BACKGROUND

The Draft Adeline Corridor Specific Plan (“Draft Plan”) and its Draft Environmental Impact Report (“DEIR”) were made available for public review on May 17, 2019. The Draft Plan reflects input gathered at dozens of community meetings and workshops held since the planning process kicked off in 2015 (Attachment 1). City staff is extremely appreciative of all the time and valuable feedback community members provided at each stage of the planning process.

The City received 80 written comments about the Draft Environmental Impact Report (EIR) and the Draft Plan during the public comment period (from May 17 through July 19, 2019), and continued to receive comments about the Draft Plan after the close of this period. All comments are reproduced in their entirety in the Response to Comments document of the Final EIR. Many of these written comments typically consisted of multiple separate comments. Most of the commenters provided comments on the Draft Plan, rather than on the Draft EIR. The California Environmental Quality Act (CEQA) has specific legal requirements regarding responses to comments that pertain to environmental issues or the adequacy of the information or analysis within the Draft EIR. Thus, comments that pertain to the EIR are addressed in the Response to Comments Document of the Final EIR. Comments about the Draft Plan are grouped by category/topic and addressed in this memorandum.

1 An overview the Draft Plan, DEIR and associated draft General Plan and zoning concepts can be found in a staff report for the June 5, 2019 Planning Commission meeting: https://www.cityofberkeley.info/uploadedFiles/Planning_and_Development/Level_3_-_Commissions/Commission_for_Planning/2019-6-5_PC_Linked%20Agenda.pdf

2 The Response to Comments Document of the Final EIR is available on the City’s website: https://www.cityofberkeley.info/AdelineCorridor/. Print copies are available for public review at the City of Berkeley Planning and Development Department and at the following locations: the Tarea Hall Pittman South Branch Library (1901 Russell St.), the Central Library (2090 Kittredge St.) and the Judge Henry Ramsey Jr. South Berkeley Senior Center (2939 Ellis St.).
The Planning Commission Adeline Corridor Specific Plan Subcommittee has been meeting since May 2019 to develop a recommendation to the full Planning Commission about the Draft Plan, associated General Plan and zoning amendments and the EIR. The responses to the Plan and EIR comments are intended to assist the Subcommittee in shaping their recommendation, tentatively scheduled to be completed in February 2019 (as shown below). The full Planning Commission will consider the Subcommittee’s recommendation (March 2020) and forward that to the City Council (April/May 2020), who is ultimately responsible to adopt a Final Plan, General Plan and zoning ordinance amendments and certify the EIR.

### Planning Commission Adeline Corridor Plan Subcommittee (Tentative schedule)

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While Plan adoption is an important milestone, Staff is already working to seize opportunities to implement Draft Plan actions that are important priorities for our community. For just one example that staff is particularly excited about, in November 2019, the City applied for a Partnership for the Bay’s Future Challenge Grant to advance the design and implementation of two policies highlighted in the Draft Plan to protect against displacement and preserve and expand affordable housing access within the local community through developing a Tenant’s Right to Purchase Act and a Local Housing Preference Policy (see section C2. Below for more detail).

**RESPONSES TO COMMENTS ON THE DRAFT PLAN**

Comments about the Draft Plan are addressed in this memorandum and organized by topic: (1) Land Use and Housing, (2) Economic Opportunity, (3) Transportation and Public Space, and (4) Implementation.

I. Land Use and Housing

A. Affordable Housing Goal

A key concept of the Draft Plan is a goal that at least 50% of all new housing built in the Plan Area is deed-restricted affordable housing serving a range of income levels. Several comments received were about this policy and whether this goal should/could be higher and how to ensure this goal would be achieved.

During the planning process, many community members repeatedly stressed that the Plan must be *implementable and implemented*. An important part of ensuring implementation of the Plan is setting
goals that are ambitious and also firmly grounded in a thorough assessment of opportunities and constraints.

The Draft Plan states that achieving the “at least 50% new affordable housing goal” will be challenging, but possible. The goal is based on the degree to which the City can control or influence development, the economics of development, and the complexities of financing new affordable housing. For most of the land in the Plan Area, private property owners decide whether and when a property develops. For properties it (or other public agencies) do not own, the City must rely on tools such as zoning regulations, incentives and fees, and the ability to work with property owners to influence development. The opportunity for the greatest number of deed-restricted affordable units is on the publicly owned sites, most notably the Ashby BART east and west parking lots, where the City and/or BART have greater ability to ensure that these sites are prioritized for affordable housing.

The Draft Plan illustrates that the 50% goal is possible under a scenario that primarily relies on reserving some/all of the publicly-owned sites for income-restricted affordable housing units. Additional units that would contribute to achievement of the 50% goal would come from mixed-income projects with inclusionary below-market rate units (as a result of the Draft Plan’s on-site affordable housing incentive).

There are other scenarios under which the “at least 50% new affordable housing goal” could be achieved. However, other scenarios would include many more assumptions/factors that are not in the City or another public entity’s control, or they would detract from other goals of the Draft Plan, such as respect for the historic context of the neighborhood and compatibility of scale. For example, if the Draft Plan and draft zoning allowed for significant upzoning (e.g. 12 – 15+ story buildings) there would be the potential to recapture the value created in the form of higher amounts of on-site affordable housing, but the scale of development would be significantly larger. As noted in the Draft Plan, numerous variables influence the economic feasibility of development that are largely outside the City’s direct control:

- economic conditions affect availability of financing to enable housing units to be developed;
- construction and labor costs;
- the availability for limited and highly-competitive federal, State and local funding;
- building/construction technology that affects the cost of materials;

In recognition of these factors and the significant uncertainty and volatility inherent in public and private efforts to produce housing, implementation of the Plan must be nimble and responsive to how the housing development landscape changes over time. The Plan must also have built in accountability and transparency for communicating progress toward the 50% goal over time. That is why the Draft Plan

3 For purposes of environmental analysis, an estimate of a reasonably foreseeable amount of development or “project buildout” associated with implementation of the Draft Plan through 2040. This estimate included a total of 1,450 new dwelling units and 65,000 sf net new commercial square feet. It was also used as the basis for analyzing the economic feasibility of achieving the goal of at least 50% new affordable housing units. See Draft Plan, p.1-8 and the Draft Environmental Impact Report on the Adeline Corridor Specific Plan, Chapter 3 Project Description for more information about the projected buildout. See Draft Plan Chapter 4 and Appendix C for more detail on the economic feasibility analysis supporting the affordable housing goal and the proposed on-site affordable housing incentive zoning.
stipulates that the Planning Department will provide an annual Plan Implementation Report to the City Council that will include a summary of the number of market rate and affordable units permitted, among other metrics, after Plan adoption. The 50% goal, coupled with the annual reporting requirement, provides the necessary framework and opportunity to review and refine the Plan strategies that may be able to better respond to changing regulatory, technological, funding and economic conditions. The allocation of the 50% target to specific income groups is discussed later in this section.

B. Community Benefits
A few comments and questions pertained to the topic of community benefits: some asked what community benefits would be required of developers and/or stated that the City should encourage developers to negotiate Community Benefits Agreements with community groups.

In general, it is primarily the change in allowable development intensity or “upzoning” above the status quo, which makes community benefits financially feasible because land becomes more valuable and development more profitable. Other factors, such as parking requirements, construction type, and duration/predictability of the entitlement (or permit) process also affect the potential for a project to provide community benefits, over and above what the City currently requires.

Because the City of Berkeley requires a number of community benefits (through development impact fees and mitigation fees) when development is approved at the baseline level, the ability to incentivize additional benefits is somewhat constrained. Most notably, the City’s Affordable Housing Mitigation Fee requires a payment of $37,962 per new residential unit (or 20% affordable housing on-site). Together with other City requirements, this fee captures most of what could otherwise be available to fund other types of community benefits before compromising the financial feasibility of a housing development project. These economic limitations make it less practical to use a menu, point system or other complex community benefits framework. Any additional community benefits which can be captured under the Draft Plan though zoning regulations governing privately owned land will be relatively limited and therefore, the community benefits framework should be relatively simple.

The Adeline planning process explored the possibility of promoting a wide range of community benefits such as public space, community facilities/uses, job training and other programs. The provision of new affordable housing emerged from public input as the primary goal. Also, while increasing parks and other public gathering space was a commonly identified priority by community members, the magnitude of the cost make it a better candidate to be funded through a combination of other means (e.g. bond funding, State and federal transportation grants and/or through on-site dedication of space within large projects, such as at the Ashby BART station) rather through incremental contributions of individual housing development projects. The Planning Department will continue to work with other City staff and partners to secure additional funding for improving public space and other important community benefits and amenities in South Berkeley.

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4 Examples of development impact fees and mitigation fees include: Affordable Housing Mitigation Fee (BMC 22.20.065, Reso No. 67, 614-N.S.); Childcare Mitigation Fee (BMC 22.20.065, Reso No. 67, 614-N.S.); One-Percent for Public Art on Private Projects (BMC 23C.23.050, Reso No. 7,526-N.S.); Berkeley Unified School District Fee. These fees do not include City of Berkeley Planning and Building or other public agency permit fees.
The Draft Plan does address and propose ways to recapture value of increased development intensity for community benefits. The Draft Plan proposes different community benefit strategies for privately-owned land and publicly-owned land. A much higher share of the potential affordable housing units will come from larger publicly-owned sites rather than smaller, privately-owned “infill” sites (See Section G. below for more detail about community benefits and other issues related to Ashby BART area).

The proposed new zoning for the Adeline Corridor (“Commercial -Adeline Corridor” District or C-AC District) substantially restructures how additional density and intensity is allowed, but it does not substantially upzone the area from the existing zoning (“Commercial-South Area District” or C-SA District). Under the proposed zoning, the bonuses for community benefits are specific, predictable, and objective. They include different tiers of additional density, height and floor area ratio, reduced parking, and streamlined approval in return for specified amounts of on-site affordable housing units (See Section E1 for more detailed explanation of the proposed zoning and on-site affordable housing incentive).

