific site on public land until 2026. **This schedule should be accelerated** (per the process above) for at least one Zone B site to enable Piedmont to use its A-1 bond allocation on public land.
- Instead of—or perhaps in addition to—a specific plan for the Corporation Yard, **the City should do a specific plan for the Civic Center:** a comprehensive master plan that explores parcels like City Hall, Veterans Hall, the tennis courts, and 801 Magnolia, all together, potentially including some of the adjacent commercial sites as well. With its wide streets, larger buildings, and proximity to schools, city employment opportunities, and recreation resources, the Civic Center offers an ideal location for denser and more affordable housing.
- One site in the Corporation Yard is designated as Above Moderate or market rate housing in the Site Inventory. **The City should prioritize affordable housing on publicly owned land.** If any market rate housing is developed, it should subsidize affordable housing in other locations.

Suggestions regarding Zones A and E (Single-Family Residential):

- The draft Housing Element makes minimal changes to Zones A and E, which occupy 68% of the land in the City, apart from ADU incentives and enabling SB9 lot splits. **We believe the City should explore zoning changes that allow duplexes, triplexes (or more on larger lots of an acre or more)** in these areas.
- Over the last five years, there has been a widespread recognition that single-family zoning was an extremely harmful policy with historical origins in racial animus. San Francisco, Berkeley, and Oakland are following the lead of cities like Portland and Minneapolis in moving away from single-family zoning, and we believe Piedmont should do the same.
- With its recent laws permitting ADUs and duplexes on most single-family lots, the State has already done much to erode single-family zoning. By law now, virtually every “single family” lot in California is permitted to have up to four dwelling units, if some conditions are met and the lot is first split into two. In addition, property owners are allowed to build a junior ADU and a detached ADU. In essence, then, the “single family” lots in Zones A and E currently allow small multi-family developments. However, existing laws still carry numerous restrictions that limit their effectiveness. For example, ADUs cannot be sold separately from the main house. SB9 requires lots to be evenly split and owner-occupied: It does not permit, for example, a 4000 sf lot to be created out of a 15,000 sf lot. Piedmont can pass its own policies implementing ADU and SB9 laws, to enable greater flexibility in configuration and therefore make housing production more likely.
- Some of the innovative types of dense small-scale development that are happening in surrounding neighborhoods (for example mini-lot developments in Oakland that put 3-4 townhouses on a single-family lot) are not possible under Piedmont’s zoning. We should update our zoning in Zones A and E to enable these types of “affordable by design” housing.
- Beautiful examples of scattered duplexes, triplexes, quadplexes, and small multifamily housing already exist and are nestled within Zones A and E in Piedmont. We should enable more of this kind of housing to occur.
- The City has listed numerous sites in Zones A and E in its Site Inventory as potentially yielding approximately 60 new dwellings for above-moderate income households. Presumably these are anticipated to be built through lot splits or other unspecified means. Since Piedmont does not have a track record of new single-family construction occurring on large lots, more flexibility and incentives will be required to increase the likelihood of new construction and redevelopment in Zones A and E.
- **The City should reduce the minimum lot sizes in Zones A and E** (to at least 4,000 sf in Zone A and 10,000 sf in Zone E) to facilitate lot splits for new housing production.

- Likewise, **the City should explore permitting lot mergers to allow for the construction of small, multifamily buildings**, and consider conditioning the benefit of the merger to the requirement of a certain percentage of affordability, or other requirements such as the inclusion of smaller, “affordable by design” units. In this respect, we urge the City not to limit its consideration of lot mergers to facilitate housing to Zones C and D only (as proposed by Policy 1.L), but to extend its consideration of this policy to the other residential zones, too. We note that Policy 4.K, which calls for “a study to better understand the viability of affordable housing development on small lots,” including the consolidation of land to develop smaller (<10 units) affordable development projects, appears to be a step in that direction. Please continue to explore ways to change the zoning controls in Zones A and E, to allow for more flexibility and feasibility of small multifamily buildings, including affordable ones.
- **The city should explain how the State’s density bonus law will be implemented in Zone A.** A cross-referencing of this state law is only in Chapter 17 for Zones C and D. No guidance is provided in the zoning code for sites in Zone A where the church/temple/school parking lots are located.
- The draft HE includes policies related to SB 9 implementation, but proposes to advance these policies in years 2025 (objective design standards), 2027 (amendments to encourage large lot splits) and 2026 (developers fact sheet and FAQs). **We encourage the City to work on these implementation measures much sooner** than that. Taking too long may discourage development and thus frustrate the City’s and the state’s goals to encourage housing production. Worse, it may encourage haphazard development and protracted implementation hurdles, leading to increased costs and staff time. For reference, HCD recently released SB 9 implementation guidance, available online at <https://www.hcd.ca.gov/docs/planning-and-community-development/sb9factsheet.pdf>

Suggestions regarding Zone D (Commercial/Mixed-Use):

- **We urge that the Draft description of Program 1.H “Increase allowances for Housing in Zone D” be amended to allow single-use residential buildings with a specified level of affordability**, rather than the tentative language “The City will also consider waiving ground floor commercial in Zone D.”
- **We support the goal of inclusionary housing**--that is, a requirement for affordable housing to be included in market rate multi-family housing projects--addressed in Program 3.G and Policy 3.8 of the Draft HE. We urge the City to carry out financial feasibility analysis to support the creation of a viable inclusionary housing or in-lieu fee program.
- The LWC financial model released last year in October should be updated to reflect a more realistic construction cost and the higher assumed cost of land shown in Appendix B. **The revised inputs in the LWC financial model should support the density**

proposed for Zone D of 80 du/acre, or a different density should be proposed that is supported by the model.

Suggestions regarding Zone C (Multifamily):

- **The City should introduce a housing preservation policy disallowing the conversion of existing multifamily to single-family dwellings.** We note that Policy 2.6 calls for the preservation of existing multi-family housing, but it does not appear to be accompanied by any implementing programs. Program 2.D requires that the existing Condominium Conversion program be maintained, but it is unclear whether this law would protect existing multifamily units from conversion into single-family dwellings. Please clarify, or add the necessary language to the HE draft to ensure that is the case.
- **The City should encourage affordable housing development in Zone C,** using similar incentives and tools as those proposed for Zone D, above.

Suggestions regarding ADUs:

- We support ADUs and believe they can be an important piece of housing production. However, we know that many ADUs in Piedmont are not rented out. As the City contemplates creating more incentives for ADU production, it's essential to **carry out analysis and regular monitoring to understand whether and how ADUs are adding rental housing to the City.** We need data to better shape effective policies for the future.
- **The draft Housing Element should include a specific regulatory plan for City staff to make sure new ADUs created under City-supported incentives are leased at affordable rates,** and continue to be occupied by persons who qualify for affordable housing.
- An expected rental yield rate for ADUs should be determined and used to reduce the 140 planned ADUs to the number of expected rental units. **Analysis of how ADUs have been used in Piedmont, i.e. rentals, guest quarters, offices, is required under current HCD guidance.**
- ADUs can also have counterproductive effects on a market like Piedmont's, leading in aggregate to larger houses that are even more out of reach to moderate-income buyers, at a time when the City is also trying to preserve its stock of smaller homes. Again, we strongly support ADUs if they can lead to production of affordable rental housing. We believe policies need to be tailored to be more effective at doing that.
- **We oppose Program 1E. Require ADUs for New Single-Family Residence Construction.** Requiring owners who do not wish to build an ADU to do so only raises construction costs without necessarily yielding new rental housing.

Other Suggestions

- We're glad to see the City is proposing the creation of an affordable housing fund (Program 3E). However the only specific purpose listed for the fund is low-interest loans for ADUs. **We believe an affordable housing fund should also be used to support other types of projects, such as affordable housing and small site development,** which would be more effective uses of affordable housing money in Piedmont.
- Maps of current zoning and the Site Inventory should be in the body of the report, not just Appendix B, and at a readable scale, for downtown especially.
- An easily understood version of Table B-9 should be in the body of the report, grouping together the single family parcels and identifying parcels by familiar names.

In conclusion, we thank the City for the opportunity to offer this feedback on the Draft Housing Element. We are proud that Piedmont, unlike many other cities in California, has taken a positive, proactive approach to the Housing Element, and is committed to doing its part in creating more housing.

Yours truly,

Members of the PREC Housing Committee

Sachin Adarkar

Deborah Leland

MeghanBennett

Jill Lindenbaum

Irene Cheng

Linda Loper

Elise Marie Collins

Hugh Louch

Frances Fisher

Andy Madeira

Carol Galante

Andrea Ruiz-Esquide

Ellen Greenberg

Brett Snyder

Beth Hughes

Alice Talcott

Sarah Karlinsky

Tracey Woodruff

Betsy King

Randy Wu

Hello Piedmont Planning Commission:

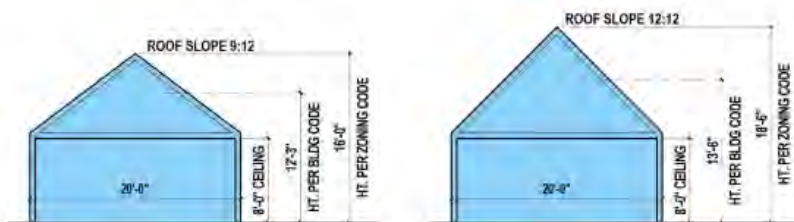
Comments on the Housing Element (HE) for your consideration.

