File No. 161044 Committee Item No. 5
Board Item No. _____

COMMITTEE/BOARD OF SUPERVISORS

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Committee: Land Use and Transportation **Date** December 5, 2016

Board of Supervisors Meeting **Date** _____

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Completed by: Victor Young **Date** December 2, 2016
Completed by: _____ **Date** _____

FILE NO. 161044 RESOLUTION NO.

[Urging City Agencies to Monitor and Review Any Development Proposal for the Brisbane Baylands Area and Urging the City of Brisbane to Prepare a Complete Environmental Impact Report and Approve a Responsible Land Use Plan]

Resolution urging the City and County of San Francisco and all relevant agencies to closely monitor and review any development proposal for the Brisbane Baylands Area to ensure that the City of Brisbane prepares a comprehensive and complete Environmental Impact Report, which includes legally required analysis of all impacts, including transportation, air quality and greenhouse gases, water supply and wastewater, and housing and population needs, in particular significant impacts that will occur within San Francisco; and urging Brisbane to adopt a responsible Land Use Plan for this area that will include needed workforce housing.

WHEREAS, The Brisbane Baylands is a site that contains 684 acres of vacant, underutilized land that is largely inaccessible to the public as a result of the legacy of geotechnical and contamination issues resulting from its former use as a landfill and railyard; and

WHEREAS, The Association of Bay Area Governments (ABAG) developed the "Plan Bay Area 2040" which identified the Brisbane Baylands as a Priority Development Area as it presents the prospect of contributing to the responsible growth and vitality of the region; and

WHEREAS, The Baylands site presents a rare opportunity to develop the land in a responsible and environmentally-sustainable way that can reestablish useable open and recreational space, protect existing wetlands and ecosystems, encourage active pedestrian and bicycle use in its interior streets, and create residential and commercial space that is high in density and in close proximity to public transportation facilities to minimize the impact on our already-congested regional roadways; and

WHEREAS, The Developer of the Baylands site, Universal Paragon Corporation, applied to develop the site with approximately 7 million square feet of office, industrial and commercial uses, 4,434 units of housing, and over 300 acres of open space and lagoon area; and

WHEREAS, The Developer subsequently requested analysis of a second development scenario, which included more entertainment-oriented uses for the Site but retained the same 4,434 units of housing and amounts of open space and lagoon area; and

WHEREAS, The Brisbane Planning Commission recommended on August 25, 2016, that no housing be allowed on this site and that only non-residential development be permitted; and

WHEREAS, The Mayor of the City of Brisbane, Clifford Lentz, was quoted in the San Francisco Chronicle as saying, "We'll provide the commercial...San Francisco will provide the housing;" and

WHEREAS, San Francisco is in close proximity to the Brisbane Baylands site and will be significantly impacted by any project developed on the Baylands, especially if the project contemplates building *no* new housing for the inevitable influx of workers that will ensue from building 7 – 8 million square feet of new commercial-industrial-institutional-retail-entertainment space; and

WHEREAS, State law recognizes the critical responsibility of each local government in the supply and affordability of housing and mandates that each local government in California adopt a Housing Element as part of its General Plan that shows how the community plans to meet the existing and projected housing needs of people at all income levels; and

WHEREAS, State law also mandates a process to determine the total number of housing units, by affordability level, that each jurisdiction must accommodate in its Housing

Element which is known as the Regional Housing Need Allocation (RHNA) and is measured by permits issued; and

WHEREAS, For the 2007-2014 RHNA, Brisbane was responsible for 401 new units of housing and met 36% of its assigned housing goals whereas San Francisco was responsible for 31,193 units and met 64% of its goal; and

WHEREAS, For the 2015-2022 RHNA, Brisbane's RHNA allocation was 83 units total and one year into this cycle, Brisbane has issued permits for 3 units; and

WHEREAS, The Draft Preferred Scenario for Plan Bay Area published by ABAG in September 2016 allocates growth of 4,400 housing units to Brisbane; and

WHEREAS, The San Francisco Planning Department's residential pipeline report that tracks the completed units and entitled units in the current residential pipeline to the first quarter of 2016 (Q1) shows that San Francisco has already met 79% or 22,806 out of its assigned 28,869 housing units according to the RHNA production goals for the period 2015-2022 to date; and

WHEREAS, The City and County of San Francisco, which is only 49 square miles, is already attempting to address the lack of affordable housing in the region but cannot physically absorb thousands of new workers without significant negative impacts to its already heavily-used streets, its increasingly unaffordable housing market, public utility use, overstrained childcare and educational institutions, and other vital city services and infrastructure; and

WHEREAS, The Brisbane Baylands also present a unique and extremely rare opportunity for a local jurisdiction to create new housing—and meet its regional responsibility for creating 4,400 new housing units--without displacing current tenants or other uses of land and actually would afford an opportunity to make an existing brownfield useable; and

WHEREAS, The development plan that the Brisbane Planning Commission has recommended does not provide jobs/housing balance in any way and is irresponsible in the face of the housing crisis throughout the Bay Area and the State of California; and

WHEREAS, Brisbane's Planning Commission has recommended disapproval of residential uses, potentially violating the California Housing Accountability Act and other State laws that attempt to address the California housing crisis throughout the State; and

WHEREAS, The City of Brisbane is considering certification of an Environmental Impact Report (EIR), as required by the California Environmental Quality Act (CEQA), which was initiated in early 2006, over ten years ago, continuing through August 2016 and now pending before the Brisbane City Council, and the EIR lacks the required consideration of the numerous and significant changes in the region over the last ten years, including but not limited to climate change, private and public transit options, density and migration of the workforce and significant housing needs, and the significant environmental impacts that will occur in San Francisco if no housing is built on the Baylands site as part of this development; and

WHEREAS, Brisbane has not adequately considered significant environmental impacts that will occur as a result of the new water supply demands and has not set forth a realistic plan to provide the new water supply necessary for this site; now, therefore, be it

RESOLVED, That the City and County of San Francisco urges and directs its Planning Department, the Mayor's Office of Housing and Community Development, the Public Utilities Commission, Municipal Transportation Agency, Department on the Environment, and any other relevant City Departments, to closely monitor, review, participate and comment upon all actions proposed to be taken by the City of Brisbane for any development of the Brisbane Baylands site; and, be it

FURTHER RESOLVED, That the City and County of San Francisco, including the City Attorney, should explore all possible legal actions available both to encourage consideration and approval of lawful, responsible development on the Baylands Site, or, alternatively, to prevent development of the Brisbane Baylands site that does not include a balance of affordable and market-rate housing along with non-residential development; and, be it

FURTHER RESOLVED, That the City and County of San Francisco should investigate the viability of annexing Brisbane so that it is fully incorporated into the County of San Francisco should the City of Brisbane continue to contemplate building no new housing as part of any project on the Brisbane Baylands; and, be it

FUTHER RESOLVED, That the City and County of San Francisco urges the City of Brisbane to commit to a responsible project for the Brisbane Baylands that includes a rational jobs and housing balance that would result in the creation of a sufficient number of housing units to accommodate new workers for any projected new jobs that would be generated by new office, industrial, institutional, entertainment or other commercial development on the Baylands site.