The proposed zoning is designed to maximize the community benefits derived from housing development projects without compromising the financial feasibility of the development of housing that the community and the region needs. Based on the City’s analysis, additional community benefits could be derived, but this would require enabling density increases that would be well in excess of the five to seven stories allowed by the proposed Plan, in order to result in substantially greater potential to cover the cost of the more expensive construction types. This would conflict with one of the fundamental goals of the Draft Plan, which is to preserve and respect the established context of the South Berkeley neighborhood.

C. Anti-Displacement Measures

Several comments pertained to the overall Draft Plan’s impact with respect to gentrification and displacement. These comments are described and responses are provided below.

1. Some commenters questioned the extent to which the Draft Plan’s proposals would address demographic and economic trends confronting the Adeline Corridor and larger South Berkeley community (e.g. the steep decrease in the African American population and the acute housing affordability crisis) and contend that the Draft Plan’s proposals will directly cause negative impacts such as displacement, that need to be studied in the Draft EIR.

The lack of income-restricted affordable housing, especially at the lowest affordability levels and ongoing displacement of area residents, especially among the African American community, have been raised consistently as top community concerns during the planning process. Some commenters strongly believe that the EIR is the appropriate place to address these concerns. While CEQA and the EIR are not the appropriate means to address these issues (discussed in further detail below), these issues are important policy considerations that are centrally addressed in the Draft Plan.

As noted in the Existing Conditions Report (August 2015) and in the Draft Plan (May 2019), trends in race and ethnicity, income, home prices and rents over the last several decades indicate that the process of gentrification and displacement has been well underway, in advance and independent of any consideration of the Adeline Corridor Specific Plan. The Bay Area as a whole is building far less housing than needed to keep up with job growth. The clear and unavoidable result of this shortage is higher
housing prices and the displacement of lower and moderate income residents, including many members of the African American community in and around the Plan area.

While no single land use plan can adequately protect neighborhood residents from the impact of the regional housing shortage, the Draft Plan commits to aggressive strategies and actions tailored to privately owned land and public land (where the City and other public agencies have a greater ability to prioritize income-restricted affordable housing). The Draft Plan includes a number of policies and actions that reflect and respond to community concerns about gentrification and displacement, which are highlighted below. Without these tailored policies and actions, the regional trends would continue to worsen. Specifically, the Draft Plan includes the following key proposals:

- Establishes an ambitious goal of at least 50% of all new housing units to be deed-restricted affordable housing serving a range of income levels (i.e. extremely low, very low, low and moderate income);
- Prioritizes public land for new affordable housing and includes a specific policy outlining development parameters, including desired community benefits, and community/stakeholder engagement for the Ashby BART station area (Policy 3.7);
- Develops new zoning regulations that include an on-site affordable housing incentive that ties increases in density, floor area ratio (FAR) and height to the provision of increments of on-site affordable housing;
- Prioritizes development of a policies to allow existing tenants and non-profit organizations a right of first offer and a right of first refusal for certain residential properties that are on the market, as well as policies to give preference for new affordable units (i.e. inclusionary Below Market Rate units and/or Housing Trust Fund/publicly subsidized units) to current residents or potentially those who have previously been displaced from the neighborhood (see response C2 below); and
- Focuses on policies and actions to support existing and future community assets and institutions, including the Berkeley Flea Market, the Juneteenth Festival and the creation of a future African American Holistic Resource Center.

The California Environmental Quality Act (CEQA) and the EIR are not the appropriate place to address the socioeconomic impacts raised by the commenters. In general, socioeconomic effects are beyond the scope of the CEQA environmental review process unless a causal link can be established between anticipated socioeconomic effects of a proposed action and adverse physical environmental impacts (CEQA Guidelines Section 15131(a), CEQA Section 21082.2).

A review of prevailing research and studies, including those cited by commenters, do not support commenters’ assertions that the Draft Plan proposals will cause increased housing costs and displacement. There is not substantial evidence that the Draft Plan would cause additional gentrification or displacement at a level substantially over and above what would occur without adoption of the Draft Plan such that direct or indirect physical environmental effects would occur. In fact, in the absence of the policies and actions discussed above that will be implemented in connection with the proposed Specific Plan, gentrification and displacement are likely to be more severe.

In a 2016 housing production study, researchers at UC Berkeley’s Urban Displacement Project found that new income-restricted affordable housing development has the greatest benefit in reducing displacement at a regional and citywide level. Further, new market rate housing development was also
associated with lower rates of displacement in areas surrounding the new development. When higher income residents have more new housing options, they seem to be less likely to move into more moderately priced existing housing. The study noted that more research was necessary to understand the relationship between new housing development and displacement at smaller geographic scales (e.g. neighborhood level vs. region or city).

Another recent study cited by commenters that looked at the effects of upzoning over a 5-year period in Chicago and found that property values (or the cost of land) increased in an amount roughly commensurate with the increase in allowed density without seeing an increase in actual units constructed. The study’s author recommends that strategies such as “rent stabilization, requiring affordable housing units in market-rate projects, setting aside municipal land, providing direct funding for fully affordable projects; and slimming the regulatory burden to reduce construction costs” to address the potential adverse local consequences to upzoning. All of these strategies are in the Draft Plan.

It is also important to note differences between the context of this study and the Adeline Corridor. One difference is the degree and manner of upzoning—in the Chicago example, floor area ratios (FAR) were ultimately increased by 33% without any of the suggested strategies to blunt potential adverse effects of upzoning; the proposed Adeline Corridor zoning proposes a restructuring of the development standards that mostly fall within the existing zoning (C-SA District) maximum FAR of 4.0 in return for higher inclusionary requirements for on-site affordable housing (See response I.E for a more detailed explanation of the proposed zoning).

2. Several comments recommended that the Draft Plan should include a provision to protect current residents of rent-controlled units by requiring a 1-for-1 replacement for any demolished rent-controlled unit, as opposed to a demolition fee payment. Some comments pertained to support for local preference policies for current City residents and workers and those who have been displaced from the community (referenced by commenters as a “right-to-return” policy).

Many of these policy objectives are being addressed on a citywide level, as they do not only relate to the Adeline Plan Area. These citywide efforts include revisions to the City’s Demolition Ordinance, which are underway. The Demolition Ordinance regulates the demolition, conversion and elimination of Berkeley’s existing housing stock. Staff are developing revisions to the ordinance designed to clarify and strengthen protections for existing housing stock. Ordinance revisions are expected to be presented to the Planning Commission in 2020.

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The City has a variety of additional anti-displacement measures in place, including a rent stabilization program that controls the rents on 19,574 units; a housing retention program that helped 55 tenants avoid eviction in the past year; an inclusionary housing program that has added 425 units to the local affordable housing stock; the Housing Trust Fund, which supported the development of 1,172 non-profit affordable units; and a Small Sites Program to support the acquisition of multifamily properties with a strong potential to convert to resident ownership or where there is a high risk of eviction for speculative purposes.

Additional efforts that the City is taking to strengthen and expand existing anti-displacement programs are the focus of citywide efforts and highlighted in the Draft Plan. These efforts will require additional funding and staff to implement. In advance of adoption of the Draft Plan, the City has already applied for a Partnership for the Bay’s Future Challenge Grant to advance the design and implementation of two policies specifically tailored to protect against displacement and preserve and expand affordable housing access within the local community:

- **Tenants Right to Purchase Act (TOPA).** Berkeley’s Tenant Opportunity to Purchase Act (TOPA) will be an ordinance modeled after Washington, DC’s Tenant Opportunity to Purchase Act (TOPA) and San Francisco’s recently-adopted Community Opportunity to Purchase Act (COPA). Berkeley’s policy would offer existing tenants, or qualified nonprofit housing organizations, a right of first offer and a right of first refusal for certain residential properties that are on the market. Berkeley’s Small Sites Program – an acquisition loan program – would be expanded to support purchases under TOPA. Tenants and qualifying nonprofit housing organizations that acquire properties pursuant to TOPA would be required to operate them as affordable housing and existing rental protections would be preserved. The development of a TOPA program will provide Berkeley tenants the opportunity to secure permanent affordable housing in their current homes and communities and transition naturally-occurring affordable housing stock into deed-restricted affordable units or a community land trust.

- **Local Housing Preference Policy.** A Local Preference Policy for affordable housing will work to prioritize affordable housing for community members who live and work in Berkeley or who have been displaced. Currently, both current and displaced Berkeley residents are no more likely to obtain affordable housing in Berkeley than a similar applicant with no connection to the community. Local governments across the country have adopted preference policies that increase the likelihood that applicants meeting certain criteria obtain affordable housing. A Local Housing Preference Policy has the potential to strengthen Berkeley’s existing anti-displacement efforts by improving the ability for low-income Berkeley residents to access affordable housing and remain in their neighborhoods. The intention is that the preference would apply to both City-funded non-profit housing and City-regulated inclusionary housing. Both the City of Berkeley’s Housing Action Plan and the recently published Draft Adeline Corridor Specific Plan (for a mixed-use commercial corridor in South Berkeley) prioritized the development of a local preference policy for affordable housing.

3. Several commenters cite the need to develop additional measures to guard against potential displacement and gentrification impacts from development that takes advantage of Opportunity Zone funding (since the Adeline Corridor Plan Area is located within City of Berkeley designated Opportunity Zones).
City staff and its consultant are researching the likelihood of Opportunity Zone (OZ) financing for Multi-family projects in the Adeline Corridor and the likely terms of such financing. The purpose of this research is to get a better sense of how OZ financing may affect housing project feasibility and to inform steps the City can take to ensure that OZs do not contribute to gentrification and displacement in this community. This information is anticipated to be presented to the Planning Commission Adeline Corridor Subcommittee and the public for discussion at its meeting on January 29, 2020. A brief summary of background information about Opportunity Zones is provided below.

