

B. POPULATION AND HOUSING

This section describes population and housing characteristics in the City of Albany (City) and Alameda County (County) and evaluates potential impacts associated with changes in population and housing that could result from implementation of the Draft General Plan.

1. Setting

The following section includes a description of the population characteristics of the City and County and relevant regulatory documents. This section uses data from the U.S. Census Bureau (Census), California Department of Finance, and Association of Bay Area Governments (ABAG).¹ Information from the Housing Element² is also included.

a. Demographics. This section describes existing demographics of Albany and Alameda County.

(1) Population. The City has grown during the last 20 years from 16,327 residents in 1990 to 18,539 residents in 2010, a 13.5 percent increase. The City experienced accelerated growth during 2000-2010, which is attributed to the reconstruction of University Village and an increase in average household size. As a City with few vacant lots for residential development, the City grew at a slower rate than Alameda County. As shown in Table IV.B-1, between 1990 and 2010 the population of Alameda County grew by 18.1 percent.

Table IV.B-1: Population Trends 1990-2000

Area/Jurisdiction	1990	2000	2010	Percent Change 1990-2010
Albany	16,327	16,444	18,539	13.5
Alameda County	1,279,182	1,443,741	1,510,271	18.1

Source: U.S. Census, 2010.

ABAG forecasts changes in population, housing, and other demographic characteristics in the nine county Bay Area region. The latest adopted forecast was published in 2013. Table IV.B-2 shows the ABAG projections for Albany and Alameda County. According to ABAG, Albany's population is expected to increase by 17.6 percent with an additional 1,109 households between 2010 and 2035.

¹ Association of Bay Area Governments, 2013. Projections 2013.

² Albany, City of, 2015. General Plan 2015-2023 Housing Element, February 2, 2015.

Table IV.B-2: ABAG 2013 Projections, 2010-2035

	2010	2015	2020	2025	2030	2035	Total Change 2010-2035	Percent Change 2010-2035
City of Albany								
Population	18,539	19,100	19,700	20,400	21,000	21,800	3,261	17.6%
Households	7,401	7,620	7,840	8,060	8,290	8,510	1,109	15.0%
Persons Per Household	2.49	2.50	2.51	2.53	2.53	2.56	0.07	2.88%
Alameda County								
Population	1,510,271	1,580,800	1,654,200	1,730,100	1,810,300	1,897,200	386,929	25.6%
Households	545,138	571,370	598,430	624,300	651,720	678,080	132,942	24.4%
Persons Per Household	2.70	2.70	2.70	2.70	2.71	2.73	0.03	1.11%

Source Association of Bay Area Governments, 2013. Projections 2013.

(2) **Age.** As shown in Table IV.B-3, the City’s proportion of children under age nine (15 percent) is greater than Alameda County (12.8 percent). The City’s 25-44 age cohort also exceeds Alameda County. This reflects the City’s popularity among young families with school-aged children. Senior citizens represent about 10 percent of Albany’s population which is consistent with the County’s population.

Table IV.B-3: Age Distribution by Percentage

Age Cohort	Albany	Alameda County	Bay Area
0-9 years	14.8%	12.8%	12.5%
10-19 years	11.7%	12.6%	12.3%
20-24 years	4.0%	7.1%	6.4%
25-34 years	16.0%	15.1%	14.7%
35-44 years	17.2%	15.0%	14.9%
45-54 years	14.2%	14.8%	15.0%
55-59 years	6.3%	6.3%	6.4%
60-64 years	5.9%	5.2%	5.5%
65-74 years	5.2%	6.0%	6.5%
75-84 years	3.1%	3.4%	3.9%
85+ years	1.6%	1.1%	1.8%

Source U.S. Census 2010.

b. Housing. This section describes existing housing conditions in Albany and Alameda County.

(1) **Households.** According to the Census, 7,401 households existed in Albany in 2010. Between 1990 and 2010, households in Albany increased by 2.7 percent; while Alameda County households grew by 13.6 percent. ABAG projects an additional 890 households in Albany between 2015 and 2035.

Average household size is a function of the number of people living in households divided by the number of occupied housing units in a given area. The average household size for Albany was 2.49 persons in 2010, an increase from 2.34 in 2000. Albany’s average household size remains lower than

Alameda County’s average at 2.70. Higher household size results from a higher percentage of family households in both Albany (67.3 percent) and Alameda County (64.6 percent). However, Albany’s percentage of family households with children under 18 (37.9 percent) is greater than Alameda County (31.1 percent). These trends also suggest the City’s popularity among young families with school-aged children, as identified in the 2010 age distribution data.