CITY OF BRISBANE

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October 13, 2016

London Breed, President and Members of the San Francisco Board of Supervisors

City Hall, 1 Dr. Carlton B. Goodlett Place

San Francisco, CA 94102-4689

Subject: Resolution 161044

Dear President Breed and Board Members:

The above referenced Resolution has been referred to the Board's Land Use and Transportation Committee. The Brisbane City Council previously objected to the paragraph in this Resolution which purports to address a "hostile" annexation of the City of Brisbane to San Francisco. The City Council continues to object to that language and specifically requests that the San Francisco Board of Supervisors strike that paragraph and any other reference to San Francisco's annexing some or all of the lands within the incorporated area of the City of Brisbane.

Any wording to that effect is extremely deleterious to the relationship between our two cities. To be clear, any mention of San Francisco's attempt in this document to annex incorporated areas of Brisbane, or any attempt to neutralize the wording but leave intact that possibility, is unacceptable to us. Its needs to be deleted in total.

While the remainder of the resolution is replete with factual errors and misunderstandings of our Baylands planning process, our focus is on the above referenced paragraph concerning a hostile annexation.

Concerning the Baylands development, the City of Brisbane is conducting a series of public hearings on various issues relative to the Final Environmental Impact Report and to a series of land use alternatives. We encourage the City of San Francisco through its various departments to continue to participate in our public process and provide written and/or oral input.

Sincerely,

Clifford R. Lentz, Mayor

Lori S. Liu, Mayor Pro Tempore

Providing Quality Services

W. Clarke Conway, Councilmember

Madison Davis, Councilmember

Terry A. O'Connell, Councilmember

cc County of San Mateo Supervisor Adrienne J. Tissier, District 5

California State Assembly Member Kevin Mullin, District 22

California State Senator Jerry Hill, District 13

City of San Francisco Mayor Edwin Lee

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Memo to the Land Use Committee

Update on the Brisbane Baylands Development

DATE: NOVEMBER, 3 2016

TO: Honorable members of the Land Use Committee
FROM: John Rahaim, Director of Planning

This memo is in response to your request on October 13, 2016 for an update on the Brisbane Baylands Development. This memo includes:

- a brief background on the Brisbane Baylands;
- an overview of the four alternatives under analysis by the City of Brisbane;
- a summary of comments submitted by San Francisco agencies on the Draft Environmental Impact Report in January 2014];
- an overview of Brisbane in the context of regional planning efforts, including the Plan Bay Area and the Regional Housing Needs Assessment; and
- an overview of the Brisbane Baylands in the context of area transportation planning.

BRISBANE BAYLANDS BACKGROUND

Just south of San Francisco's Visitacion Valley neighborhood and Schlage Lock Development site, the Baylands consists of approximately 733 acres (primarily in the City of Brisbane) of former and current industrial lands including the current Recology site (44 acres) and the Brisbane lagoon (119 acres). It is bounded by US-101 to the east and Bayshore Boulevard to the west and south. The Caltrain corridor bisects the site into eastern and western portions. The Bayshore Caltrain station straddles the San Francisco/San Mateo county line, laying partially in San Francisco and partially in Brisbane. The Muni Metro T-Third line terminates just northwest of the site on Bayshore Boulevard at Sunnydale Avenue.

The City of Brisbane General Plan currently prohibits housing on the Baylands. In 2006, the primary owner of the Baylands (Universal Paragon Corporation or UPC, which also owns and is developing the Schlage Lock site), proposed a Specific Plan and related General Plan amendments for the site.

After two years of community process, the City of Brisbane proposed two alternatives to the developer-proposed specific plan. In 2011, UPC submitted a new Specific Plan with two updated developer-sponsored plan variants. These four alternatives were equally evaluated in the Brisbane Baylands Draft EIR published in 2013. In addition, in 2015 a survey was conducted to gauge community opinions and attitudes on number of issues pertaining to Baylands. This was a mail-in survey sent to all registered voters in Brisbane.

The four Plans evaluated in the EIR are summarized briefly below and in the following table excerpted from the EIR. (See Exhibit A)

- ***Developer-Sponsored Plan (DSP).*** The DSP scenario was proposed by Universal Paragon Corporation (UPC), the primary landowner within the Project Site. Overall, the DSP includes approximately 12.1 million square feet of building area within a 684-acre Project Site, 170 acres of "open space/open area," and approximately 136 acres of "lagoon" area. To promote transit accessibility, the DSP proposes higher intensity uses in proximity to transit stops. The Plan includes over 4,400 residential flats and townhomes; 7 million square feet of retail, office and R&D uses; and 369 hotel rooms. This scenario assumes that Recology does not expand and also assumes a Geneva Avenue "extension" to US-101, crossing the Caltrain tracks about 1,700 feet (0.32 miles) south of the County line.

- ***Developer-Sponsored Plan – Entertainment Variant (DSP-V).*** The DSP-V scenario is also proposed by UPC and set forth in the Brisbane Baylands Specific Plan. It is similar to the DSP in its development intensity and land use pattern, but replaces some of the retail, office and R&D space in the northeast portion of the site with entertainment-oriented uses, including a 20,000-seat sports arena, a 5,500-seat concert theater, a multiple-screen cinema, over 700 hotel rooms, and more conference/exhibition space than the DSP. The overall acreages and number of residential units are the same as the DSP.

- ***Community Proposed Plan (CPP).*** In addition to the 684 acres in the DSP and DSP-V, the CPP includes the 44.2-acre Recology site, which spans the cities of Brisbane and San Francisco (for a total of 733 acres). The CPP provides for approximately 7.7 million square feet of office, commercial, industrial and institutional uses; 2000 hotel rooms; along with approximately 330 acres of open space/open area and the 135.6-acre lagoon. The CPP does not include residential development.

- ***Community Proposed Plan – Recology Expansion Variant (CPP-V).*** The CPP-V differs from the CPP in that it proposes modernization and expansion of the existing Recology facility. Under the CPP-V scenario, Recology would expand by 21.3 acres southward from its current boundary, consolidating its offsite facilities and replacing the hotel and R&D uses proposed under the CPP just north of Geneva Avenue and east of Tunnel. New development under the CPP-V scenario would total approximately 8.1 million square feet of building area.

