



## MEMO

**Date:** October 1, 2020  
**To:** Mayor & City Council  
**From:** City Manager Clay Holstine  
**Subject:** Plan Bay Area 2050

### Recommendation

Review letter that was sent as well as oral presentation and provide direction as appropriate.

### Background

Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC) are in the process of updating Plan Bay Area (PBA). PBA is an effort to plan several decades in the future for regional growth. It is a planning document that is by its very nature visionary not a regulatory. It does not specifically require the City to take any specific action. (See attached letter to Mayor Lui of August 8, 2017).

However, the City is concerned that the current update (PBA 2050) may have several flaws that could inadvertently lead to a disproportionately high number of housing units identified for Brisbane. ABAG/MTC has recently adopted a model that while somewhat obtuse attempts to identify areas where housing meets various regional planning goals. These include placing housing near existing transit, job centers and areas that are ripe for redevelopment (often this includes industrial areas where land values are increased by up zoning to housing). Another strategy is to look at various methods and locations to increase density for housing. (Such as transit stops).

The City's general concern is that the underlying assumptions in the model regarding potential future housing are inaccurate and/or unrealistically aggressive. For example the model assumes the PGE substation will be redeveloped for residential purposes that there is the potential for more housing on the Northeast Ridge, and that some or all of Crocker Park will be redeveloped for residential purposes. The model also ignores city adopted planning regulations like Measure JJ. While the information provided to date by ABAG is unclear, it appears that the model assumes the entirety of the Baylands (including the entire east side, Visitation Creek and Icehouse Hill) can be developed residentially. In part our argument is that the City and its elected leaders spent many years studying the Baylands site to identify areas appropriate for housing development. PBA 2050 should leverage this work and not ignore it.

While PBA 2050 is a high level planning document, it is being used as a basis for updating the Regional Housing Needs Allocation (RHNA). This process does have regulatory implications as the City's next General Plan Housing Element update must demonstrate that the City has identified adequate sites to meet its RHNA obligations in order for the Housing Element to be certified by the Department of Housing and Community Development (HCD) an agency of the State of California. Failure to have a certified Housing Element by HCD would leave the City in a legally vulnerable position, and potentially jeopardize city access to some state funding.

While adoption of PBA 2050 is still over a year away as an environmental impact report (EIR) must be prepared, it appears that MTC and ABAG are highly invested in the preliminary plan and are unlikely to entertain substantial changes. It is important for us to understand that while the model provides an outlier result for our community it seems to generally work for most of the region. This is why our focus is on trying to adjust the model and not undermine it. The latter we doubt we would engender much support for.

The attached letter was sent to the Executive Director of MTC last week. We will report on the status of our request for consultation in open session at the October 1<sup>st</sup> meeting.



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Therese McMillan  
Executive Director  
Metropolitan Transportation Commission  
375 Beale Street, Suite 800  
San Francisco, CA 94105

September 22, 2020

Dear Ms. McMillan,

I am writing to you on behalf of the Brisbane City Council, specifically regarding item 8a of your September 23, 2020 agenda - **"Proposed action on revisions to Strategies and Growth Geographies for the Plan Bay Area 2050 Final Blueprint, as well as the Regional Growth Forecast."**

We appreciate the challenges and difficulties in identifying models and tools for projecting growth in the region. We also appreciate and support the regional goals of creating a wider variety and quantity of housing options and to do so using opportunities for transit oriented development.

To that end the City of Brisbane, submitted a proposal to our voters in the Fall of 2018 to determine the path forward on housing for our City. Ballot Measure JJ, which was approved by voters and developed in consultation with regional and state leaders, amended the City's General Plan and identified environmentally appropriate and safe areas to build on the area of a former rail yard allowing up to 2200 housing units. This is literally a doubling of the current population and housing stock of Brisbane.

We are concerned that the methodology that MTC/ABAG is proposing does not adequately take into account either the voter approved initiative or the environmental constraints of the area, including a transfer station for Recology Solid Waste operations which serve the City and County of San Francisco, watercourses and other areas subject to flooding, areas of sensitive habitat, site contamination and other physical limitations. Additionally, it appears that projections made for the remainder of the City assume conversion of a major PGE substation and maintenance yard and other industrial properties to housing.

We are not suggesting that MTC stop or even change their modeling but are asking for direct opportunity to raise these issues at the highest level of your organization. We believe that while the modelling may be accurate for much of the Bay Area, we may indeed be an anomaly. Our assessment of the model is that growth of housing projections would increase by 450% over the planning timeframe. Keep in mind that City voters have already stepped up and approved an increase of approximately 100% in Measure JJ. Beyond that we believe the model as applied in Brisbane is unrealistic and fails to accurately take into account the land use and environmental constraints of the area.

Sincerely,

A handwritten signature in blue ink, appearing to read "Clayton Holstine".

Clayton Holstine  
City Manager  
City of Brisbane