Background:

Created by the Federal 2017 Tax Cuts and Jobs Act, Opportunity Zones are designated census tracts where new real estate and business investments, under certain conditions, may be eligible for preferential tax treatment. Investors may defer and reduce taxes on eligible capital gains by making an appropriate investment in real estate or a business within an Opportunity Zone, via a Qualified Opportunity Fund. The California Department of Finance designated census tracts as Opportunity Zones according to specific criteria (up to 25% of census tracts that either have poverty rates of at least 20% or median family incomes of no more than 80% of statewide or metropolitan area family income9), and those nominations have been certified by the Internal Revenue Service.10

Opportunity Zone investors achieve the maximum benefits if they invest in projects or funds by the end of 2019, as the maximum amount of capital gain tax exclusion requires a seven year investment, a threshold that must be met by the end of 2026.11 A 15% discount off the investor's initial taxes can be realized as long as the investment is made by the end of 2019; and if the opportunity zone investment is held for at least 10 years, no federal capital gains taxes are due on any appreciation that has accrued from the investment upon sale of the project.

The Adeline Corridor Plan Area is contained within Opportunity Zones in the City of Berkeley that are defined by census tract 4232, 4235, 4239.01, and 4525. Many concerns have been expressed about potential development fueled by Opportunity Zone funds from wealthy investors seeking tax benefits that would exacerbate on-going displacement. There are several factors that may reduce the attractiveness and thus the overall impact of Opportunity Zone funding in California:

- Lack of parallel state tax liability benefit: six states, including California are not conforming to the program.12
- “Substantial improvement” of a property within a 30-month period, which effectively means for most development projects that they would need to have the permitting and environmental review process completed, and be constructed.13

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9 State of California, CA Opportunity Zones, Online: https://opzones.ca.gov/actions/.
10 Internal Revenue Service, 2019 Online: https://www.irs.gov/newsroom/opportunity-zones-frequently-asked-questions
13 IRC Sec. 1400Z-2(d)(2)(D)(i) states that qualified opportunity zone property held by a qualified opportunity fund must satisfy one of the following requirements: 1) The original use of qualified opportunity zone property commences with the qualified opportunity zone fund, or 2) The qualified opportunity zone fund substantially improves the property. As clarified in the recent Revenue Ruling by the IRS, the term substantially improves means that taxpayers must double their adjusted basis in the property after purchase and during any 30-month period.
- Environmental review pursuant to the California Environmental Quality Act (many states in the country have less rigorous or no environmental review requirements)

In response to criticism about potential abuses pertaining to the Opportunity Zone program, legislation has been recently introduced in both houses of the U.S. Congress to tighten rules around the program, create transparency and require more reporting. The Opportunity Zone Reporting & Reform Act of 2019, S. 2787 includes requirements for “robust and public information reporting by all Qualified Opportunity Funds,” as well as annual reporting by Qualified Opportunity Zone Fund investors, clarifying rules regarding Opportunity Zone investments to ensure the funds are actually helping the community, and require program review by the Government Accountability Office.14

D. Affordable Housing Funding

Several comments stated that the Draft Plan does not commit the City to funding affordable housing outlined in the Plan, citing funding sources such as the Measure O affordable housing bond recently passed by Berkeley voters in 2018.

To allocate these and other affordable housing monies (such as those from Measure P, Measure U1, or the City of Berkeley Housing Trust Fund resources) and allocate resources such as public land and inclusionary units, the City Council is advised by three different advisory boards, as required under each measure, and receives input from the Planning Commission and additional entities.

While the Draft Plan cannot make the decision about the allocation of these types of funds outside of the established decision-making process, it is very clear about putting forth a strategy that the levels of affordable housing proposed in the Draft Plan for the Adeline Corridor will only be possible if substantial public subsidies—and primarily local public subsidy such as bond financing—in addition to public land, are allocated for affordable housing. The implementation chapter of the Draft Plan includes an action that states that the City shall work with the Measure O Oversight Committee and the City Council to “allocate Measure O dollars and continue to identify new locally controlled funding sources and expand financing mechanisms to fund affordable housing in the Adeline Corridor” (See Draft Plan, Chapter 8, Implementation Action HA-2).

E. Proposed Zoning

Many comments were received about different aspects of the proposed zoning for the Plan Area, as described in Chapter 3: Land Use and Appendices A and C of the Draft Plan. Note: a more detailed, full zoning chapter was drafted and discussed at the 11/21 Planning Commission Subcommittee meeting that elaborated upon the zoning concepts in the May 2019 Draft Plan.15 Additional comments and topics were raised at the 11/21 Subcommittee Meeting which the Subcommittee will continue to discuss the

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15 Meeting materials for the November 21, 2019 Planning Commission Adeline Corridor Specific Plan Subcommittee are available on the Planning Commission website: https://www.cityofberkeley.info/pc/
draft General Plan and zoning amendments at its upcoming Subcommittee meetings (See the Background section above for more information about the Subcommittee meeting schedule). The responses below reference updated discussions where relevant.

Comments generally pertained to the following topics:
- Development standards and approval process
- Group Living Accommodations (GLA)
- On-site affordable housing requirements
- Ground Floor - Allowed Uses
- Parking requirements
- Daylight plane/shadows

The zoning concepts proposed in the Draft Plan are based on the feedback collected during the planning process, which prioritizes maximizing on-site deed-restricted affordable housing. The proposed zoning achieves this through introducing development standards, including a density standard (dwelling units per acre) and different levels or “tiers” of on-site affordable housing requirements.

There are several aspects of the proposed zoning that are also being discussed in parallel processes at the Council/Commission level, such as:
- Zoning Ordinance Revision Project (a multi-phase project whose first phase is addressing a restructuring and reorganization of the entire Berkeley zoning ordinance)
- Parking and transportation demand management (TDM) standards
- Changes to the zoning code based on change in State Law that affect Accessory Dwelling Units (ADUs), Objective Design Standards, Shadow and Daylight Plane Standards, Vehicle Miles Traveled (VMT) standards for CEQA analysis, and zoning for BART-owned properties (Assembly Bill 2923).

The proposed zoning for the Adeline Corridor Plan Area will likely need to be updated periodically based on future changes to State law and ongoing local policy efforts as set in motion by City Council.

1. Development Standards and Approval process

The proposed Commercial-Adeline Corridor (C-AC) District is not a “downzoning” as compared with the existing zoning in the Plan Area (which is primarily zoned as Commercial-South Area or C-SA District).

The current zoning (C-SA) allows for a maximum floor area ratio (FAR) of 4.0 and the granting of Use Permits to modify any of the “by-right” development standards for height, lot coverage, and setback for mixed-use and residential only buildings, which are based on the “R-4 Multi-Family Residential District Provisions”. The R-4 standards include substantial front, rear and side yard setbacks. In addition to the maximum FAR of 4.0, developers can utilize the State Density Bonus to exceed the maximum FAR or any other development standard, provided that they include the required amount of on-site affordable housing (and the City’s Affordable Housing Mitigation Fee requirements).

In contrast, the proposed C-AC District zoning establishes four “tiers” of set development standards for the Plan subareas that are attained by providing required increments of on-site affordable housing. The primary development standards (e.g. density, height, FAR, parking and open space requirements) are
appropriate to a mixed-use commercial corridor on a major arterial; reflect the built form of existing buildings and projects that are being/have been approved; and cannot be modified with a Use Permit.\textsuperscript{16}

The first tier of the proposed zoning standards may be combined with the State Density Bonus. The maximum density/height/FAR provided in the tiers either match the existing C-SA zoning FAR of 4.0 or exceed it—the “South Shattuck” subarea goes up to a FAR of 5.0 and seven stories if a developer provides increasing amounts of on-site affordable housing. Most of the existing projects in the area that have been approved or are under review fall below a FAR of 4.0.

The different tiers of on-site affordable housing requirements were set based on the goal of incentivizing on-site affordable units. Raising the starting tier (“Tier 1”) height, density and FAR would result in reducing the amount of on-site affordable housing from potential development projects, unless the incentive height/density/FAR standards were also raised to levels that were higher than contemplated by the proposed zoning and were feasible from a development economics standpoint. For example, raising development standards by a small increment from six or seven stories to eight or nine stories would not result in a feasible incentive structure. Generally speaking, building taller than six or seven stories requires a different construction type that is considerably more expensive (e.g. steel frame and concrete instead of wood frame) and would not be built unless proposed buildings were considerably taller than six or seven stories.

As noted in Section B above, while the amount of upzoning as compared to existing zoning is modest, the proposed zoning makes several other changes that allow for “value recapture” in order to require increasing amounts of required on-site affordable housing such as: reducing parking requirements, making development standards more clear and transparent at the outset, and streamlining approval process for new construction.

The boundary between the South Shattuck and North Adeline subareas has been shifted to move the east side of Adeline between Derby and Russell into the South Shattuck area. The boundary shift is a change from the subareas shown in Figure 2.2 of the Draft Plan (See Attachment 2 for a revised Plan Subarea map). This change would enable more development in the form of one additional story in height and increases in the dwelling units per acre and FAR on the three affected parcels. The rationale for this change is based on the fact that these large parcels are buffered from nearby, lower-density residential zones by wide streets and parcels with commercial uses (similar to the Ashby BART Subarea west parking lot) and thus, appropriate for the added development potential.

2. \textit{Group Living Accommodations (GLA)}

One commenter asked how the proposed zoning for the Adeline Corridor would treat Group Living Accommodations (GLA) with regards to density requirements. GLA in the proposed C-Adeline Corridor District would be subject to the Tier 1 development standards of the subarea in which they are located, as well as the R-3 density standards (350 sf/resident). Additional density is possible with the State Density Bonus. GLA’s would still be subject to the City’s Affordable Housing Mitigation Fee

\textsuperscript{16} The proposed zoning establishes development standards for three of the four Plan subareas: South Shattuck, North Adeline and South Adeline. Because zoning for the Ashby Subarea is dependent upon clarification surrounding how BART will interpret the requirements of Assembly Bill 2923 that is expected by June 2020, it will be refined as part of a separate process.
requirements. The proposed zoning allows GLAs in the C-AC district, but does not make them a more attractive development option than standard dwelling units.