The Final EIR was published in May 2015. After 25 public meetings over the course of a year, on August 25, 2016 the Brisbane Planning Commission completed their review and voted unanimously to recommend to the City Council to deny the Developer-sponsored plan (DSP) and DSP variant in favor of a plan that allows a maximum of 1-2 million square feet in non-residential building area, distributed throughout the site. While many principles of the DSP were incorporated in the Commission's recommendation, including commercial land uses, sustainability framework and open space preservation; the commission expressed concerns over infrastructure needed for the development intensity in the four alternatives, and that they would exacerbate the "already unacceptable traffic conditions." The Planning Commission also preferred renewable energy infrastructure in areas where the

DSP proposed office and industrial development. Finally, the Planning Commission decided not to allow housing in the Baylands due to:

- safety issues in relation to site contamination and remediation,
- community survey results indicating support for prohibiting housing within the Baylands,
- effects on community character resulting from the physical separation of the Baylands from other residential neighborhoods in Brisbane, and
- municipal cost-revenue considerations.

Land Use Breakdown in the Four Proposed Alternatives

LAND AREA TYPES ON BRISBANE BAYLANDS PROJECT SITE

Component	Developer-Sponsored Plan (DSP) and Variant (DSP-V) (acres)	Community Proposed Plan (CPP) and Variant (CPP-V) (acres)
Project Site Area		
Total Buildable Area[a]	380.4	223.2
Existing Recology Site	0.0	44.2
Lagoon (including open water and perimeter)	135.6	135.6
Open Space	168.0	330.0
Total Site Area	684.0	733.0[b]

[a] The "buildable area" includes all planned development and associated area for streets and infrastructure.
[b] The total site area under the CPP and CPP-V includes the existing 44.2-acre Recology site plus adjacent roadway rights of way.

SOURCE: UPC, 2011; Dyett and Bhatia, 2011.

PROPOSED DEVELOPMENT FOR BRISBANE BAYLANDS PROJECT SITE BUILDABLE AREA

	DSP (square feet)	DSP-V (square feet)	CPP (square feet)	CPP-V (square feet)
Residential	**5,150,400**	**5,150,400**	**0**	**0**
Residential Flats	4,351,800 (3,950 units)	4,351,800 (3,950 units)	-	-
Residential Townhomes	798,600 (484 units)	798,600 (484 units)	-	-
Hotels and Conference	**261,100**	**586,800**	**1,392,300**	**1,046,100**
Hotels and Conference	261,100 (369 rooms)	586,800 (719 rooms)	1,392,300 (1,990 rooms)	1,046,100 (1,500 rooms)
Retail and Mixed Use	**566,300**	**283,400**	**2,209,500**	**2,209,500**
Retail	566,300	283,400	-	-
Commercial/Office/R&D	-	-	2,209,500	2,209,500
Research and Development Single Use	**3,328,300**	**2,599,200**	**2,007,000**	**1,672,200**
Research and Development	3,328,300	2,599,200	2,007,000	1,672,200
Office and Institutional	**2,762,000**	**2,363,100**	**992,700**	**992,700**
Office	2,651,200	2,252,300	-	-
Institutional	110,800	110,800	-	-
Office/ Institutional Mixed	-	-	992,700	992,700
Entertainment/Civic/Cultural	**28,200**	**1,066,500**	**1,074,500**	**1,074,500**
Arena	-	630,100	-	-
Theater/ Exhibition/Performance Venue	-	337,200	274,500	274,500
Multiplex	-	71,000	-	-
Cultural/Entertainment	-	-	611,300	611,300
Civic/ Cultural	28,200	28,200	188,700	188,700
Industrial	**142,500**	**142,500**	**469,100**	**1,220,100**
Existing Relocated Industrial	142,500	142,500	142,500	142,500
New Industrial	-	-	66,600	66,600
Existing Resource and Recovery	-	-	260,000	-
Expanded/Rebuilt Resource and Recovery	-	-	-	1,011,000
Total	**12,238,800**	**12,191,900**	**8,145,100**	**8,215,100**

NOTE: See Table 3-2A for description of "buildable area."

SOURCE: UPC, 2011; Dyett and Bhatia, 2011.

SUMMARY OF CEQA AND POLICY COMMENTS FROM SAN FRANCISCO AGENCIES

The Mayor's office, Planning Department, SFMTA, SFCTA, OCII and SFPUC submitted comments (See Exhibit D) to Brisbane on the Draft EIR for the Baylands on January 21, 2014. Highlights of the key comments include the following:

Recology Expansion

Our comments supported Recology expansion on 21.3 acres of the Baylands as reflected in CPP-V variant (Figure 3-14) and did not support alternative uses at the proposed expansion location. The comment went on to discuss the need for analyzing potential Mitigation Measures or Alternatives to reduce or avoid potential impacts in order to ensure smooth co-existence of the necessary truck and vehicular access to and from the Recology site with along with traffic generated from the proposed high intensity commercial, office, institutional uses as well as the planned Geneva-Harney Bus Rapid Transit, pedestrian and bicycle routes through the area.

Caltrain Station Location

Our comments highlighted that San Francisco does not support moving the Caltrain Bayshore Station farther south from its current location, especially with the planned growth in Visitation Valley, Executive Park, Hunters Point Shipyard, and Candlestick Point. The comments noted that moving the Caltrain station south would reduce the attractiveness of transit for many San Francisco residents. We suggested that this proposal would require a shift in mode split assumptions for transportation analysis in the Baylands EIR. We stressed that relocating the Caltrain Station further to the south would jeopardize funding for other transit improvements for the area that rely on proximity to Caltrain (eg. T-Third Line extension to Caltrain Station, Geneva Avenue BRT, Bayshore Multi-modal Station Improvements). We commented that the DEIR should analyze this assumption and its impacts on the transportation methodology.

Our comments presented specific concerns about a transit Mitigation Measure, the lack of clarity, absence of performance objectives or analysis of feasibility, and conclusion that such an unspecified mitigation measure or future plan could reduce impacts on transit capacity to less than significant levels.

Alternative Analysis

The DEIR concludes that the No Project alternative is the only alternative that would avoid significant transportation and air quality impacts. In our comments, we raised this issue as an omission in the EIR. We recommended including a Specific Plan Mixed-Use with Housing Build Alternative that furthers the stated project objectives related to environmental protection, sustainability, contribution to regional housing, transportation and air quality solutions, but minimizes the significant impacts to surrounding communities. For this Alternative we recommended including parameters such as a mixed-use development including housing, with reliance on transit, while reducing potential transportation conflicts, especially with regards to expansion of Recology site.