(2) Housing Stock and Tenure. Albany consists primarily of older housing stock with 66.6 percent of all units built before 1960. According to the Housing Element, City staff’s field survey estimated that 99 percent of Albany’s housing stock was in excellent condition while less than one percent of housing units have serious or persistent code enforcement issues.

As shown in Table IV.B-4, over half of the housing units in the City are single-family detached homes.

Table IV.B-4: Housing Units by Type, 2010

Unit Type	Percent
Single-Family, Detached	51.9
Single Family, Attached	3.0
2 Units	5.7
3-4 Units	5.7
5-9 Units	9.4
10-19 Units	7.8
20+ Units	16.2
Mobile Home & Other	0.3
Total	100.0

Source: City of Albany, General Plan Housing Element, 2015.

(3) Housing Market. Home values in Albany rose through the 1990s, accelerated between 2000 and 2006, dropped between 2007 and 2009, and have generally trended upward since 2010. There was a rapid increase during 2012 and 2013, followed by a leveling out in 2014. Zillow.com reported the median home value in Albany was \$533,000 in January 2012, \$602,000 in January 2013 and \$726,000 in January 2014, an increase of 36 percent in two years. Home values had previously peaked at \$672,000 in 2006. As of September 2015, the median home value reached 819,000.

The Zillow data are generally consistent with data on home values provided by the Census. The Census reported a median home value of \$626,000 in 2012, which was an increase of 87 percent over the 2000 Census figure of \$334,800. Between 2010 and 2014, home prices in Albany increased faster than in Berkeley and El Cerrito, posting a 31 percent gain, and faster still than in Richmond.

Median rent also rose during the 1990-2010 period, reaching \$1,535 in 2012, based on American Community Survey data. However, the Census data do not reflect the run-up in rental rates since 2012. Zillow.com indicates rents in Albany increased 25 percent between January 2012 and July 2014. A search of Craigslist ads in September 2014 found nine listings in Albany, with a median rent of \$2,425. Rents were \$1,350 for a studio, \$1,650 for a one bedroom apartment, and \$2,100 to \$2,900 for a two bedroom apartment. Two three-bedroom two bath homes were listed, for \$3,850 and \$4,000 respectively.

Vacancy. According to the Census, Albany had 237 vacant units in 2000 and 488 vacant units in 2010. As a percentage of total housing stock, the vacancy rate was 3.4 percent in 2000 and 6.2 percent in 2010. The increase was primarily due to economic conditions in 2010, although the recent completion of University Village at the time of the 2010 Census may have also been a factor. Tract level data indicate that 48 units in University Village were vacant at the time of the 2010 Census. The vacancy rate has decreased since 2010, although current Census data on vacancy are not available.

Regional Housing Needs. As required by State law, Albany’s General Plan Housing Element discusses ABAG’s regional housing needs (RHNA) plan. ABAG’s determination of the local share of RHNA takes into consideration the following factors: market demand for housing, employment opportunities, availability of suitable sites and public facilities, loss of existing affordable units, transportation, and special housing needs. Albany adopted its General Plan Housing Element on February 2, 2015.

As shown in Table IV.B-5, Albany’s Regional Housing Needs Allocation for 2014-2022 totals 335 housing units including 80 very low income units; 53 low income units; 57 moderate income units; and 145 above moderate income units. The City has demonstrated sufficient capacity to accommodate this quantity of housing in its Housing Element. It has also adopted plans and programs to facilitate housing construction and conservation for all income groups.

Table IV.B-5: 2014-2022 Regional Housing Needs Allocation, City of Albany

Income Category	Housing Units	Percent
Very Low	80	24
Low	53	16
Moderate	57	17
Above Moderate	145	43
Total	335	100

Source: City of Albany, General Plan Housing Element, 2015.

c. Employment. Two metrics for measuring employment are described below: (1) total jobs – which is the number of jobs within the community; and (2) employed residents – which is the number of residents of working age in the community who actively participate in the civilian labor force. A comparison of these data can provide an indication of commute patterns in a community (i.e., whether significant out-commuting or in-commuting occurs), although the comparison is more useful on a sub-regional basis in regards to regional commuting patterns.

