



MEMORANDUM

DATE: February 24, 2022
TO: Planning Commission
FROM: Planning Staff
SUBJECT: **Workshop - 2023-2031 Housing Element Update: Selection of Housing Sites for Rezoning**

Tonight's workshop is the fourth in a series leading up to the preparation of the draft update to the Housing Element, which will be presented to the Planning Commission in the Spring of this year. Links to the December 16th, January 27th and February 10th workshop materials are provided as attachments, for reference. Tonight's workshop will focus on selection of housing sites for rezoning, to receive comments from the Planning Commission.

Workshop Objective:

While there is no final decision required of the Planning Commission tonight, staff requests the Commission's input regarding potential sites to accommodate Brisbane's Regional Housing Needs Allocation (RHNA).

Given the 1,800-2,200 housing units allowed for under Measure JJ and the General Plan for the Baylands, staff recommends that the Baylands be considered as the primary site to meet Brisbane's RHNA. Zoning of the Baylands for 1,800 units, along with existing zoning within the City would provide a buffer of 641 over the 1,588 RHNA. Approval of 2,200 units in the Baylands would provide a buffer of 1,041 units. As described in the previous workshop, due to HCD's delays in housing element certifications, the Baylands Specific Plan (not yet formally submitted) would most likely need to be adopted by January 31, 2024. If the specific plan adoption does not happen by the statutory deadline, the City risks having a noncompliant Housing Element, as detailed in the previous workshop.

A number of other sites were put forward through Balance Brisbane and may be included as an additional buffer. If the Baylands were not to be rezoned by the deadline, a total of 1,477 units would need to be made up through other sites.

Housing Sites Selection

In prior workshops we've discussed Brisbane's household demographics, how to ensure fair access to housing across household types and income categories, Brisbane's RHNA, and the shortfall in the City's existing zoning to meet the RHNA. The yield for sites already zoned for housing that we plan to claim towards meeting the RHNA are summarized in the table below. Existing sites count for 429 units, leaving a total shortfall of 1,477 units and 330 units in the low-income and very low-income (termed together as lower income) categories.

**City of Brisbane RHNA 2023-2031
 Housing Units and Existing Zoning Shortfall by Income Categories**

	Very Low	Low	Moderate	Above Moderate (Market Rate)	Totals
RHNA Housing Units by Existing Zoning	254	16	44	129	429
RHNA +20%**	380	220	364	942	1,906
Shortfall for Rezoning	126	204	320	818	1,477

** 15-30% buffer recommended by HCD. See February 10th PC workshop report for further details.

Given the shortfall, a number of sites were put forward to the public for input through the Balancing Brisbane program, as discussed further below. Each site has its own specific constraints and capacity limitations based on size and reasonable scale of development, given the context. Constraints are further discussed toward the end of this report. The sites are listed as follows and the contemplated site densities and housing unit yields are provided in Attachment D:

Residential Zoned Sites, included in Balancing Act	Sites Considered for Rezoning in Balancing Act
Central Brisbane	The Baylands
Visitacion Ave	Levinson Site
Southwest Bayshore	Peking Handicraft Site
Parkside PAOZ-1	Parkside PAOZ-2 Extension
Parkside PAOZ-2	Parkside PAOZ-3 Extension
	Southeast Bayshore
	Sierra Point Marina
	Lower Thomas Hill (A portion of Lower Brisbane Acres)

Summary of Site Considerations

Given potential unintended consequences and impacts that upzoning existing residential districts to higher density and the large number of units required through the RHNA, the housing sites selection focus is on large vacant sites close to infrastructure and large underutilized commercial sites. Only one of the vacant sites, Lower Thomas Hill, is already zoned for residential, so it would require upzoning to higher density, while the others would involve rezoning to residential from commercial uses. The nonresidential sites vary significantly in terms of land use history, geography and the related constraints.

