

Objective Design Standards for 1–4 Family and 1–3 Story Multifamily Development

Workshop #1 Summary Notes

Date: April 15, 2025. 1:30 PM – 3:00 PM

Key Topics:

Document Structure & Applicability

OHA: Why two separate documents exist despite overlaps in standards?

Staff: Separate documents help users (staff and applicants) easily navigate standards suited to their project types. Small-scale developers, homeowners and Planning staff would benefit from this split because it results in more user-friendly guidance.

OHA: Why apply ODS to single-family homes if state law requires them only for 2+ units?

Staff: The City plans to allow ministerial approval for single-family homes, requiring objective standards per the Housing Element. Objective standards are also required for single-family homes with ADUs.

Context-Based Porch Standards

Staff: explained context porch requirements: if 60% of buildings in context have covered/recessed entries, new development must include them.

OHA: Questioned raising the threshold from 50% (used in 1-2 unit manual) to 60%.

Staff: 60% aligns with other multiple planning code references to identifying “majority” as it relates to Immediate Neighborhood Context for clarity and consistency. 60% helps to identify strong context when it is present more definitively and decisively, while 50% is not as definite and may be more open to interpretation, especially in more architecturally diverse neighborhoods or areas.

PB: Asked if all porches need to be recessed.

Staff: No, the recess is optional. Porches and other type entries can be recessed or include a projection or a combination of a recess and projection, as long as the entries are covered.

PB: Why not allow stoops?

Staff: Stoops are not prohibited completely, but they are de-prioritized in favor of grade-level entries for ADA/accessibility reasons, especially for multifamily development. This is very important for the Accessibility advocates who maintained this priority throughout the project.

Context Area Definition

OHA: Concerned about revised definition which limits context to the immediate block face and across a facing street rather than nearby/corner properties across the side streets. Thinks this narrows contextual understanding and weakens consistency with existing standards.

Staff: Revision made for clarity, focus on the context where it is the strongest, and ease for staff and applicants in following the requirement and verifying compliance. This approach keeps context strong without overextending analysis to areas across side streets (often wide streets) with potentially very different character and zoning. Context within the block face is easier on applicants and more desirable for staff verification. Staff thinks that this revised approach (block face focus) is strengthens the context application, and it is consistent with how Existing Context is determined along the Corridors.

Roof Form Standards

OHA: Asked how 50% roof form standard applies to narrow lots. CB: Suggested clarification of measurement (e.g., using front 30 feet instead).

Staff: 50% is a minimum, aiming for flexibility without sacrificing contextual fit.

PB: Noted many appealing buildings lack sloped roofs; pitched roofs not always necessary or cost-efficient. Prefers flat roof design.

Articulation & Blank Walls

OHA: Noted problems with blank walls above windows in the top section of buildings along the roofline; suggested detailing or horizontal moldings to break monotony. Advocated avoiding overly tall, top-heavy facades without detailing. However, also emphasized that well-designed flat facades can meet standards without excessive articulation.

Staff: It is difficult to write objective standards for “good detailing”. Also the detailing may be a reflection of more traditional styles. Modern examples built in Oakland often do not show much detailing and prefer a cleaner look of these building portions. City wants to be open to any styles, including the modern styles, that may have or need less detailing. Also, it is often a matter of taste: some people may prefer buildings without detailing above the top row of windows or at the top portion of the building. It is a matter of preference and should be left to a designer.

OHA: Emphasized importance of addressing blankness at building tops and need for upper-level minimum transparency of 25%.

Staff: consider possibly extending the 15' maximum blank wall stretch to above ground floor walls. Requiring residential transparency is problematic. If desired, it can be addressed in the Planning Code, not ODS.

Building Style and Flexibility

OHA: Warned against over-reliance on articulations leading to stylistic bias.

Staff: Standards aim to be style-neutral; our intent is flexibility. Visual examples from which some standard options were derived reflect current Oakland developments.

Building Entrances & Windows

OHA: Questioned poor design choices (e.g., trash cans in front gates) on one of the supporting images.

Staff: Likely due to trash day; gate and pedestrian path shown is separate from driveway.

Additions to Historic Buildings

OHA: Opposed language discouraging replication of historic elements; could create confusion.

OHA: Proposed allowing matching materials and detailing for clarity and alignment with Historic Preservation Element.

Staff: The goal is to avoid exact replication of unique detailing – this may be difficult and require skills or trade no longer available; welcomed written detailed comments for consideration to improve clarity.

Objective Design Standards for 1–4 Family and 1–3 Story Multifamily Development

Workshop #2 Summary Notes

Date: April 17, 2025. 5:00 PM – 6:30 PM

Key Topics:

Context Determination for Corner Lots

Discussion on how to determine context for corner buildings and whether buildings across side streets should be included.

OHA: Context for corner buildings should consider both facing and caddy-corner buildings. If a cross street is narrow, buildings across it should count as context.

Staff: Keeping context to the immediate block is simpler and more focused on the actual context in places where it is the strongest. Crossing side streets adds complexity, especially if zoning or context differs.