3. **On-Site Affordable Housing Requirements**
   a. A few comments stated that the on-site affordable housing should be calculated based on the percentage of a housing project’s **total units** (the total number of project units including the additional density bonus units) and not the “base project units” (or the number of units of a proposed project before any local or State Density bonus is applied) of the proposed project.

As noted in the Draft Plan (*Appendix C, under “Percentage of What”*), the share of on-site affordable units that are required can be calculated either as a percent of **base project units** or as a percent of the **total project units**. Existing City and State regulations, such as the State Density Bonus and the City’s Affordable Housing Mitigation Fee, use different calculation methods:

- The State Density Bonus calculates affordable housing requirements as a percent of the **base project units** which would be allowed without a bonus;
- Berkeley’s Affordable Housing Mitigation Fee, on the other hand, requires 20% of the **total project units** be affordable.

While it is a simple calculation to **convert** from one method to the other, it is not possible to merely switch the requirement to be based on total units instead of base units using the same percentages in the proposed zoning. This is due to the fact that the percentages are based on an assessment of economic feasibility (See *Appendix C* of the Draft Plan for more detail about the issues with existing zoning and the State Density Bonus and how the proposed C-Adeline Corridor (C-AC) zoning’s targeted on-site affordable housing incentive addresses these issues).\(^\text{17}\)

City staff and its consultant will return to the Planning Commission Adeline Corridor Subcommittee and the public for further discussion about the on-site affordable housing requirement and how it is calculated at its upcoming meetings (12/12/19 and 1/29/20).

b. Some comments stated that the proposed zoning should require a different mix of affordability levels than the current draft of the proposed C-Adeline Corridor District zoning, which requires increasing amounts of on-site affordable housing that must be split evenly as: 50% Very Low Income and 50% Low Income deed-restricted affordable units. Specifically, commenters emphasized that Extremely Low Income and Moderate Income housing should also be included.

The Draft Plan recognizes that increasing the amount of all levels of deed-restricted affordable housing is important. Changes to the required income level mix have implications pertaining to economic feasibility. The different levels of affordable housing require different levels of subsidy, among other factors. City staff and its consultant will analyze the economic feasibility of additional policy scenarios that include different mixes of affordability levels and bring that information back to the Planning Commission Adeline Corridor Subcommittee and the public for further discussion at its meeting on January 29, 2020.

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\(^\text{17}\) Appendix C, Draft Adeline Corridor Specific Plan (City of Berkeley, May 2019)

[https://www.cityofberkeley.info/uploadedFiles/Planning_and_Development/Level_3_-_Land_Use_Division/Adeline%20SP%20Public_AppendixC_5.15.19.pdf](https://www.cityofberkeley.info/uploadedFiles/Planning_and_Development/Level_3_-_Land_Use_Division/Adeline%20SP%20Public_AppendixC_5.15.19.pdf)
c. Some comments related to additional changes to the proposed zoning affordability requirements. These options are shown below and should be discussed further at upcoming Planning Commission Subcommittee meetings.

- Require that any affordable housing mitigation fees collected for projects in the Adeline Corridor be earmarked for affordable housing in the Plan Area or in South Berkeley. There are two factors to consider with this potential policy: the rate and amount of accumulation of fees just from projects in the Adeline Corridor Plan Area would likely not be enough to cover the subsidy needed for potential non-profit affordable housing projects; and there is uncertainty around when viable affordable housing projects are actually proposed. Thus, there is the potential that any future earmarked fees have the impact of decreasing affordable housing elsewhere in the City if the funding were to go to the Housing Trust Fund (pursuant to the usual practice). If this policy were pursued, there may be a reason to explore an assessment after a defined period of time (e.g. 5 years) to determine whether the earmarked funding should be made available for affordable housing projects elsewhere in the City.

- Providing options to provide the required affordable units off-site by either constructing those units off-site or by acquiring an existing development and making it permanently, deed-restricted affordable housing. This option could be feasible if the acquired property/properties were transferred directly to another entity (e.g. non-profit affordable housing developer) and not to the City (which does not currently have the resources or capacity to administer such a program).

- Allow developers to pay fees in-lieu of providing on-site affordable units under certain (defined) circumstances. There may be situations where providing flexibility for a project applicant to pay the City’s inclusionary housing fees would be desirable. For example, it might make sense to exempt smaller projects (e.g. 5 units or less) because of the greater challenges and cost for market-rate properties to own and manage a single or a few units of affordable housing (and services) and the associated City staff resources needed to register new units and monitor them long-term, as compared to larger projects that result in more units and larger efficiencies (with respect to providing and managing the units, as well as City staff resources to register and monitor them).

4. Ground Floor - Allowed Uses

A few comments pertained to the extent of the “active ground use” requirements in the Draft Plan, as outlined in Policy 3.1 Overall Mix of Uses and Table 3.1 Ground Floor Use by Subarea, preferring more flexibility to avoid potential difficulty in finding tenants for the spaces in the future.

The intent of the ground floor use requirements is to support a pedestrian-friendly environment in specific areas of the Adeline Corridor. “Active” ground floor uses are uses that will generate regular and frequent foot traffic and include retail stores, restaurants, cafes and markets.

Preliminary revisions to respond to comments were presented at Planning Commission Adeline Corridor Subcommittee’s November 21st meeting that:

- No longer required commercial uses on Adeline between Derby Street and Russell Street to reflect its existing ground floor conditions with a mix of residential and commercial uses;
Active ground floor commercial uses were required along Adeline between Russell Street and Ashby Avenue, and along Shattuck Avenue between Ward and Russell Streets (to support the existing active restaurant/retail uses) See Figure B3 of the 11/21 Meeting Packet.

Subcommittee members and the public had further comments and revisions to the 11/21 revised proposal regarding ground floor uses. City staff will bring back proposals that respond to the most recent comments to the Subcommittee’s January 29, 2020 meeting.

5. Parking Requirements

A few comments stated that the proposed zoning should eliminate parking minimums in the proposed zoning.

The proposed development standards in the Draft Plan included a maximum parking ratio of 1 space per residential unit and also minimum parking requirements that decreased to zero with the Tier 3 Incentive Development Standard (e.g. 50% affordable housing). Conceptually, the rationale for this decrease was the project cost savings that could be leveraged for more on-site affordable housing. However, recent discussions regarding citywide parking and transportation demand management (TDM) changes at the Planning Commission suggest that parking minimums in zoning may be eliminated citywide. Thus, Policy 3.2 (Development Standards) and the proposed C-Adeline Corridor (C-AC) zoning district have been amended to eliminate all parking minimums at this time. The C-AC District regulations will also be amended to be consistent with citywide TDM requirements once they have been finalized.

6. Daylight Plane/Shadows

A few comments raised concern that the language in the Draft Plan and the draft C-AC District zoning that allowed setbacks to be modified with a Use Permit was too subjective, and some made suggestions that the City should adopt objective standards to address potential shadow impacts such as...

The intent of allowing the Use Permit option was to allow for a process by which the Zoning Adjustments Board could allow for adjustments to specified setbacks/stepbacks required under specific conditions (e.g. a project abutting or confronting a residential district) if a project applicant provided information that such setbacks/stepbacks were not necessary to protect neighborhood sunlight access and privacy in the context of the proposed project. The City’s Joint Subcommittee for the Implementation of State Housing Laws (JSISHL) is in the process of discussing options for citywide objective standards to address potential shadow impacts (e.g. establishing a “daylight plane” which is a height limitation that when combined with the maximum height limit, defines the allowed building envelope). Discussion at Planning Commission’s Adeline Corridor Specific Plan Subcommittee has included proposals to eliminate the Use Permit option to modify required setbacks in the proposed C-AC District zoning at this time, and to revise them to incorporate objective standards when they are developed by the JSISHL.

F. Ashby BART

Many comments received about the Ashby BART Subarea related to: affordable housing (levels of affordability and amount); zoning and development standards; public space; the Berkeley Flea Market;
the Tuesday Farmers Market; other community benefits; clarifications about property ownership and the decision-making process regarding future development.

1. **Development Requirements at Ashby BART Subarea Should Be More Specific**

The City and BART have embarked upon a process to work together, starting with development of a memorandum of understanding (MOU) that identifies next steps, roles, and responsibilities for future development of the Ashby and North Berkeley BART sites.\(^\text{19}\) The MOU also establishes a community advisory group to advise the Planning Commission on zoning changes and priorities for future development at the Ashby BART and the North Berkeley BART sites. While the City has a process for zoning and entitlements, and BART has a process for the development of its properties, the MOU identifies in broad terms how these processes will work together. There will be multiple opportunities for community input to provide input as zoning and development parameters are defined, based on the framework outlined in the Draft Plan, and consistent with other City of Berkeley plans such as the General Plan and the Climate Action Plan.

As acknowledged by the Implementation Chapter (Chapter 8), there are many variables that need to be analyzed and subject to further, focused discussion by the City, BART and the community regarding the Ashby BART station. These variables include:

- **Clarification of Assembly Bill 2923 (AB 2923).**\(^\text{20}\) On September 30, 2018 Governor Jerry Brown signed AB 2923, a bill that prioritizes transit-oriented development on land owned by BART. The legislation directs the transportation agency to adopt new zoning standards for each BART station as a way of addressing the region’s acute housing affordability crisis. BART and the City understand that AB 2923 requires further clarification related to height, FAR, density, bicycle parking minimums, automobile parking minimums and maximums. To address these points of clarification, BART will publish a guidance document offering all affected local jurisdictions information on AB 2923 conformance in order to ensure local zoning conforms to State law. According to BART, a draft of this document is anticipated in early 2020. It will be subject to a public review process and its adoption date is targeted for June 2020. It would be premature for the Draft Plan to prescribe specific details in the absence of the new standards.