1. Recommend staff lower the allowed height for ADUs to 20 feet and conduct further study of this height.

The presentation on ADU incentives at the October 2021 Housing Advisory Committee meeting is to my knowledge the only documentation on ADU incentives in the HE public process. Excerpts from that presentation are presented below. At no point was 24 feet presented as an option for ADU height yet the HE recommends this height and without the additional study called for in the October 2021 presentation (see below). In fact, the diagram shows a height of 18.6 ft as acceptable for new ADUs.

“Incentive Programs While Junior ADUs (JADUs) can qualify as affordable units without additional regulation, formal incentive programs need to be established in order for ADUs to contribute to Piedmont’s affordable housing stock. The State’s Health and Safety Code (HSC), Section 65583(c)(7), requires that cities and counties develop a plan as part of their Housing Element that incentivizes and promotes the creation of ADUs that are offered at affordable rent for very-low, low-, and moderate-income households. Affordable rents are typically enforced with 10-year deed restrictions, and the units must be recorded and filed with the California Department of Finance. Over the course of this study, we reviewed a number of potential incentives to encourage the development of low- and very-low income rent-restricted units. The general strategy is to allow less restrictive development standards in return for a time-limited deed-restriction ensuring the maintenance of the affordable dwelling unit. **We believe the following incentives deserve additional study and consideration: Height Limit and Number of Stories 1. In exchange for a deed-restricted affordable unit, grant an increase in the height limit to 20 to 22 feet and allow for construction of a 2-story ADU.** Imposing a slightly wider setback of 6 to 8 feet could help mitigate the impact on neighboring properties. 2. Similarly, an affordable unit could be permitted over an existing garage, with similar height limits, or height limits that take into account the height of the existing garage

Carriage House: While noted as a potential affordable incentive in our report, relieving the height limit for an ADU constructed over an existing garage, assuming the footprint remains the same, would enable residents to maintain on-site covered parking while adding a dwelling unit to their property. This Carriage House model is a traditional way of providing an additional dwelling unit over a garage or storage building, and would seem consistent with much of Piedmont’s existing residential fabric. Other California jurisdictions (Santa Monica and Orange County, for example) have adopted this option to encourage retaining existing parking counts. **A similar limit on overall building height, and/or accommodation of roof pitch, as noted in the previous recommendation, would be appropriate.”**



Carriage House

While noted as a potential affordable incentive in our report, relieving the height limit for an ADU constructed over an existing garage, assuming the footprint remains the same, would enable residents to maintain on-site covered parking while adding a dwelling unit to their property. This Carriage House model is a traditional way of providing an additional dwelling unit over a garage or storage building, and would seem consistent with much of Piedmont’s existing residential fabric. Other California jurisdictions (Santa Monica and Orange County, for example) have adopted this option to encourage retaining existing parking counts. A similar limit on overall building height, and/or accommodation of roof pitch, as noted in the previous recommendation, would be appropriate.

https://p1cdn4static.civiclive.com/UserFiles/Servers/Server_13659739/File/Government/Departments/Planning%20Division/Housing%20Programs/LWC_Piedmont_New%20Fair%20Housing%20Programs_101821.pdf

This recommendation for elevated ADU height of 24 feet seems predicated on the belief that it is consistent with Piedmont's residential neighborhoods.

“This Carriage House model is a traditional way of providing an additional dwelling unit over a garage or storage building and would seem consistent with much of Piedmont's existing residential fabric.”

This assumption may be correct for Zone E but is grossly incorrect for Zone A, where most of Piedmont's residences are found. Piedmont's residential fabric is mostly defined by the Chapter 17 principal that new development not impact the light, views and privacy of neighboring properties. Those characteristics are defined by large front yard setbacks (with prohibitions with what can be placed there) and consistent side and rear yard setbacks that leads most properties to develop the backyard as a principal space for socialization. And in many cases, garages and other structures are placed at the 4-foot rear and sideyard setback lines so as to preserve backyards as habitable space. Allowing such structures to rise to 24 feet would significantly impact the enjoyment of the neighboring backyards. Piedmont limits fence height to 8 feet so expanding the setback in such cases to 8 feet would have virtually no effect on this degradation of neighbor privacy.

The HE proposed multiple incentives to foster new and affordable ADU development and the effectiveness of these proposals should be evaluated through the next housing cycle before resorting to this extreme proposal of 24 feet, especially as the HE provides no rationale for this height. And without a mechanism in place to document that ADU and deed-restricted ADU are being occupied by new residents, it seems disingenuous to the spirit of the HE and the City's residential character to incentivize their development through this approach.

2. Incorporate additional references of the Piedmont General Plan and Climate Action Plan Policies into the Housing Element.

There are many policies in the General Plan that need to be coordinated with the HE proposals, especially site selection and particularly the Moraga Canyon sites. These pertain to sustainability policies that were specifically incorporated in the General Plan when it was updated in 2009. Three examples are presented below. Likewise, the HE should reference the Climate Action Plan 2.0 2030 and 2050 Greenhouse Gas reduction targets and assert that all new development – ADU, single family and multi-family development – be all-electric construction. All cities face these targets but Piedmont is fairly unique in that most of its existing housing stock is remodeled rather than replaced with new construction. As such it is very difficult for the City to achieve GHG reductions through energy-efficient new construction. As natural gas use in Piedmont is increasing, it is essential that new construction not add to that trend.

City of Piedmont Sustainability Policy

It is the intent of the City of Piedmont to be a sustainable community - one which meets its current needs without compromising the ability of future generations to meet their own needs. In adopting this policy, the City of Piedmont accepts its responsibility, through its operations, programs and services, to:

- Continuously improve the quality of life for all Piedmont residents without adversely affecting others.
- Enhance the quality of air, water, land and other natural resources through conservation, reduced pollution, increased efficiency, and protection of native vegetation, wildlife habitat and other ecosystems.
- Reduce greenhouse gas emissions, specifically by reducing landfilled waste, energy consumption, and water consumption, and by encouraging walking, bicycling and other alternative travel modes.
- Encourage greener methods of construction.

- Support small local businesses that use sustainable practices in their own operations
- Promote public education and awareness of sustainability issues.
- Align and partner with community groups, businesses, residents, non-profits, and neighboring communities where appropriate to work toward these goals

Policy 14.4: Retention of Healthy Native Trees Encourage the retention of healthy native trees as new construction takes place, including home additions and landscaping projects. Existing significant trees should be conserved where feasible when development takes place.

Policy 16.1: Linking Land Use and Transportation Choices Consistent with the Land Use and Transportation Elements of this plan, retain walkable neighborhoods, reliable public transportation, safe cycling, carpooling, convenient access to shops and services, and other measures which reduce the need for driving and fuel consumption in Piedmont.

3. Include an assessment of potential units from development of the multi-family and multi-use zones in Piedmont.

In Table B.4 of Appendix B, the HE provides the new density assumptions for the different zones in Piedmont but then does not appear to apply them to estimate potential for units in the multi-family and multi-use zones. Properties in these zones are non-vacant but the HE should calculate the potential units that could be developed on these sites should they be converted to multi-family housing during the next cycle. Table B-7 gives an example of what this analysis would look like. The development of the multi-use zone occurred during the 5th Cycle and while no new units were generated as a result, the increase in allowable density in the current HE could change that. As the HE is about housing *potential*, the potential of these zones should be quantified in Appendix B.

4. Include an assessment of potential units from the development of residential zones A and E.

There is immense potential for new housing in Zones A and E due to the new development rights granted by SB9. As table 3.2 from the General Plan shows, almost 50% of Piedmont residential lots are greater than 10,000 square feet and 22% greater than 20,000 square feet. How this potential could be used for affordable housing needs further study but a simple “by right” assumption that all these lots will split under SB9 provides a simple assessment of its housing potential. Table B-4 needs to be updated with a more realistic assessment of density for single family residential-estate and that assumption used to estimate potential units. The text below from an HCD factsheet indicates that the state allows an SB9 analysis to be included in housing elements.