OHA Suggestion: Use a two-system approach — one for APIs/ASIs (allowing across-the-street context), and another for general areas.

Staff: this approach will increase the complexity for applicants and for staff to verify the conformance significantly, while only capturing a very small number of potential cases. ODS need to remain as simple as possible to follow and verify and cover the majority of cases. The idea behind ODs is streamlining of housing approvals. Additional complexities are inconsistent with this goal as they require more time from both applicants and staff.

PB: This should be limited only to APIs and ASIs to preserve distinctiveness.

Rhythmic Massing and Facade Articulation

Debate on 1-foot façade modulation as an optional feature among others to provide design flexibility - not a mandatory choice feature.

PB (Question): Why impose 1-foot modulation requirements for 1–3 story buildings when those were originally a solution for large 4+ story buildings?

Staff (Answer): The 1-foot modulation is **optional** and intended to provide flexibility in façade design. It doesn't impact floor plans. It's one of many design options (e.g., bay windows, porches) that allow for creative approaches for appropriate multifamily buildings such as townhomes and rowhomes,

with staff relying on examples built in Oakland. This articulation method is used widely in recent developments in Oakland and staff wants to keep this in the toolkit as an optional feature.

Blank Wall Standards

Concerns about blank upper facades at the tops of the buildings and recommendations for horizontal articulation such as cornices or moldings on tall parapets to prevent 'top-heavy' building appearance.

OHA: Top edges with blank parapets feel heavy. Even modest molding could improve them. Suggest limiting this new standard to APIs/ASIs.

Staff: It's worth a discussion. Caution against mandating traditional elements like cornices — may preclude modern cleaner more austere designs.

OHA Clarification: Not asking for ornate detailing, just a *modest* horizontal articulation (e.g., 4–6 inch band with 1–2 inch projection) to break up the mass visually.

OHA: Also recommends 25% wall transparency for residential upper floors to prevent blank facades. Why not include this in ODS?

Staff: Transparency standards are Planning Code issues, not ODS. Residential transparency isn't currently required but can be discussed as a change in Planning Code. This can be difficult for staff to verify and create more work and make ODS review more onerous and time-consuming. Every additional ODS makes the review more complex for applicants and staff. This is inconsistent with the goal of ODS to streamline project approvals, especially when we are talking about 1-4 Family buildings or smaller multifamily development. Staff is not convinced we need transparency requirements for residential uses. Windows can be closed/draped by residents.

Window Typical “Wood” Dimension and Additional Submission Requirements/Feasibility

Discussion around additional detailed window dimension requirement to match “typical wood” dimensions using a diagram.

OHA (Question): How do we define “wood-like appearance”? Suggest specifying dimensions of window features (e.g., recess depth, rail width).

Staff (Answer): Concerned about feasibility — off-the-shelf windows may not match dimensions; custom specs could increase project costs.

OHA: Diagrams can be reused in applications, minimizing design work. Flexible ranges in dimensions could address staff concerns.

Staff: Every overly detailed standard adds verification time for staff and can be onerous on inexperienced applicants. Need to balance design detail requirements with staff capacity/streamlining goals. We must consider applicant's ability.

OHA: Suggest using a diagram-based approach as in Alameda to simplify verification.

Staff: Concerned about adding more prescriptive requirements on applicants and staff. If OHA's research already found that most windows that can be purchased off the shelf match the OHA desired "typical wood" dimensions, then why require additional detailed standards?

OHA: Reuse of standard diagrams avoids extra costs. Recommends aligning with Standard 5.8C, using "typical dimensions" to define "wood-like."

Historic Detailing

OHA Recommendation to allow matching ornamentation and detailing unless restricted by federal historic preservation standards.

OHA: Historic Preservation Element allows detailing to match existing buildings unless federal oversight applies. Recommends removing any prohibition on ornamentation.

Staff to consider all comments.

