CITY OF BRISBANE

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October 7, 2016

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

Subject: Plan Bay Area 2040 Draft Preferred Scenario

Dear Mr. Kirkey:

The City of Brisbane has reviewed the *Plan Bay Area 2040 Draft Preferred Scenario*, including Household and Job Growth Projections by jurisdiction. The City objects to the Brisbane projections and requests that these figures be revised as noted below.

Specifically, the draft preferred scenario projects 4,400 new households in the Brisbane portion of the Bi-County PDA. Currently this portion of the City includes no residential units. 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 plan for these units. The bulk of the PDA lies within the Brisbane Baylands where the City's General Plan currently prohibits housing. You are aware that the City of Brisbane is currently considering an application by the property owner to amend the City's General Plan to allow housing and approve a specific plan containing approximately 4,400 residential units. This application is currently under review by the Brisbane City Council, with a decision expected in summer/fall of 2017.

The City of Brisbane is extremely troubled by the draft household projection, 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 whatever land use scenario is included, Plan Bay Area does not govern, control, or override local land use regulations. Given that the City is actively engaged in the review and decision making process for the Baylands, it is objectionable for the preferred scenario to include the household projections as proposed which are inconsistent with the City's General Plan. 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 regarding the outcome of the City's land use process, or as an unseemly attempt on MTC'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 this is not an appropriate role for MTC to play in local land use matters.

The City requests that the Household and Employment Projections for the Brisbane PDA be revised to reflect the current Brisbane General Plan. This was the approach utilized in PBA 2013, and the City sees

no justification for MTC to make different assumptions at this time. The projections should be revised to reflect the planned 230 housing units within the PDA. 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.

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,

Cliff Lentz
Mayor

cc: Brisbane City Council
Clay Holstine, City Manager