The most significant site for consideration is the **Baylands**. Although the Baylands does not yet have zoning established through an adopted specific plan, the subarea will accommodate future development of 1,800 to 2,200 housing units, as approved through Measure JJ and the subsequent General Plan amendment. For the **Levinson and Peking Handicraft** sites, within the Guadalupe Hills subarea, the General Plan’s Land Use Element designates a variety of potentially acceptable land uses as planned development, including housing. However, no housing densities are established. There are a couple

important factors in considering the Levinson and Peking Handicraft sites. Both are within the San Bruno Mountain Habitat Conservation Plan (HCP) area and have been identified as having potential endangered butterfly habitat on their upper reaches. Peking is very steep on the Bayshore Boulevard side. Levinson has the advantage that it is relatively flat in its lower reaches where it may be accessed from Main Street and/or Bayshore Boulevard. That lower section is away from the most likely potential habitat area. Both sites have a San Francisco Water Main easement running north-south roughly through their middle. These are issues that are assumed to limit development potential and would need to be addressed with any development application.

The remaining four nonresidential sites, **Parkside extension areas #2 and #3, Southeast Bayshore and the Sierra Point Marina** site, have not received the same level of consideration for housing in the past as the first three. The Parkside extension areas are developed with warehouses and one might envision these as overlay districts similar to the existing Parkside overlay zoning of PAOZ-1 and PAOZ-2, but such redevelopment would displace businesses from these sites. The Southwest Bayshore district is comprised of three parcels in a single ownership that are also developed with warehouse buildings on the larger two out of three sites. The Sierra Point site includes the northern Marina parking lot, which is owned by the City. As such, the implications of replacing a significant share of Marina parking would need to be considered.

Lower Thomas Hill is the one existing residential site considered for upzoning to higher density. As indicated in the next section, it only received approximately 33% favorable responses in Balance Brisbane. It is relatively steep and it's within the HCP area, as indicated in the constraints section. However, it is also close to Central Brisbane services and adjacent to the R-3 zoning district, across the street along Thomas Avenue, which is zoned to a density of up to 29 units per acre. It is also close to the roadway and public utilities along San Bruno Ave.

“Balance Brisbane” Final Results

Balance Brisbane, which closed on February 6th, had nearly 450 page views and a total of 54 submissions. 88 percent of the submissions (about 47) selected the Baylands subarea as a site that could accommodate housing units mandated by the State during the upcoming 2023-31 Housing Element cycle. The remaining sites, excluding the Lower Brisbane Acres, were identified to accommodate some housing on the majority of the submissions as well (see attachment E). However, while the submissions showed participants indicated housing could be accommodated within multiple subareas throughout the City, the quantities of housing units they submitted was fairly low relative to Brisbane's mandated RHNA of 1,906 housing units (including a buffer), with the exception of the Baylands. Attachment E includes additional details and data from the Balance Brisbane submissions.

Both staff's review and Balance Brisbane results would lead first to the Baylands to meet the RHNA. If the Baylands specific plan is not adopted by the deadline, then potentially other sites such as Levinson and Southeast Bayshore could be considered alternatives for an additional buffer.

Claiming RHNA Credit

As a refresher, to meet the RHNA for lower income households the State requires zoning to meet the

following requirements:

1. Permit a minimum density of 20 dwelling units per acre (du/ac).
2. Lot size adequate to yield at least 16 units per site.

State guidelines further recommend that parcel sizes be between 0.5 and 10 acres, or detailed analysis/justification is needed to demonstrate that they are viable.

Housing Constraints for Potential Rezoning Sites

As we discussed in the February 10th workshop, the City must evaluate and remove, to the extent feasible, governmental and nongovernmental constraints to developing housing in Brisbane (Government Code Section 65583(a)(6)). These constraints must be considered at the macro level, applicable Citywide (e.g., permit processing times, plan check fees, etc.) and the site-specific level (i.e., unique characteristics of a particular housing site that make housing development challenging). We'll focus our discussion tonight on site-specific constraints in the context of the Commission's consideration of potential sites for rezoning to meet the RHNA shortfall. Attachment F, Tables 2a and 2b, provide a matrix of nongovernmental and governmental constraints applicable to each site. Site constraints should be taken into consideration in discussing site selection.

Affirmatively Furthering Fair Housing in Sites Selection

As we discussed in the January 27th workshop, the City must proactively consider housing equity when selecting sites to rezone to meet the RHNA shortfall under the State mandate to affirmatively further fair housing (AFFH). Much like constraints to housing development, AFFH considerations are applicable at the Citywide level (e.g., development of policies or programs to provide resources to residents who face discrimination in housing throughout the City), and site-specific level (e.g., ensuring sites identified for low-income housing are located near transit, schools, and community amenities). Because of the City's small size, all of Brisbane is considered a "moderate" resource area and there are no areas of concentrated poverty or households of similar racial identity that would impact the housing sites under consideration for rezoning.