ATTACHMENT B

#	Initials or Organization	Public Comment	Related Standard	Staff Response
1	AT	Remove the ban on visible unenclosed exterior corridors. Most lots are only 40-50 feet wide, which means that buildings would only be wide enough for apartments on one side of the corridor. Unenclosed corridors allow the apartments to have windows on both sides for better lighting and ventilation. They also reduce the bulk of the building.	2.4.2	see response #8 below
2	AT	Remove the requirement for facade articulation. This adds significant unnecessary cost and makes buildings less energy efficient and more likely to leak. For a small building on a 40-50 foot wide lot it would also create awkward unit layouts where one room (usually ends up being the living room) ends up smaller than ideal.	2.1 and 2.2	see response #12 and #13 below
3	AS	Please DO NOT change the standards to force exteriors of 1-4 unit apartment buildings to have facades (articulation). Every new building is a boxy, intimidating structure because of these requirements, and we hardly get the sense of people actually LIVING in these buildings. We live in California where it is sunny and mild NOT Ohio where the weather is cold and depressing. Our architecture should reflect our environment. By changing all of our standards to make apartments share the same style, we are creating anti-social and isolated environments. Plus, the material costs of maintaining the facade will be even higher since tariffs will jack up the price of those buildings. We need to make affordable housing affordable to build.	2.1 and 2.2	No change proposed or needed.
4	MD	While I support streamlining housing approvals, I'm concerned Oakland's proposed design standards will actually hinder housing production. Many existing Oakland homes wouldn't meet these new rules, and the standards add unnecessary costs and complexity. Requirements about trim, materials, and historic ratings could block needed density and infill, making it harder for small builders and affordable housing projects. I urge the City to revise these standards to prioritize housing abundance and affordability. We should remove or narrow context-matching rules, allow a wider range of materials, and take a balanced approach to historic preservation. Oakland needs more homes, not more roadblocks.	var.	Planning staff disagrees with these broad, unsupported claims. The proposed requirements are practical and minimal, and ensure a baseline level of design quality and compatibility with surrounding neighborhoods. ODS implement one of the key roles of the Planning Department to oversee development. Pro-housing organizations such as East Bay for Everyone (see comment #5 below) have observed that the standards strike a reasonable balance between maintaining design quality and streamlining housing production. Staff thinks that adopting these standards will promote more predictable, streamlined project approvals—ultimately accelerating housing delivery. This approach has already proven effective with the adoption of the 4-8 story Objective Design Standards. Most Cities have adopted or in the process of developing their ODS. Most existing typical small-scale housing projects would already comply with these standards, which allow flexibility by offering multiple options to select from. Contextual standards are applied sparingly and only when necessary. Importantly, the standards do not require buildings to “match” their surroundings; rather, they call for context-sensitive responses to a few key elements—such as porches—that can be met through a variety of design solutions.
5	EB4E	We think the current Draft ODS avoids many of the costly prescriptive requirements sometimes seen in such municipal standards. This is appropriate for the subject development types: smaller scale and often built on narrow lots. These are the types of development that—due to their incremental nature, smaller mass, lower height and likely lower capitalization structure—are less likely to overwhelm, complicate and interfere with the public realm.	n/a	Thank you!
6	EB4E	We should remember that these incremental infill housing types—located mid-block between arterial streets—already face significant challenges associated with smaller developers: lower access to capital, more potential opponents, lower economies of scale and lower tolerance for delay and risk due to high carrying costs. These challenges could explain why few, if any, permits for missing middle housing under the October 2023 rezoning have been filed. Much of that dearth of applications has to do with high interest rates and declining rents, which are beyond the City's control. But in such an environment, the City is morally obligated to use all the levers that are at its disposal. We ask you to consider both the inherent challenges and development input challenges of incremental development that the current Draft ODS would lay on yet more costs to small builders.	n/a	Staff is aware of the existing challenges and proposing to create one of the most housing-friendly and responsive of context ODS.
