

## Correspondence

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**From:** Gael Alcock <gael@glotrans.com>  
**Sent:** Monday, September 22, 2025 5:08 PM  
**To:** Planning Commission  
**Subject:** Please distribute

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Dear Secretary Horner and Shen,  
Please share this article\* with the planning commissioners in regard to city planner Klein's assertion that building more market rate housing brings about affordable housing. Also, please ask Jordan to share links in support of his view, with the commissioners and myself.

Thank you,  
Gael Alcock  
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\* from Berkeley Neighborhoods Council meeting ( link is undated, but BNC calendar has Shiver presenting his Middle Housing summary on October 19, 2024 )

[Up Zoning Analysis by David Shiver](#)

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# Berkeley Neighborhoods Council

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## Up Zoning Analysis by David Shiver



## City-Wide Up-Zoning Analysis

By David Shiver – Principal at BAE Urban Economics

The City's Housing Element clearly states that the City is not required to rezone or up-zone to meet its RHNA housing goals. The Council's proposed action to upzone all R-1 and R-2 districts is not necessary to meet Berkeley's housing production goal of 8,934 affordable and market rate housing units.

The growth projections that are behind the RHNA are out-of-date and overestimate population growth. The forecasts used for the Housing Element are based on way over-optimistic projections of population using data prior to the 2020 census. The California Department of Finance projects far less population growth statewide and in Alameda County.

Single-Family zoning has already been eliminated statewide. Senate Bill 9 passed in 2021 establishes ministerial approval of up to 4 units on a single single-family lot, subject to objective design standards. All Berkeley needs to do is establish objective design standards related to height, setbacks, and lot coverage. The proposed upzoning goes way beyond that!

The proposed upzoning will permit up to 5-units (4 units plus ADU) with a permitted maximum height of 34 feet and 60 lot coverage ratio with no notice or public review. This means three stories next to one-story homes. It is not what the City Council advocates are saying to the public.

With the state density bonus, even more units and relaxation of design standards can happen. All projects that include more than five units must provide 20 of the units at affordable rents. That will trigger the State density bonus which will allow the building to exceed the height limit and will allow for additional units (Susan Wengraf email).

The new maximum going from 14' to 34' means new development can block solar installations. Owners of solar systems will have no recourse. This goes against our climate change programs and sustainability goals.

This proposed action should be noticed to every resident in the City and is better considered

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as a General Plan Update, not amendment. The impacts of this proposed upzoning should be fully vetted with residents and give all stakeholders a chance to evaluate this proposal with the idea of making sure we have a 'complete city' -one with adequate infrastructure, parks, and city services.

There is nothing in the proposed zoning change that will result in affordable housing. The goal of Berkeley's Program 29 in the Housing Element is to "encourage housing for middle- and moderate- income households, and to *increase the availability of affordable housing ...*" (page 146, Berkeley Housing Element).

Over the last Housing Element cycle, Berkeley under-produced affordable housing and overproduced market rate housing. Under the last housing element, Berkeley was supposed to produce 1,558 affordable housing units but only produced 691 units, less than half. However, the City produced 3,940 market rate units, way over the 1,401 units needed. (Annual Housing Element Progress Report, 2022, City of Berkeley, Table B, page 51.

Berkeley needs to focus on producing affordable units. It's the only way to address unhoused people living on the streets and to provide people with low-paying jobs housing.

Table 2-1. Defining affordability thresholds

HOUSEHOLD	INCOME	EXAMPLE
INCOME CATEGORY	THRESHOLD	JOBS
Extremely Low Income	Up to 30% of AMI	Farm worker, barista, cashier, housekeeper
Very Low Income	30% to 50% of AMI	Waiter, delivery driver, security guard, nursing aid
Low Income	50% to 80% AMI	Retail manager, emergency medical technician
Moderate Income	80% to 120% AMI	Construction site manager, data analyst, accountant
Above - Moderate Income	Above 120% AMI	Doctor, software engineer, firefighter, CEO

Plan Bay Area 2050; Housing Chapter, Table 2-1.

Many well-intentioned housing advocates think producing more market rate housing will eventually lead to affordable housing. This "trickle-down" housing approach does not work. For a 2-bedroom apartment to be affordable to a single parent with two kids earning \$70,000, the average rent would need to be \$1,750 per month (assuming maximum housing cost burden of 30of income). The current average rent for a 2-bedroom in Berkeley is \$3,147 (apartments.com).

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