



City of Brisbane
50 Park Place
Brisbane, CA 94005-1310
415-508-2100
415-467-4989 Fax

September 30, 2020

ABAG Planning Subcommittee
375 Beale Street, Suite 800
San Francisco, CA. 94105-2066

Subject: Proposed RHNA Methodology

Dear ABAG Planning Subcommittee;

The City of Brisbane is writing in opposition to the draft RHNA methodology as recommended for approval by the regional housing needs allocation (RHNA) Methodology Subcommittee on September 18, 2020. While the City understands the rationale for utilizing the 2050 household projections from draft Plan Bay Area 2050 (PBA 2050) as the baseline for determining RHNA allocations, as applied to Brisbane, it results in an unrealistic allocation that places an outsized burden on the City that will not result in increased housing production in the Bay Area region.

There are notable limits on Brisbane's ability to dramatically expand in size – the City is nestled up against the San Bruno Mountains which naturally creates barriers to housing development. The Baylands, the City's largest opportunity site for future housing, includes uses such as a tank farm that supports San Francisco International Airport, Recology's Solid Waste Facility serving San Francisco, aquatic resources such as Guadalupe Channel and Brisbane Lagoon, and Icehouse Hill which is home to protected wildlife, that will limit housing on the property. In addition, much of the land is heavily environmentally impacted by its previous use as a landfill and railyard. Clean up of the Baylands will be complicated and may take the better part of the upcoming RHNA cycle for portions of the land to be made suitable for housing development. And finally, the state's High Speed Rail Authority has identified the Baylands as a critical location for a train maintenance facility as they develop the peninsula portion of the rail line. These factors were not adequately taken into account in developing the projections for PBA 2050.

The City's objections to the proposed methodology is not an indication that the City is unwilling do to 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.

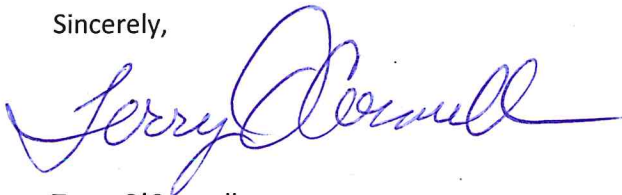
PBA 2050 however, projects more than 9,000 households in Brisbane by 2050 where the City currently has approximately 1,900 households. **That proposed methodology applied to this RHNA cycle would generate an estimated allocation of 2,819 units, within a single 8-year RHNA cycle.** For context, our current 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 by 2050 is 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 suitable for housing. Having PBA 2050 as a starting point for Brisbane is the first step in a process that sets our City up to fail and to suffer the funding penalties for failure. Brisbane continues to work with ABAG to try to gain a better understanding of the factors behind the PBA 2050 projections and considering the limiting factors at play for Brisbane specifically, will improve the accuracy of the regional model.

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