Schedule and Next Steps:

The next workshop scheduled for the Planning Commission is the regular meeting on March 10th. The topics tentatively planned are Sites Selection, draft Policies and Programs and Remaining Topics TBD.

Attachments:

- A. Workshop Agenda Report, [December 16, 2021](#)
- B. Workshop Agenda Report, [January 27, 2022](#)
- C. Workshop Agenda Report, February 10, 2022
- D. Summary of Potential Sites to Meet the RHNA
- E. Balance Brisbane Report
- F. Housing Constraints Tables

Table 1
Summary of Potential Housing Sites to meet RHNA

1.A - Baylands Specific Plan/Rezoning Planned:

BA #	Area	Site Size (Acres)	Unit Yield Low	Unit Yield High
1	The Baylands (residential only)	55	1,800	2,200

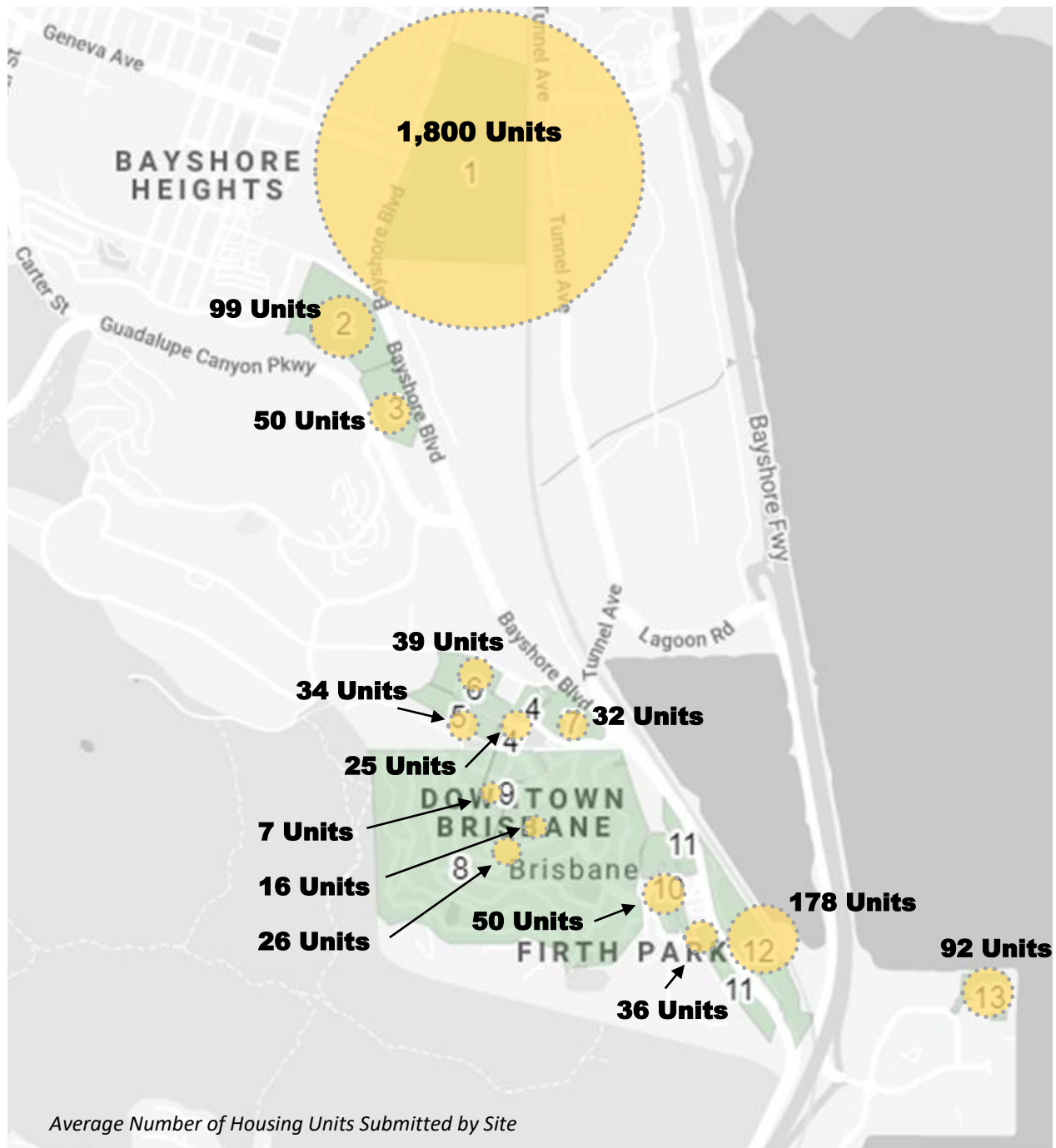
Notes: The Baylands yield of between 1,800 to 2,200 housing units are as provided by [Measure JJ](#) (2018 ballot measure) and [General Plan amendment](#) (2019). The owner, BDI, has proposed 2,200 units, but the actual number of units is subject to City Council adoption of the Specific Plan. The density range would be 33 units per acre or 40 units per acre, given the site acreage and General Plan unit totals. The site size and density are higher than the “right size” range provided in the Govt Code. City will need to provide additional analysis to demonstrate feasibility. All units may be assumed to meet the lower income RHNA requirements based on 20 units/acre minimum and 16 units per site minimum. Adopted zoning via the Specific Plan would need to be by-right.

