

**EAST BAY  
FOR EVERYONE**



**East Bay Housing Organizations**

July 21, 2021

Planning and Housing  
City of Concord

RE: Coast Guard Redevelopment Site

To Whom It May Concern,

We write regarding the Coast Guard Redevelopment Site (CGRS) in Concord that has recently been purchased from the General Services Agency by private parties. We urge the City of Concord to condition the proposed change of use from military to residential on the landowners' conforming with the design and goals outlined in the yet-to-be adopted Concord Community Reuse Project. This site, next to North Concord BART, close to Downtown Concord jobs and the Concord Naval Weapon Stations redevelopment site, must be planned to meet its full potential as envisioned by the Concord community.

As part of the Regional Housing Needs Allocation (RHNA) and 6th Cycle Housing Element Update, we will be engaging with cities across Contra Costa County to advocate for mixed-income and affordable infill housing near transit and jobs.

CGRS was included in Concord's 2014-2022 Housing Element as a non-quantified opportunity site. It is clear that this site will be key to Concord planning for its 6th Cycle RHNA. We have reviewed the proposal from the landowner for rehabilitation (Option 1) as well as the proposals from staff for an 800 unit buildout (Option 2) and phased 910 - 1,180 unit buildout (Option 3).

As a preliminary matter, we strenuously oppose Option 1. The proposed five (5) dwelling units per acre is unserious for a site within one-third of a mile from a BART station. Approval of the change of use for Option 1 locks in a low-density land use pattern next to a heavy rail station for

decades. It will also require Concord to identify sites elsewhere to meet its ambitious RHNA goals elsewhere in the city.

Secondly, we must caution against the use of a phased approach such as Option 3 with the timelines envisioned by staff. There is no guarantee that the current or future landowner will complete all three phases and for the community to realize whatever community benefits are negotiated as part of a development agreement. A phased approach defers the delivery of the majority of sorely needed units for *eleven years* until 2032 and beyond. This date is outside of the planning period for the 6th Cycle (2023-2031). As such, the City of Concord cannot lawfully count the 430 to 580 units in Phase 3 towards their 6th Cycle Housing Element Update.

Instead, we urge the City of Concord to condition change of use on a plan that contemplates 800 or more homes by 2031 per Option 2. This approach prioritizes delivering the full potential of the site within the 6th Cycle. The landowner still has a choice to phase development between the southern and northern portions of CGRS under this option.

In addition, we hope the City of Concord will require public streets and grade separated bike and pedestrian connections to facilitate public access and active transportation. Finally, we believe CGRS would be a good opportunity for land dedication or joint development in-lieu of inclusionary housing. A non-profit housing developer would be well-positioned to partner with the landowner to deliver low and moderate-income units on the northern section of CGRS.

We look forward to continuing to engage on CGRS, the larger Concord Community Reuse Project, and the 6th Cycle Housing Element.

Sincerely,

**East Bay For Everyone**

**Greenbelt Alliance**

**East Bay Housing Organizations**