- **Further Development and Analysis of Potential Development Scenarios and Community Benefits.** The Draft Plan establishes a goal for the redevelopment of the Ashby BART subarea as a “vibrant neighborhood center with high-density mixed use development” with new public space and civic and commercial uses. Policy 3.7 outlines seven key objectives for future development of the Ashby BART subarea including: an affordable housing goal of at least 50% at a range of income levels Extremely Low, Very Low, Low and Moderate; development parameters and desired community benefits including public space, public art, pedestrian and bicycle connections, and Transportation Demand Management (TDM) strategies, and; future engagement between the City, BART and community stakeholders, such as the Berkeley Flea Market. Note that BART owns the land (east and west parking lots) and the Berkeley Flea

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\(^{20}\) For text of AB 2923: [https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB2923](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201720180AB2923)
Market pays rent to BART to use the west parking lot on the weekends. The City has an option to retain the “air rights” to the west parking lot.

There are many factors that influence possible development scenarios that require further feasibility analysis and discussion, such as the types and levels of affordable housing, size/density of development, level of public subsidy, the type and range of community benefits desired (e.g. subsidized community-serving space, parks/plazas, infrastructure), amount/type of parking and infrastructure costs (for station redevelopment).

2. Berkeley Flea Market

Several comments stated that the Draft Plan must have more specific language and provide guarantees for the Berkeley Flea Market to continue to operate at the Ashby BART station.

The Draft Plan recognizes that the Berkeley Flea Market is a community institution, providing pathways to entrepreneurship, a celebration of diversity and cultural expression and a community meeting place for over 45 years. The Draft Plan expresses strong support for the Berkeley Flea Market. Supporting and enhancing the Flea Market and other existing and future community assets is one of the five central or “big ideas” of the Draft Plan (See pp. 2-16 – 2-17). The Draft Plan includes multiple interrelated policies and actions to support the Flea Market such as:

- Chapter 3: Land Use, Policy 3.7 that outlines key objectives that apply to future development and a community engagement process for the Ashby BART area that emphasizes participation by key stakeholders such as the Flea Market;
- Chapter 5: Economic Opportunity, Policy 5.4 specifically focuses on enhancing the community’s longstanding outdoor markets—the Flea Market and the Farmers Market—by providing near term technical assistance and support longer-term capital improvements such as a new public plaza/market space that includes public restrooms, children’s play areas, performance space and other amenities;
- Chapter 7: Public Space, Policy 7.3 regarding public space opportunity sites, reinforces the above policies, emphasizing the opportunities at the Ashby BART subarea for new civic plaza and park space that could accommodate the Berkeley Flea Market and a potentially relocated Farmer’s Market.

Since early 2019 when the Flea Market was experiencing financial difficulty, the City’s Office of Economic Development (OED) staff and their consultants have been working with the Market’s management (Community Services United21) to provide technical and financial assistance. OED and consultant work with the Flea Market has included capacity building, strategic plan development, strengthening governance practices and marketing activities.

The City of Berkeley does not have authority to unilaterally determine what happens on the property where the Flea Market currently operates. BART owns the land around the Ashby BART station (currently being used as surface parking). The City of Berkeley has an option to purchase the air rights over the west parking lot. The Flea Market pays rent to BART to use a portion of the west parking lot on the weekend. However, the City is committed to continuing to support the Berkeley Flea Market as it

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21 Note: at the time of writing this document, the Flea Market management was in the process of changing its management structure and to become a 501(c)3 non-profit corporation, governed by a Board comprised of Flea Market management staff and vendors.
works with BART to redevelop the Ashby BART area into a site that can provide an improved space for the Market and much needed affordable housing.

G. Historic Resources

Several comments pertained to the history and/or historic resources of the Plan Area, including requests for:

- Clarification about the terminology used to describe historic resources and corrections to Draft Plan and Draft EIR regarding locally designated historic resources; and
- Further study of the Plan Area’s historic resources (e.g. an area-wide Historic Resources Inventory similar to that which was undertaken for the Downtown Plan Area) and augmenting the area’s history in the Draft Plan, specifically about the area’s African-American history.

1. Clarification Regarding Terminology Used to Describe Historic Resources and Historic Designation Status in Draft Plan Figures and Tables

A few commenters stated that the terms “known” and “potential” used with respect to historic resources in the Draft Plan are not defined and need to be clarified. It was also noted that the same terminology is used in Figure 3.3 and that the figure did not include three locally designated historic resources.

“Known” historical resources refer to resources as defined in CEQA Guidelines Section 15064.5. These include resources that have been listed in or determined eligible for the National Register of Historic Places or California Register of Historic Resources and/or appear on the Local Register. The resources shown in Figure 3.3 of the Draft Plan were based on information provided in the Existing Conditions report prepared in 2015. Comments correctly identified three properties that have been designated as Landmark/Structure of Merit since 2015. In response to these comments, Figure 3.3 of the Draft Plan was revised to reflect this information by including the following three properties:

- Hull Undertaking Co. & Little chapel of the Flowers, at 3031-51 Adeline Street;
- University Laundry, at 2526 Shattuck Avenue;
- George A. Mattern/Berkeley Bank Building, at 2500 Shattuck.

An accompanying table listing these resources and their historic status and the revised Draft Plan figure are included at the end of this memo (See Attachment 3).

2. Further Study of the Plan Area’s History and Historic Resources

A few comments the Plan should include additional study of the Plan Area’s historic resources and documentation of its history (specifically about the area’s African-American and Japanese-American history), beyond the brief summary that is in the Draft Plan in Chapter 2: Vision + Planning Framework, “the legacy of Adeline Street” and in Chapter 3: Land Use.

City staff acknowledges that more needs to be done with respect to the study and documentation of the Plan Area’s history and historic resources. Staff are always in search of grant opportunities to help implement priorities identified in area plans and as citywide priorities and propose to add two implementation actions to Chapter 8 to work with the Landmarks Preservation Commission (LPC), the
Civic Arts Commission and the community, as appropriate to identify grants to undertake the desired work. Grantors often require a “local match” of City funds in order to be eligible.

**H. Opportunities for Development in the Plan Area**

Several comments requested more information about how the estimated “projected buildout” analyzed in the Draft EIR was derived; some commenters suggested that the DEIR analysis should have analyzed a larger amount of development. “Topical Response E: Buildout Assumptions” in the Final EIR addresses why the amount of development in the EIR is a “reasonably foreseeable maximum” and therefore an appropriate amount. This response provides more background about the rationale behind the assessment of opportunities for development and the Draft EIR projected buildout.

The City reviewed the Plan Area on a parcel-by-parcel basis to identify parcels that had the highest likelihood of change or re-development (e.g. vacant parcels and parcels comprised of surface parking lots; and “underutilized” parcels where existing buildings were no more than one story, did not have significant historic or cultural resources for the purposes of environmental review under the California Environmental Quality Act (CEQA), and were either vacant or lacked a tenant that was likely to remain in place over the time horizon of the Specific Plan). Publicly-owned parcels were also identified because of the greater level of control the City or another public agency has over the site. Some properties less than 10,000 sqft. were not included. Parcels with a development application under review, an already entitled development project or included projects that were under construction or recently constructed, were also not included as an “opportunity site”.

A map of opportunity sites, which includes a smaller subset of parcels that were used to estimate the EIR projected buildout is shown at the end of this memo (See Attachment 4). The parcels included in the EIR projected buildout reflect an assumption that not every parcel that is a potential opportunity site, especially that have been substantially improved and/or have an occupant that is likely to remain long-term will actually redevelop more intensely. The EIR buildout projection represents the foreseeable maximum development that the City has projected and can reasonably be expected to occur in the Plan Area through the horizon year of 2040.

It is important to note that parcels identified as Opportunity Sites do not imply that the sites will actually be developed. Development of most of the properties in the Plan Area would be implemented through the market-driven decisions that individual landowners make for their properties. Additionally, the EIR buildout projections are not a “development cap” that would restrict development in the Plan Area. Rather, the Draft Plan allows for flexibility in the quantity and profile of future development. Therefore, it is possible for buildout to exceed the assumptions in the EIR. Future projects would be able to tier or streamline their CEQA analysis from the Adeline Corridor Specific Plan EIR. If projects are found not to be consistent with the assumptions in the Draft EIR, those potential future projects would be required to undergo individual project-level CEQA review in order to be consistent with the provisions of CEQA. Projects which do not meet the requirements for an infill exemption under CEQA Guidelines 15183.3 or other streamlining provision under CEQA will be reviewed by City staff to determine the appropriate level of environmental review on a case by case basis. Per State CEQA Guidelines, the level of environmental review required for a development project is determined by the potential for significant environmental effects. Thus, projects proposed in the Plan Area which exceed buildout projections...
would be subject to staff review and determination regarding the required level of environmental review.

II. Economic Opportunity

A. Business Improvement Districts (BIDs)

A few commenters expressed concern about the Draft Plan’s recommendation to establish Business Improvement Districts (BIDs) because of the potential that BIDs may support actions at the expense of the homeless.

As part of the formation process of any new BID, the BID would be required to submit a Management Plan for Council approval. During the approval process, business owners, property owners and other community members can shape the Management Plan to include goals, programs/services and capital improvements that best reflect the community’s vision, such as ensuring that the BID commits to work to end homelessness and providing assistance (e.g. potential employment to assist with BID activities).

B. Protections for commercial tenants against rent increases and evictions; the right of first refusal for commercial tenants to purchase a building.

One comment stated that the Draft Plan should be revised to include policies to protect commercial tenants against rent increases (e.g. commercial rent control) and evictions, including giving commercial tenants the right of first refusal to purchase the building in the event it is sold.

