



May 21, 2014

Laura Kaminski, AICP  
 City of Oakland  
 250 Frank H. Ogawa Plaza, Suite 3315  
 Oakland, CA 94612

Dear Ms. Kaminski:

The **Better Broadway Coalition** comprises Greenbelt Alliance, East Bay Housing Organizations Sierra Club Northern California Chapter, Alameda County Building Trades Council, Valdez Plaza Resident Council, Walk Oakland Bike Oakland, Westlake Christian Terrace Resident Council, California Nurses Association, TransForm, and Urban Habitat. Together our organizations represent multiple stakeholders who live, work, do business and worship in the Broadway Valdez area. We are pleased to respond to the Broadway Valdez District Specific Plan (Final Plan) with the collective comments of the Coalition.

First, we express thanks to you for your work with the Better Broadway Coalition over the past several years. The current Final Plan contains many of the recommendations of our coalition and other stakeholders who worked at great depth with the City on creating a thriving, equitable, and sustainable Oakland.

As you know, our Coalition continues to support the vision of the Broadway Valdez District Specific Plan. Nonetheless, the Final Plan has left some very important needs unaddressed, leaving Oakland's residents vulnerable to economic instability in a time of rapid neighborhood change. We believe, with a few key modifications, this plan will give life to policies that benefit the full diversity of Oakland's residents and shine as an exemplar of Priority Development Area (PDA) planning for the region.

**Quality Jobs for Oakland Residents**

Beyond mentioning the goal of quality jobs, the plan offers no specifics on job quality or a plan for how these jobs will benefit local Oakland residents. It is vitally important that the Final Plan make the jobs/housing connection between the Plan Area's current workforce, opportunities for new quality jobs, and housing opportunities that people can afford. In order to bring life to this regional and local goal, the plan should include a section in the Land Use Chapter that specifies the importance of local, living-wage jobs with benefits directed at residents from distressed communities in and adjacent to Oakland.

Moreover, this section of the Final Plan should include language from the City of Oakland’s local hire ordinance, which specifies that developers and operators provide a plan as part of their project applications specifying how they will achieve those goals.

Disappointingly, the Final Plan failed to include “quality jobs” as one of the community benefits in the development of the bonus and incentive program. In this era of increasing income inequality and low wage job growth, quality jobs are a great community concern for Oakland’s current and future families.

**Recommendation 1: The Final Plan should include a “Quality Jobs for Oakland” subsection in the Land Use Chapter that includes the City’s commitment to quality, living wage job growth and specifies that (1) the City will strive toward a goal of a minimum of 50% local hire of the construction workforce in accordance with City-wide policy; (2) employers pay area standard wages to construction workers employed on projects enabled by the Specific Plan, wherever feasible; and (3) that California State Certified Labor-Management apprenticeship programs are used to create career opportunities for area youth in the construction industry.**

**Recommendation 2: The Final Plan should include quality jobs as a specific community benefit in Policy LU-10.9 to be considered in the development of the forthcoming bonus and incentive program.**

### **Homes We Can All Afford**

Thriving retail depends on a strong residential presence, and it’s refreshing to see the Final Plan’s inclusion of affordable homes as part of a “complete community” policy. This is a difficult time to finance affordable housing, now that the city has lost the ability to use tax-increment financing. Even so, the City proactively identified housing opportunity sites (Figure 8.5) that are competitive for Low Income Housing Tax Credits—the largest source of funds for building new affordable homes. To embolden the “target” of 15% affordable units and provide significant advancement towards Oakland’s Regional Housing Need Allocation and commitment to Priority Development Areas, the City of Oakland must take advantage of its single greatest opportunity site. As shown in Appendix A, the City-owned parcel at 2330 Webster vastly outcompetes all other Broadway Valdez sites for tax credits because it would have the advantage of a city commitment to donate or lease the land for affordable housing development.

We are very pleased that the City of Oakland removed the costly and unnecessary financial commitment to building structured parking and instead aligns Oakland with policies that use transportation demand management and parking in-lieu fees to support future parking supply. Despite this, Policy IMP-1.9 still considers selling the City-owned parcel to fund a parking garage. Rather than wasting this great resource on hypothetical future parking supply, Oakland can create a catalytic project at 2330 Webster with affordable homes, quality jobs, and opportunities for enhancing the livability and vibrancy of the Valdez Triangle.

