



May 31, 2016

Ken Kirkey
Planning Director
Metropolitan Transportation Commission

Dear Mr. Kirkey:

The City of Brisbane is in receipt of your letter of May 18, 2016 transmitting PBA 2040 Alternative Scenarios, including Household and Job Growth Projections by jurisdiction. The information provided raises a number of serious questions and concerns that the City of Brisbane would like to see addressed. Our concerns are both procedural and substantive in nature as outlined below.

The primary substantive issue relates to the Household Growth Projections for the City of Brisbane as set forth in Attachment 2. Growth projections for the City of Brisbane in all three scenarios are unrealistically high. Even the most conservative projection results in a nearly five-fold increase in the number of households within the City which would necessitate growth at a historically unprecedented rate.

The City recognizes that from a regional perspective, Brisbane's infill location, access to transit, and proximity to job centers in Silicon Valley and San Francisco make it a geographically desirable residential infill area. However, this geographic fit and the region's aspirational goals for infill residential development must be balanced against the constraints that local jurisdictions face in accommodating new development.

I understand that ABAG and MTC cannot be expected to be intimately familiar with each municipality within your broad jurisdictional limits. In the case of Brisbane, there are physical, policy, infrastructure and political constraints which render the amount of projected development, in even the most conservative scenario, impossible to achieve. As you may be aware, the City is currently reviewing land use options for the Brisbane Baylands, the largest (approximately 540 upland acres) remaining undeveloped area of land within the City. The most aggressive housing proposal for the site as put forth by the property owner includes 4,400 residential units, as compared to the approximately 2,000 residential units in Brisbane today. While the Baylands planning application is currently in process, information in the public record clearly demonstrates significant community opposition to residential development at the scale proposed, amid concerns that this amount of new development will irrevocably alter Brisbane's character.

Additionally, the EIR prepared for the Baylands land use program has identified a number of program-related and cumulative significant environmental impacts which cannot be mitigated to a less than significant level. Existing water supply and transportation are key infrastructure components which have been identified as being inadequate to serve projected development. A number of other unavoidable significant environmental impacts have also been identified.

Assuming that these considerable barriers could be overcome and the project is approved for the maximum number of residential units proposed, this would still leave the City approximately 2,000 households short of the most conservative growth projections. This additional growth dwarfs what is allowed for under the City's adopted General Plan. Aside from the City's General Plan, Brisbane's limited size (approximately 2.3 upland square miles including the Baylands), built-out character, and steep topography greatly limit the opportunities for the degree of densification required to approach even the most conservative projection. Lastly, the infrastructure issues identified for the Baylands would only be exacerbated in accommodating substantial new growth beyond that proposed for the Baylands.

The City also has concerns with the PBA 2040 process. As requested by ABAG, the Brisbane City Council was briefed in February, 2016 regarding the ongoing PBA 2040 process. To help contextualize this discussion, ABAG provided preliminary projections dated December 23, 2015 for use by jurisdictional planning staff. Consistent with ABAG's request, staff did not make these preliminary numbers publicly available in providing the City Council with an overview of PBA 2040. However, these preliminary projections were closely aligned with the projections contained within Plan Bay Area 2013, which were accepted and supported by the City Council. The expectation that PBA 2040 would be aligned with PBA 2013 heavily influenced the tone of staff's discussion with the City Council. I can assure you that the dialogue with the City Council would have been markedly different if the scenarios as now proposed were the subject of discussion.

Since the projections for Brisbane have been increased by several orders of magnitude from the preliminary projections, several difficulties now result. This change has precluded the City Council from offering meaningful feedback earlier on in this regional process. It also puts city staff in an awkward position, as staff's presentation to the City Council conveyed a tone and message that is very different than the current situation. When staff is called upon to explain this misalignment, it will likely reflect poorly upon the transparency and legitimacy of this regional planning process, further heightening the level of mistrust toward regional agencies. All of these are unfortunate outcomes which we would prefer to avoid.

I am requesting to schedule a meeting between City of Brisbane staff (City Manager and myself) and you to discuss how to address both the substantive and procedural concerns described herein. Thanks for your prompt consideration to this request. I can be reached at jswiecki@ci.brisbane.ca.us or at 415.508.2120.

Sincerely,



John A. Swiecki, AICP
Community Development Director

c:Miriam Chion, Planning Director, ABAG
Clay Holstine, Brisbane City Manager