

EAST BAY FOR EVERYONE

Benicia City Hall, 250 East L Street
Benicia, CA 94510
January 27th, 2022

Honorable Members of the Benicia Planning Division,

East Bay for Everyone is a network of people fighting for the future of housing, transit, tenant rights, and long-term planning in the East Bay. We like that you are starting early to identify sites for your 6th Cycle Housing Element but are concerned that you are not making enough effort to qualify those sites and reduce barriers to development in Benicia. After attending the Benicia City Council/Planning Commission Joint Meeting on Jan 25th, 2022 in which the 6th Cycle Housing Element process was discussed we have the following comments:

Buffer on sites:

From 2015 to 2020 only 39 housing units were produced in Benicia which was 12% (or approximately 1 in 8) of the 5th cycle RHNA. Assuming this trend holds, in order to hit the 6th Cycle RHNA target, the city should plan for 8 times the number of sites as their 6th Cycle RHNA allocation. Since their 6th Cycle RHNA is 750 units, this means Benicia must show sites that can accommodate 6000 new dwelling units. However, the city is only planning a buffer of 15% - just 862 homes - which means that the city assumes that 86% of the sites on the inventory will be built at full capacity before 2031. We think this is extremely unrealistic, given past trends. **The city must make more drastic steps to reduce the barriers to development, or identify sites that can accommodate 6000 new dwelling units given the current barriers.**

ADUs:

The city currently plans to count 14 ADUs in Very Low and Low Income sites. The city must provide justification that current ADUs in the city are being rented at below market rates, by community surveys or other means. **Please provide the methodology or justification that will be used in the Housing Element or remove these sites from the Very Low and Low Income categories.**

Urban Growth Boundary and Open Spaces:

At the City Council meeting on January 25, 2022 members of the City Council and Vice Mayor made repeated comments that they are not confident they can meet RHNA with the current available sites within the city, and that the urban growth boundary may have to be extended or Open Spaces may have to be built on. Specific barriers to development were mentioned such as

maximum height limits and maximum lot coverage. **We encourage the city to reduce the current barriers to development such as height limits, and increase densities above the 21 DU per Acre that is currently being suggested instead of expanding into new greenfield sites.** 21 DU per Acre is considered a minimum, not a maximum, for low income development and we encourage the city to embrace density in developed areas of the city.

Sincerely,

Maxwell Davis
East Bay for Everyone