7	EB4E	It would be helpful to identify the purpose of each proposed standard, and whether it exists to protect an important functional aspect of the public realm (such as limiting driveways across bike lanes), to enhance the quality of life for building residents (such as standards for play areas), or to regulate aesthetic quality.	var.	Purpose and intent sections are added for each category of standards, similar to the 4-8 Story ODS. However, it is not feasible to provide detailed purpose and intent discussion for the individual standards as requested. The ODS must remain concise and user-friendly to be effective. Developing extensive explanations for each item would require significant staff time and could compromise the clarity, objectivity, and usability of the document. Design is also one of the most subjective topics. Writing objective design standards is a very difficult task for that reason. Staff developed the standards to be flexible and accommodating of almost any design solutions. Also, all examples from other cities only include brief and general purpose statements for a group or category of standards. Oakland ODS is not unique in that respect. The overall purpose of the standards is informed by local needs, extensive professional experience of our staff from different departments who contributed to this effort, and best practices in design and planning.
8	EB4E	Single Loaded Corridors - (2.4.2): This provision would effectively ban one of the most cost-effective and natural light enhancing egress types for these developments. Single Loaded Corridors allow for designers to place egress and stairs outside of the building's envelope, which 1) lowers costs of egress/corridor construction for unenclosed elements; 2) preserves interior square footage for residents to use; and 3) provides shallower unit depth that provide more access to sunlight and air relative to other configurations. To the extent that Planning is concerned about privacy for side lots, this can be mitigated through planting and privacy fences. It is unclear what public purpose beyond upholding a particular aesthetic it achieves to prohibit Single Loaded Corridors facing public Rights of Way. We urge you to provide privacy-mitigated pathways for Single Loaded Corridors facing side lots and allow them fronting streets as of right.	2.4.2	Staff acknowledges the perspective on unenclosed exterior corridors and has revised the standard to remove the visibility requirement. However, staff maintains that this standard should remain for the following reasons: 1. The Objective Design Standards are meant to guide the visual quality and basic public-facing aesthetic of development, including how buildings interact with public streets. Unenclosed corridors clearly under ODS purview. 2. Claims that unenclosed corridors improve efficiency overlook fire safety, Building Code, and privacy requirements. These corridors trigger Building Code requirements for either fire-rated walls or increased side setbacks, reducing buildable area and negating any of the alleged efficiency gains. Regular enclosed corridors have minimal impact on unit design, access to natural light, and ventilation. 3. Future Building Code changes, such as modified single-stair requirements, may provide more flexible and cost-effective solutions for building efficiency. 4. Privacy Concerns – Side-facing corridors pose privacy issues for neighbors, which landscaping alone cannot fully mitigate. Additionally, landscaping requires maintenance that can't be controlled by Planning, and may also necessitate additional setbacks, further limiting efficiency. 5. Design Flexibility – The revised standard allows designers to incorporate rear-facing unenclosed corridors where appropriate, providing flexibility while maintaining design quality.
9	EB4E	Ground floor access requirements - (2.5.3): This would require 60% of ground floor units to be accessed from a sidewalk or shared access easement. This prescriptive site plan requirement limits the ability of designers and site planners to effectively design. It is unclear what the public purpose of this requirement is or even the basis for the 60% threshold. It also penalizes residents of 1-3 story multifamily structures who wish for more privacy for their ground floor units.	2.5.3	Staff re-evaluated the standard and concluded that while it addresses an important goal of improving walkability, safety, and street connectivity, it can be removed because it does not adequately account for alternative building configurations when apartments are accessed from the side of a building or through a shared entry.
10	EB4E	Wall Planes - (4.1.6): This would require wall planes to recess or project at least 3" but no more than 12". The purpose of this proposed standard is to avoid a continuous flat wall plane. Some versions of this requirement may make sense in limited scenarios for buildings with frontages in excess of 200'. But it is highly unlikely that a 1-3 story multifamily housing development with a 200' wide frontage will be proposed—these sorts of parcels will most likely be proposed as 4-8 story multifamily through Oakland Planning's code or the State Density Bonus Law. Wall plane recession or projection is not an issue for 50-150' wide 1-3 story structures—they simply do not have sufficient massing for a flat wall plane to overwhelm the public realm. Moreover, this proposed standard is not costless. It increases framing costs and risk of water intrusion. Planning may consider mitigating potential flat walls by requiring non-structural decorative elements, and/or setting a threshold facade length below which such requirements do not apply. We appreciate that narrower facades are exempt from material variation requirements.	4.1.6	Staff appreciates and supports EB4E proposal for the threshold over 150' for the standard to apply. The standard has been revised in 1-3 Story Multifamily draft and removed from 1-4 Family ODS.
11	EB4E	We appreciate that contextual development standards generally apply only in a few designated areas of particular historical and aesthetic distinction, as these standards increase the complexity and cost of compliance.	var.	Thank you. Staff worked diligently to strike the right balance in applying the context-sensitive standards only where it is necessary—respecting existing neighborhoods while supporting a diverse range of housing types and styles.