Lot Area	Number of Lots	Percent of Total	Total acres	Percent of total
Smaller than 1,000	87	2.2%	0.4	0.1%
1,001 to 2,500 SF	49	1.2%	2.2	0.3%
2,501 to 4,000 SF	388	9.7%	31.8	4.0%
4,001 to 5,000 SF	679	16.9%	69.9	8.8%
5,001 to 6,000 SF	600	14.9%	76.1	9.6%
6,001 to 7,000 SF	592	14.7%	88.2	11.1%
7,001 to 8,000 SF	342	8.5%	58.9	7.4%
8,001 to 9,000 SF	220	5.5%	43	5.4%
9,001 to 10,000 SF	179	4.5%	39	4.9%
<i>Total smaller than 10K</i>	<i>3,136</i>	<i>78.1%</i>	<i>409.5</i>	<i>51.8%</i>
10,001 to 12,500	354	8.8%	90.4	11.4%
12,501 to 15,000	181	4.5%	57.2	7.2%
15,001 to 17,500	92	2.3%	34.2	4.3%
17,501 to 20,000	60	1.5%	26.2	3.3%
20,001 to 25,000	82	2.0%	41.2	5.2%
25,001 to 43,560	80	2.0%	60.6	7.7%
Greater than 43,560	31	0.8%	71.8	9.1%
<i>Total larger than 10K</i>	<i>880</i>	<i>21.9%</i>	<i>381.6</i>	<i>48.2%</i>
GRAND TOTAL	4,016	100.0%	791.1	100.0%

Source: Alameda County Assessor's Records, 2006. City of Piedmont, 2007

(*) Excludes Piedmont Unified School District and most properties owned by City of Piedmont

“Housing Element Law. To utilize projections based on SB 9 toward a jurisdiction’s regional housing need allocation, the housing element must: 1) include a site-specific inventory of sites where SB 9 projections are being applied, 2) include a nonvacant sites analysis demonstrating the likelihood of redevelopment and that the existing use will not constitute an impediment for additional residential use, 3) identify any governmental constraints to the use of SB 9 in the creation of units (including land use controls, fees, and other exactions, as well as locally adopted ordinances that impact the cost and supply of residential development), and 4) include programs and policies that establish zoning and development standards early in the planning period and implement incentives to encourage and facilitate development. The element should support this analysis with local information such as local developer or owner interest to utilize zoning and incentives established through SB 9. Learn more on HCD’s Housing Elements webpage.”

5. Eliminate or modify the recommendation that the City Charter be reviewed.

The HE calls for a study of the City Charter on the development of affordable housing and potential action by City Council to modify the charter to eliminate the requirement for voter approval of zone changes. As housing targets were achieved in the 5th Cycle and are projected to be achieved (with 10% surplus) in the 6th Cycle, it seems premature to undertake that study during the next housing cycle, especially within the first year at the HE proposes. At the very least, propose that it be done 4 years into the next cycle by which time a better assessment can be made.

6. Add a table of all the 6th Cycle HE policies/programs to the document.

This is routinely done for large policy documents and there is an example in the HE (Table D-1 in Appendix D). The requirement that ADU be built with large additions, development of transitional housing in the residential zone, 24 foot ADU height and other examples are embedded throughout the document and are not easy find in one place.

7. Recommend that the City extend submitting the Housing Element until May 2023.

A recent statute extended the filing deadline for Housing Elements to May 2023. The City should take advantage of this and allow for more outreach and comments by the community. It will also give the City time to prepare the SB9 analysis I recommend in my comment.

Garrett Keating
■ Ricardo Ave.

May 5, 2022

Dear Planning Commissioners,

I am Michael Henn, a longtime resident of Piedmont and a mostly retired city planner who has been through the Housing Element process several times as staff with different jurisdictions. I was also on the Piedmont Planning Commission which worked on the current HE. I have also served on the Alameda County Grand Jury three times. I think most planners and managers recognize that each city goes through this HE exercise primarily because we are required to do so by the state. Nevertheless, a good faith effort is needed to avoid legal action and being targeted by militant housing advocates like Yimby Law and Public Advocates. I would think that there is more likelihood of Piedmont being criticized by HCD and housing advocates for including infeasible sites in the inventory than for accepting the legislature's intent and welcoming more ADUs and SB9 duplexes and potentially a few lot splits for developed lots. As proposed in the Draft HE, little benefit would result from ADUs and none from SB9 potential duplexes and lot splits. This failure to benefit from pro-housing legislation creates more pressure to place sites into the inventory which are increasingly improbable. For example, Corpus Christi School's playground is a highly suspect site for high density apartments. Where are the kids going to play? Cannibalizing a city's already inadequate parks and open space was not intended by the legislature. The Quimby Act sets minimum park acreage standards per 1000 residents. Piedmont's park acreage is already deficient under the law. Losing developed parkland acreage to the HE would worsen the deficiency. Including such sites is also not going to be politically acceptable. Thus, proposing high density multifamily housing for sites like Coaches Playfields and Blair Park invites valid criticism. What is the city going to do for a corporation yard if the one and only one we have is actually included in the HE list, and lost?

I would suspect that jurisdictions which are more protective of the qualities of their communities will handle their RHNA's differently. They will assign larger numbers toward both ADUs and SB9 housing. Given the extensive litigation statewide against RHNA assignments (34 cities in SoCal), and the State Auditor's criticism of the HCD's RHNA methodology, I would expect that HCD will be conservative in rejecting such attempts, if at all. Logically, HCD should be receptive to allowing a substantial unit yield from both sources. The State passed the "by-right" ADU without requiring any parking, and the by-right duplex/lot-split laws with the expectation that these strong new laws would have a significant impact in producing needed infill housing. To now disparage their significance makes no sense and actually endangers the city to unnecessary litigation because of the lack of a realistic expectation that many of the selected sites could ever achieve the necessary units.

The city staff and their HE consultants have not made use of the fact that HCD has issued an opinion document on how to treat potential SB9 units in a HE. The SB 9 Fact Sheet on the Implementation of Senate Bill 9, dated March 2022, provides for a means to allow valid new housing units from SB9 into a HE. As stated in the HCD document: "To utilize projections based on SB 9 toward a jurisdiction's regional housing need allocation, the housing element must: 1) include a site-specific inventory of sites where

SB 9 projections are being applied, 2) include a non-vacant sites analysis demonstrating the likelihood of redevelopment and that the existing use will not constitute an impediment for additional residential use, 3) identify any governmental constraints to the use of SB 9 in the creation of units (including land use controls, fees, and other exactions, as well as locally adopted ordinances that impact the cost and supply of residential development), and 4) include programs and policies that establish zoning and development standards early in the planning period and implement incentives to encourage and facilitate development. The element should support this analysis with local information such as local developer or owner interest to utilize zoning and incentives established through SB 9. Learn more on HCD's Housing Elements webpage."

I would expect that staff and the outside consultants should be able to provide a defensible analysis which could provide, for example, a couple hundred units over 8 years. Also, the HE is being too conservative for potential ADU production. The "by-right" ADU law passed in 2019 and it takes a certain time for such a change to filter through a community and be broadly implemented. To take only the average of past ADU production, when regulations were more restrictive, makes little sense.

Although not directly related to Piedmont's Draft HE, it should be pointed out, in general, that HCD's RHNA assignments are severely problematic. Throughout much of the last decade California was adding 200,000 or more people per year to its population although slowing toward the end of the decade. The draft RHNA numbers, which assumed continued and even higher growth rates were circulated to planners by 2019. These older numbers remained almost unchanged in the final adopted statewide metro-by-metro RHNAs. However, there was actually a significant halting of state population growth followed by a significant and unprecedented population decline after January 2020. Nevertheless, the HCD administration refused to update their obsolete assumptions. Numerous articles, such as the following, have publicized this decline, but that reality has done nothing to update the state or local RHNAs.

[Exodus: Bay Area, California population dropped in 2021 as people left \(mercurynews.com\)](https://www.mercurynews.com/2021/07/27/exodus-bay-area-california-population-dropped-in-2021-as-people-left/)

<https://www.eastbaytimes.com/2022/04/10/walters-californias-shrinking-population-has-big-consequences/>

Besides not being demographically sound, the state's collective metro RHNAs add up to some 2.2 million units for the state by 2031. At the typical 2.8+/- people per dwelling unit, the state is assuming that there is a need for housing for 6 million more people by 2031, or 750,000 per year. That number is higher than any year in California history. Planners I've talked to at MTC/ABAG defend their overshoot by saying the bigger numbers are needed to reduce overcrowding and reduce the number of people who are cost-burdened by the high cost of housing. While a laudable goal, it is rather speculative as to how much excess housing is needed to bring down the cost of housing to where it

becomes affordable. And why would builders build such an amount if the present profit margins were to go away?

Another aside that is not directly aimed at the current Draft HE, in my view a proper RHNA process should be a bottom-up not top-down process. State and regional planners allocated RHNA housing units to over 500 jurisdictions without knowing what is existing on the ground. Instead, the process should start with an accurate and detailed inventory of each jurisdictions vacant and underutilized sites, and the actual density of developed residential areas (Most of Piedmont has relatively small lots compared to the suburbs so Piedmont is already about four times denser than, say Orinda or Lafayette). Only once this factual background information is known, units can logically be assigned. Piedmont is largely built out, but that fact was not known or appreciated in Sacramento.

To conclude, I believe Piedmont should slow down the review process and ask for an extension. Then we should eliminate the sites that most would consider infeasible, particularly if the owners knew their sites were on the list. The HE does not provide evidence that the owners have been contacted and are in agreement. Responses should be obtained from at least Corpus Christi Church, Kehilla Synagogue, Zion Lutheran Church and Ace Hardware that these sites are available for affordable housing, or not. If the answer is No, then these sites need to be struck from the list. Then, the HCD SB9 review process should occur to identify larger private lots feasible for SB9 lot splits, and assume that a proportion of the single family homes could very well be converted to duplexes or Tenant-In-Common two family residences (TICs). Much of the apparent single family housing in San Francisco is actually, two-family TICs. I hope that these comments are appropriately addressed. I fear that the staff and consultants have already set out on the path they wish to take. Doing so could unnecessarily produce opposition and even litigation, and do little for actually producing the housing that the Housing Element process is meant to achieve.