In 1987, Berkeley’s commercial rent control ordinances (Elmwood, Telegraph and West Berkeley) were found to be unconstitutional (Ross v. City of Berkeley). In 1988, the California Legislature banned commercial rent control statewide (CA Civil Code Section 1954.25-.31).

Any potential ordinance related to commercial tenants first right of refusal for purchase of a commercial building should be analyzed and implemented Citywide and not through a plan limited to a small geographic area.

C. Support for businesses and workforce development.

A few commenters wanted to know how the Draft Plan could more directly support business-owners and ensure better paying jobs. One of the comments referenced Opportunity Zone funding as a potential way to fund support to business owners and workforce development.

The Draft Plan addresses direct support to business owners and employees through the City’s Office of Economic Development and its partners, as noted in:

- Policy 5.1 Existing Business Retention and Expansion, by providing technical and financial assistance to existing businesses;
- Policy 5.2 Partnerships with community organizations, local institutions, merchant groups and other local stakeholders promoting economic opportunity, and
- Policy 5.4 Enhancing and broadening the appeal of the Flea Market and Farmers Market through technical and financial assistance and supporting public improvements and amenities that would help the markets.

There are also many citywide initiatives that assist businesses and workers such as the modifications to the City’s Revolving Loan Fund (RLF) Administrative Plan approved by the City Council on September 24,
2019. The changes will make the RLF more accessible to worker-owned cooperatives seeking to obtain financing, and would make the City of Berkeley one of the first cities in the country to offer loan funding tailored to the needs of worker-owned cooperatives. Worker-owned cooperatives make vital contributions to Berkeley’s local economy. Owned and run by employees, these businesses often provide higher wages, benefits, professional development, job security, and upward mobility for low to moderate income people.

D. Vacancy Tax

One commenter suggested that the City should institute a “vacancy tax” and the proceeds used to build affordable housing.

The City has considered a vacancy tax in the past. In order for it to be effective, it would need to be implemented citywide, not just in the Plan Area. In order for the fee to be set at a level that would have the desired impact, it would need to be approved through a ballot measure initiated by the City or voters.

III. Transportation and Public Space

Several commenters desired variations to the Draft Plan related to the conceptual design of the Adeline right-of-way. The options suggested included: different lane orientations, bus-only lanes, and further reductions in the overall number of automobile travel lanes in order to yield additional space for pedestrians, bicycles and for open space. Other comments emphasized the lack of sufficient park space in this area of the City and expressed that the Draft Plan should be more specific about the location, size and type of opportunities for parks (as opposed to plazas/hardscaped areas or merely landscaped areas).

During the planning process, the need to improve mobility and safety, and the desire for increased park space and community gathering spaces were repeatedly raised among the top concerns of community members. Ensuring that park and open space improvements serve existing residents and businesses was raised as a priority.

As noted in the Draft Plan, Chapter 6, Policy 6.2 Street Right-Of-Way Design, the long-term right-of-way design is illustrative and open to further revision and refinement in the future. There are many variables that need to be discussed and studied in order to refine the potential options and further analyze technical and financial feasibility. For example, planning for the Ashby BART station area, with respect to the envisioned civic plaza and Berkeley Flea Market and a potentially relocated Farmers Market would influence planning and programming for the open space opportunity site in the “South Adeline” subarea (the current location of the Farmers Market).

Refinement of the right-of-way conceptual design will require additional in-depth discussion with community members regarding potential design and programming. Ensuring that affordable housing and other investments to address economic development and other community needs are in place prior to, or concurrently with, open space/park improvements will help maximize the benefits of park investments for existing residents without exacerbating gentrification.
As discussed in the Draft Plan, significant funding sources (e.g. local bond funding, federal, State and regional grants) will need to be identified to fund right-of-way, public space and park improvements. The Draft Plan does not propose in-lieu fees for new development to go towards paying for area-wide public space improvements due to the magnitude of the cost. These improvements would be funded through a combination of other means (e.g., bond funding, State and federal transportation grants and/or through on-site dedication of space within large projects, such as at the Ashby BART station) rather through incremental contributions of individual housing development projects.

IV. Implementation

Several comments address the content, level of detail and structure of Chapter 8 (Implementation) including suggestions to:

- Better connect the funding sources presented to the actions in the implementation table;
- Include metrics related to equity and diversity (e.g. an “Inclusion, Equity and Diversity Impact Report”);
- Establish an oversight group of business owners and residents (renters and homeowners) to monitor implementation of the Adeline Corridor Draft Specific Plan (“Draft Plan”).

One comment suggests the Adeline Corridor Specific Plan should model the prioritization and timeline structure found in the implementation chapter of the Lafayette Downtown Specific Plan (DSP). Upon further review, it was determined that prioritization given to programs found within the Lafayette DSP are all equivalent to the lifespan of the DSP—20 to 30 years. In comparison, the Implementation Chapter of the Adeline Corridor Draft Plan provides a detailed action table specifying short-term goals and ongoing goals. Short-term goals are expected to be initiated or completed within the first three years from Draft Plan adoption, while on-going goals will be addressed throughout the life of the Draft Plan. Each action is associated with policies and strategies outlined throughout the Plan. In doing so, the Draft Plan is able to provide more realistic timeframes and offer the flexibility to pursue project funding for all goals outlined in each chapter, as it becomes available.

As noted in the Draft Plan, the Implementation Chapter outlines key actions to move towards the long-term vision. The Plan is intended to be a “living document” that will be monitored and updated on a regular basis to reflect progress, new lessons learned, changing circumstances, new opportunities, and community priorities.

Many of the action items are dependent on funding sources that are under the purview of other entities and, as such, cannot be committed solely through adoption of the Draft Plan. However, the Draft Plan can be used as a guide for prioritizing local, regional, and state funding opportunities. Furthermore, many of the action items involve coordination and decision-making across multiple City Departments and other public agencies (such as regional transportation and transit agencies). As noted in the Draft Plan, the City has established an implementation team comprised of staff from the City Departments as well as outside public agencies that will meet to review progress, challenges and new opportunities and to update the Adeline Corridor Action Plan.

Ultimately, implementation of the Plan rests on ongoing and diligent effort across many stakeholders, including residents, non-profits and business, City and other public agency staff, and elected officials.

In order to ensure that the City Council and the community stay informed about Plan implementation and that there is accountability and transparency in its implementation, the City will provide an annual report that includes a range of progress updates and metrics, such as the number and levels of affordability of new affordable housing units; status and next steps of Ashby BART development process; and status of funding sources and related projects, among other metrics related to the implementation actions listed in Chapter 8 of the Draft Plan. The annual report may include recommended amendments to the Implementation chapter on a regular basis that could be done without amending the Specific Plan, so that it remains relevant and timely.
VISIONING AND EXISTING CONDITIONS

Introductory Community Forum (January 31, 2015). The Community Forum hosted by then-Mayor Tom Bates and then-District 3 Councilmember Max Anderson, was intended to introduce the project scope, City, and consultant staff and to solicit community ideas about the best way to outreach to the community prior to starting the planning process.

Adeline Community IDEA Centers (April – June 2015). The “IDEA Center” provided a unique and convenient opportunity for community members to participate in the planning process. Over 500 people dropped-in during this 3-month period to learn about the Adeline Corridor Plan process; share input on community goals related to affordable housing, local jobs, historic preservation, transportation, and other topics; and discuss ideas and priorities for physical improvements to the corridor such as streetscape design, public art, pedestrian safety, and improved connectivity. City and consultant staff were available at the Firehouse Art Collective (3192 Adeline Street) for 2 weekdays per week and on five Saturdays at different locations within the Plan Area during the visioning phase of the planning process in April – June 2015.

Pop-Up Event and Walking/Bike Tours (June 13, 2015). The primary goal of the “pop-up” event was to collect public input on how to better use public spaces along Adeline and South Shattuck and check out temporary “pop-up” ideas for the future of the Adeline/South Shattuck corridor. By transforming a normally quiet sidewalk area into a bustling public plaza complete with food, music, live art, and community activities, the 150+ event participants were able to experience and envision potential changes within their community. The event also included two walking tours and one biking tour for community members to share their thoughts on the pedestrian and cyclist experience along the Adeline/South Shattuck corridor. Over 50 community members participated in the three tours.

Community Workshop: Existing Conditions and Visioning (August 31, 2015). The visioning workshop presented members of the community with an opportunity to review and discuss the ideas emerging from community feedback collected to-date and the data in the Existing Conditions Report. The workshop also provided a large-scale forum for residents and community members to work collectively to develop a clear vision for the character of the corridor.

Surveys. City staff and consultants, in partnership with the community, conducted several surveys to help collect information about needs and opportunities. Surveys conducted included: Community Opportunities and Needs Survey (April – June 2015 – 1,118 responses); Business Survey (April/May 2015 – 102 responses out of 340 mailings – 30% response rate); Flea Market Vendor Survey (December 2015 – Feb. 2016 – 41 responses); Shopper/Employee/ Business Owner Transportation Intercept Survey (May – June 2017).

Community Learning Sessions (November 2015 – April 2016). In response to community requests for more background information relating to key areas of concern/interest, City staff organized three “101 sessions” that included speakers from City departments, other public agencies, and community partners on the following topics: affordable housing, zoning and planning, and “complete streets” (planning for all modes of transportation to increase safety, access, and mobility).
DEVELOPING PLAN DIRECTION

Community Workshop: Building the Plan Together. Affirming the Community Vision, Exploring Options for Transportation/ROW and Publicly-Owned Land (May 21, 2016). The primary goals of the community workshop were to review and affirm the community vision and to discuss options to identify the community’s preferred direction for transportation options and uses of both right-of-way (ROW) opportunity areas and publicly-owned sites to better serve community goals.