Other concerns raised in our comments included: analyzing impacts on the mixed-use neighborhoods in Visitation Valley/Schlage Lock, the need to address the demand for housing on a bi-county and regional level by including housing to the maximum feasible extent, and analyzing the impacts of high drive-alone uses such as retail, entertainment, and industrial uses.

California High Speed Rail Facility

Our comments appreciated acknowledgement in the DEIR of the potential California High Speed Rail (CHSR) Terminal Storage and Maintenance Facility that would occupy approximately 100-acres of the Baylands. We suggested a more in-depth analysis of the implications of the Baylands proposals upon the CHSRA concept and overall CHSRA service. The comments suggested that the EIR combine the future storage facility with the Renewable Energy Alternative already analyzed in the DEIR into a new Variant. We disagreed with the statement in the DEIR that the CHSRA project is premature and speculative, noting that the Baylands was the recommended location for the storage and maintenance facility in the CHSRA EIR and called specific attention to the lack of analysis related to potential conflicts between the Alternatives and the CHSRA 2010 Business Plan.

Water Supply

In addition to the comments on the DEIR submitted by the Planning Department, the SFPUC submitted comments on the DEIR stating, in part, that the DEIR was inadequate with regards to its analysis of the potential impacts of the proposed water supply arrangement for the project. For the SFPUC to enter

into agreements with the City of Brisbane on water supply, further analysis of the potential direct and indirect effects of providing such water supply would need to be evaluated in a CEQA document for all alternatives identified.

BRISBANE IN THE REGIONAL CONTEXT OF PLAN BAY AREA AND RHNA

The regional planning agencies, the Association of Bay Area Governments (ABAG) and the Metropolitan Transportation Commission (MTC), are in the process of updating the regional plan, Plan Bay Area. Scheduled on a 4-year cycle of updates, Plan Bay Area was last adopted in 2013. The current update, to be adopted in 2017, is considered by ABAG/MTC to be a "minor" update, in that the time horizon of the plan is remaining at 2010-2040 and this plan update does not coincide with an update to the state-mandated Regional Housing Needs Allocation (RHNA). (The next update to Plan Bay Area will be in 2021, which will coincide with a RHNA cycle and the time horizon of the plan will likely shift to 2050.) However, other aspects of the 2013 Plan are being modified, including adopting a new Regional Transportation Plan (RTP), and revising the growth projections and distribution of growth around the region. Plan Bay Area satisfies the state's requirements under SB 375 to create a Sustainable Communities Strategy that ties land use to transportation in order to reduce greenhouse gas emissions by certain targets. To achieve this objective, as well as achieve other policy goals of the region (such as reducing sprawl/retaining natural and agricultural lands), the Bay Area has created the policy framework of "Priority Development Areas" (PDAs) within which most new growth should be directed. The premise of PDAs is that they are transit-served and generally urban infill locations where growth is most appropriate. PDAs are entirely self-designated by local jurisdictions (and are not created or imposed by ABAG/MTC), though ABAG/MTC adopted a set of Eligibility Criteria for PDAs that lay out expectations that PDAs incorporate new housing at minimum quantities and densities based on a set of place types established in their adopted Station Area Planning Manual. For the place type appropriate for the Baylands (i.e. "Suburban Center") the station area target is 2,500-10,000 units at a density of 35-100 units per acre.

In 2008 the cities of San Francisco and Brisbane applied in tandem to ABAG/MTC to create a joint "bi-county" PDA covering areas of Visitation Valley (including Schlage Lock and Sunnydale, HOPE SF) and Executive Park, and the Baylands. The Brisbane application at the time indicated a potential housing range for the Baylands of 0- 800 units. The adopted Plan Bay Area in 2013 did not include any housing growth in Brisbane, reflecting only housing growth in the San Francisco part of the joint PDA. In 2015 Brisbane amended their PDA application to increase the housing range allowing any number of units between zero to 4,600 units to reflect the full range of alternatives under review.[1]

The Draft Preferred Scenario published by ABAG/MTC in August 2016 for the current update of Plan Bay Area, includes total growth for the City of Brisbane of 4,500 households and 12,400 jobs, of which 4,400 households (98%) and 10,900 jobs (88%) would be in the PDA. Comments on the Draft Scenario were due to ABAG/MTC by October 14. Brisbane Mayor Cliff Lentz submitted a letter (See Exhibit E) to MTC on October 7 objecting to the inclusion of housing in the Baylands PDA and requesting that the

[1] As part of the 2015 PDA application, Brisbane added an area to the PDA separate from the Baylands called the "Gateway" area which would include 230 units. This small area is west of Bayshore Boulevard near the southern end of the Baylands.

numbers be revised to reflect Brisbane's current General Plan which would allow only 230 units in the City. Mayor Lentz stated that he finds it "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 Planning Department, SFMTA, and SFCTA submitted a joint SF-agency comment letter to ABAG/MTC on October 17 (See Exhibit F) holding up the Brisbane case as a display of how the current Plan Bay Area process lacks teeth to ensure adequate housing production region-wide and how this dilemma "undermines the effectiveness of Plan Bay Area ... and any hope of meeting the challenges of affordability in the region." On October 28 ABAG/MTC published a proposed Final Preferred Scenario for consideration for approval by the ABAG Executive Board and MTC Commission on November 17, which would advance the Preferred Scenario to environmental review. The Final Preferred Scenario published on October 28 maintains the roughly 4,400 household increase for the Brisbane PDA.

The most recently adopted Regional Housing Needs Allocation (RHNA) for the City of Brisbane, which covers the period 2015-2022, designated only 83 units. Available data indicates that Brisbane has produced three units to date in the current cycle.[2] While the current Plan Bay Area update will not result in revised RHNA allocations, presumably this 2017 Plan Bay Area update will become the starting point for the 2021 Plan Bay Area update, which will feed directly into the RHNA adoption the same year.

BRISBANE BAYLANDS IN THE CONTEXT OF AREA TRANSPORTATION PLANNING

Bi-County Transportation Study

The Bi-County Transportation Study was led by the San Francisco County Transportation Authority (SFCTA – March 2013) in partnership with several agencies from both sides of the San Francisco/San Mateo county line to evaluate potential transportation improvements needed to address significant current and anticipated land use growth on both sides of the border to (1) produce a multi-modal package of transportation improvements addressing regional and local needs, (2) develop cost estimates for the top-priority infrastructure projects, needed transit services and circulation and access projects, and (3) establish funding and implementation strategy that considered appropriate levels of contributions of both public and private sources to fund the needed improvements.

While the study did identify transportation needs and anticipated land use in the area, specifically for the Brisbane Baylands site, the study stated that various land use alternatives were under consideration.

