



January 10th, 2023

Dana Ayers (via email - DanaA@claytonca.gov)

Community Development Director

City of Clayton

6000 Heritage Trail

Clayton, CA 94517

To Whom It May Concern,

East Bay for Everyone and the undersigned organizations write to provide comments on the City of Clayton's progress towards a draft 6th Cycle Housing Element. We are happy with the progress that Clayton has made so far, but have additional feedback that we believe would increase the likelihood of development in Clayton and improve affordability for new residents:

**Increase FARs, building heights and eliminate setbacks in current multifamily zones** Setbacks decrease the amount of buildable area, increase the distance pedestrians need to travel to reach their destination, and reduce the sidewalk shadow on hot days. Clayton's set-backs requirements are larger than other high income areas in the region. To encourage development and non-car trip modes, Clayton should remove setback requirements to make development for multifamily development.

**Reduce minimum lot sizes in single-family zones.** Clayton's minimum lot sizes are very large, even for the region. The smallest minimum lot size is 10,000 square feet. This is not listed as a constraint to development in the housing element, but much more housing could be built if lot sizes were reduced to 2-3,000 square feet. See for example Gray and Furth, "[Do Minimum-Lot-Size Regulations Limit Housing Supply in Texas?](#)" suggesting that lot sizes in this range frequently serve as a constraint to new development. Please study and take steps to reduce minimum lot sizes for single family development across the city.

#### **Landscaping requirement**

Landscaping requirements and minimum Open Space requirements can be a barrier to development. Please ensure that these requirements are in the service of proper stormwater drainage and climate resilience and do not go beyond State guidelines, and are not simply for aesthetic reasons.

**Reduce parking requirements from single family developments:**

The draft states the city will “Revisit parking requirements for single-family residential uses...” but does not specify the new requirements. The city should specify the proposed change and we strongly encourage you to reduce requirements to **1 uncovered spot per single-family home**, regardless of number of bedrooms across all zoning categories. If developers feel it necessary they will continue to construct larger garages and spaces. Furthermore, covered spots are often not used for parking and are instead used for storage and other uses, so should not be required in any zoning area.

**Reduce parking requirements from multifamily developments.** Given Clayton's strict height requirements in multifamily development, parking will likely need to be constructed underground, which can cost \$90,000 per space, a cost which gets passed on directly to developers and buyers, who need to take out larger loans and interest payments. The city should reduce requirements to **1 uncovered spot per unit**, regardless of number of bedrooms across all zoning categories. Also, add provisions that secure bicycle parking may substitute for car-parking at a rate of 4 bicycles per 1 car spot.

Sincerely,  
Maxwell Davis and the 2500 members of East Bay for Everyone

Victor Flores  
Greenbelt Alliance