The civilian labor force includes: (1) those who are employed (except in the armed forces); and (2) those who are unemployed but actively seeking employment. Those who have never held a job, who have stopped looking for work, or who have been unemployed for a long period of time are not considered in the labor force. According to the California Employment Development Department, as of June 2014 an estimated 9,800 residents³ (52 percent of the total 2014 City population) in Albany were in the labor force.⁴

(1) Jobs. As shown in Table IV.B-6, the number of jobs in Albany grew approximately 8.4 percent between 1990 and 2010. In 2010, Albany had approximately 5,075 jobs. Jobs are concentrated in the retail and service sectors with approximately 45 percent of jobs designated as services and 24 percent of jobs designated as retail.

³ Data are not seasonally adjusted.

⁴ California, State of, 2011. Employment Development Department, Labor Market Information Division. *Monthly Labor Force Data for Cities and Census Designated Places (CDP)*, March 2014. Website: (accessed August 18, 2015).

Table IV.B-6: Employment by Industry

Industry Type	Year			% Change
	1990	2000	2010	
Agriculture & Natural Resources	40	80	25	-37.5%
Manufacturing, Wholesale & Transportation	410	380	600	46.3%
Retail	860	710	1,200	39.5%
Financial & Professional Services	2,420	970	2,280	-5.8%
Health, Educational, & Recreation		2,270		
Other	950	780	970	2.1%
Total	4,680	5,190	5,075	8.4%

Note: 2010 Figure is from ABAG SCS Preferred Scenario. Categories shifted between 2000 and 2010. 2010 employment categories are Agriculture, Manufacturing, Wholesale Trade, Retail, Services, and Other.

Source: City of Albany, General Plan Housing Element, 2015

(2) **Employment and Unemployment.** Employment and unemployment data for 2010 and 2014 are shown in Table IV.B-7. According to data from the California Employment Development Department, Albany’s labor force has increased by approximately 10 percent since 2010, while the labor force in the County experienced a 6.6 percent increase. In 2014, the data from the California Employment Development Department reported 9,400 employed Albany residents, 400 unemployed residents, and an unemployment rate of 3.8 percent, which is the lowest in the County. For the same time period, the County had a total of 764,300 employed residents and a total of 47,700 unemployed residents and an unemployment rate of 5.9 percent.⁵

Table IV.B-7: Employment and Unemployment

Labor Force Data ^a	2010	2014	% Change
Albany			
Civilian Labor Force	8,900	9,800	10.1%
Civilian Employment	8,500	9,400	10.6%
Civilian Unemployment	400	400	–
Civilian Unemployment Rate	4.9%	3.8%	-22.4%
Alameda County			
Civilian Labor Force	762,000	812,000	6.6%
Civilian Employment	676,000	764,300	13.1%
Civilian Unemployment	85,900	47,700	-44.5%
Civilian Unemployment Rate	11.9%	5.9%	-50.4%

Notes:

^a Civilian Labor Force is the sum of civilian employment and civilian unemployment. It refers to workers based upon place of residence – where people live regardless of where they work.

Source: California Employment Development Department; LSA Associates, Inc., 2015.

⁵ Ibid.

(3) **Employment Projections.** Job growth is expected to continue to grow similarly to housing units. As shown in Table IV.B-8, ABAG projects that Albany will add approximately: (1) 1,180 jobs between 2010 and 2035, resulting in a 27.9 percent increase in jobs, and (2) 850 jobs between 2015 and 2035. Total jobs are projected to increase from 4,230 in 2010 to 5,410 in 2035. Total jobs in Alameda County are projected to increase by 31.1 percent between the period of 2010 and 2035.⁶

Table IV.B-8: Employment Projections, 2010-2035

	2010	2015	2020	2025	2030	2035	Total Change 2010-2035	% Change 2010-2035
Albany	4,230	4,560	4,930	5,070	5,220	5,410	1,180	27.9%
Alameda County	694,460	757,010	826,790	850,610	875,390	910,650	216,190	31.1%

Source: Association of Bay Area Governments, 2013. *Projections 2013*.

(4) **Employed Residents.** In 2010 there were 8,430 employed residents in Albany. Unemployed residents are not counted as employed residents, even if they are actively seeking employment.

