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ABAG-MTC
375 Beale Street, Ste. 800
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Subject: Proposed RHNA Methodology and Subregional Shares

To Whom It May Concern:

The City of Brisbane is writing in opposition to the Plan Bay Area 2050 (PBA 2050) Households as the baseline for the proposed regional housing needs allocation (RHNA) methodology. While the City understands the rationale for utilizing the projections from draft PBA 2050, as applied to Brisbane it results in an unrealistic allocation based on inaccurate information of the available developable land in the City. And ultimately, this outsized burden on Brisbane will result in less housing production in the Bay Area region overall at a time when our state critically needs it.

There are important limits on Brisbane's ability to dramatically expand in size. The Baylands, the City's largest opportunity site for future housing, includes areas that are not suitable for housing development, not because of local preferences but due to environmental hazards and existing regional uses that cannot be diverted to other jurisdictions. Brisbane's dramatic increase in growth projections in the PBA 2050 model are largely driven by the assumption that the entire Baylands area and areas designated with existing uses are available for housing development. It is critical that ABAG-MTC account for these limitations and develop realistic planning projections that will actually serve to expand housing availability.

Specifically, the Brisbane Baylands includes an unregulated landfill that is environmentally hazardous and unsuitable for housing development. This accounts for a significant portion of the Baylands, covering roughly 364 acres. The clean-up required is significant and based on a previous EIR of the area would take the better part of a decade to remediate. Even then, the existing developer has expressed no intention of putting housing on that property due to these hazards. In fact, the state's High Speed Rail Authority has identified the Baylands landfill as a critical location for a train maintenance facility as they develop the peninsula portion of the rail line. These plans demonstrate the point that the landfill area of the Baylands is best suited for industrial use, not housing development.

In addition, Brisbane is home to existing critical infrastructure for the Bay Area region that also needs to be removed from consideration as areas available for housing development. The Recology facility which processes waste from San Francisco, the PG&E energy substation just west of the Baylands, and the tank farm which houses fuel used for San Francisco International Airport are all existing uses that are obviously not appropriate for housing development. PBA 2050 does not take those uses into consideration in developing the projections for Brisbane.

Providing Quality Services

The Baylands also contains a variety of sensitive wildlife habitats, including aquatic resources such as Guadalupe Channel and Brisbane Lagoon, and an endangered species habitat on Icehouse Hill which will limit housing development on the property. None of these factors were adequately taken into account in the projections for PBA 2050 that will ultimately inform the final RHNA allocations.

The City's objections to the proposed methodology is not an indication that the City is unwilling to do its part to address the regional housing shortage. In 2018, the residents of Brisbane voted to amend its General Plan to permit the development of housing on the Baylands and approximately double its population and number of housing units. No other City in the region has made this type of bold commitment to help solve the housing problem. And again, the City's residents did this knowing the development of the property, given the significant environmental impacts on the Baylands, will be a huge undertaking for the City in conjunction with the landowner.

PBA 2050 however, projects more than 9,000 households in Brisbane by 2050 where the City currently has approximately 1,900 households. That proposed methodology applied to this RHNA cycle would generate an estimated allocation of 2,819 units, within a single 8-year RHNA cycle. The previously rejected Modified Option 8A that some jurisdictions are advocating would result in Brisbane being saddled with 7,591 units of housing in one RHNA cycle. For context, our current RHNA obligation is 83 units of housing, and we've already started planning for more than 1,800 units. The PBA's projection that the City quadruple this commitment is absolutely unrealistic given the geography of the City and impossible given the decades and costs of the environmental cleanup that would be required before most parts of the Baylands could even be made suitable for housing. The lack of adequate consideration of these constraints in PBA 2050 creates a starting point for Brisbane that sets our City up to fail and to suffer the funding penalties for failure.

The RHNA consequences of relying on these figures will be dire for the City of Brisbane. Establishing such an unattainable target will not increase housing production or further fair housing as the statutory objectives for the regional housing allocation require. Instead this target will put Brisbane in a perpetual state of failure that has real consequences for our residents that affect City planning, housing development allowances, and economic investment in the area. And when Brisbane is unable to meet this impossible allocation, it will mean the entire region continues to lag behind appropriate planning and development overall.

Do not confuse the City's objections to the proposed methodology as an indication that the City of Brisbane is unwilling do to its fair share (and more) to address the regional housing problem. We stand ready to do that in an environmentally responsible manner. In this spirit, the City of Brisbane looks forward to continuing these conversations with ABAG and getting to a result that is achievable for the City and the region.

Thank you for your consideration.

Sincerely,



Terry O'Connell
Mayor, City of Brisbane