1.B - Worksheet of Other Potential Rezoning Sites:

BA #	Site or Area	Gross Site(s) Area (Acres)	Net Site(s) Area (Acres)	Minimum Density for RHNA Credit as Lower Income		Alternative Density Above Minimum		Notes
				Density Low (Units/Acre)	Lower Income Unit Yield Low	Density High (Units/Acre)	Lower Income Unit Yield High	
2	Levinson Site	21.95	10.98 (50%)	20	220	30	329	Density based on net acres. May need further study to claim towards RHNA income categories.
3	Peking Handicraft Site	9.37	2.81 (30%)	20	56	30	84	
6	Parkside PAOZ-2 Extension	8.96	NA	20	179	28	251	
7	Parkside PAOZ-3 Extension	7.85	NA	20	157	40	314	
10	Lower Thomas Hill	9.6	NA	20	192	50	480	
12	Southeast Bayshore	17.5	NA	20	350	60	1,050	
13	Sierra Point	6.51	NA	20	130	45	293	

Notes: Site densities are shown for illustrative/discussion purposes only and do not represent a recommendation for rezoning. All units may be assumed to meet the lower income RHNA requirements based on 20 units/acre minimum and 16 units per site minimum. Any adopted zoning would need to be by-right.

BALANCE BRISBANE



Key:

- | | | |
|-------------------------------|---|--|
| 1. Baylands (Northwest) | 5. Parkside PAOZ-2 (Parkside) | 10. Lower Thomas Hill (Lower Acres) |
| 2. Levinson (Guadalupe Hills) | 6. Parkside PAOZ-2 Extension (Parkside) | 11. Southwest Bayshore (SW) |
| 3. Peking (Guadalupe Hills) | 7. Parkside PAOZ-3 (Parkside) | 12. Southeast Bayshore (SE) aka Former VWR |
| 4. Parkside PAOZ-1 (Parkside) | 8. Central Brisbane (SFD/MFD/ADU) | 13. Marina (Sierra Point) |
| | 9. Visitacion Ave (Central Brisbane) | |

Quick Stats:

- Simulation tool launched at the beginning of December 2021 and closed February 6, 2022
- Available in English and Simplified Chinese
- Nearly 450 page views
- 54 Submissions
- Participants spent, on average, 6 minutes using the tool
- The Baylands planning area was identified as a housing site on 88% of submissions

Planning Subareas vs. Sites

Balance Brisbane included 13 sites, as seen on the map, that may have been a collection of one or more individual parcels, categorized by a planning area correlating with the planning areas identified within the General Plan. For example, the Guadalupe Hills planning area includes 2 sites that encompass a single parcel each - Levinson and Peking – while the Parkside planning area includes 4 sites which each comprise multiple parcels. Refer to Table 1 for the classification of sites and planning areas.