**Recommendation: Eliminate the “Option B” in Policy IMP-1.9 to sell city-owned property. Instead, the City should focus on 2330 Webster by partnering with a non-profit developer to build affordable homes that will fulfill the complete community goals of the plan, advance Oakland’s commitment to PDAs and**

**RHNA allocation, activate the street, and offer opportunities for quality construction jobs for Oakland residents.**

**Significantly Limit Upzoning**

We are glad to see that the height limits proposed in the Draft Plan were changed in the Final Plan, specifically in sub-sections of D-BVD-3 (Final Plan B5, figure B.4). Instead of allowing by-right heights of 200 and 135 feet, these heights have been changed to 135/200 and 85/135, with the greater heights allowed only with a Conditional Use Permit (CUP).

Considering that the City of Oakland is now actively pursuing a bonus and incentive program, it is in the City's best interest to maintain existing height and density limits, and only allow more intensive development in return for community benefits (e.g. affordable homes, quality jobs, open space and other amenities selected in the development of the bonus and incentive program). In order to make the proposal for incentives and bonuses more attractive, the City should refrain from upzoning unless it is only to satisfy modest increases to conform to building construction types, such as increasing heights from 75 to 85 feet. Existing incentive programs, such as the density bonus, are rarely utilized, in part because Oakland's zoning and development standards already permit the types of development that the market will support.

Additionally, while we are glad to see these changes in the areas mentioned, we would like to see similarly limited heights in the D-BVD-3 south of 30th St., because it would provide the same advantages to the City and the community.

**Recommendation: Maintain all height limits in D-BVD-3 at their current level, with the exception of modestly adjusting building heights to conform to construction types.**

Thank you for your consideration of these comments. We look forward to your response on these issues, and we would be happy to discuss these points further with you as the Final Plan moves towards adoption.

Sincerely,

The Better Broadway Coalition

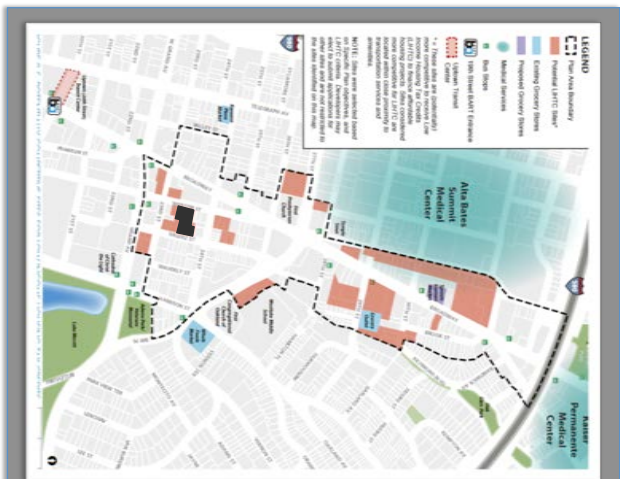
Coalition Coordinators:

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## 2330 Webster: Oakland's Best Chance to Create a Complete and Sustainable Community



Policy Imp-1.9 prioritizes the use of City-Owned Property (2330 Webster shown in black) as an incentive to facilitate retail development and parking. However, this parcel (currently listed as a competitive site for Federal LIHTC), could serve multiple purposes of activating the street and offering the City a great opportunity to create homes at a range of incomes. We recommend that the City revise Policy IMP-1.9 to eliminate the "Option B" to sell the property. Instead, the City should partner with developers that can create development to fulfill the complete community goals of the plan and offer homes affordable to Oakland's residents.

The three sites compared here all demonstrate competitive LIHTC points. However, 2330 Webster also offers additional competitive points for having public land donation or leasing. With this additional asset, Oakland can achieve an exciting and affordable community that activates the street at all times of the day.



- 2330 Webster:**  
**Area - 45,000 sqft**  
**22 Points + Public funds points\***
- 7 Transit
  - 3 Public Park
  - 0 Public Library
  - 5 Grocery Store
  - 3 School
  - 1 Pharmacy
  - 3 Hospital



- 3073 Broadway:**  
**Area - 80,812.7 sqft**  
**23 Points**
- 7 Transit
  - 3 Public Park
  - 0 Public Library
  - 5 Grocery Store
  - 3 School
  - 2 Pharmacy
  - 3 Hospital



- Webster St. parking lot:**  
**Area - 11,220 sqft**  
**21 Points**
- 7 Transit
  - 3 Public Park
  - 0 Public Library
  - 4 Grocery Store
  - 3 School
  - 1 Pharmacy
  - 3 Hospital

\* LIHTC Points: Federal Tax Exemption  
 \* LIHTC Points: State Tax Exemption  
 \* LIHTC Points: Local Tax Exemption  
 \* LIHTC Points: Other  
 \* LIHTC Points: Total