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12	EB4E	<p>Facade Treatments - (2.1): This would require designers to choose among a menu of five options to provide a treatment or articulation for the facade of 1-4 family housing. This is completely unnecessary. Again, there is a limited case for facade articulation requirements for wide and massive buildings of 200'+. In contrast, 1-4 family development scenarios will nearly always be a 50' wide lot and a 2-story structure. These are not massive buildings and there is no public purpose for prescribing such treatments when the risk to the public realm is minimal.</p>	2.1	<p>Staff recommends retaining the facade articulation standard for the following reasons:</p> <p>Flexibility. The menu of options is broad, easy to meet, and reflects typical features commonly found in 1-4 family homes or 1-3 story buildings. These features can be conceived in a number of ways without impacting buildings layout or creating awkward floorplans. Most typical well-designed buildings already include at least one of these elements.</p> <p>Visual richness, individuality and character. Even small buildings can negatively affect the public space if façades are blank or monotonous. Articulation enhances visual interest and street presence when used creatively.</p> <p>Minimal Cost and Impact. The options are not cost-prohibitive and can be incorporated without significantly affecting layout, energy efficiency, or construction. Unlike deep massing changes (not proposed) these methods have negligible impacts on building costs but have large public benefit creating quality homes and friendly and attractive urban environment.</p> <p>Baseline Quality. The standard helps prevent poor design outcomes without being overly prescriptive, supporting the broader goals of the Objective Design Standards.</p>
13	OHA	<p>Why were the following 4-8 story standards not included? 4.5.3 (roofline edge treatment), 4.5.4 (flat roofs), 4.5.5 (cornices), 4.7.1 (windows context), 4.7.2 (window alignment), 4.7.3 (glazing), and 4.7.7 (window elements/divided lights). Although we had recommended several changes, these provisions were generally very helpful. In addition, 4-8 story standard 4.5.6 and 1-3 story and multi-family standards 2.4.4 and 2.7.4, respectively, (parapet caps/caps) now omits the 4-8 story standards' important dimensional provisions.</p>	n/a	<p>As we expand the Objective Design Standards to 1-4 family, 1-3 story, and the "missing middle" housing, staff carefully re-evaluated which 4-8 story standards are appropriate for this smaller-scale development. Several of the referenced standards, such as roofline edge treatments (4.5.3), cornices (4.5.5), and other more detailed requirements, were excluded because they were put in place for buildings of larger scale with defined top/middle/ground floor sections, which do not exist in the lower-density buildings. Applying these standards to smaller projects could add unnecessary complexity and costs without meaningful design benefit, be inappropriate from design standpoint, or even create obstacles for housing production. Staff is also aiming to keep these standards practical and accessible to homeowners and small-scale developers and designers, avoiding overly prescriptive or costly requirements for these much smaller projects. Additionally, we're using this phase in ODS development as an opportunity to re-evaluate the necessity of certain standards from the 4-8 story ODS, based on what we've learned so far.</p>
14	OHA	<p>Retain the context area definition in the 4-8 story standards. The 4-8 story standards methodology more accurately ensures that the context area reflects the surrounding development concurrently with the project site. For corner lots, defining the context area as the five closest lots to the project site on the cross street as well as the five closest lots on the primary street will help ensure that the entire context area is covered. We understand staff is concerned that these approaches may not be viable if properties along the cross street are distinctly different architecturally or that the projects on the cross street are in a different zoning district. The approaches may also not be viable if the cross street is especially wide, essentially dividing the context area. (Staff, please tell us if our understanding is incorrect.) However, projects with different land uses and/or zoning districts also could be constructed on the opposite side of the primary street according to the staff proposal. The primary street could also be very wide, which, in some cases makes the street the centerpiece of a context area, such as Havenscourt Boulevard and portions of 90th Ave. One way to address the staff concerns would be to apply the context methodology only to APIs and ASIs. Alternatively, apply only the more architecturally focused context methodology to APIs and ASIs and the remaining methodology to other context areas.</p>	n/a	<p>The strict application of the "5/5/10" rule, particularly when it includes properties across side streets, has long presented challenges for Planning staff internally and often required a Planning Director's determination. This discretionary approach is no longer viable under the ODS, which must remain fully ministerial and objective, easy to understand, use, and verify—especially for smaller-scale projects like 1-4 family homes or 1-3 story multifamily developments. When strict application of the 5/5/10 rule requires discretion, it works against the City's streamlining efforts.</p> <p>Our goal is to keep the context methodology as simple and predictable as possible while still covering the vast majority of typical development scenarios. While we recognize that certain edge cases, such as corner lots facing side streets, may not be fully captured in 100% of cases, the overall approach ensures that absolute majority of projects are still subject to consistent and predictable design standards.</p> <p>If a specific issue arises frequently in implementation and creates undesirable issues in practice, staff is open to revisiting and refining the context approach and standards over time. For now, we recommend retaining the current context definition and approach as proposed, recognizing that a small number of corner-lot conditions may potentially fall outside the defined context area. Even in those cases, the full set of applicable ODS will continue to apply and ensure quality outcomes.</p> <p>In addition, related to this comment, the "60% or more" threshold is used throughout the document to identify strong existing context patterns, instead of 50%, to stay consistent with the Planning Code, which references 60% in several places when defining strong and clear patterns. For more details, see the Summary Notes from the Community Workshops, where staff addressed this question.</p>
15	OHA	<p>Delete "but in a manner that does not replicate or duplicate the exact detailing of the existing historic building" from the ends of sections 2.7.2 and 5.2 from the 1-4 unit standards and 1-3 stories standards, respectively. This language is inconsistent with the historic preservation element's table 2 item1(a), finding (i). Here is the historic preservation elements explanatory text: The City believes that conformity with the Standards is not the only way to avoid adverse effects on Landmarks and Preservation Districts. In the past, the City has consistently approved alterations to noncharacter-defining elements or additions which match the style of the existing building but violate the Standards (e.g. Rehabilitation Standard 3) because the design either cannot be documented as an actual historical design or makes minor modifications to the historical design for functional reasons. The Standards consider such changes to create false historical appearances, but it may be appropriate for the City to continue this practice if the work is well done. Finding (ii) of Table 4.2, Item 1(a) therefore does not require conformity with the Standards if they do not legally apply to the project (e.g. the project does not require tax credit or Section 106 reviews) and the project will still not adversely affect the Landmark or Preservation District. (The paragraph is on page 4-16 of the Element.) In addition, our experience has been that many architects and contractors have found that visually matching existing buildings detailing to be the easiest and most straightforward design strategy for additions. Note that the Historic Preservation Element's strategy is to allow the visually matching of existing architectural details without requiring it.