<i>Planning Area</i>	<i>Site</i>
<i>Baylands</i>	Northwest (NW)
<i>Central Brisbane</i>	Single and Multifamily (SFD/MFD)
	Visitacion Ave
<i>Guadalupe Hills</i>	ADUs
	Levinson
<i>Parkside</i>	Peking
	PAOZ-1
	PAOZ-2
	PAOZ-2 Extension
<i>Sierra Point</i>	PAOZ-3
	Marina
<i>South Bayshore Blvd</i>	Southwest Bayshore (SW)
	Southeast Bayshore (SE) <i>aka Former VWR</i>
<i>Lower Brisbane Acres</i>	Lower Thomas Hill

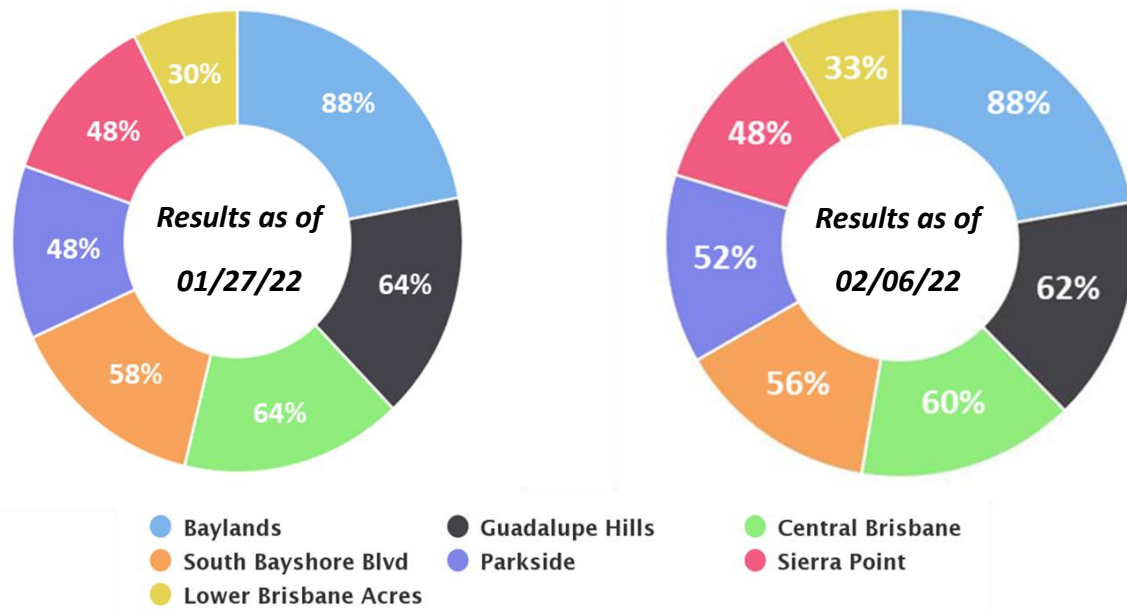
Table 1: Sites by Planning Area

Simulation Results:

Figure 1 represents the percentage of all submissions that identified housing for each planning area. For example, of the 54 submissions, 88 percent (about 47) selected the Baylands as a site that could accommodate housing units mandated by the State during the upcoming 2023-31 Housing Element cycle. The remaining planning areas, excluding the Lower Brisbane Acres, were identified to accommodate some housing on the majority of the submissions as well, with the Sierra Point, Parkside, South Bayshore Boulevard, Central Brisbane, and Guadalupe Hills planning areas receiving housing units on 48-62 percent of the submissions.

Figure 1: Percentage of submissions that identified housing by planning area in January and at close.

PERCENTAGE OF SUBAREAS IDENTIFIED FOR HOUSING BY SUBMISSION



However, while the submissions showed participants indicated housing could be accommodated within multiple planning areas throughout the City, the quantities of housing units they submitted, excluding those on the Baylands, was fairly low. Figure 2 illustrates the average number of housing units allocated by site. The Baylands received by and far the most average number of housing units. This is in part because [Measure JJ](#) allows between 1,800 and

