



June 27, 2022

Ellen Clark
Community Development Director
City of Pleasanton

RE: Draft Housing Element

Ms. Clark,

East Bay for Everyone is a membership organization advocating for housing, transit, tenant rights, and long-term planning in the East Bay. We and the undersigned organizations write to provide comments on the City of Pleasanton's 6th Cycle Housing Element Public Review Draft.

Programs and Policies

- Program 1.3 - We support Pleasanton's commitment to rezoning and preparing development standards for the BART-owned land at Dublin/Pleasanton BART to meet BART TOD Guidelines.
 - Replacement parking requirements should be minimized.
- Program 1.4 - This is a commitment to follow existing state law (AB1397) requiring by-right approvals for certain sites.
 - Unless there is documented interest from Kaiser in development within the planning period the 5600 Stoneridge site should be removed from the site inventory. Kaiser has an active medical center and facilities. Kaiser has never developed housing on its land in the Bay Area. Two RHNA cycles should be sufficient proof that they do not intend to do so in Pleasanton.

Site Inventory

- The sites inventory analysis states: "[I]astly, the City is unaware of any leases that would perpetuate existing uses or prevent the development of housing on nonvacant sites during the planning period." B-17
 - What investigation has the City done with respect to leases for nonvacant sites?

- There are multiple sites listed with over 5 different owners and dozens of leases. Multifamily housing developments typically take 24 months from groundbreaking to certificate of occupancy. A commercial lease is typically between 5 and 10 years. Is it the City's belief that zero of lessees of property within its site inventory will run through 2028? That would be highly unlikely.
- Area 2 - Stoneridge
 - Requiring replacement parking would increase the cost and decrease the likelihood of new development, discourage transit ridership, and increase traffic and pollution. We think you should waive the requirement to provide replacement parking.
- Area 3 - PUSD Donlon
- Area 5 - Clorox Business Park
 - Do not require replacement parking. This site is only ½ mile from BART. This will increase construction costs, slow redevelopment and raise housing costs.
- Area 7 - Old Santa Rita
 - This nonvacant collection of 20 parcels with diverse ownership is highly unlikely to be developed absent additional incentives for land assembly.
 - We have previously written to raise issues with this site being developed within the planning period due to difficulties outbidding existing uses and land assembly.
 - Given the diversity of parcels and ownership, does the City of Pleasanton have substantial evidence (i.e. written interest from owners) that use could be discontinued within the planning period?
- Area 20 - Boulder Court
 - This is an industrial site without easy access to parks, commercial uses and other resources. The Low-Income units here would be surrounded by other industrial uses.
 - Is there any indication that remediation will be needed from existing and prior industrial uses? How long would that take?
 - Is there any evidence of interest from the property owner?
 - This site should not be used for Low Income housing and its units should be allocated to other sites.

Constraints Analysis

- Pleasanton's governmental constraints analysis is inadequate, especially as it relates to development standards.

- Pleasanton's Multi-Family Residential Zones (RM zones) require between 4,000, 2,500, 2000 and 1,500 square feet (SF) of land per unit.
 - By comparison, neighboring Dublin requires 750 SF of land per unit in its RM zones. Thus Pleasanton's density limits on multifamily housing are between 2-5x more onerous than Dublin's development standards.
 - There is no discussion of these density limits in the analysis.
 - Pleasanton should revise its analysis to consider the impact of density limits in RM zones to bring them in line with peer cities like Dublin.
- Pleasanton's Multi-Family Residential Zones (RM zones) require 20' side setbacks.
 - By comparison, neighboring Dublin requires only 10' side setbacks.
 - There is no discussion of setbacks within the analysis apart from noting that Core Area Overlay District allows for reductions in setbacks. But this is limited to a small neighborhood near downtown. The analysis notes that these setback reductions have netted 5 units in recent years. Relative to housing needs, this figure is small. Why is there no discussion of expanding the ability to reduce setbacks beyond areas near downtown?
 - Pleasanton should revise its analysis to consider the impact of setbacks for RM zones, especially side setbacks, as a governmental constraint.
- Pleasanton's off-street parking standards are excessive.
 - For example, *a fourplex would be required to provide eight parking spaces for four 2-bedroom units.*
 - The excessive base standards mean that any reductions allowed as part of overlay districts merely bring parking requirements down to peer city base requirements, rather than true relief.
 - There is no specified path or program for reducing parking requirements near Pleasanton's two BART stations. This has the effect of increasing housing costs for potential development near BART compared to peers like Dublin and Walnut Creek. As a policy matter, overparking residential development near transit has the practical effect of cannibalizing potential transit ridership and undermining public investment in heavy rail transit.
 - Pleasanton should reduce its base parking requirements for apartments and provide a path for reduced or zero parking apartments near BART.

We look forward to continuing to engage with the City of Pleasanton in this process.

John Minot
Co-Executive
East Bay for Everyone