



June 1, 2017

Ken Kirkey, Planning Director
Metropolitan Transportation Commission
Bay Area Metro Center
375 Beale Street, Suite 800
San Francisco, CA 94105

Subject: Draft Plan Bay Area 2040

Dear Mr. Kirkey:

The City of Brisbane reiterates its objections to Household and Job Growth Projections for the City of Brisbane as set forth in Draft Plan Bay Area 2040 and requests that these figures be revised as noted below.

Specifically the draft plan projects 4,400 new households in the Brisbane portion of the San Francisco/Brisbane Bi-County Priority Development Area (PDA). The Brisbane portion of the Bi-County PDA includes the Brisbane Baylands site and an area identified as the Parkside Precise Plan area. Currently the City of Brisbane General Plan prohibits housing with the Baylands site, although a developer-prepared specific plan proposing approximately 4,400 residential units within this area is in process and currently under review by the Brisbane City Council. The Housing Element of the City's General Plan proposes 230 additional residential units in the Parkside subarea, and the City is actively engaged in the development of a precise plan to establish an overlay zone to accommodate these units.

The City of Brisbane is extremely troubled by the draft household projections, which can only be achieved if the Brisbane Baylands project as proposed by the developer is approved. ABAG/MTC has taken great lengths to reassure local municipalities that the land use scenario included in Plan Bay Area does not govern, control, or override local land use regulations.

Given that the City is actively engaged in the review and decisionmaking process for the Baylands, it is objectionable for Plan Bay Area to utilize household projections which are inconsistent with the City's General Plan but rather are dependent on approval on a pending private land use application. Utilizing these projections does not reflect acceptance or recognition of the City's land use regulations. Rather, these projections can only be construed either as an unjustified presumption on the part of MTC/ABAG regarding the outcome of the City's land use process, or as an unseemly attempt on MTC/ABAG's part to pressure and/or intimidate the City of Brisbane and unduly influence the outcome of the City's independent planning process. The City respectfully suggests it is inappropriate for MTC/ABAG to insert itself into local land use decisionmaking in such a manner.

The City would further point out that the SB 375 requires that a regional sustainable communities strategy reflect a realistic land use pattern which is typically defined as existing general plans and reasonably foreseeable general plan changes. Given the level of controversy regarding the Brisbane Baylands

Specific Plan and where it stands in the development process, it would be unwarranted for MTC/ABAG to conclude that approval of the proposed Specific Plan is “foreseeable” and reflects the City’s future land use policy direction.

The City points out that similar circumstances surrounding the Baylands existed during the preparation of Plan Bay Area 2013, although the City’s Baylands planning process was at a much earlier stage. In Plan Bay Area 2013, MTC/ABAG respected the City’s local land use process and deferred to the City’s General Plan in establishing Household and Employment Projections. The City sees no justification for MTC/ABAG to make different assumptions at this time and requests that the Household and Employment Projections for the Brisbane PDA be revised to reflect the current Brisbane General Plan, which would include 230 additional housing units beyond what was included in Plan Bay Area 2013. In regard to employment, the General Plan currently does not accommodate appreciable job growth within the PDA so it is recommended that the PDA employment projections utilize the same growth rate projections applied to employment within non-PDA areas of Brisbane.

Be advised that the City of Brisbane will be following up with additional correspondence regarding this matter in advance of formal consideration of Plan Bay Area 2040. Thank you for your consideration in this matter. Should you have any questions regarding this letter please contact John Swiecki, Community Development Director at jswiecki@ci.brisbane.ca.us or at 415.508.2120.

Sincerely,

A handwritten signature in blue ink, appearing to read 'JAS', with a stylized flourish extending to the right.

John A. Swiecki, AICP
Community Development Director

c: Clay Holstine, City Manager