Re-Imagines Adeline Open House Exhibits (January/March 2017). The purpose of this event was to present refined design concepts to redesign the right-of-way based on community feedback collected over the past two years with technical studies conducted by staff and consultants. The exhibit consists of display boards and 3-dimensional models to visualize potential changes to the Adeline corridor. The exhibit was hosted at the Ed Roberts Campus at 3075 Adeline Street for two viewing periods. The first viewing period took place between January 28 and February 4, 2017 and began with a “kickoff” event including remarks from City officials. The second viewing period took place between March 25 and March 31, 2017. Additionally, a web-based version of the exhibit was created, including a video and on-line questionnaire that included the same questions presented at the exhibit itself.

Adeline Corridor Open House and Workshops. Plan Concepts (March and June 2018). Members of the public were asked to provide input about draft Plan concepts that would become the basis for preparing a draft Plan. The open house was first presented as a two-week exhibit along with four topic-specific workshops about equity, affordable housing and community benefits, redesigning the public right-of-way to improve mobility and safety and increase open space, and strategies to foster economic opportunity. The open house took place at the Ed Roberts Campus at 3075 Adeline Street from March 10 – March 23, 2018. Additionally, a web-based version of the open house exhibits was created using the City’s online forum “Berkeley Considers” to give the public additional opportunities to provide input from May 17 through June 3, 2018.

Community Meeting about a Vision for the Ashby BART Station Area (August 2, 2018). Mayor Jesse Arreguin, Councilmember Ben Bartlett, and BART Director Lateefah Simon hosted a community meeting to have a deeper conversation about the long-term vision for the Ashby BART Station Area. The Mayor, Councilmember, Director Simon and City of Berkeley Planning Director Timothy Burroughs provided brief opening remarks to frame the discussion. Verbal and written community input was documented and incorporated into the Adeline Corridor Plan.

Stakeholder/Focus Group Meetings. The project team conducted meetings with numerous groups and individuals throughout the planning process, including but not limited to: the Flea Market Board and vendors; the South Berkeley Farmer’s Market, the Berkeley Chapter of the NAACP, Friends of Adeline; Lorin Business Association; groups of church members and the pastors of (historically black) churches in the area; Healthy Black Families; Ed Roberts; the East Bay Center for the Blind; senior housing residents; youth groups; the Drop-In Center clients (homeless); non-profit affordable housing advocates/developers; and non-profit service providers in the area.
Attachment 1: Summary of Planning Process and Community Engagement

PLAN REVIEW AND ADOPTION

The Planning Commission established an Adeline Corridor Specific Plan Subcommittee, which has been meeting since May 2019 to review the documents and develop guidance and/or a draft recommendation for the full Planning Commission. Meetings are currently scheduled through February 2019. Agendas for the meetings are available online at the Planning Commission webpage (www.cityofberkeley.info/PC).

The Planning Commission will consider its Subcommittee recommendation and prepare a recommendation from the full Commission to the City Council regarding the Adeline Corridor Specific Plan and associated General Plan and Zoning Amendments and certification of the Environmental Impact Report (EIR). Anticipated in Spring 2020.

The City Council will consider the Planning Commission’s recommendation and will be the body that adopts and certifies the Final Adeline Corridor Specific Plan and associated General Plan and Zoning Amendments and certification of the Environmental Impact Report (EIR). Anticipated in Spring/Summer 2020.

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23 Additional stakeholder group and community engagement will continue throughout the Plan Review and Adoption phase.
Attachment 2: Revised Plan Subarea Map (Figure 2.2 in Draft Plan)
Attachment 3: Revised Historic Resources in the Plan Area (Figure 3.3 in the Draft Plan) and Table
### List of Known Historical Resources in the Plan Area

<table>
<thead>
<tr>
<th>ID #</th>
<th>APN</th>
<th>Address</th>
<th>Year Built</th>
<th>Name</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>54-1722-6</td>
<td>2750 Adeline St</td>
<td>1906</td>
<td>Frederick H. Dakin Warehouse</td>
<td>3S, BLM</td>
</tr>
<tr>
<td>2</td>
<td>53-1598-16</td>
<td>2970-2976 Adeline St</td>
<td>1905</td>
<td>Adeline St</td>
<td>3D</td>
</tr>
<tr>
<td>3</td>
<td>53-1598-17</td>
<td>2982 Adeline St</td>
<td>1910</td>
<td>Hoffman Building</td>
<td>3D</td>
</tr>
<tr>
<td>4</td>
<td>53-1598-18-1</td>
<td>2988-2990 Adeline St</td>
<td>1905</td>
<td>William Clephane Corner Store</td>
<td>1S; BLM</td>
</tr>
<tr>
<td>5</td>
<td>52-1592-16</td>
<td>3021 Adeline St</td>
<td>1901-02</td>
<td>Hull &amp; Durgin Funeral Chapel &amp; Little Chapel of Flowers</td>
<td>3S; BLM</td>
</tr>
<tr>
<td>6</td>
<td>53-1592-15</td>
<td>3025 Adeline St</td>
<td>ca. 1901</td>
<td>T.M. Lucks Nichelodeon</td>
<td>3S</td>
</tr>
<tr>
<td>7</td>
<td>53-1592-14</td>
<td>3027 Adeline St</td>
<td>1905</td>
<td>Carlson’s Block</td>
<td>3S; BLM</td>
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<tr>
<td>8</td>
<td>53-1595-9-3</td>
<td>3031-3051 Adeline St</td>
<td>1922</td>
<td>India Block</td>
<td>3B; BLM</td>
</tr>
<tr>
<td>9</td>
<td>53-1703-7</td>
<td>3061 Adeline St</td>
<td>1910</td>
<td>William Clephane Corner Store</td>
<td>1S; BLM</td>
</tr>
<tr>
<td>10</td>
<td>52-1551-8-1</td>
<td>3192 Adeline St</td>
<td>1909</td>
<td>South Berkeley Bank, Wells Fargo Bank</td>
<td>3B; BLM</td>
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<tr>
<td>11</td>
<td>52-1530-5</td>
<td>3228 Adeline St</td>
<td>1903</td>
<td>Webb Block</td>
<td>3B; BLM</td>
</tr>
<tr>
<td>12</td>
<td>52-1531-1</td>
<td>3250 Adeline St</td>
<td>1903</td>
<td>Burton Block</td>
<td>3B; BLM</td>
</tr>
<tr>
<td>13</td>
<td>52-1531-2</td>
<td>3258 Adeline St</td>
<td>1903</td>
<td>L. M. Williamson Building</td>
<td>3S; BLM</td>
</tr>
<tr>
<td>14</td>
<td>52-1531-3</td>
<td>3264 Adeline St</td>
<td>1923</td>
<td>L. M. Williamson Building</td>
<td>3S; BLM</td>
</tr>
<tr>
<td>15</td>
<td>52-1531-4-2</td>
<td>3278 Adeline St</td>
<td>1928</td>
<td>L. M. Williamson Building</td>
<td>3S; BLM</td>
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<tr>
<td>16</td>
<td>52-1531-5</td>
<td>3280 Adeline St</td>
<td>1953</td>
<td>L. M. Williamson Building</td>
<td>3S; BLM</td>
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<tr>
<td>17</td>
<td>52-1531-6</td>
<td>3286 Adeline St</td>
<td>1906</td>
<td>L. M. Williamson Building</td>
<td>3S; BLM</td>
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<tr>
<td>18</td>
<td>52-1532-4-3</td>
<td>3332 Adeline St</td>
<td>1920</td>
<td>L. M. Williamson Building</td>
<td>3S; BLM</td>
</tr>
<tr>
<td>19</td>
<td>53-1598-20</td>
<td>1979-1981 Ashby Ave</td>
<td>1907</td>
<td>L. M. Williamson Building</td>
<td>3S; BLM</td>
</tr>
<tr>
<td>20</td>
<td>53-1598-19</td>
<td>1985 Ashby Ave</td>
<td>1905</td>
<td>L. M. Williamson Building</td>
<td>3S; BLM</td>
</tr>
<tr>
<td>21</td>
<td>55-1823-13</td>
<td>2120-2122 Dwight Way</td>
<td>1905</td>
<td>L. M. Williamson Building</td>
<td>3S; BLM</td>
</tr>
<tr>
<td>22</td>
<td>53-1703-1</td>
<td>1900 Essex St</td>
<td>1936</td>
<td>L. M. Williamson Building</td>
<td>3S; BLM</td>
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<tr>
<td>23</td>
<td>52-1531-16</td>
<td>1808 Harmon St</td>
<td>1909</td>
<td>L. M. Williamson Building</td>
<td>3S; BLM</td>
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<tr>
<td>24</td>
<td>54-1723-2</td>
<td>2727 Milvia St</td>
<td>1940</td>
<td>L. M. Williamson Building</td>
<td>3S; BLM</td>
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<tr>
<td>25</td>
<td>55-1822-1</td>
<td>2500 Shattuck Ave</td>
<td>1923</td>
<td>L. M. Williamson Building</td>
<td>3S; BLM</td>
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<tr>
<td>26</td>
<td>55-1822-6</td>
<td>2526-2530 Shattuck Ave</td>
<td>1905</td>
<td>L. M. Williamson Building</td>
<td>3S; BLM</td>
</tr>
</tbody>
</table>

1S: Individually listed in the NRHP & CRHR
2S: Individual property determined eligible for NR by the Keeper. Listed in the CR.
3S: Appears eligible for NR as an individual property through survey evaluation.
3B: Eligible for listing in the NRHP or CRHR as an individual property and as a contributor to a historic district
3D: Eligible for listing in the NRHP or CRHR as a contributor to a historic district
3S: Eligible for listing in the NRHRP or CRHR as an individual property
BLM: City of Berkeley Landmark
BSOM: City of Berkeley Structure of Merit
Attachment 3: Revised Historic Resources in the Plan Area (Figure 3.3 in the Draft Plan) and Table

### List of Potential Historical Resources Identified by Reconnaissance Survey

<table>
<thead>
<tr>
<th>ID #</th>
<th>APN</th>
<th>Address</th>
<th>Year Built</th>
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<tbody>
<tr>
<td>27</td>
<td>52-1532-7</td>
<td>1719-1721 63rd Street</td>
<td>1907</td>
</tr>
<tr>
<td>28</td>
<td>52-1681-10-1</td>
<td>2820 Adeline Street</td>
<td>1895</td>
</tr>
<tr>
<td>29</td>
<td>52-1524-3</td>
<td>3350 Adeline Street</td>
<td>1920</td>
</tr>
<tr>
<td>30</td>
<td>54-1722-11</td>
<td>2005 Stuart Street</td>
<td>1895</td>
</tr>
</tbody>
</table>

*This table reflects potential significance for architectural merit and retention of integrity based on reconnaissance survey only.