AVERAGE HOUSING UNIT ALLOCATION BY SITE

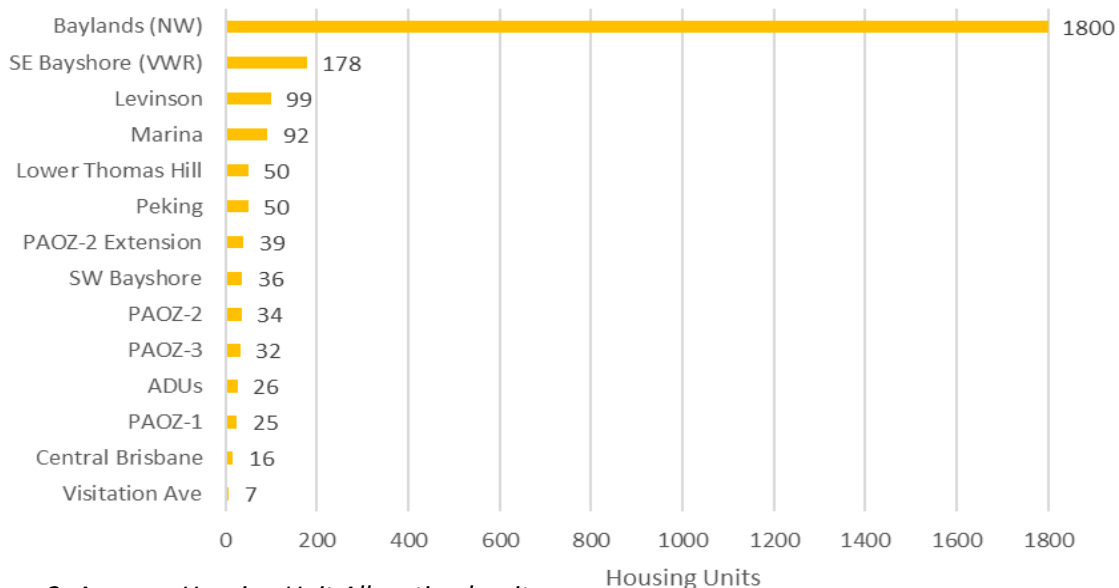


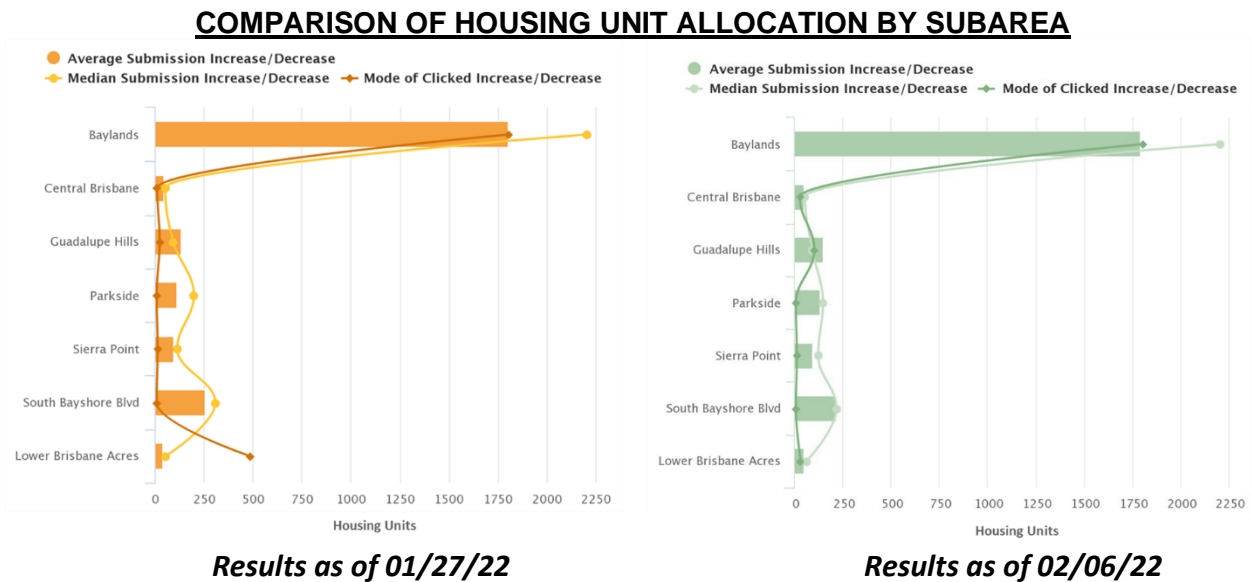
Figure 2: Average Housing Unit Allocation by site.

