

June 15, 2022

Dear Oakland Housing Element Team,

Thank you for the opportunity to comment on Oakland's Draft Housing Element. As you know the Housing Element is a critical document that lays out how the city is going to accommodate future housing growth at all income levels and the policies can help make Oakland a more affordable city. We appreciate the time and care that the Housing Element Team has put into drafting this document and conducting outreach to groups across the city.

SPUR is a public policy non-profit organization in the Bay Area with offices in Oakland, San Francisco and San Jose. We work across policy areas and political lines to solve the big problems the region faces. Our comments on this housing element combine both a regional and local perspective. Our feedback on the Draft Housing Element is as follows:

- 1. The Housing Element should take stronger steps to affirmatively furthering fair housing.**  
We appreciate the effort that the team has taken to analyze how this Housing Element draft affirmatively furthers fair housing. However, we believe that more can be done to achieve this goal. The draft notes that most of the residential capacity for housing is located in low resource, high segregation areas due to the fact that over 60% of the land in Oakland is in these categories. And the land that is located in high and highest resource categories is impacted by environmental constraints such as very high fire hazard severity zones.

These are challenging constraints to address. Nevertheless, we believe that there are some steps that can be taken to increase the housing capacity in high resource areas. Specifically, we believe that Oakland's Housing Element should look at sites that can be intensively upzoned within the Rockridge and Elmwood neighborhoods, including the Rockridge BART parking lot. Potential sites could include the Trader Joe's site directly adjacent to the BART station (inclusive of parking lot) and the triangular lot at the corner of College Avenue and Claremont. While some sites in this area may be too small to support affordable housing, they could accommodate apartments that would be more affordable than the single family homes that currently exist in the majority of the neighborhood.

Additionally, the city may wish to consider requiring that some larger lots that are currently zoned for community commercial include housing at some required minimum density. This would be particularly appropriate for the large, currently undeveloped portion of the shopping center site at the corner of Pleasant Hill and Broadway.

- 2. The Housing Element should identify concrete strategies to build more community infrastructure in low-income communities in order to make affordable housing in those neighborhoods more equitable.**

Given that so much of the residential capacity in Oakland is located in low resource and high segregation areas, and therefore that a sizable portion of affordable housing in Oakland may be located in these areas, it is important to ensure that appropriate community infrastructure is being

planned in these neighborhoods. Building affordable housing in low-income neighborhoods can help stabilize communities and is an important anti-displacement strategy. However it must be paired with investments in parks, community spaces, and programs that benefit low-income families.

**3. The Housing Element should clarify where upzoning is being contemplated.**

Policy 3.4 - Reforming zoning and Land Use to Address Community Priorities references allowing additional building heights and/or housing densities along certain corridors such as International, Foothill and MacArthur Boulevards, allowing a diversity of housing types in single-family neighborhoods, increasing height and density in areas approximate to BART and BRT and increasing density in resource rich neighborhoods.

We appreciate and support all these policies. However, we feel that it is important for the Housing Element to provide more specific detail about precisely which locations are being contemplated for upzoning and by how much.

Additionally, we understand that the Housing Element team is considering tools such as affordable housing overlays to help encourage more affordable housing production. We support the use of affordable housing overlays, but feel that the team should provide more information about where they should be utilized.

**4. State housing agencies should prioritize numerous important goals – including funding affordable housing near transit and stabilizing neighborhoods at risk of displacement – when determining where to allocate affordable housing funds.**

Appendix F of the Draft Housing Element notes that the California Tax Credit Allocation Committee's competitive tax credit applications disadvantage Oakland because so much of the residentially zoned land is considered "low resource". While affirmatively furthering fair housing is an absolutely critical goal that the state should be advancing, it is also important that Oakland, as a regional hub with many BART stations, be able to access tax credits and other funding to build affordable housing close to transit. Additionally, as mentioned earlier, affordable housing is an important tool for stabilizing neighborhoods at risk of displacement. It would be helpful for HCD to work with partner agencies at the state level to help balance these important values in the allocation of affordable housing resources.

Thank you for your consideration of our comments. Should you have any questions, please do not hesitate to contact me.

Sincerely,



Sarah Karlinsky  
Senior Advisor

Cc: SPUR Oakland Board of Directors  
California Department of Housing and Community Development

