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Robert J. Benich  
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Morgan Hill, CA 95037

March 18, 2016

Mr. John Baty, Senior Planner  
Community Development Department – Planning Division  
City of Morgan Hill  
17575 Peak Avenue  
Morgan Hill, CA 95037

Subject: Comments Regarding City of Morgan Hill 2035 Draft EIR

Dear Mr. Baty:

This letter is to address inconsistencies between the Morgan Hill 2035 Draft EIR and Draft General Plan Update, and the Proposed Revisions to the Redevelopment Control System.

Reference: Draft EIR, Section 3.6.3

Specifically, the draft EIR states:

1. The proposed RDCS establishes a population limit of 64,600 in 2035.
2. The City Council may award a maximum of 300 allotments each year.

The figures of a population cap of 64,600 in 2035 and building allocations of 300/year is inconsistent with historical trends and is incompatible with a good growth pattern for the City of Morgan Hill (refer to Fig. 1).

Analysis

Time frame: 2035 – 2020 = 15 years

Population change: 64,600 - 48,000 = 16,600

Avr. Pop. Change = 16,600/15 = 1,107 persons/year

Persons/Dwelling Unit (DU) = 3.08 (ABAG set number)

Max. Building allocations = 1,107/3.08 = **359/year**

To have a calculated maximum 359 building allocations per year is way beyond what the City of Morgan Hill has given out during the past 20 years. Yet, the EIR states that only a maximum of 300 allotments will be awarded each year.

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Therefore, using the 300 allotments/year number:

Time frame: 2035 – 2020 = 15 years

**Building allocations /year = 300**

Persons/Dwelling Unit (DU) = 3.08 (ABAG set number)

Population projection: 300 DU/yr. x 3.08 pp/DU x 15 yrs. = 13,860

Population maximum in Year 2035: 48,000 + 13,860 = **61,860**

This is still inconsistent with the aforementioned EIR number of 64,600.

To solve this problem and make the various documents more consistent and, to make it easier for the general public to understand the proposed changes, I recommend that the draft EIR and all associated references and documents be changed, as follows:

**Reference: EIR Section 3.6.3**

- 1. The proposed RDCS establishes a population limit of 60,000 in 2035.*
- 2. The City Council may award a maximum of 250 allotments each year.*

Re-Analysis

Time frame: 2035 – 2020 = **15 years**

Population change: 60,000 - 48,000 = **12,000**

Aver. Pop. Change = 12,000/15 = **800 persons/year**

Persons/Dwelling Unit (DU) = 3.08 (ABAG set number)

Max. Building allocations = 800/3.08 = **260/year**

A population cap of 60,000 persons in 2035 and a limit of 250 building allotments per year is more consistent with the historical growth of Morgan Hill and still allows for good planned development of a variety of housing types.

Sincerely,

Robert J. Benich, P.E.  
Former Planning Commissioner,  
City of Morgan Hill

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