</p>	2.7.2 and 5.2	<p>After consulting with the City's historic preservation staff, the standard was revised to apply only to National Register historic properties governed by the Secretary of the Interior's guidelines. This ensures consistency with Federal guidelines and provides clear direction in those extremely rare cases. Removing the standard is also an option. Therefore, exact replication is not prohibited for most additions if desired by a project.</p> <p>However, the revision proposed by OHA is not acceptable because it would require new additions to exactly replicate the original building's style, materials, colors, and multiple other details, making them copies of the existing structures. Again, this approach is allowed, but if required for all additions, this would severely limit design flexibility and burden staff with verifying every detail, slowing down significantly what is intended to be a streamlined, ministerial process. In some cases, it could delay or even block housing production for purposes of maintaining the existing building period or architectural style, which conflicts with the goals of the Housing Element and state housing laws that promote creation of diverse housing, including additions to existing building that lead to creation of new units. Planning staff, including our historic preservation staff, do not support this approach. Additions to other historic properties (on the State or Local Register) will continue to follow the existing practical standards in Section 5 and the rest of the ODS.</p>
16	OHA	<p>Amend the Planning Code ASAP to allow developers to opt out of the ODS. An underlying premise of the ODS—consistent with state law and used as a basis for many of our recommendations—is that developers who prefer not to conform with the ODS, especially developers who believe the ODS are too prescriptive and/or who desire to pursue more creative designs, can always opt out of the ODS and use the city's existing discretionary design review criteria and design guidelines instead. Staff has advised us that the opt-out option cannot be offered until the Planning Code's design review procedure is amended. Such an amendment to allow the opt-out option should be pursued ASAP.</p>	n/a	<p>Please see a Planning Bulletin and Waiver that explain the process and allow developers to opt out of By-Right residential approval under Objective Design Standards and opt-in for Regular Discretionary Design Review. If a project does not meet one or more Objective Design Standards after receiving a Planning Bureau compliance letter, applicants may either revise their proposal to comply with all standards or opt out of By-Right Residential Approval and proceed with Regular Design Review by submitting a Waiver https://www.oaklandca.gov/documents/zoning-code-bulletin-on-objective-design-standards-from-december-19-2024</p>
17	OHA	<p>Section 2.2 (Mitigation of Blank Walls). In our 10-11-24 letter, we recommended expansion of the standard to specify the percentage of wall surfaces that should be open or transparent. We submitted this possible text:</p> <p>a. Minimum Transparency of Residential Floors. At least 25 percent of the area of each street facing facade must consist of windows or other transparent openings. This requirement applies to portions of buildings backed by residential uses. (For ground-floor transparency requirements for nonresidential portions of mixed-use development, see below.)</p> <p>b. Ground-floor Transparency of Nonresidential Floors. Ground floor street-facing windows, doors, or other openings shall constitute at least 75 percent of the ground-floor street-facing building wall area. Openings fulfilling this requirement shall have transparent glazing (not tinted glass, or reflective film or coating) and shall provide views into window displays at least five feet deep or into sales areas, lobbies, work areas, or similar active commercial spaces.</p> <p>Page 12 of the 10-2-24 staff report states that the 75% transparency standard for nonresidential ground floors is too high. In follow-up discussions, staff correctly observed that shear walls, utility installations and similar elements will often make 75% transparency infeasible. However, the 1-3 story standard's mitigation treatments for blank walls, Section 2.1, can be used when 75% transparency is not feasible. The 4-8 story ODS Section 2.2.3 and 2.2 exemption of the 15' maximum blank walls from Building Code requirements will also apply to the 75% transparency standards. In addition, the ODS transparency provisions for upper floors are significantly weaker than the 4-8 story standards. The staff report and staff comments at the 7/24/24 DRC meeting noted that transparency requirements are in the Planning Code and that any additional transparency requirements should therefore also be in the Planning Code, rather than the ODS. In that case, perhaps the blank wall provisions that are already in the ODS should instead be in the Planning Code.</p>	2.2	<p>Staff considered new transparency (window) requirements for upper-story residential units but decided not to move forward at this time. This is due, in part, to pending changes to the Building Code, which already requires a minimum number of windows/openings % per unit. To avoid potential conflicts, staff recommend keeping the current standards unchanged for now. The Planning Code sets transparency requirements for non-residential ground floors (typically 50-65%, depending on the zone), it does not require minimum transparency for residential frontages. Staff do not recommend adding new standards for residential transparency because of concerns about ground-floor privacy, the added burden of verification at planning stage that must be streamlined and efficient, and potential conflicts with the Building Code given the upcoming changes.</p> <p>Any future changes to residential transparency requirements should be addressed through the Planning Code, not ODS, to avoid duplication and ensure consistency with future Building Code updates.</p>
18	OHA	<p>Sections 4.7.2 a. and 4.7.2 b. Horizontal and vertical window alignments. We very much appreciated staff's inclusion in the 4-8 story standards of our recommendation that the tops of upper floor windows be horizontally aligned. However, why is this provision not included in the 1-3 story standards nor the 1-4 unit standards?</p> <p>In addition, in the 4-8 story standards staff applied the standard to 80% of the windows on each floor, while OHA recommended 90%. The 10-2-24 staff report incorrectly stated that the OHA recommendation is 100%. We are concerned that reducing the 90% to 80% will result in excessive inconsistencies in the alignment of window tops.</p> <p>We also recommended that this provision apply to all new buildings within an API, not just new buildings adjacent to a 4-8 story local register building. This provision should also apply to corner elements covered by 1-4 unit Standards 2.1.3 and 4.1.4 since otherwise they might not be well integrated with the rest of the building.</p> <p>We appreciated staff's inclusion in the 4-8 story ODS that at least 60% of upper floor windows are vertically aligned. But why is this provision also not included in the 1-3 story and 1-4 unit ODS?</p> <p>We continue to recommend that upper floor windows have sills and that 100% of upper floor windows be vertically aligned rather than the proposed 60%. But these recommendations could be limited to just APIs, Immediate Context Areas and/or Existing Context Areas.</p>	var.	<p>Window alignment standards were not included in the 1-3 story or 1-4 unit design standards because such prescriptive alignment is less important at smaller building scales. In taller 4-8 story buildings, window patterns are more visually prominent, visible from larger distances, and help define the building's overall composition, especially the relationship between the base, middle, and top. Even for 4-8 story buildings, staff emphasized the need for flexibility. We set the alignment threshold at 80% to balance consistency with design freedom, while OHA recommended 90%. Staff is discussing to lower this threshold further in future ODS updates to allow for more flexibility.</p> <p>For smaller buildings, strict alignment rules can unnecessarily limit design options and have less visual impact. To support flexible and design, alignment standards were intentionally left out of the proposed ODS.</p>