Piedmont Housing Puzzle Engagement Report – May 5, 2022

Goals

On March 24, 2022, the City of Piedmont launched the Piedmont Housing Puzzle, a web-based interactive tool hosted on Balancing Act software. Active from March 24, 2022, to May 1, 2022, the tool was intended to present land resources and constraints analysis prepared for the Draft 6th Cycle Piedmont Housing Element to members of the public in an engaging format. The license to use Balancing Act, as well as software technical support, were awarded to the City of Piedmont as the result of a competitive grant.

At the Housing Element Community Workshop on March 24, 2022, City staff and consultants introduced the Housing Puzzle tool to the community. As presented to the public, the goals of the Piedmont Housing Puzzle were:

- Create a setting that puts residents in the shoes of decision-makers to show how they would solve tough public policy challenges
- Frame trade-offs so that background data, community values, and community preferences can be included in decision-making
- Allow public engagement that is not limited by staffing resources, so that thousands of people can provide informed input using smartphone, computer, or tablet.

One of the Housing Element Community Workshop presenters on March 24, 2022, was Chris Adams, President of Balancing Act. During the presentation, he highlighted the kinds of data the Piedmont Puzzle was not intended to provide, as follows:

- The Piedmont Housing Puzzle was not intended to be the sole or final means by which sites for the Housing Element sites inventory will be evaluated
- The Piedmont Housing Puzzle, by itself, is not a scientifically valid research tool
- The Piedmont Housing Puzzle was not intended to capture other factors that go into site selection, such as environmental constraints or affordability and equity requirements.

Publicity and Promotion of the Piedmont Housing Puzzle

The Piedmont Housing Puzzle was published to the homepage of the Housing Element website at Piedmontishome.org and to the homepage of the City of Piedmont city website. The Piedmontishome.org website was, in turn, publicized with 30 banners on streetlights along Grand, Highland, and Moraga Avenues starting the week leading up to the launch on March 24, 2022, and continuing beyond the close of the web-based tool on May 1, 2022. Physical posters were located at community bulletin boards, including City Hall, the Piedmont Police Station, Mulberry's Market, Wells Fargo bank, the Piedmont Service Station on Highland Avenue, the Shell gas station on Grand Avenue, a location near Kehilla Community Synagogue, and Piedmont Community Church.

The City publicized the Piedmont Housing Puzzle in notices and posters for the March 24, 2022 Housing Element Community Workshop, as well as the Planning & Building eNewsletter mailing to over 4,000 email addresses. Emails were sent to all City staff and sent to PUSD to share with School District employees. Local news outlets, including the Piedmont Post, The Exedra online newspaper, and the Piedmont Civic Association website published stories about the Piedmont Housing Puzzle and the March 24, 2022 Housing Element Community Workshop.

Approach

Piedmont's next Housing Element must identify the sufficient land to meet the Regional Housing Needs Allocation (RHNA of 587 new housing units by 2031). The Piedmont Housing Puzzle tool included a map of Piedmont with 14 sites, chosen using the following methodology: sites suggested by the community in March-April 2021 through the web-based interactive Pinnable Map tool, hosted on Social Pinpoint software; public comments gathered at stakeholder interviews, public meetings, and community events, hosted in person and virtually over the last 12 months; and sites and constraints analysis, completed by City staff and Housing Element consultants. Users of the Puzzle could allocate the 587 units to any of the identified sites, up to reasonable maximums capped in the software to urge users to develop a "balanced" housing plan with sites for new housing throughout the community.

These 14 sites were identified on the Housing Puzzle map:

1. Zones A & E, Single-Family Residential Zone
2. Piedmont Community Church
3. Zone C – Linda Avenue at Oakland Avenue
4. Zone D – Grand Avenue
5. Corpus Christ Church and School
6. Linda Dog Park
7. Kehilla Community Synagogue
8. Zone D - Gas Station, Mulberry's, Bank of America, Wells Fargo
9. Grassy Strip and Median on Highland Avenue at Sheridan Avenue
10. Public Works Corporation Yard
11. Blair Park
12. Civic Center: City Hall, Veterans Hall, Corey Reich Tennis Center, etc.
13. Plymouth Community Church
14. Zion Lutheran Church & Renaissance School

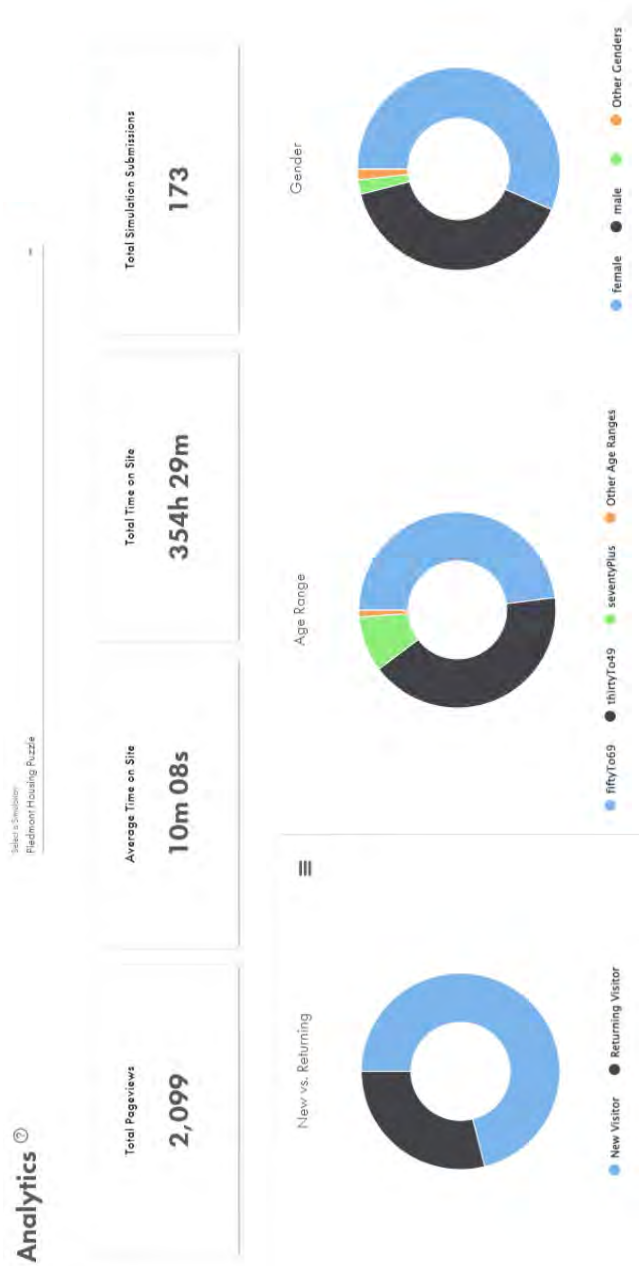
Piedmont Housing Puzzle Users

As shown below, the Piedmont Housing Puzzle had 2,099 total pageviews and 1,050 new sessions, and users spent an average of 10 minutes on the site. This equated to 246 hours of on-line public engagement. The Balancing Act software reported 1,050 new sessions and 1,477 total sessions (new and returning visitors, combined). Of the 1,050 new sessions, approximately 16% (173 users) submitted a housing plan and comments showing where these Housing Puzzle users would choose to allocate the 587 housing units required by the RHNA.

Housing Puzzle users identified the general location of their residences as part of the tool. The resulting map of user locations showed that Piedmonters in all parts of the City were aware of, and participated in, the Housing Puzzle tool.

Comments were received as part of the housing plans filed through the Housing Puzzle. These comments have been incorporated into the public comments compiled for the Planning Commission and City Council consideration, as well as listed in the appendix to this report. Users who did not file housing plans were not able to leave comments through the Housing Puzzle. Alternative forms of communication were provided in publicity materials. Many people used the comment form at Piedmontishome.org or via email to Piedmontishome@piedmont.ca.gov.

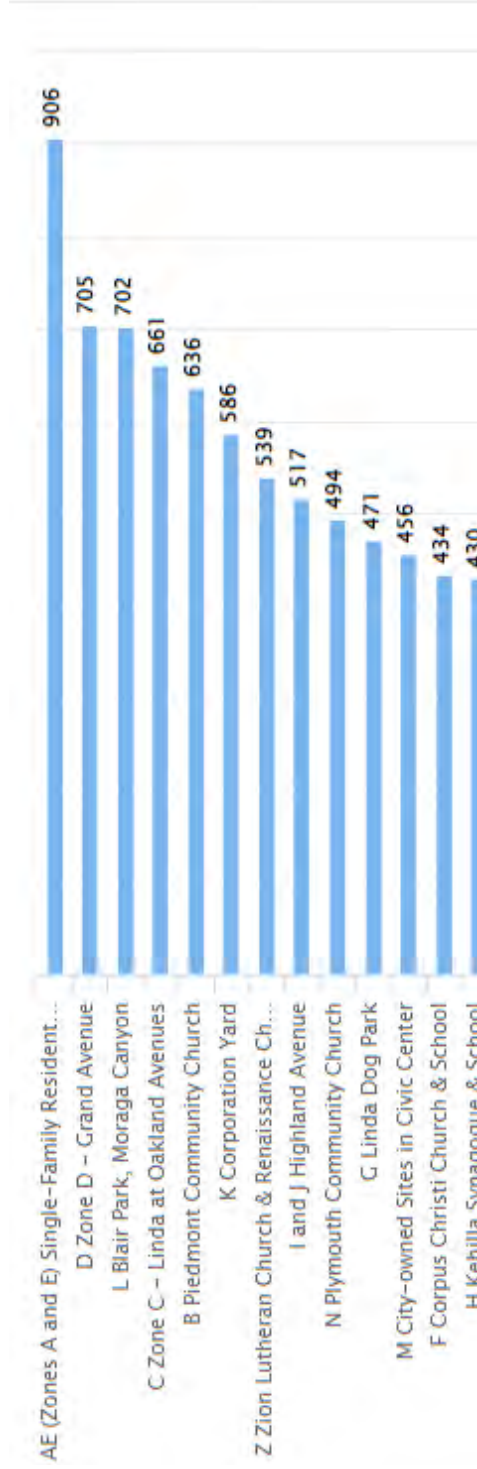
Demographics analysis provided by Balancing Act software reported that 56.5% of users were female, 39.4% were male, and 4% were other genders. Also, users represented every age bracket with the age bracket of 50 - 69 representing the largest group (48% of users), 30 to 49 (42%), and 70 or older representing the second smallest bracket (9% of users).