The study identified regional transportation improvements needed including:

- Geneva Avenue Extension from its current terminus to a new interchange with US-101
- Geneva Harney BRT and street improvements
- MUNI Forward service enhancements

[2] Brisbane's RHNA allocation for the 2007-2014 RHNA cycle was 401 units. During that period, Brisbane permitted 144 units (36% of the allocation), which met 82% of their Above Moderate allocation, 9% of the Moderate allocation, and none of their Low and Very Low Income allocation.

- T-Third Extension from its current terminus at Sunnydale Avenue to connect to the Bayshore Caltrain station

While the City and County of San Francisco adopted the Bi-County Transportation Study, San Mateo did not adopt or reject the study recommendations and conclusions.

Geneva-Harney Bus Rapid Transit (BRT)

Coming out of a recommendation of the Bi-County Transportation Study (see above), San Francisco County Transportation Authority (SFCTA) completed Phase I of the Geneva-Harney BRT study (July 2015). The route was envisioned to provide existing and future neighborhoods along the San Mateo-San Francisco County border between the Balboa Park BART/Muni Station and the Hunters Point Shipyard with bus connections to the key transit hub, particularly a connection to the Bayshore Caltrain Station. The route would be operated by SFMTA.

San Francisco Municipal Transportation Agency (SFMTA) is further studying potential alignments and operational considerations as part of Phase II of the study with a possible opening of 2023.

Bayshore Multi-Modal Facility Study

The City and County of San Francisco's Planning Department, in coordination with the SFMTA, SFCTA, City of Brisbane, C/CAG, and Caltrain, is currently completing a study to identify where and how a multi-modal facility (or elements thereof) should be located and designed near the Bayshore Caltrain station to better facilitate usage of and wayfinding between all transportation modes in the area. This Study builds off the work of prior studies, particularly the Bi-County Study, and ongoing studies, particularly regarding Geneva-Harney BRT, as well as the now-approved and under implementation Schlage Lock development. Phase I of the study evaluated potential locations for a facility considering four potential future land use scenarios, based on the Brisbane Baylands EIR. The preferred location has been identified as the Sunnydale Avenue corridor and four alternative concepts for the corridor are scheduled to be taken to the public for comment on November 3, 2016. The Sunnydale location was preferred based on factors such as transportation access, surrounding land uses, ridership, ability to implement, and consistency with regional policy. As consistent with San Francisco's comments on the Baylands EIR, the evaluation showed that moving the Caltrain station south runs counter to the future development and projected transit demand in the bi-county area.

Future High Speed Railyard and Synergies with Brisbane

In February 2016, the California High Speed Rail Authority (CHSRA) modified its business plan to build the initial operating segment (IOS) from just north of Bakersfield to San Jose, and then, using the Caltrain tracks, into San Francisco terminating at 4th/King until the Downtown Rail Extension (DTX) is completed into the Transbay Transit Center. Originally the IOS was identified as Bakersfield to Los Angeles in 2025 and from Bakersfield to San Francisco by 2029. The 2016 CHSRA Business Plan anticipates operating the Bakersfield-San Francisco segment by December 2025 and from Bakersfield to Los Angeles in 2029, essentially flipping the two construction segments.

The CHSRA environmental review currently underway identifies the Baylands area as a potential site for an essential maintenance/storage facility. North of San Jose, HSR would operate with Caltrain on the same tracks as a Blended Service. The Baylands is the only location north of Gilroy that could act as a storage and maintenance facility for HSR, and without a northern facility, movement of trainsets would take 60-90 minutes to/from Gilroy. CHSRA is considering an approximately 80-120 acre facility on either

the east or west side of the current Caltrain tracks in the Baylands. In both cases, to locate the maintenance/storage facility as far north as possible, CHSRA is studying moving the Bayshore Caltrain station south by 800-1,400 feet from where it is currently located with the new station bounded on one side by the maintenance/storage facility. As stated previously, the predominance of users of the Bayshore Caltrain Station come from San Francisco and that number is anticipated to grow with the development of Schlage Lock, Candlestick Point, and other developments in the area. The City and County of San Francisco's individual agencies identified our concerns with moving the Bayshore Station south including impacts to other modes, interconnectivity, and others during the Scoping Process for CHSRA DEIR/S which closed in June 2016.

The City and County of San Francisco has requested CHSRA evaluate moving the Caltrain Bayshore Station north, resulting in their maintenance/storage facility access tracks to be located directly south of the station (instead of north). By moving the station north and having the access tracks directly south of the station, we do not believe it would affect the operations of the storage/maintenance facility significantly and solves the issue of providing better access for the land uses that exist and are anticipated in the area while also not resulting in a Caltrain station with one side completely edged by a storage/maintenance facility.

CHSRA is anticipating publishing a DEIR/S in early 2017 with a Record of Decision (ROD) anticipated in late 2017 or early 2018.

The City's ongoing Railyard Alternatives and I-280 Boulevard Feasibility Study (RAB) continues to evaluate these CSHRA concepts and their relationship with planning issues throughout San Francisco. Specifically, the RAB is evaluating the potential for CHSRA to share their maintenance/storage facility with Caltrain.

San Mateo Countywide Transportation Plan 2040

In parallel with Plan Bay Area, the City/County Association of Governments of San Mateo (C/CAG) is updating their Countywide Transportation Plan. At present that Draft Plan incorporates several transportation projects in Brisbane to serve the Baylands (including two redesigned/expanded freeway interchanges and an extension of Geneva Avenue), which would require San Francisco coordination and cooperation (if not also funding). These projects are proposed by C/CAG for inclusion in the regional RTP as part of Plan Bay Area. However the C/CAG's Draft Plan does not discuss the need for bi-county cooperation nor does it contain land use performance standards for the Baylands PDA (despite the Plan including extensive policies around the need for housing in the county and mixed-use development). A San Francisco joint agency letter was sent on November 1 (attached) to the C/CAG expressing concern about both the lack of recognition of the need for bi-county cooperation and concern about the lack of housing in Baylands.

NEXT STEPS FOR BRISBANE BAYLANDS

The project is now before the Brisbane City Council for consideration. The City Council had their first meeting on September 29, 2016 which was a workshop providing an overview of the Council's review process, the project components, EIR, and Planning Commission Recommendations. The Council has set

a schedule for monthly public workshops on the project over the next several months, each workshop focusing on one or few topics, culminating with potential approval of the project and related General Plan amendments sometime after May 2017 (See Exhibit C).

In the coming months, the Department, in coordination with other San Francisco agencies, will seek to work collaboratively with the City of Brisbane to encourage consideration of our comments and especially inclusion of housing in the final adopted project and General Plan amendments.