Source: JRP Historical Consultants 2015
Note: The City reviewed the Plan Area on a parcel-by-parcel basis to identify parcels that had the highest likelihood of change or re-development “opportunity.” Parcels identified as Opportunity Sites do not imply that the sites will actually be developed. Development of most of the properties in the Plan Area would be implemented through the market-driven decisions that individual landowners make for their properties.

Parcels with a development application under review, already entitled or under construction/constructed; as well as, parcels with a significant historic or cultural resources for the purposes of environmental review under the California Environmental Quality Act (CEQA) were excluded for the purposes of mapping “Opportunity Sites”. Parcels smaller than 10,000 sf were also not included unless they were adjacent to opportunity sites that would, when considered together, be greater than 10,000 sf.
List of Opportunity Sites in Plan Area

<table>
<thead>
<tr>
<th>Map ID</th>
<th>APN</th>
<th>Address</th>
<th>Owners</th>
<th>Current Use</th>
<th>Lot Size (SF)</th>
<th>Subarea</th>
</tr>
</thead>
<tbody>
<tr>
<td>1*</td>
<td>55-1822-3-1</td>
<td>2032 Dwight Way</td>
<td>Herrick Foundation</td>
<td>Surface Parking Lot</td>
<td>12,756</td>
<td>South Shattuck</td>
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<tr>
<td>2*</td>
<td>55-1823-11-1</td>
<td>2104 Dwight Way</td>
<td>Alta Bates Corporation</td>
<td>Surface Parking Lot</td>
<td>41,293</td>
<td>South Shattuck</td>
</tr>
<tr>
<td>3*</td>
<td>55-1824-18-1</td>
<td>2116 Blake St</td>
<td>Berkeley Free Market LLC</td>
<td>Music Lovers (Retail) + Surface Parking Lot</td>
<td>13,500</td>
<td>South Shattuck</td>
</tr>
<tr>
<td>4</td>
<td>55-1824-14</td>
<td>2105 Parker St</td>
<td>Thallaug Kirsten TR &amp; Thallaug Haakon E</td>
<td>Viking Trader Furniture Store</td>
<td>18,220</td>
<td>South Shattuck</td>
</tr>
<tr>
<td>5*</td>
<td>55-1825-19</td>
<td>2609 Shattuck Ave</td>
<td>Valiyee Reza</td>
<td>Vacant building + Surface Parking Lot</td>
<td>15,234</td>
<td>South Shattuck</td>
</tr>
<tr>
<td>6*</td>
<td>55-1825-20</td>
<td>2110 Parker St</td>
<td>Valiyee Reza</td>
<td>Surface Parking Lot</td>
<td>10,125</td>
<td>South Shattuck</td>
</tr>
<tr>
<td>7*</td>
<td>55-1825-15-2</td>
<td>2621 Shattuck Ave</td>
<td>Valiyee Reza</td>
<td>Best Auto Radio(Auto Repair)</td>
<td>26,700</td>
<td>South Shattuck</td>
</tr>
<tr>
<td>8</td>
<td>55-1819-3-1</td>
<td>2680 Shattuck Ave</td>
<td>City Of Berkeley</td>
<td>Berkeley Fire Station 5</td>
<td>17,300</td>
<td>South Shattuck</td>
</tr>
<tr>
<td>9</td>
<td>55-1826-20</td>
<td>2627 Shattuck Ave</td>
<td>Valiyee Reza</td>
<td>Honda Dealership</td>
<td>15,800</td>
<td>South Shattuck</td>
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<tr>
<td>10*</td>
<td>55-1826-18-2</td>
<td>2655 Shattuck Ave</td>
<td>S H Kay LLC</td>
<td>DaVita Berkeley Dialysis Center</td>
<td>23,655</td>
<td>South Shattuck</td>
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<tr>
<td>11</td>
<td>54-1723-1</td>
<td>2700 Shattuck Ave</td>
<td>2700 Shattuck LLC</td>
<td>McKevitt Auto Dealership</td>
<td>45,651</td>
<td>South Shattuck</td>
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<td>54-1721-1</td>
<td>2747 Adeline St</td>
<td>Shattuck Properties LLC &amp; ETAL</td>
<td>Honda Dealership</td>
<td>10,925</td>
<td>South Shattuck</td>
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<tr>
<td>13</td>
<td>53-1684-1</td>
<td>2801 Adeline St</td>
<td>2801 Adeline LLC</td>
<td>Walgreens</td>
<td>47,916</td>
<td>South Shattuck</td>
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<tr>
<td>14</td>
<td>53-1683-1</td>
<td>2020 Oregon St</td>
<td>2020 Oregon Street Lp &amp; ETAL</td>
<td>Berkeley Bowl Grocery</td>
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<tr>
<td>15*</td>
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<td>2926 Adeline St</td>
<td>East Bay Center For The Blind Inc</td>
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<td>10,000</td>
<td>North Adeline</td>
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<td>16*</td>
<td>53-1591-18-3</td>
<td>2001 Ashby Ave</td>
<td>Cooperative Center Federal Credit Union</td>
<td>Cooperative Center Federal Credit Union + Surface Parking</td>
<td>26,303</td>
<td>North Adeline</td>
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<tr>
<td>17*</td>
<td>53-1597-39-4</td>
<td>Adeline St</td>
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<td>BART Parking Lot (+Flea Market Site)</td>
<td>194,348</td>
<td>Ashby BART</td>
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<td>18*</td>
<td>53-1703-9</td>
<td>Adeline St</td>
<td>San Francisco Bay Area Rapid Transit District</td>
<td>BART Parking Lot</td>
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<td>Ashby BART</td>
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<tr>
<td>19*</td>
<td>52-1552-19</td>
<td>3175 Adeline St</td>
<td>Lee Kam M TR &amp; Lee Kam M &amp; Jai Audrey L TRS</td>
<td>Surface Parking Lot</td>
<td>6,850</td>
<td>South Adeline</td>
</tr>
</tbody>
</table>

* Included in EIR Buildout Scenario

Source: Alameda County Assessor
### List of Opportunity Sites in Plan Area (Continued from previous page)

<table>
<thead>
<tr>
<th>Map ID</th>
<th>APN</th>
<th>Address</th>
<th>Owners</th>
<th>Current Use</th>
<th>Lot Size (SF)</th>
<th>Subarea</th>
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</thead>
<tbody>
<tr>
<td>20*</td>
<td>52-1552-18</td>
<td>3175 Adeline St</td>
<td>Lee Kam M TR &amp; Lee Kam M &amp; Jai Audrey L TRS</td>
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<tr>
<td>21</td>
<td>52-1529-22</td>
<td>3205 Adeline St</td>
<td>City Of Berkeley</td>
<td>Black Repertory Group Theatre</td>
<td>5,355</td>
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<td>22</td>
<td>52-1529-23</td>
<td>3201 Adeline St</td>
<td>City Of Berkeley</td>
<td>Black Repertory Group Theatre</td>
<td>5,806</td>
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<td>23*</td>
<td>52-1529-21</td>
<td>3209 Adeline St</td>
<td>City Of Berkeley</td>
<td>Black Repertory Group Theatre</td>
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<td>Chin Yong S &amp; Pun S</td>
<td>Washington (Coin Laundry)</td>
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<tr>
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<td>52-1528-15-4</td>
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<td>Parking Lot</td>
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<td>52-1532-16</td>
<td>1728 Alcatraz Ave</td>
<td>Progressive Baptist Church</td>
<td>Progressive Baptist Church Parking Lot</td>
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<td>52-1527-15</td>
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<td>Bates Tommie T TR</td>
<td>Vacant building (formerly Euwell's Cleaners)</td>
<td>5,288</td>
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<tr>
<td>28*</td>
<td>52-1527-14-3</td>
<td>M L King Jr Wy</td>
<td>San Francisco Bay Area Rapid Transit District</td>
<td>Surface Parking Lot</td>
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<td>52-1532-6</td>
<td>Adeline St</td>
<td>City Of Berkeley</td>
<td>Right-of-Way</td>
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<td>30</td>
<td>52-1525-7-4</td>
<td>3372 M L King Jr Wy</td>
<td>San Francisco Bay Area Rapid Transit District</td>
<td>Right-of-Way</td>
<td>13,062</td>
<td>South Adeline</td>
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<td>31</td>
<td>52-1434-5</td>
<td>3401 Adeline St</td>
<td>Splendorio Steven F TR</td>
<td>Parking lot</td>
<td>3,689</td>
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<td>52-1434-4</td>
<td>3407 Adeline St</td>
<td>Splendorio Steven F TR</td>
<td>Buslab Garage</td>
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<td>33</td>
<td>52-1434-3</td>
<td>3411 Adeline St</td>
<td>Carmack Rashell L TR</td>
<td>Apartment</td>
<td>6,203</td>
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<tr>
<td>34</td>
<td>52-1434-8-8</td>
<td>1728 62nd St</td>
<td>Crisis Support Services Of Alameda County ETAL</td>
<td>Therapeutic Nursery School</td>
<td>15,096</td>
<td>South Adeline</td>
</tr>
</tbody>
</table>

* Included in EIR Buildout Scenario

Source: Alameda County Assessor