Results

The Piedmont Housing Puzzle tool generated 173 housing plan submittals and 116 public comments. Although the majority of sessions (84%) did not result in a balanced housing plan filed through the Piedmont Housing Puzzle, the software could track where all user activity was occurring as people considered the pros and cons of the various locations. As shown below in the table titled “Table 1, Piedmont Housing Puzzle Opens By Site,” the most activity or “opens” occurred in the following categories: Zones A & E; Zone D on Grand Avenue; and Blair Park. All the sites listed on the Housing Puzzle map received some level of interest from members of the Piedmont community.

Table 1, Piedmont Housing Puzzle Opens By Site

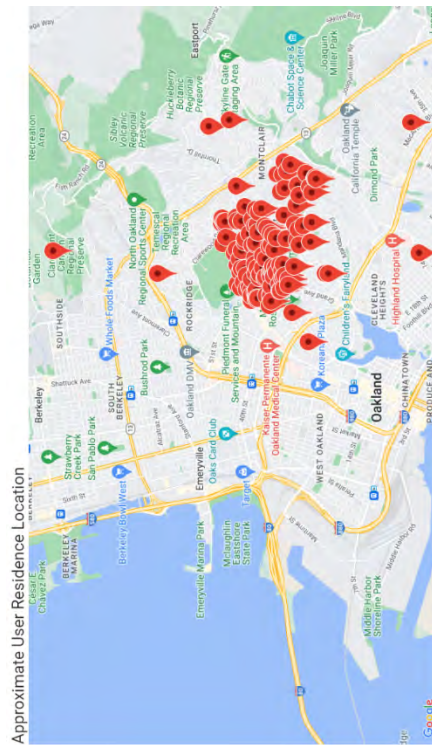
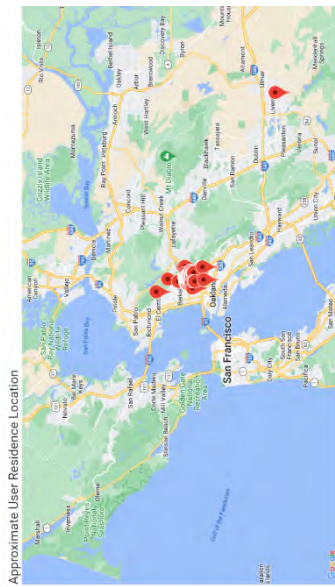


Conclusion

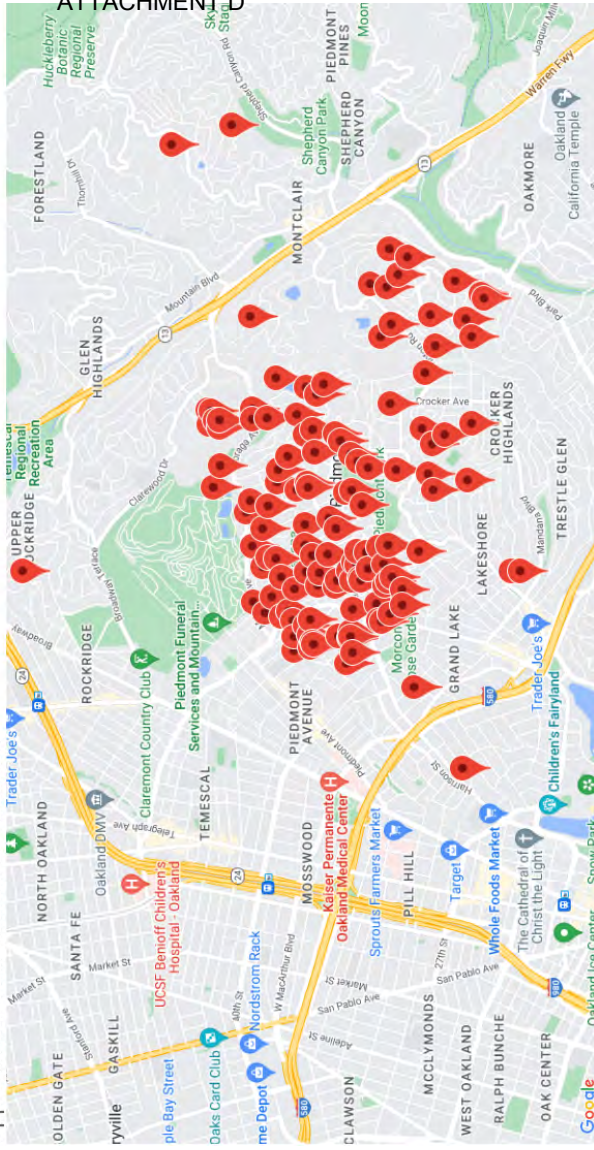
In conclusion, the Piedmont Housing Puzzle helped introduce the Draft Housing Element sites inventory and successfully piqued the interest of a significant percentage of Piedmont community members. It provided a venue for community members to both learn about sites considerations and share their perspectives on potential housing sites. The web-based tool resulted in 116 additional public comments, which are listed in the appendix and included in the public comments compiled for the consideration of the Planning Commission and City Council. This qualitative data is important to fully understand the community’s concerns and preferences for growth.

