

From: [Ed Brakeman](#)
To: [City Clerk](#); [Joan Cox](#); [Steven Woodside](#); [Melissa Blaustein](#); [Jill Hoffman](#); [Ian Sobieski](#)
Subject: [EXTERNAL] Comments on City Council's 2/25/25 meeting agenda items 1.A and 1.B
Date: Tuesday, February 25, 2025 11:50:11 AM

Dear Members of the City Council,

I am writing with comments on the 2/25/25 agenda items 1.A and 1.B.

As you are well aware, it is critical that the Housing Element EIR, Amended Housing Element and Proposed Amended Ordinance 1022 documentation is complete and clear in order that it is fully enforceable and supported by adequate administrative record. In that respect, there are two areas of comment that are important to achieving that objective:

1. In the Final EIR, revise Mitigation Measure MM 3.4-1(a) to be enforceable.

Current wording (problematic):

"The evaluation shall identify measures implemented to reduce the impact to a less than significant level, including measures that ensure the project is consistent with the Secretary of the Interior's Standards"

Proposed revision (clearer and enforceable):

"The evaluation shall identify measures that would reduce the impact to a less than significant level, including measures that ensure the project is consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, and all such measures that are necessary to reduce the impact to a less than significant level shall be implemented."

2. Throughout the Housing Element EIR, Amended Housing Element and Proposed Amended Ordinance 1022, ensure consistency in zoning terminology and definitions.

In the Proposed Amended Ordinance, there are zoning terminology that is introduced that is inconsistent with that used elsewhere. If the changes in zoning terminology (e.g., "M29", "M429" instead of "MU-29/85%") are typographical errors, then I request that the City Council direct staff to make these typographical changes in the ballot measure. If the changes are substantive, then I request that the Council continue the public hearing on these agenda items for at least a week to give staff time to explain the meaning of these new terms and how they would affect zoning of the proposed Housing Opportunity Overlay Zone sites.

Regards,

Ed Brakeman