2,200 housing units to be developed within the northwest quadrant of the site and the simulation did not allow users to select fewer units, unless they decided no units would be constructed on the Baylands due to the Specific Plan not being adopted in time. Figure 3, shows the average, median, and mode of all submission, by planning area in January and at close; there was very little difference between the January snapshot and at close.

Table 2 provides a more detailed breakdown of Figure 2, the average number of housing units allocated by site. The table indicates the lowest, highest, and average number of housing units submitted for each site within the planning areas.

As indicated previously, nearly all submissions allocated housing units to the Baylands; only 4 submissions allocated zero housing units to the Baylands. It could also accommodate nearly all of Brisbane’s Regional Housing Needs Allocation (RHNA) if the Specific Plan is adopted within the statutory deadline prescribed under State law. Should the Baylands not accommodate any of Brisbane’s RHNA, Table 3 shows the lowest, highest, and average number of housing units of the 4 submissions that allocated zero units to the Baylands.

Figure 3: Housing Unit Allocation by subarea in January 2022 and at close.



Tables 2 and 3 also indicate if the average number of housing units submitted per site could qualify as accommodating affordable housing. To qualify under State law, the minimum density of a site must be 20 dwelling units per acre (DU/AC) in order to be claimed as affordable. As shown in Table 2, no sites other than the Baylands could be classified as affordable using the average number of housing units from the submissions. However, when only considering the submissions that excluded the Baylands, Table 3, 4 sites could be classified as affordable at the densities preferred by respondents.

Table 2: Low, High, and Average Number of Housing Units Allocated by Site and Affordability

SITE	Amount Submitted			Gross		Net		Qualifies as affordable?
	Low	High	Average	Acres	DU/AC	Acres	DU/AC	
BAYLANDS (NW)	0	2,200	1,800	55	32.73			Yes
CENTRAL BRISBANE	0	104	16	8.95	1.79			No
VISITATION AVE	0	25	7	0.81	8.64			No
ADUS	0	122	26	NA	NA			*
LEVINSON	0	940	99	21.95	4.51	10.98	0.41	No
PEKING	0	350	50	9.37	5.34	2.81	1.90	No
PAOZ-1	0	105	25	2.36	10.59			No
PAOZ-2	0	190	34	6.85	4.96			No
PAOZ-2 EXTENSION	0	250	39	8.96	4.35			No
PAOZ-3	0	260	32	7.85	4.08			No
MARINA	0	760	92	6.51	14.13			No
SW BAYSHORE	0	195	36	12.03	2.99			No
SE BAYSHORE (VWR)	0	1,050	178	17.5	10.17			No
LOWER THOMAS HILL	0	480	50	9.6	5.21			No
TOTAL			2,484					
EXCLUDING BAYLANDS			684					

* 60% OF ADU PRODUCTION COULD QUALIFY AS AFFORDABLE PER THE CENTER FOR COMMUNITY INNOVATION, OR 16 ADUS

Table 3: Low, High, and Average Number of Housing Units Allocated by Site and Affordability – for submissions that allocated zero housing units to the Baylands

SITE	Amount Submitted			Gross		Net		Qualifies as affordable?
	Low	High	Average	Acres	DU/AC	Acres	DU/AC	
CENTRAL BRISBANE	0	38	21	8.95	2.35			No
VISITATION AVE	0	25	13	0.81	16.05			No
ADUS	56	122	96	NA	NA			*
LEVINSON	40	940	340	21.95	15.49	10.98	30.97	Yes
PEKING	0	350	173	9.37	18.46	2.81	61.57	Yes
PAOZ-1	0	105	76	2.36	32.20			Yes
PAOZ-2	0	190	110	6.85	16.06			No
PAOZ-2 EXTENSION	0	250	135	8.96	15.07			No
PAOZ-3	0	260	140	7.85	17.83			No
MARINA	0	760	204	6.51	31.34			Yes
SW BAYSHORE	0	195	101	12.03	8.40			No
SE BAYSHORE (VWR)	50	1,050	350	17.5	20.00			Yes
LOWER THOMAS HILL	30	480	158	9.6	16.46			No
TOTAL			1,917					

* 60% OF ADU PRODUCTION COULD QUALIFY AS AFFORDABLE PER THE CENTER FOR COMMUNITY INNOVATION, OR 58 ADUS

Simulation Comments:

