

To: Planning Commissioners  
From: Dana Dillworth  
RE: Housing Element Study Session

Since Study Sessions do not allow comment, please enter this into the record.

**Where are the other types of housing considered in this discussion?**

Every Housing Element renewal period comes with the discussion of how to add housing stock opportunities, particularly for low to moderate income residents. We have relaxed the secondary unit regulations to the point of missing their numbers in the low-income housing stock inventory chart Table 34. Only 15 possible affordable housing units in ALL of Central Brisbane, that's hard to believe. It's too low. What happened to the in-law unit potential in the totals for this category and why are potentially large projects "To be Determined" and ignored in the calculations? How about an emergency interim use for mobile homes at Sierra Point?

**Re: Crocker Park and Southeast Bayshore**

In every location that has former industrial uses, the transportation or recycling of toxins or was a fill operation pre-earthquake standards, should be carefully examined for residual toxins from the former uses and the stability of the lands below if you choose to designate them for housing. Some former businesses were violators of the health and safety regulations of the time (Quicksilver,) some have current uses involving toxins, diesel generator fumes, and others were just not regulated. When looking to "place" low and moderate-income housing, you need to be careful of the appearance of Environmental Racism. Low-income families suffer more asthma, cancers, and illnesses because affordable housing is often along freeway interchanges, corridors or contaminated land (Midway Village.) Each of these areas under consideration has this consequence. They will be unstable during an earthquake and may be polluted.

Crocker Park is former marsh. I was at 100 Valley Drive during the Loma Prieta earthquake. You need to have an understanding of liquefaction, of how unsafe landfills are during an earthquake. It needs to be in the discussion of constraints but does not appear on Table 3. Additionally, cell phone towers have been placed in the Park Lane area as they are not allowed in residential areas where sensitive receptors, babies and people with health issues may be exposed to the transmission waves. Consideration of the area should require studies of noise and Electromagnetic waves.

**Carry over Requirements? Define your Unit.**

How does a town of 1300 units get an RHNA equal to one fifth of it's current housing stock? 20% growth, that's outrageous. And who is doing the math? The language on Table 34 states up to 30 units per acre. If the land is a combined 6.9 acres, it would render 207 units, not the 125 the city calculates.

**Environmental Review Required**

As has been mentioned in previous meetings, study sessions aside, before amending our General Plan, the City will need to do a full environmental impact analysis of the policies in this document. The environmental impacts need to be considered for noise and vibration, impacts of adjacency to the HCP and the health and welfare of siting housing on potentially toxic fill or unstable landslide areas. It should also be measured with global warming statistics. What may not be a floodplain today may have a different characteristic in the future. You should require soil tests and the proper former use information before making recommendations to the city council.