Attachments:

Exhibit A – Context Map of Baylands

Exhibit B – Land Use Plans of Baylands EIR Alternatives

Exhibit C – Schedule for Brisbane Baylands City Council hearings

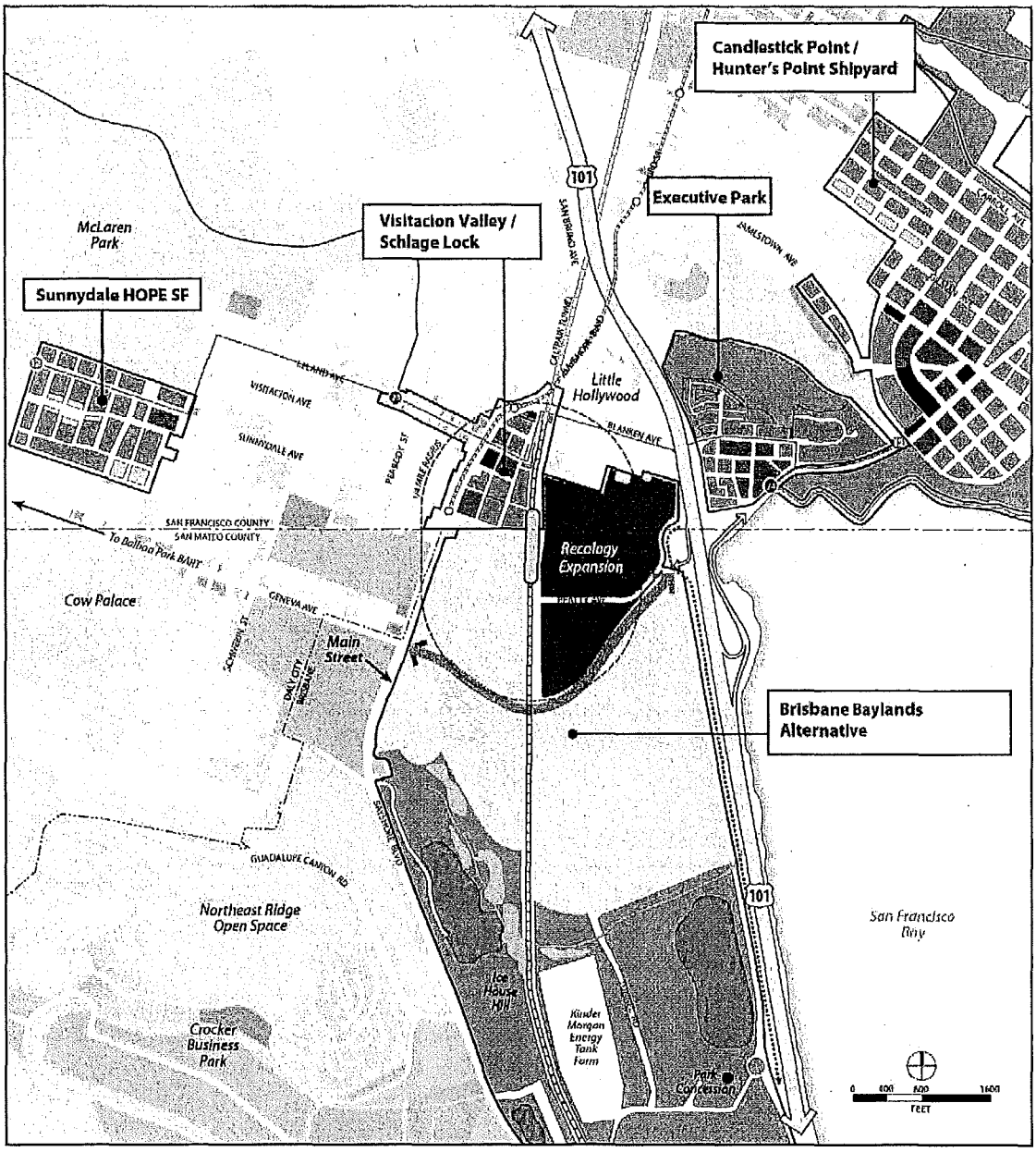
Exhibit D – San Francisco agency comments on Baylands DEIR (January 21, 2014)

Exhibit E – City of Brisbane comment letter on Plan Bay Area Draft Preferred Scenario (October 7, 2016)

Exhibit F – San Francisco agency comment letter on Plan Bay Area Draft Preferred Scenario (October 17, 2016)

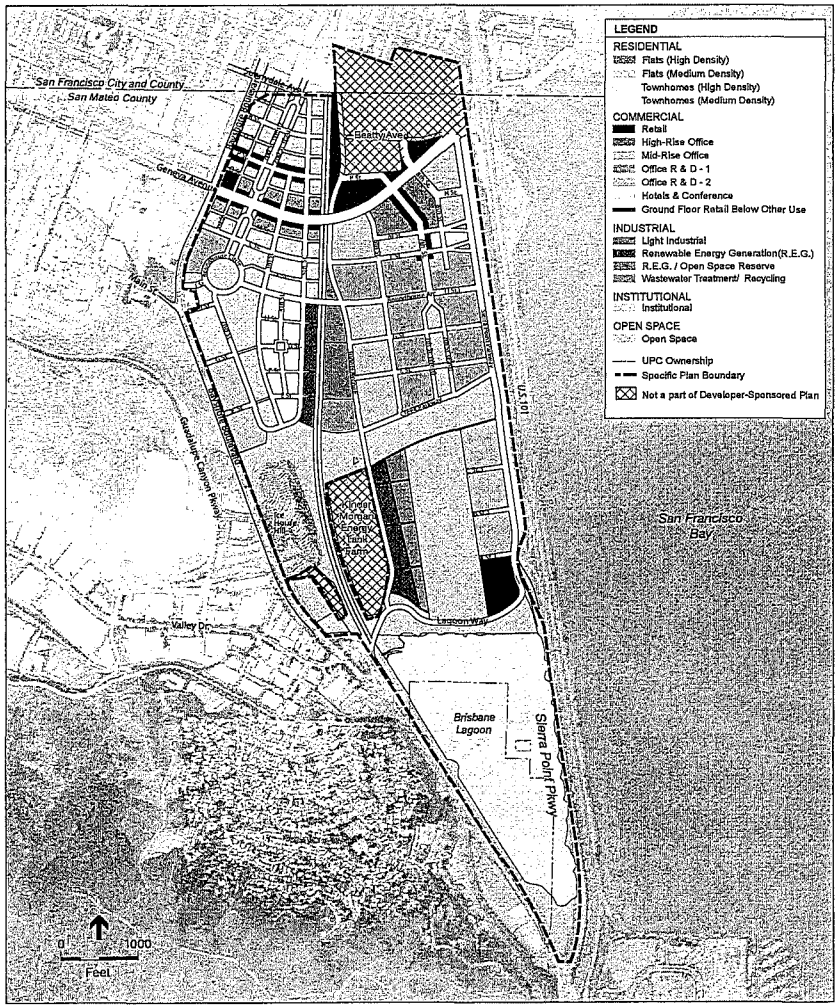
Exhibit G – San Francisco agency comment letter on San Mateo Countywide Transportation Plan (November 1, 2016)