Balance Brisbane also allowed participants to submit comments as part of their submissions, and many participants did so. The list below contains recurring concerns or comments offered by participants:

Recurring comments:

- Water forecasting/allocation for increased housing units/population
- Transportation, traffic management, and circulation must improve (with increased density) e.g.:
 - i. More/increased rush hour shuttles to BART/Caltrain/Muni in San Francisco/Oyster Point ferry
 - ii. Extend Muni (light rail?) to Central Brisbane
 - iii. More bike/pedestrian paths to transit
- Housing at Sierra Point would serve jobs and create a mixed-use neighborhood
- Sea level rise implications
- Importance of quality of life, i.e., noise, traffic, and environmental impacts should be thoroughly understood, considered, and addressed

Participants were also asked to identify additional sites that were not included in the simulation. The list below includes every additional site mentioned by participants, excluding any that were already included within the simulation. Some sites, such as Crocker Industrial Park and parcels along Bayshore Boulevard were mentioned more than once.

Other sites to consider comments:

- All of Crocker Industrial Park
- Along Bayshore Blvd, Visitation Ave, and San Francisco Ave
- Vacant industrial sites
- All of Sierra Point
- Above Lagoon Rd (Nonresidential portion of Baylands)
- Infill on Ridge
- The Quarry

Table 2

2.a - Preliminary Draft - Nongovernmental Constraints and AFFH Considerations (Govt. Code Sec. 65583(a)(6),(c)(5), & (c)(10))

Constraint	Baylands - NW Quadrant	Levinson	Peking	Parkside PAOZ-2 Extension	Parkside PAOZ-3 Extension	Lower Thomas Hill	SE Bayshore	Sierra Point Marina North Parking Lot
Developed Site				Yes, developed with warehouses.	Yes, developed with warehouses.		Yes, developed with warehouses.	
Availability of Financing								
High Price of Land	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
High Cost of Construction	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Steep Topography >20%		Western Portion	Yes			Yes		
Within 100 year Floodplain				Yes (165-185 Valley Dr., 325 Valley Dr.)	Yes (125 Valley Dr., ptn. Brisbane Village Shopping Center)			
Located on Sanitary Landfill	**Portion designated for housing is outside the sanitary landfill area, but on Bay fill.							Yes. Development subject to engineering controls and review by County Health and Water Board.
Environmental Cleanup	Yes. Subject to approval by regulatory agencies, consistent with EIR.01						Yes. Portions of the site are under Water Board cleanup order	
Other								Subject to City Council agreement to release land for residential uses. Impacts on Marina users.
AFFH	Education scores	Education scores	Education scores	Education scores	Education scores	Education scores	Education scores	

Notes: Blank cells indicate no constraint raised.

2.b- Preliminary Draft - Governmental Constraints (Govt. Code Sec. 65583)

Constraint	Baylands	Levinson	Peking	Parkside PAOZ-2 Extension	Parkside PAOZ-3 Extension	Lower Thomas Hill	SW Bayshore (former VWR)	Sierra Point Marina Lot
San Bruno Mtn. HCP		Yes. Subject to review by outside agencies, including USFWS, CAL FWS, and SMC Parks Dept.	Yes. Subject to review by outside agencies, including USFWS, CAL FWS, and SMC Parks Dept.			Yes. Subject to review by outside agencies, including USFWS, CAL FWS, and SMC Parks Dept.		
Subject to Review by Environmental Health Agencies	Yes, per EIR.	Potentially at lower edge of the site along Main St, to confirm extents of past PG&E Martin substation impacts					Yes. Portions of the site are under Water Board cleanup order	Yes. Site is on Sierra Point landfill and development and foundation and landfill gas mitigations are subject to SMC Health Dept and Water Board review.
San Bruno Mtn. HCP		Yes. Upper areas may have habitat restrictions.	Yes. Upper areas may have habitat restrictions.			Yes. Updated biological survey required with development.		
Water	Dedicated water supply required per EIR.							
Sewer	Sewer to be supplied. Infrastructure required, per EIR							
Dry Utilities	Infrastructure required per EIR							
Road Access	Infrastructure required per EIR	Bayshore Boulevard and Main Street are adjacent to site.	Bayshore Boulevard and Guadalupe Canyon Pkwy are adjacent to site.					

Notes: Blank cells indicate no constraint raised.