2. Impacts and Mitigation Measures

The following section presents a discussion of the impacts related to population and housing that could result from build out of the Draft General Plan. The section begins with the criteria of significance, which establish the thresholds to determine if an impact is significant. The latter part of this section presents the impacts associated with implementation of the proposed project and the recommended mitigation measures, if required.

a. Criteria of Significance. Development of the proposed project would result in a significant impact related to population and housing if it would:

- Displace substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere;
- Induce substantial population growth in an area, either directly (for example, by proposing new homes or businesses) or indirectly (for example, through extension of roads or other infrastructure); or

b. Project Impacts. The following discussion describes the potential impacts related to population and housing that would result from implementation of the proposed project.

⁶ Association of Bay Area Governments, 2015. It may be noted that the City is using the increment of growth in these forecast as the basis for its own forecasts of job growth between 2015 and 2035. However, the City is using a different baseline figure, based on Table IV.B-6, since it believes the ABAG figures for 2010 and 2015 are too low.

(1) Displace Existing Housing or People. The projected increase in housing units within the City is 815 housing units, an approximate 10 percent increase from the existing 7,845 units to 8,660 units. New housing units would be generally located along San Pablo Avenue and Solano Avenue. The City has assumed a 5 percent vacancy rate for new development, yielding a projected increase of 775 households between 2015 and 2035. This is slightly lower than the ABAG projection of 890 additional households between 2015 and 2035, reflecting market trends and development conditions as of 2015.

Albany consists primarily of developed land; therefore the Draft General Plan focuses on redeveloping existing land through infill and increased density. Housing development in Albany during the Draft General Plan period would include primarily high density mixed-use development along commercial corridors (Housing Element Policy 2.7) and a limited number of single-family units and second-units (Housing Element Policy 2.5). Although the primary focus of housing development would be mixed-use, a diversity of housing types would be supported under policies in the Draft General Plan (Policy LU-1.1 and Policy LU-1.9) and Housing Element (Policy 2.1). Additionally, the Housing Element promotes the preservation and improvement of Albany's existing housing stock through policies 1.1 and 1.2, which focus on reinvestment and rehabilitation of the existing housing stock in Albany. As such, implementation of the Draft General Plan would not directly impact the existing housing stock and the impact to housing would be less than significant.

The projected increase in residential units under the Draft General Plan (815 units) would more than offset potential impacts related to the minimal amount of potential displacement of housing units or people that might result from implementation of the Draft General Plan. While the potential loss of existing units and the construction of new units may not occur within the same time period, the existing supply of units (for rent or purchase) is expected to be adequate to accommodate the temporary increase in demand for housing resulting from any short-term loss of units. The Housing Element has policies to protect the rental housing stock and limit short-term rentals (Policy 1.3 and 1.8). Therefore, the Draft General Plan would have a less-than-significant impact and would not displace a substantial number of existing housing units or people, and would not necessitate the construction of replace housing elsewhere.

Implementation of the Draft General Plan policies would also not hinder achieving the City's RHNA goal of 335 units for the 2014-2022 period. Housing Element Program 2.L ensures the City will monitor development to maintain sufficient land to accommodate RHNA. The RHNA for the 2014-2022 period income categories include the following: 80 units for very-low income households, 53 units for low income households, 57 units for moderate income households, 145 units for above moderate income. The City has a variety of programs and policies to promote affordable housing including Policies 2.3, 2.12, 2.14, 3.6, and Programs 2.A, 2.B, 2.C, 2.D, 2.G, 2.K, and 3.E.

The Draft General Plan policies identified above are listed below:

- **Policy LU-1.1 New Housing Opportunities.** Create opportunities to meet the housing needs of current and future Albany residents by zoning land for a variety of housing types particularly on underutilized commercial property.
- **Policy LU-1.9 Income Diversity.** Recognize economic and income diversity as one of Albany's greatest strengths. Ensure that future land use decisions contribute to this diversity by creating housing and employment opportunities for persons of all incomes and backgrounds.

- **Policy LU-2.5: Second Units.** Encourage development of attached and detached secondary dwelling units, taking into consideration the need to provide parking and protect existing neighborhood character.

