



**DAVID CRABBE ARCHITECT**  
**ARCHITECTURE • PLANNING • INTERIOR DESIGN**

May 3, 2017

Mayor and Members of the Brisbane City Council  
C/O City Clerk

RE: Baylands Development

This is a reprise of a letter I sent to Council September 7, 2016 with a few additional comments.

First, I want to acknowledge all the time the city has spent on this Plan. I know there have been many long and contentious meetings to date.

However, I have some serious concerns about the results of all that work.

**1. Sustainability.** It is the stated goal of the City that all the proposed Plans be sustainable, but Brisbane has defined sustainability primarily through an environmental lens. The Sustainability Guidelines address the 3Es of sustainability – the Environment, Economy, and Social Equity, but this Plan addresses primarily the Environment. It fails on social equity and is shaky on the economy.

**2. Social equity.** The greatest problem right now in San Mateo County is the glaring imbalance between jobs created and the provision of new housing for those new employees to live in. Not one of the six alternative plans under consideration seriously addresses this region-wide problem. Instead they create lots of jobs and foist the provision of housing onto adjacent communities who are struggling themselves to provide housing for their own citizens. This is not only selfish planning, but it is unsustainable planning. For example:

**DSP** - 7M s.f. commercial can be expected to generate a minimum of 23,000<sup>1</sup> new jobs requiring a minimum of 15,500<sup>2</sup> new housing units. The developer proposes 4,400 units (11,100 units short).

**DSP-Variant** – 5.4M s.f. commercial = 18,000<sup>1</sup> new jobs and 1.6M s.f. of hotels and entertainment center = 1,600 jobs<sup>3</sup> requiring a minimum of 13,067<sup>2</sup> new housing units. The developer proposes 4,400 units (8,667 units short).

**CPP Plan** – 5.7M s.f. commercial = 19,000<sup>1</sup> new jobs and 2.5M s.f. of hotels and entertainment center = 1,600<sup>3</sup> jobs requiring a minimum of 13,733<sup>2</sup> new housing units. This plan proposes no housing units (13,733 units short).

**289 CRESTVIEW DRIVE  
SAN CARLOS, CA. 94070  
PHONE: (650) 631-8614**

**CPP-Variant** – 6.1M s.f. commercial = 20,333<sup>1</sup> new jobs and 2.1M s.f. of hotels and entertainment center = 2,100<sup>3</sup> jobs requiring a minimum of 14,955<sup>2</sup> new housing units. This plan proposes no housing units (14,955 units short).

**Planning Commission Recommended Plan** – up to 2.6M s.f. commercial = 8,667<sup>1</sup> new jobs requiring a minimum of 5,778<sup>2</sup> new housing units. This plan proposes no housing units (5,778 units short).

**CREBL Plan** – 2.2M s.f. commercial = 7,333<sup>1</sup> new jobs requiring a minimum of 4,889<sup>2</sup> new housing units. This plan proposes no housing units (4,889 units short).

Without a more equitable balance between jobs and housing, this robust regional economy of San Mateo County is going to eventually implode returning Brisbane and the Region back to the economy of the great recession of 2008-11, leaving empty office and R&D buildings and underwater home mortgages. Without balance, there is instability. This Plan should include a enough housing to offset the number of jobs being created.

**3. The economy.** The March 22, 2016 Economic Feasibility memorandum said the cost to remediate, restore and develop infrastructure for future development could run anywhere from \$600K to \$1B. There is no way the limited development in the proposed Planning Commission Recommended Plan or the CREBL Plan can support a cost of that scale. These two Plans are economically unfeasible if you wish to create all the parkland and do all the environmental remediation work you propose. Either the scope of those developments needs to be increased or the scope of environmental improvements needs to be reduced.

According to the memorandum, the other four Plans have the potential to produce enough revenue to support horizontal development costs, but housing seems to have a slight advantage over commercial as residential has the potential to generate \$4.5M per developed acre as opposed to \$4M per acre for commercial.

**4. TOD.** All the Plans are touted as transit-oriented, yet all the illustrative examples I have seen by the consultant show widely-spaced buildings and vast numbers of parking spaces. This leads me to the conclusion that staff and the consultants do not really believe that these Plans are really transit-oriented.

TOD means not just being near transit, but designed to encourage transit use. This site is close to several different transportation options - an ideal location for properly designed transit-oriented development, the kind of development that creates a real community with a balance of complementary uses including R&D, but also housing and mixed-use as proposed in the Paragon Plans. It should not be planned only as a free-standing research campus.

The City of Brisbane already has many more jobs than employed residents. Saying yes to new jobs without new housing will further exacerbate the housing/jobs imbalance in the region, and add traffic to the Baylands, rather than reduce it. The DEIR backs up this point by recognizing that if housing is built in balance with commercial development, many of the new residents may choose to walk or bike to work rather than driving, thus mitigating potential traffic impacts.

### **5. Political Considerations:**

It is my impression that one of the main objections to including housing in the Plan is the fear that adding a community of 4,400 or more housing units located some distance from existing houses in central Brisbane will dilute the political influence of the existing residents when considering future policy decisions. This is a reasonable concern which needs to be addressed.

One way this potential political imbalance could be resolved would be for Brisbane to consider splitting off the northern end of the Baylands through LAFCO so that San Francisco or San Mateo County could be given authority over that portion of the site to develop housing. I believe both entities would be interested in such a deal as both are very concerned about the lack of housing in the area and are desperately trying to come up with ways to resolve it.

Such a land deal could benefit Brisbane by separating the areas dedicated to housing from the areas dedicated to commercial and solar development. In other words, Brisbane could benefit from the taxes generated by commercial development and the energy generated by a potential solar farm, but the political balance in the city would not be changed. It would also reduce the area of the site where Brisbane would need to finance site remediation and development. This solution could also give Brisbane recognition for helping the region cope with the lack of housing, rather than be seen as adding to the problem. Please give this suggestion serious consideration.

**6. Plan Opponents:** Bay area organizations opposed to the current Plan include both environmental, housing, and business interests. They include: The Housing Leadership Council of San Mateo County, Bay Area Council, Greenbelt Alliance, SAMCEDA, and SPUR. Seldom does such a diverse mixture of interests find common cause over a development plan. Please give their concerns serious consideration.

**7. To conclude:**

- The Plan should address all 3Es of sustainability – Environment, Economy, and Social Equity, not just primarily the Environment.
- The Plan should include a balance of jobs and housing.
- The Plan should be robust enough so that fees and taxes from development will cover the huge cost of environmental remediation and restoration for the entire site.
- The Plan should take full advantage of its transit-rich location to create a truly mixed-use community, especially towards Geneva Avenue and the Caltrain station to assure it is truly Transit-oriented.
- Consider using LAFCO to split off the northern portion of the site for housing development under another City’s jurisdiction.

Respectfully Submitted,

David Crabbe

<sup>1</sup> Rule of thumb = 300 sf per job in R&D. May be as little as 150 sf per job in office buildings

<sup>2</sup> Rule of thumb = 1.5 jobs per dwelling unit

<sup>3</sup> Rule of thumb = 1,000 sf per job in hotel, entertainment uses