Appendix

Part I, Approximate User Residence Location

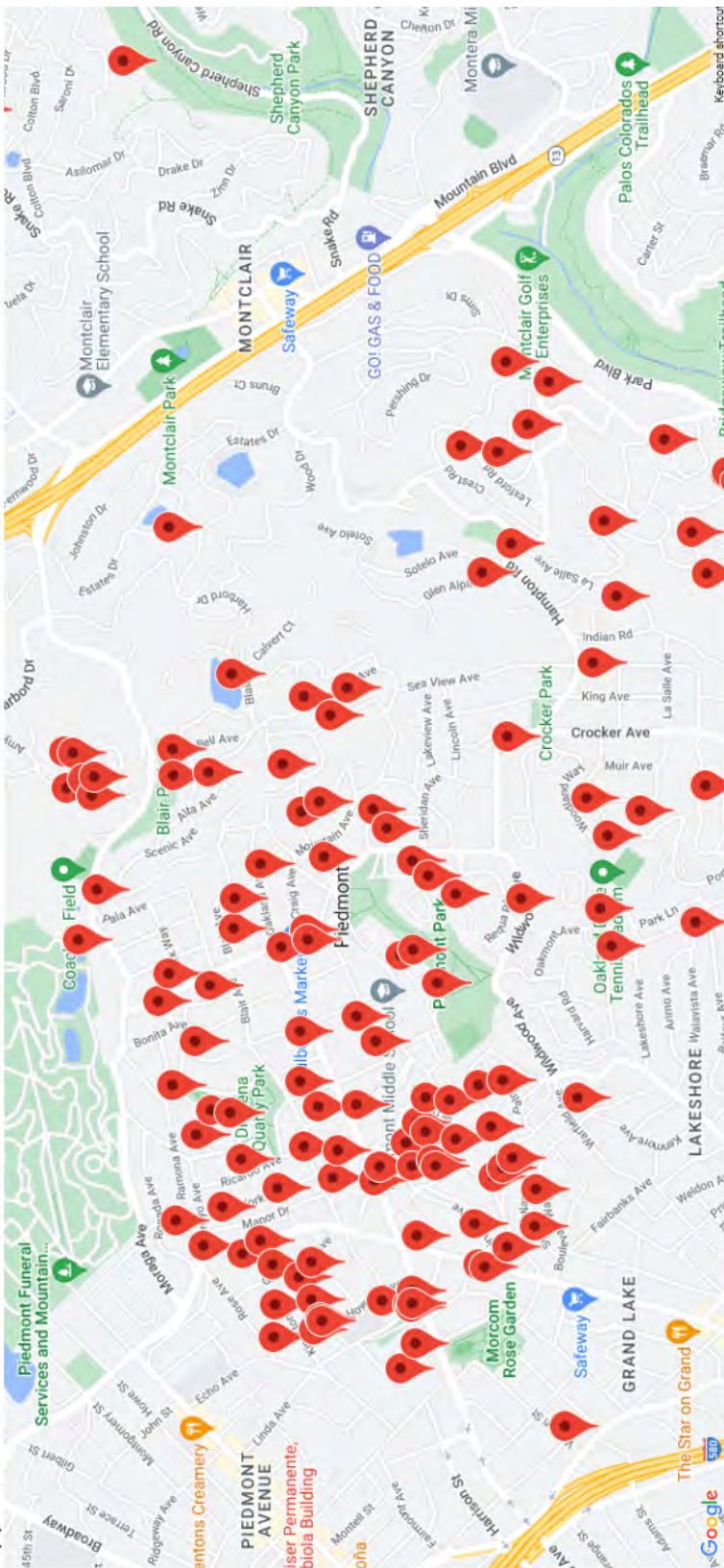


Approximate User Residence Location



Pierce Macdonald, Senior Planner
City of Piedmont

Approximate User Residence Location



Part II, Piedmont Housing Puzzle Comments

<u>Comment</u>	<u>Item</u>	<u>Change</u>	<u>Date</u>
1 Lots of great options and the #2 place to place units (Zone D is best location).	C - Properties in Zone C, Multi-family Zone	96.15	5/2/2022 18:16
2 This is absolutely the #1 place to put units. I'd add retail at the ground floor. Great access to public transportation and easy walk to commercial.	D - Zone D - Ace Hardware, Sylvan Learning Center, Homes and Small Businesses	210.53	5/2/2022 18:16
3 Great area to add units. Ideally the Blair Park (L) gets turned into a park with soccer fields (desperately needed).	K - Redevelop City Corporation Yard	166.67	5/2/2022 18:16
4 I think it's important to develop this area into a park with soccer fields. Piedmont desperately needs more soccer fields! Given that I needed a few more units, I added some to this location....hoping that still allows for space for soccer.	L - Blair Park, 930 Moraga Avenue	24.24	5/2/2022 18:16
5 Deprioritize for housing - maintain quiet nature of city center	B - Piedmont Community Church Property, 400 Highland Avenue	0	5/2/2022 16:09
6 Close access to school, transportation, retail shops and restaurants	C - Properties in Zone C, Multi-family Zone	96.15	5/2/2022 16:09
7 Access to transportation and retail shops, grocery and restaurants	D - Zone D - Ace Hardware, Sylvan Learning Center, Homes and Small Businesses	210.53	5/2/2022 16:09
8 Close access to Park Ave transportation and retail shops and restaurants	F - Corpus Christi School Property	31.25	5/2/2022 16:09
9 Close access to school, public transport and shops	G - Linda Dog Park, 333 Linda Avenue	23.81	5/2/2022 16:09
10 Deprioritize for housing - surrounded by single family homes	I - Grassy Strip and Median along Highland Avenue at Sheridan Avenue	0	5/2/2022 16:09
11 Offering new commercial options would be interesting but not housing. Prioritize needs of surrounding single family homes (quiet, parking)	J - Zone D - Gas Station, Mulberry's, Bank of America, Wells Fargo	0	5/2/2022 16:09
12 Housing could make sense here (along Moraga thoroughfare) as along as Coaches Field is not disturbed. Piedmont already has too few rec fields / spaces	K - Redevelop City Corporation Yard	166.67	5/2/2022 16:09
13 Would love to turn this into soccer fields which we are desperately in need of	L - Blair Park, 930 Moraga Avenue	0	5/2/2022 16:09
14 Like the idea of supporting emergency and rec uses but not additional housing	M - City Hall, Veterans Hall, Corey Reich Tennis Courts, etc.	0	5/2/2022 16:09
15 Close access to Park Ave and Montclair for public transport and shops	Z - Zion Lutheran Property	40	5/2/2022 16:09
16 Super congested already---bad city planning	B - Piedmont Community Church Property, 400 Highland Avenue	0	5/1/2022 20:52
17 Close to public transit and retail best for dense living.	D - Zone D - Ace Hardware, Sylvan Learning Center, Homes and Small Businesses	210.53	4/30/2022 3:24
18 it would be great if in development the density could be varied so there were different housing types - townhomes, apartments, etc.	C - Properties in Zone C, Multi-family Zone	86.54	4/29/2022 22:53
19 Mixed -use zoning to allow business uses to remain with housing above. Since housing almost always is more profitable to develop, require mixed-use with business/not-for-profit tenancy, not just vacant space. Consider affordability as well. Does Piedmont work to house its teachers and first responders, etc.?	D - Zone D - Ace Hardware, Sylvan Learning Center, Homes and Small Businesses	210.53	4/29/2022 22:53
20 has Piedmont considered housing for teachers and first responders who work in Piedmont? any consideration of affordability? locations like this one could be a good opportunity for lovely townhouses	I - Grassy Strip and Median along Highland Avenue at Sheridan Avenue	4.94	4/29/2022 22:53
21 keep businesses - mixed-use zoning	J - Zone D - Gas Station, Mulberry's, Bank of America, Wells Fargo	20.41	4/29/2022 22:53
22 this could be a great place for Piedmont to add some new multi-family housing with greater density than is typical in the city - and to consider affordability	K - Redevelop City Corporation Yard	166.67	4/29/2022 22:53
23 could be a very interesting venture - lots of unique opportunities with the Church and school and the location on Park with access to bus, etc.	Z - Zion Lutheran Property	40	4/29/2022 22:53
24 Like the newer condos below the dog park, this could be high end bt smaller unit syle condos and townhouses. Good transportation and walkability score. Good for the senior set and city employeee preference housing, teachers, fire dept, rec center, city admin, etc	G - Linda Dog Park, 333 Linda Avenue	31.75	4/29/2022 18:01

Part II, Piedmont Housing Puzzle Comments

25	The corporation yard seems a good area to put the multi unit type development. There is a main road already in place, public transportation route, and in walking distance for someone who is fit to school and to area's of interest. IT will also not negatively affect the main part of the community with added traffic because of normal commute.	K - Redevelop City Corporation Yard	166.67	4/29/2022 18:01
26	How will public transportation be delivered to this area? What would be the main routes drivers would take to this community?	L - Blair Park, 930 Moraga Avenue		
27	Why is this area not already open to the Piedmont community and public as a park? Adding some housing here would change the nature of the Piedmont City Center. Perhaps the city buildings in place could be reidentified for community need.	M - City Hall, Veterans Hall, Corey Reich Tennis Courts, etc.	181.82	4/29/2022 18:01
28	My comments are in the specific areas.	RHNA Allocation	25.86	4/29/2022 18:01
29	Actually, why is the maximum 183, each house could turn their garage into an ADU according to CA state law	AE - Private single-family properties throughout Zones A and E	0	4/29/2022 18:01
30	Redeveloping a park into housing is quite a drastic step compared to allowing more ADUs in the AE zone or redeveloping a larger area of the corporation yard into usable space	G - Linda Dog Park, 333 Linda Avenue	182	4/29/2022 17:52
31	Do we need giant banks downtown? An ATM seems sufficient	J - Zone D - Gas Station, Mulberry's, Bank of America, Wells Fargo	0	4/29/2022 17:52
32	Honestly, do we need the public works facilities to be inside city limits? What about acquiring or leasing land in Oakland and developing the corporation yard into high-density housing? Has the advantage of easy access to CA-13 and frankly the nearby neighbors may prefer a well designed housing complex to an ugly corporation yard (I could be wrong)	K - Redevelop City Corporation Yard	96.94	4/29/2022 17:52
33	This park is really underutilized and could be a good spot for townhomes, with easy access to CA-13	L - Blair Park, 930 Moraga Avenue	166.67	4/29/2022 17:52
34	Please convert this useless Bank of America into some kind of restaurant or cafe please!	J - Zone D - Gas Station, Mulberry's, Bank of America, Wells Fargo	48.48	4/29/2022 17:52
35	We need to focus on the Estates Zone. These are large lots, and mansions could be remodeled as condos and new multi-unit housing built on excess land. An outreach effort needs to be made to homeowners in this zone. It is not inconceivable that many will see the justice and benefit of their property being sold to a developer who can convert it into multifamily housing. This is especially possible in cases where the homeowners' heirs live elsewhere and understand the inequities brought about by intergenerational wealth transfer and the unprecedented levels of wealth concentration we are experience in this country.	AE - Private single-family properties throughout Zones A and E	0	4/28/2022 20:36
36	This should be recreation space, if you're talking about the space between the Oakland Ave bridge and Linda Beach field	C - Properties in Zone C, Multi-family Zone	182	4/28/2022 18:05
37	What happened to the idea of the owner of the Shell station to convert that to multi-unit housing?	D - Zone D - Ace Hardware, Sylvan Learning Center, Homes and Small Businesses	0	4/28/2022 18:05
38	Not sure if there's any room here, but Kehilla would be disposed to the social justice angle	H - Kehilla Synagogue Property, 1300 Grand Ave	78.95	4/28/2022 18:05
39	No. This needs to be maintained and improved as open space -- for both the human and animal populations of the area. Piedmont has less open park space than surrounding areas, and I believe we're below the national standard.	L - Blair Park, 930 Moraga Avenue	6.91	4/28/2022 18:05
40	If the tennis courts in the center of town are being proposed, why not the City of Oakland owned Davie Tennis Stadium (within Piedmont city limits)? Eminent domain that place and let Oaklanders ironically complain about Piedmont building affordable housing instead of letting them keep a tennis stadium. Oakland has plenty of other property to build a tennis stadium.	M - City Hall, Veterans Hall, Corey Reich Tennis Courts, etc.	0	4/28/2022 18:05
41	This is very confusing. I'm just adding these here to account for housing created by ADUs and letting people split parcels to build additional homes. There could be more.	AE - Private single-family properties throughout Zones A and E	34.48	4/28/2022 17:44
42	This just seems dumb to include this. We're not tearing down our community church in the center of town for housing. Why do you even have non-starters on here?	B - Piedmont Community Church Property, 400 Highland Avenue	182	4/28/2022 1:05
43	Again! Why are we even suggesting getting rid of a thriving church and school? This is dumb.	F - Corpus Christi School Property	0	4/28/2022 1:05
44	No! It's offensive to even be suggesting this.	H - Kehilla Synagogue Property, 1300 Grand Ave	0	4/28/2022 1:05