The Housing Element policies identified above are listed below:

- **Policy 1.1: Housing Re-Investment.** Support continued maintenance and improvement of Albany's existing housing stock. City zoning regulations, permitting practices, and code enforcement procedures shall support reinvestment in the housing stock.
- **Policy 1.2: Housing Rehabilitation.** Continue to participate in housing rehabilitation programs and pursue funding to rehabilitate older housing units. Albany's supply of low and moderate income market-rate housing units shall be conserved to the greatest extent feasible.
- **Policy 2.7: Mixed Use.** Encourage development of rental housing above commercial development along Solano and San Pablo Avenues.
- **Policy 1.3: Protecting the Rental Housing Stock.** Continue to conserve affordable rental housing by limiting the conversion of existing multi-family rental units to condominiums.
- **Policy 1.8: Short Term Rentals.** Conserve rental housing opportunities by limiting the use of existing or potential rental properties, such as second units, for short-term stays.
- **Policy 2.3: Housing Affordability.** Continue to encourage the construction of housing affordable to very low, low, and moderate income households, in addition to market rate housing. Projects which combine market rate and affordable housing, using mechanisms such as the City's inclusionary ordinance, are encouraged.
- **Policy 2.12: Scattered Site Affordable Housing.** Encourage small affordable housing developments consisting of 1-4 unit buildings located on scattered sites, in addition to encouraging traditional affordable housing developments on larger, higher-density mixed use sites.
- **Policy 2.14: Tax Credit Projects.** Encourage the use of state and federal low income housing tax credits by developers as a way to improve the financial feasibility of affordable housing development and affordable housing acquisition and rehabilitation projects in Albany.
- **Program 2.A: Inclusionary Zoning.** Continue implementation of an inclusionary housing program which requires 15% of proposed units in for-sale projects with seven units or more to be made affordable to low income households, and which requires payment of an in-lieu fee for 5-6 unit projects. Explore revisions to the program to ensure that it is achieving desired outcomes, is compliant with inclusionary zoning case law and statutes, and is responsive to changes in the housing market.
- **Program 2.B: Affordable Housing Nexus Study and Potential Impact Fee.** Complete a nexus study, either independently or collaboratively with one or more other jurisdictions in the East Bay, to determine the cost and feasibility of an affordable housing impact fee.
- **Program 2.C: Density Bonuses.** Maintain a density bonus ordinance consistent with state requirements. Encourage applicants to apply for density bonuses as a tool to produce affordable housing and to promote new housing which is subject to parking standards defined by state law rather than the requirements set by Albany Measure D.
- **Program 2.D: Affordable Housing Incentive Program.** Evaluate, and if feasible implement, an Affordable Housing Incentive Program (AHIP) focused on the SC and SPC zoning districts.
- **Program 2.G: Technical Assistance.** Work with local non-profit developers to identify potential housing sites, and to pursue available funding, including CDBG and HOME funds, for the construction of affordable housing.

- **Program 2.K: Affordable Housing Fund.** Create a City of Albany Affordable Housing Fund which becomes a repository for funds that will be used to help support affordable housing development in the City
- **Program 2.L: No Net Loss of Housing Capacity.** Monitor development activity on the Housing Opportunity Sites to ensure that the City maintains sufficient land to accommodate the Regional Housing Needs Allocation (RHNA) during the planning period. In the event a housing site listed in Chapter 4 is redeveloped with a non-residential use or at a lower density than shown in Chapter 4, ensure that the City has adequate capacity to meet the RHNA by making the findings required by Government Code Section 65863 and identifying alternative site(s) within the City if needed.
- **Policy 3.6: Extremely Low Income Households. Facilitate a variety of programs, partnerships, and activities which** meet the housing needs of Albany households earning 30 percent or less of area-wide median income. The City will pursue funding opportunities for affordable housing, with a priority on meeting the needs of extremely low income households.
- **Program 3.E: CDBG Funds.** Continue to prioritize programs which benefit extremely low income households in the disbursement of funds through the annual CDBG program.

The Housing Element identifies a series of sites that would accommodate the Regional Housing Needs Allocation (RHNA) numbers for 2015 to 2023. Therefore, the City would meet its RHNA requirement (with the support of policies in the Draft General Plan) and no significant impact in regards to displacement of housing or people would result.

(2) Induce Substantial Population Growth. The Draft General Plan is projected to directly increase the population of the City by approximately 1,800 persons, from 18,585 to 20,385 persons by 2035. This population growth would occur primarily due to the construction of new housing in the City. The development of new housing units throughout the City would be supported and promoted by Draft General Plan policies, which encourage the development of mixed uses, affordable housing, and transit-oriented development. In particular, Housing Element Policies 2.1 and Land Use Element Policy LU-1.1 encourages housing type diversity for diverse household and incomes. Land Use Element Policies LU-1.2, and LU-1.8 promote balanced, transit-oriented mixed-use development by linking housing, employment, and transportation.