ATTACHMENT B

19	OHA	<p>Section 4.7.4 Window muntins and recesses. We very much appreciated staff's incorporation in the 4–8 story standards of our recommendations concerning muntins, so it is especially unfortunate that the muntin provisions are not included in the subject standards. Again, why were the muntin provisions not included? We previously also recommended increasing the 2 inch minimum inset provided by Section 4.7.4 to 4 inches if the surface material is brick (which is typically at least 4 inches thick), stone, concrete or architectural terracotta. The 10-2-24 CPC staff report responds that brick is no longer a common exterior material in California. This is not true, although brick is often installed in the form of panels rather than individual bricks. The ODS even promotes brick in certain cases, such as in Standard 2.2.1 (1) and includes brick in the lists of permitted materials.</p>	4.7.4	<p>These requirements were not included to avoid overly detailed requirements that could burden smaller projects and homeowners, who may have fewer resources or less experience navigating complex regulations. Simplifying the standards also reduces the time staff need to verify compliance, helping to keep the approval process efficient as it is intended.</p> <p>Requiring detailed specifications, such as muntin types and dimensions, adds unnecessary time and complexity to both submittals and staff review for minimal public benefit. This slows down approvals and works against the City's goal of streamlining housing production. That's why staff must focus only on essential requirements.</p> <p>Regarding the proposed 4-inch window inset for materials like brick or stone, we've kept the 2-inch minimum for consistency and easier implementation.</p>
20	OHA	<p>Section 5. Additions to existing buildings and new buildings on lots with existing historic buildings. This section is generally especially good, except for the new provisions prohibiting replication of exact details as discussed in Comment 3 above. As drafted, the section mostly requires new buildings to be consistent with the architectural treatment (entries, windows, etc.) of the existing building on the lot. However, if the new building is within 40 feet of a street line, is not behind an existing building, and is within an API, ASI or other context area, the new building should be consistent with the ODS context standards, even if such consistency does not conform with the existing building. Maintaining contextual architectural integrity will usually be more important than architectural consistency with the existing building.</p>	Section 5	<p>The standard in question has been modified (see #15 above) to allow replication for most additions, if so desired, but not required to allow for architectural flexibility and to promote housing production. Section 5 only covers additions to existing buildings that create new housing units. New detached buildings are covered by ODS above, which include a number of context standards even if such consistency does not conform with the existing building. Staff added clarification to confirm applicability. New detached buildings on lots with existing historic structures are not subjects to standards in this section (with the exception of standard 5.2) and are instead covered by the standards in above sections.</p>
21	OHA	<p>Consideration of architectural style in the ODS. The 10-2-24 CPC 4-8 story staff report states repeatedly that it is inappropriate for the ODS to address any prevailing architectural styles within a context area. We continue to believe that considering the architectural style of a new building for purposes of compatibility of the building with a context characterized by a particular architectural style is useful, especially with regard to architectural detailing so that such detailing relates well to the building design as a whole and does not look out of place or kitschy.</p> <p>Note that the State Housing and Community Development Department (HCD), which is responsible for ensuring that California communities conform with state housing laws, including providing design standards that are truly "objective," in its SB 35 Guidelines allows consideration of architectural style for new buildings, especially in areas characterized by a particular architectural style.</p> <p>Example Objective Design Review</p> <p>Objective design review could include use of specific materials or styles, such as Spanish-style tile roofs or roof pitches with a slope of 1:5. Architectural design requirements such as "craftsman style architecture" could be used so long as the elements of "craftsman style architecture" are clearly defined (e.g., "porches with thick round or square columns and low-pitched roofs with wide eaves"), ideally with illustrations.</p> <p>The complete SB 35 Guidelines are attached. See Page 8 (PDF Page 11.) Other communities have used this approach in their objective standards.</p> <p>Although the 4–8 story ODS may now be too fully developed to accommodate consideration of architectural style without significant revision and delay, we urge that architectural style be considered as part of the subject ODS, especially for 1–3 story buildings. ODS style definitions could refer to those in Rehab Right and in the Oakland Cultural Heritage Survey Manual, as well as many style guides.</p>	n/a	<p>Planning staff are currently focused on the draft ODS for 1–4 family homes and 1–3 story multifamily housing. The public review process should remain centered on these drafts. Revisions to the 4–8 story ODS will follow as a separate effort. Staff recommends continuing with the current approach, which was unanimously approved by the Planning Commission in October 2024.