Part II, Piedmont Housing Puzzle Comments

45	Ditto. Stop with the anti-religious suggestions. It's really offensive.			0.45	4/28/2022 1:05
46	If a church decides it can no longer function, it will sell its property and then we can have these discussions. Until then, it's offensive to suggest getting rid of them.	N - Plymouth Church Properties on Olive Avenue Z - Zion Lutheran Property		0	4/28/2022 1:05
47	This has always seemed like the most realistic place to build new housing, especially multi-unit housing	L - Blair Park, 930 Moraga Avenue		193.94	4/28/2022 0:42
48	Important that the HE include more than the needed number of housing units as it is unlikely that all of the locations will develop and not providing excess capacity for development will mean the City has not successfully authorized the amount of development needed to meet our RHNA numbers. Please don't treat this like a check the box exercise - Piedmont must do its part.	AE - Private single-family properties throughout Zones A and E		182	4/26/2022 22:31
49	Lots splits in Zone E should be encouraged. ADUs that are rented may be counted but not those used for other purposes.	AE - Private single-family properties throughout Zones A and E		63	4/26/2022 16:52
50	Displacement of current tenants should be avoided	C - Properties in Zone C, Multi-family Zone		19.23	4/26/2022 16:52
51	Public land should be used only for affordable housing. Market rate units or above moderate should be built on privately owned land.	K - Redevelop City Corporation Yard		121.21	4/26/2022 16:52
52	Given the history at Blair Park some open space for an enclosed dog run and heritage trees should be preserved.	L - Blair Park, 930 Moraga Avenue		60.61	4/26/2022 16:52
53	It is important to allow increased density in Piedmont's historically single family neighborhoods. This could be through ADUs, duplexes, triplexes etc.	AE - Private single-family properties throughout Zones A and E		147	4/26/2022 14:17
54	These are well located sites with transportation where we should zone for increased housing density. But because they have existing economically viable uses, they are unlikely to be actually redeveloped quickly. We should not count on these to meet a significant portion of our RHNA obligation.	D - Zone D - Ace Hardware, Sylvan Learning Center, Homes and Small Businesses		105.26	4/26/2022 14:17
55	This is a great site and our best opportunity to build a feasible affordable housing development soon. this is one of the few sites in Piedmont that can build a community that is large enough to be financially feasible and meet our ELI/VLI goals	K - Redevelop City Corporation Yard		75.76	4/26/2022 14:17
56	this site is one of two sites large enough to build an affordable project capable of meeting our ELI/VLI goals- it must be considered. The site could be developed in a way to retain and improve park land. Without these larger sites it is simply impossible to actually meet the goal of building our ELI/VLI RHNA requirement	L - Blair Park, 930 Moraga Avenue		72.73	4/26/2022 14:17
57	These are great sites, close to schools and services. These are likely to take a long time to redevelop, however-- but let's start planning!	M - City Hall, Veterans Hall, Corey Reich Tennis Courts, etc.		68.97	4/26/2022 14:17
58	I did not even realize the church had a parking lot. This seems like a great option for housing with parking underground.	B - Piedmont Community Church Property, 400 Highland Avenue		29.85	4/26/2022 4:02
59	I support housing along Grand Avenue and adjacent lots, including this intersection.	C - Properties in Zone C, Multi-family Zone		96.15	4/26/2022 4:02
60	Grand Avenue is one of the most logical places for multiunit housing. The Ace Hardware parking lots are a total pain - I have even been in a car accident in the hardware parking lot. This space could be easily redesigned to include the current hardware and garden stores, parking and housing above that. It is accessible to transit and in a very walkable location too.	D - Zone D - Ace Hardware, Sylvan Learning Center, Homes and Small Businesses		210.53	4/26/2022 4:02
61	This is probably the least attractive dog parks in Piedmont. This site could be nicely reconfigured to provide housing and some park area for dog walkers at the same time. The one unknown is how this would affect traffic by Beach School.	G - Linda Dog Park, 333 Linda Avenue		103.17	4/26/2022 4:02
62	Perhaps the parking lot could be repurposed to include housing with parking underground.	H - Kehilla Synagogue Property, 1300 Grand Ave		6.91	4/26/2022 4:02
63	This section of the street could be reconfigured to incorporate housing.	I - Grassy Strip and Median along Highland Avenue at Sheridan Avenue		30.86	4/26/2022 4:02
64	This is an area prime for an update. The BofA is currently unused. Gas stations will soon be obsolete as we transition to electric vehicles to address climate change before it's too late. This area combined with the police station and veterans building could be redesigned together to include the banks and Mulberry's in a visually appealing way that also features substantial affordable housing.	J - Zone D - Gas Station, Mulberry's, Bank of America, Wells Fargo		96.94	4/26/2022 4:02
65	The city's owned site are the easiest and biggest opportunity for adding housing because the land would not cost money. The city should seriously consider the corporation yard as well as the skatepark.	K - Redevelop City Corporation Yard		166.67	4/26/2022 4:02

Part II, Piedmont Housing Puzzle Comments

66	Blair Park, the city's largest owned property, is the most logical place for affordable housing. This is highly underutilized open space. I regularly drive by and see one person or nobody using this space. Affordable housing could be designed for this space in a way that includes open space that gets far more use than what is there now and even has more appealing greenery. It can be done in a way that would not hurt neighbors who live above the park and it could be done in a way that minimizes traffic impacts on Moraga, for instance by widening part of the road by this property.	L - Blair Park, 930 Moraga Avenue	193.94	4/26/2022 4:02
67	It makes total sense to consider the tennis courts especially for housing. The housing could be designed in a way that retains the tennis courts, perhaps on the roof. It also makes sense to look at the veterans hall and city hall as part of the plan. Finally, while we are considering tennis courts, why not look at the ones by Hampton Field and off Highland behind the dog park too.	M - City Hall, Veterans Hall, Corey Reich Tennis Courts, etc.	112.07	4/26/2022 4:02
68	we should be promoting ADUs while being realistic about affordability and production numbers. Owners of large lots should be able to subdivide their properties to create additional legal lots, and duplexes/triplexes/fourplexes should be allowed on the larger and the smaller lots.	AE - Private single-family properties throughout Zones A and E	42	4/26/2022 3:33
69	If the Church wants to add housing I'm supportive. I am adding units here because of the way the "puzzle" is structured, which requires 587 units. I object to this - people should be able to contribute whatever input they have, even if it is partial.	B - Piedmont Community Church Property, 400 Highland Avenue	29.85	4/26/2022 3:33
70	Yes I support multifamily on Linda.	C - Properties in Zone C, Multi-family Zone	96.15	4/26/2022 3:33
71	Redevelopment of the Sylvan learning center building seems very feasible in light of what appear to be relatively low value tenants and a relatively low value building. I support a 5-6 story apartment building on that block and I'd support a variance enabling 100% residential, in light of how little demand there is for retail space. Ace hardware, I suspect, isn't changing.	D - Zone D - Ace Hardware, Sylvan Learning Center, Homes and Small Businesses	118.42	4/26/2022 3:33
72	I don't think this is a feasible housing site.	G - Linda Dog Park, 333 Linda Avenue	0	4/26/2022 3:33
73	why maximum of 8? This is a great housing site.	H - Kehilla Synagogue Property, 1300 Grand Ave	6.5	4/26/2022 3:33
74	I support multifamily housing on Blair park with up to 5/6 stories - whatever is needed to create a project feasible and with some level of affordability. I think Blair Park has much better potential than the sites across Moraga.	L - Blair Park, 930 Moraga Avenue	181.82	4/26/2022 3:33
75	Yes!! Veterans building and tennis courts especially should be considered as sites. Veteran's building is probably near the end of its useful life, and community hall/police/fire could be below residential in a 4/5/6 story building. Tennis courts could be on the roof of a multifamily building.	M - City Hall, Veterans Hall, Corey Reich Tennis Courts, etc.	60.34	4/26/2022 3:33
76	Slope of site appears to make it unsuitable for housing, but I'd be happy to see housing there if feasible.	N - Plymouth Church Properties on Olive Avenue	7.17	4/26/2022 3:33
77	only more than 3 units with low income. Up to 8 units if design of building is consistent in style with neighborhood like 1001 Warfield avenue.	AE - Private single-family properties throughout Zones A and E	7	4/26/2022 2:52
78	6 stories max	B - Piedmont Community Church Property, 400 Highland Avenue	13.43	4/26/2022 2:52
79	up to 10 stories high	D - Zone D - Ace Hardware, Sylvan Learning Center, Homes and Small Businesses	184.21	4/26/2022 2:52
80	make same zone as D	H - Kehilla Synagogue Property, 1300 Grand Ave	6.91	4/26/2022 2:52
81	up to 6 stories	M - City Hall, Veterans Hall, Corey Reich Tennis Courts, etc.	25.86	4/26/2022 2:52
82	It would be great to see a variety of housing types that would allow a broader range of people with different needs welcomed to Piedmont.	AE - Private single-family properties throughout Zones A and E	70	4/24/2022 15:19
83	Please consider this site even including the skatepark, which wasn't well designed and is not accessible to kids that would use it anyways. Seems like a great place for housing!	K - Redevelop City Corporation Yard	151.52	4/24/2022 15:19
84	I'd love to see housing here...seems like an under utilized resource and has great proximity to nearby amenities.	L - Blair Park, 930 Moraga Avenue	193.94	4/24/2022 15:19
85	We should allow duplexes, triplexes, and small apartment buildings in Zones A and E, especially on larger lots. We need to think beyond single-family homes and ADUs.	AE - Private single-family properties throughout Zones A and E	182	4/23/2022 15:47
86	I'd love to see apartments over retail and buildings up to 6-7 stories on Grand Ave.	D - Zone D - Ace Hardware, Sylvan Learning Center, Homes and Small Businesses	78.95	4/23/2022 15:47

