HOUSING ACTION COALITION

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Berkeley Planning Commission
North Berkeley Senior Center
1901 Hearst Ave,
Berkeley, CA 94709

Re: Item 10A – Efficiency Dwelling Units

Dear Chair Marthinsen and Members of the Planning Commission,

The Housing Action Coalition (HAC) writes in support of establishing Efficiency Dwelling Units as a distinct dwelling unit type in Berkeley. Small, self-contained homes are affordable by design, and they allow builders to deliver more homes within the same building envelope. We appreciate staff's work and offer the following input on the policy questions before you.

Keep staff's core framework. Defining these units as a type of dwelling unit gives builders a clear alternative to the group living model, allows small units to be reviewed as conventional multifamily housing, and, unlike group living, allows them to be separately owned as condominiums. We urge the Commission to allow them wherever residential uses are allowed. State law already limits numeric caps on these units near transit and campuses, and the Fire Department has confirmed that all fire and life-safety requirements apply regardless of zone, so additional geographic restrictions are not needed.

Allow the smaller size. We support using the state's authority to set a 150-square-foot minimum. If a maximum size is needed to qualify for any reduced standards, we urge the top of staff's range, 400 square feet, with larger units simply reverting to standard dwelling unit rules.

Density is the most consequential choice. In the middle housing districts, the 70 dwelling units per acre cap could stop a project of efficiency units before the building reaches its allowed size. We urge the Commission to count these units as a fraction of a dwelling unit, or exempt them from numeric caps, so that height, setbacks, and other building envelope standards determine capacity.

Keep requirements simple and objective. We encourage the Commission not to add new shared-amenity mandates or additional affordability requirements. Under existing rules, each unit counts as one unit for inclusionary housing, with the current compliance options available.

Thank you for your continued work.

Sincerely,



Brianna Morales, *Political Organizing & Programs Manager*
Housing Action Coalition (HAC)