The improvement and expansion of utilities and services associated with aging infrastructure and new developments would occur under the Draft General Plan. Because new development would occur within the City limits, the development of new utility and transportation infrastructure would not indirectly induce unanticipated population growth. Therefore, implementation of the Draft General Plan would not substantially and indirectly induce population growth and this impact would be less than significant. No additional mitigation is required. The policies and actions not previously identified above are listed below:

- **Policy LU-1.2: Balanced Growth.** Promote a balanced mix of housing and employment growth so that more Albany residents have the opportunity to live, work, and shop in their community.
- **Policy LU-1.8: Transit-Oriented Development.** Encourage land use patterns which support transit use, including additional mixed use (commercial and higher-density residential) development along the San Pablo and Solano Avenue corridors.

- **Policy 2.1: Housing Diversity.** Encourage a mix of unit types, including attached and detached single family homes, second units, large and small multifamily developments, live-work units, and mixed use development, to respond to the diverse needs of Albany's households and to provide housing for residents of all incomes and ages.

The projected 2035 population of 20,385 residents indicates an estimated 6.7 percent increase in population from 2014 levels. This population growth is lower than ABAG's 2013 projection of 21,800 residents in 2035. The ABAG forecast assumed a slightly higher number of housing units and a slightly higher average household size. However, the margin between the two figures is small (about 115 households, or just over 1 percent of the total). Implementation of the Draft General Plan would not substantially and directly induce population growth, resulting in a less-than-significant impact.

In addition, the direct population growth that could occur as a result of the Draft General Plan would not be considered substantial or adverse, based on the developed nature of the City. The Draft General Plan anticipates the majority of growth to occur in commercial and transit corridors along San Pablo Avenue and Solano Avenue. As described in Section IV.A Land Use, Planning Policy, and Agricultural Resources these areas are identified as potential priority development areas in ABAG's Sustainable Communities Strategies. The Draft General Plan promotes mixed-use infill development along these transit corridors through policies and action items.

The improvement and expansion of utilities and services associated with aging infrastructure and new developments would occur under the Draft General Plan. Policies within the Draft General Plan address the adequacy of the water, sewer, drainage, and telecommunication systems, and the need to maintain, and in some cases expand these systems as development takes place. New development would occur mainly along commercial corridors and within City limits; therefore the development of new utility and transportation infrastructure would not indirectly induce unanticipated population growth. Implementation of the Draft General Plan would not induce population growth through the provision of new or expanded utilities and the impact would be less than significant. No additional mitigation is required.

c. Cumulative Impacts. As shown in Table IV.B-2, Alameda County's population is expected to increase from 1,510,271 residents in 2010 to 1,897,200 residents in 2035. As shown in Table IV.B-8 employment growth in Alameda County is expected to increase from 694,460 jobs in 2010 to 910,650 jobs in 2035.

This anticipated growth is expected to substantially increase demand for housing in the region, thereby constituting a potentially significant cumulative impact. Because of a limited supply of undeveloped land in the County, and policies that promote housing growth in already-developed areas, much of this anticipated demand for housing is expected to be met through development in urbanized areas, especially areas in close proximity to transit hubs and employment centers per the goals of SB 375. New housing in such areas is considered an environmentally preferred strategy to accommodate expected regional growth. Draft General Plan policies and action items listed previously would encourage the development of housing along transit routes, near commercial centers, and in already-urbanized locations that can accommodate growth, and therefore would not make a cumulatively considerable contribution to the expected regional increase in housing demand.

Because growth would be focused in urbanized areas, some displacement of existing housing and people is possible. However, adverse impacts associated with displacement would be minimized by an overall increase in the region's housing stock (including the supply of affordable housing), and planning policies that relate to the protection of established residential neighborhoods (Policy LU-2.1 and LU-2.8). Therefore, displacement would occur only under limited circumstances, and the Draft General Plan would not make a cumulatively considerable contribution to such an impact. The policies identified above follow:

- **Policy LU-2.1: Context-Sensitive Design.** Ensure that infill development in residential areas is compatible in density, scale and character with the established neighborhood context.
- **Policy LU-2.8: Kains Avenue and Adams Street.** Maintain Kains Avenue and Adams Street as predominantly residential streets. Land use regulations should limit the encroachment of commercial uses onto parcels that are currently developed with housing. Residential uses along these streets and in adjacent areas should be protected from the potential adverse impacts of commercial uses through special setback requirements. The use of these two streets for primary access to non-residential uses shall be discouraged or prohibited as appropriate.

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