Part II, Piedmont Housing Puzzle Comments

87	Strongly support exploring the Corp Yard for affordable housing. We should add the skate park site too for consideration.	K - Redevelop City Corporation Yard	166.67	4/23/2022 15:47
88	Blair Park is a great opportunity site. We should definitely explore. Could put housing and some park / recreational space there, such as a playground.	L - Blair Park, 930 Moraga Avenue	193.94	4/23/2022 15:47
89	We should do a master plan for the Civic Center that integrates some of these facilities and puts affordable housing over community and city facilities. Strongly support putting affordable housing in the Civic Center so it is well integrated and close to transportation.	M - City Hall, Veterans Hall, Corey Reich Tennis Courts, etc.	112.07	4/23/2022 15:47
90	It makes sense to have housing where there are services and community resources.	M - City Hall, Veterans Hall, Corey Reich Tennis Courts, etc.	0	4/22/2022 21:20
91	This area would help benefit lower income families due to ease of access to local businesses and transportation.	C - Properties in Zone C, Multi-family Zone	96.15	4/22/2022 21:09
92	Blair park should be maximized. It is only used by a few residents. Perfect area for development.	L - Blair Park, 930 Moraga Avenue	193.94	4/22/2022 18:42
93	This is a wonderful central location and I would advocate upzoning this area to incentivize housing in this area, especially low and moderate income housing	B - Piedmont Community Church Property, 400 Highland Avenue	29.85	4/21/2022 18:11
94	97 units in this small area with small lots seems unlikely, given the high cost of construction and the fact that properties in this zone are already developed	C - Properties in Zone C, Multi-family Zone	38.46	4/21/2022 18:11
95	I think significant upzoning will be needed to make redevelopment of private businesses in this area financially feasible, but it would be great to have higher density housing in this area	D - Zone D - Ace Hardware, Sylvan Learning Center, Homes and Small Businesses	78.95	4/21/2022 18:11
96	This seems unlikely to me given the existing use of the church and school property	F - Corpus Christi School Property	0	4/21/2022 18:11
97	probably too small to be feasible	H - Kehilla Synagogue Property, 1300 Grand Ave	0	4/21/2022 18:11
98	Central locations seem like the best place for new housing, given proximity to schools, city jobs, and transit	I - Grassy Strip and Median along Highland Avenue at Sheridan Avenue	24.28	4/21/2022 18:11
99	Central locations seem like the best place for new housing, given proximity to schools, city jobs, and transit. 60 du/acre seems like a reasonable maximum	J - Zone D - Gas Station, Mulberry's, Bank of America, Wells Fargo	61.22	4/21/2022 18:11
100	This site is less connected to city services (schools, jobs, transit) but could still accommodate some housing, with efforts to improve traffic safety and integrate the neighborhood	K - Redevelop City Corporation Yard	60.61	4/21/2022 18:11
101	This site is less connected to city services (schools, jobs, transit) but could still accommodate some housing, with efforts to improve traffic safety and integrate the neighborhood	L - Blair Park, 930 Moraga Avenue	60.61	4/21/2022 18:11
102	The city center is the best place for new housing given proximity to schools, jobs, transit and recreation resources	M - City Hall, Veterans Hall, Corey Reich Tennis Courts, etc.	112.07	4/21/2022 18:11
103	I'm not in favor of converting any city land/parks into housing.	G - Linda Dog Park, 333 Linda Avenue	0	4/18/2022 3:42
104	I'm not in favor of converting any city land/parks into housing.	I - Grassy Strip and Median along Highland Avenue at Sheridan Avenue	0	4/18/2022 3:42
105	I'm not in favor of converting any city land/parks into housing.	K - Redevelop City Corporation Yard	0	4/18/2022 3:42
106	I'm not in favor of converting any city land/parks into housing.	L - Blair Park, 930 Moraga Avenue	0	4/18/2022 3:42
107	I'm not in favor of converting any city land/parks into housing.	M - City Hall, Veterans Hall, Corey Reich Tennis Courts, etc.	0	4/18/2022 3:42
108	This is too many units, but because it's on the city's borderline it would be less disruptive.	F - Corpus Christi School Property	31.25	4/14/2022 22:05
109	This is a very condensed area, and therefore I believe there should be 0 units placed here.	I - Grassy Strip and Median along Highland Avenue at Sheridan Avenue	0	4/14/2022 22:05
110	This seems to be the least obtrusive place for new housing of all the locations offered.	K - Redevelop City Corporation Yard	166.67	4/14/2022 22:05
111	This seems like too many units for one location, but too many of the other locations shouldn't have any new units.	L - Blair Park, 930 Moraga Avenue	193.94	4/14/2022 22:05
112	These zones should be upzoned to allow 2-6 units per property by right.	AE - Private single-family properties throughout Zones A and E	182	4/12/2022 1:50
113	I don't believe it's likely that the maximum buildout would actually be possible as many landowners may not be interested.	D - Zone D - Ace Hardware, Sylvan Learning Center, Homes and Small Businesses	118.42	4/12/2022 1:50

Part II, Piedmont Housing Puzzle Comments

114	<p>I live near here and this area desperately needs revitalization and increased density! Ground floor retail with space for hardware store, coffee shops, karate place, sandwich shop etc etc would be ideal. Hard to picture how many stories these buildings would have to be to accommodate this housing though, so I'm not sure what is reasonable number of units here.</p>	<p>D - Zone D - Ace Hardware, Sylvan Learning Center, Homes and Small Businesses</p>	<p>105.26 0</p>	<p>4/7/2022 3:46 4/7/2022 3:46</p>
115	<p>I don't have a dog but it seems this space is heavily utilized - would need to preserve some dog-park area.</p>	<p>G - Linda Dog Park, 333 Linda Avenue</p>		
116	<p>This area so needs to be reimagined! Less space for cars, and more for people. See Mill Valley for inspiration of a charming downtown with a plaza (both downtown Mill Valley, and the recent redevelopment of the Mill Valley Lumbar Yard). It would be ideal to have ground level retail and apartments above. Mulberry's, an ATM, and a few other shops/cafes around a small plaza with tables/outside eating area, with housing above. Remove the banks and lawyer/real estate offices. Make Highland Way a small pedestrian-only walkway, or remove all together? It's hard as a lay person to know how different number of housing units would feel here, but I think apartments above more (non-chain) businesses would be a wonderful transformation.</p>	<p>J - Zone D - Gas Station, Mulberry's, Bank of America, Wells Fargo</p>		
117	<p>Empty lot behind 216 Howard.</p>	<p>C - Properties in Zone C, Multi-family Zone</p>	<p>25.51</p>	<p>4/7/2022 3:46</p>
118	<p>Why is this the only park listed? There are many other parks in Piedmont. Why are we listing parks at all?</p>	<p>L - Blair Park, 930 Moraga Avenue</p>	<p>38.46</p>	<p>4/6/2022 6:19</p>
119	<p>Testing</p>	<p>F - Corpus Christi School Property</p>	<p>0</p>	<p>3/25/2022 1:30</p>
120	<p>This is a park. It is not zoned for residential. Do not take away our parks!</p>	<p>L - Blair Park, 930 Moraga Avenue</p>	<p>4.69</p>	<p>3/25/2022 1:22</p>
			<p>0</p>	<p>3/25/2022 1:22</p>

Part II, Website Traffic Referrers

Top Referrers

Source	%	#
(direct)	70.7%	1045
piedmontshome.org/	10.28%	152
m.facebook.com/	6.09%	90
piedmont.ca.gov/	3.38%	50
l.facebook.com/	2.23%	33
google	1.35%	20
admin.localhost:8083/	1.15%	17
ci.piedmont.ca.us/	1.01%	15
lm.facebook.com/	0.68%	10
piedmontcivic.org/	0.47%	7