Exhibit A: Context Map Excerpt from San Francisco Planning's Bayshore Multi-modal Facility Study



Study Area Land Use and Planned Developments

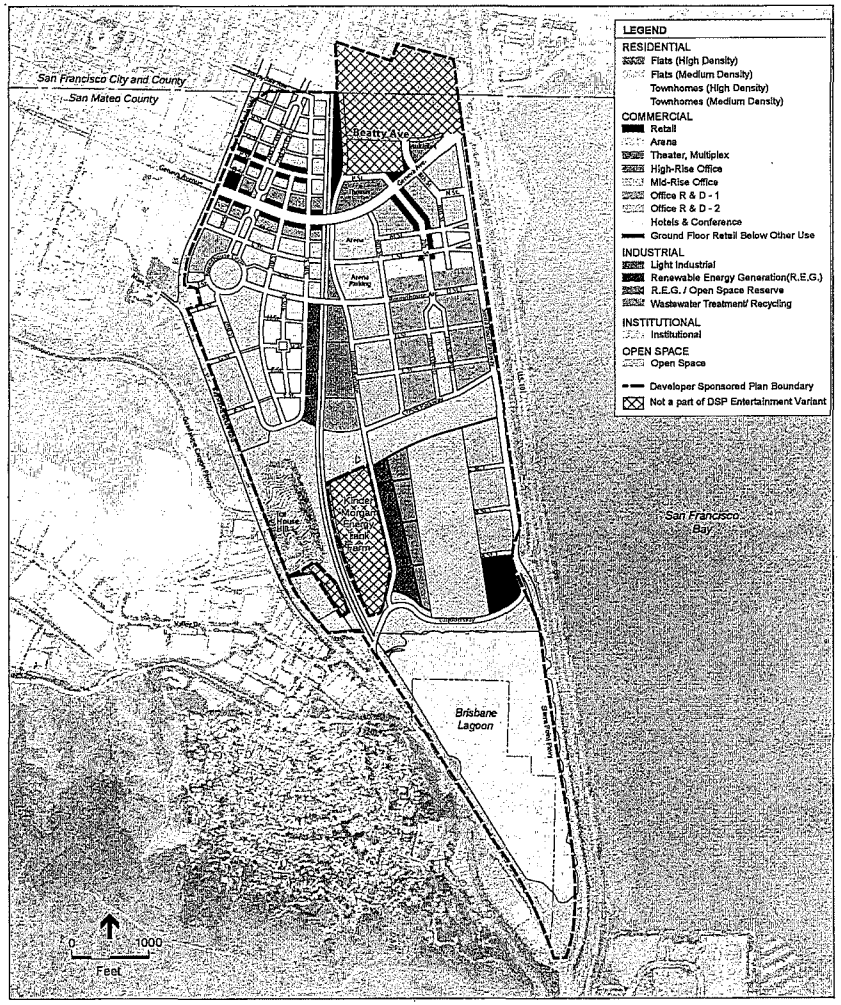
- Single Family Residential
- Multi-family Residential
- Residential Mixed Use
- Commercial/ Commercial Mixed Use
- Office
- R&D
- Cultural/Civic/ Entertainment
- Hotel/Hotel Overlay
- Industrial/Renewable Energy
- Institutional
- Open Space
- Vacant/Missing Information
- Area Plan
- Existing Caltrain Platform
- Caltrain Rail
- Existing Muni LRT
- Green Connection 12
- Green Connection 23
- Green Connection 24
- 1/4 Mile Walking Radius from the platform
- Geneva Extension Alignment
- Proposed Bay Trail



SOURCE: UPC, 2011

Brisbane Baylands . 206069

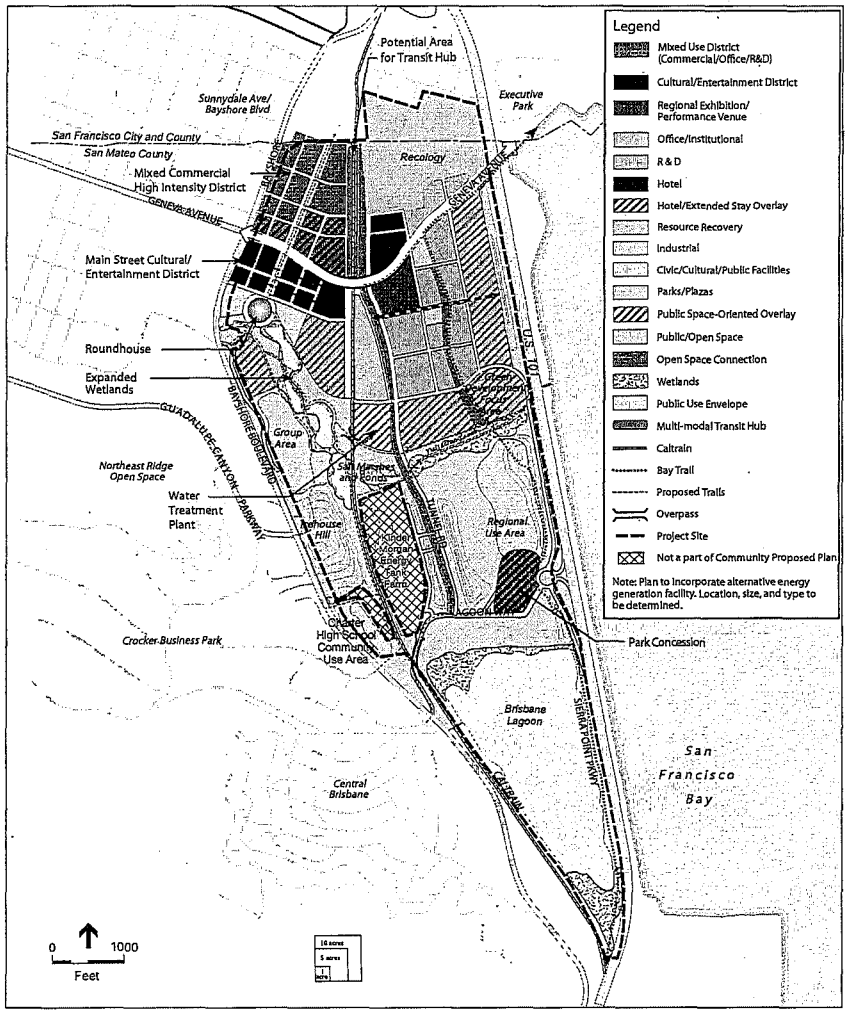
Figure 3-11
Developer-Sponsored Plan (DSP)
Proposed Land Use Plan