</p> <p>We understand OHA's position on architectural styles and desire to replicate these styles in new buildings, and have previously considered a style-based approach that was proven not appropriate locally, overly onerous, and unworkable. Staff continue to recommend against requiring conformity to any specific architectural or historical style. At the same time, ODS do not prohibit any classical styles from being proposed. The primary goal of the ODS is to streamline housing production and approvals—not to replicate any existing buildings. The proposed contextual standards emphasize broadly desirable features—such as recessed and covered entries—without prescribing a specific style to these features. For example, a Craftsman porch, a Victorian porch, or a Modern porch may differ in design of elements, but all can meet the standard as long as they provide a recessed and protected entry.</p> <p>Staff recommends a flexible and practical approach that supports architectural diversity and helps achieve the City's goal of creating a clear, efficient, and objective approval process that results in high-quality buildings. Adopting style-based requirements would reintroduce subjectivity and the need for discretion, slow down reviews, and therefore conflict with the state's and City's streamlining priorities.</p> <p>Style-specific codes may be more appropriate in smaller jurisdictions or gated subdivisions with tightly controlled architectural identities, where applicants are expected to choose from a defined style guide and work with specialists trained to replicate those styles. In contrast, Oakland's architectural diversity and inclusive vision call for a more adaptable, housing-friendly framework. Also, many architects and designers education and training does not support adherence to specific classical styles. Existing local practices reflect that reality by designing and building across different styles, including modern and contemporary buildings. This strategy also reflects the practical realities of staffing, capacity, and the need to streamline housing approvals.</p> <p>Finally, the "Rehab Right" document is intended to guide the treatment and rehabilitation of existing buildings, not new construction covered by these ODS.</p>
22	OHA	<p>Equitable outcomes (10-2-24 CPC Staff report pages 23–24): Page 24 of the staff report states the following: Planning staff does not recommend imposing additional restrictions on new housing proposals in Areas of Secondary Importance (ASIs) or on developments near "C"-rated Potentially Designated Historic Properties (PDHPs), with some exceptions. Doing so, as was suggested by the Oakland Heritage Alliance, would contradict the equity considerations and housing production goals central to this initiative. As mentioned before, there are over 330 ASIs and thousands of PDHP properties rated "C", covering significant areas of Oakland that are served well by transit and close to vital neighborhood services, areas where more dense housing development should take place. The ODS are designed to promote inclusivity and flexibility in housing development, ensuring that new policies do not perpetuate past inequities.</p> <p>We continue to be concerned that this statement implies that conformity to the architectural characteristics of ASIs or C-rated PDHPs would "perpetuate past inequities." There are also statements implying use of "certain architectural and historic period styles" has similar impacts. However, we reiterate that good design and respect for context are valued in Oakland's flatlands and modest areas just as in more expensive ones. At least one member of the public who previously commented and who appears to be a resident of a "low resource" neighborhood spoke favorably of older building architecture and noted that recently constructed buildings are "ugly." Oakland residents of all economic, ethnic, and racial groups deserve and appreciate attractive streets. One of our largest historic districts is Oak Center in West Oakland; its residents battled the city for decades to avoid demolition and undistinguished. As a fundamental part of equitable development, new buildings should avoid intrusiveness, and instead strengthen neighborhoods and blend in.</p>	n/a	<p>Areas of Secondary Importance (ASIs) are often significantly more architecturally diverse than Areas of Primary Importance (APIs) and often lack the same concentration of historically or stylistically unified building context as APIs. This is why ASIs are designated as "secondary" for historic preservation purposes. ASIs are also far more numerous and cover much larger areas of the city where active housing development and growth continues to occur. Planning Department wants to encourage and support high-quality development there. Therefore, new development in ASIs appropriately requires somewhat less strict conformity to the existing context compared to the fewer and much smaller API areas. Certain contextual standards still apply in ASIs, though to a lesser degree than in APIs. ODS ensure a baseline of design quality in ASIs regardless of architectural style. Staff worked diligently to strike the right balance.</p> <p>The ODS require all new buildings to meet high-quality design standards, regardless of architectural style. Staff remains concerned that imposing additional restrictions on development in ASIs, as suggested by OHA, could stifle development of architecturally diverse housing, including affordable housing, for people across all income levels, put additional significant burdens on Planning staff who review these proposals, and diminish the effectiveness of City's project review streamlining efforts.</p>