SOURCE: UPC, 2011

Brisbane Baylands . 206069

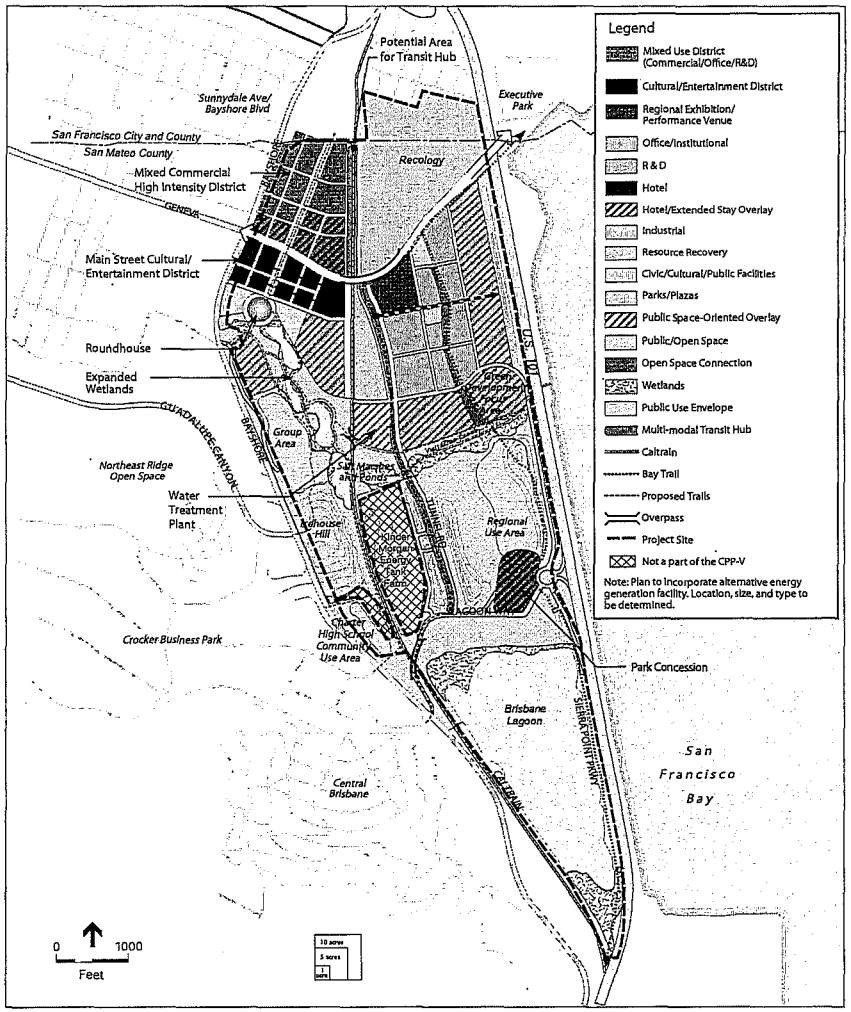
Figure 3-12
Developer-Sponsored Plan-Entertainment Variant (DSP-V)
Proposed Land Use Plan



SOURCE: Dyett & Bhatia

Brisbane Baylands . 206069

Figure 3-13
Community Proposed Plan (CPP)
Proposed Land Use Plan



SOURCE: Dyett & Bhatia

Brisbane Baylands . 206069

Figure 3-14
Community Proposed Plan Recology Expansion Variant (CPP-V)
Proposed Land Use Plan

Exhibit C: Schedule for Brisbane Baylands City Council hearings

- <u>September 29, 2016:</u>
  - Overview of Review Process
  - Overview of Proposed Baylands Development
    - Developer's application
    - Project Components
    - Environmental Impact Report
    - Sustainability Framework
    - Commission Recommendation

- **November 17, 2016**:
  - Site Remediation and Title 27
  - Landfill Closure and Related Policy Issues

- **December 15, 2016**:
  - Traffic, Noise, Air Quality, GHG Emissions and Related Policy Issues

- **January 19, 2017**:
  - Water Supply, Public Services and Facilities and Related Policy Issues

- **February 16, 2017**:
  - Other Environmental Issues and Related Policy Implications

- **March 16, 2017**:
  - Economics: Development Feasability, Municipal Cost-Revenue and Related Policy Implications

- **April (TBD) 2017**:
  - Land Use and Planning Issues and Related Policy Implications

- **May 18, 2017**:
  - Applicant and Community Presentations

- **TBD**: City Council Deliberations

Exhibit D – San Francisco agency comments on Baylands DEIR (January 21, 2014)

OFFICE OF THE MAYOR
SAN FRANCISCO

EDWIN M. LEE
MAYOR

January 21, 2014
John Swiecki, AICP
Community Development Director
City of Brisbane
50 Park Place
Brisbane, CA 94005

via e-mail: eir@ci.brisbane.ca.us

Re: Draft Environmental Impact Report (DEIR) for the Brisbane Baylands
Dear Mr. Swiecki:

Enclosed are comments from San Francisco Agencies and Departments on the above-referenced Draft EIR. Included are comments from the San Francisco Municipal Transportation Agency (SFMTA), the San Francisco County Transportation Authority (SFCTA), and the San Francisco Planning Department. It is our understanding that you will also be receiving a separate comment letter from the San Francisco Public Utilities Commission.

In addition to the enclosed comment letters, we would like to highlight several issues of local and regional importance:

San Francisco strongly supports Recology's desire to modernize and consolidate its existing facilities to meet San Francisco's goal of achieving zero waste by 2020. Recology's plan to expand its operations on 21.3 acres of the Brisbane Baylands project area, as reflected in the CPP-V variant, is critical to achieving this goal. We applaud Recology's thoughtful expansion plan and would not support alternative uses at the proposed Recology expansion location.

San Francisco does not support moving the Caltrain Bayshore Station farther south from its current location. With the coming electrification of Caltrain and more frequent service, tens of thousands of future San Francisco households and workers in Visitation Valley, Executive Park, Hunters Point Shipyard and Candlestick Point will increasingly depend on a convenient and accessible Caltrain Bayshore Station. The attached letter from SFMTA expands upon this concern and related technical issues.

San Francisco appreciates acknowledgement in the Baylands DEIR that the California High Speed Rail Authority (CHSRA) has identified the Baylands as the recommended location for an approximately 100-acre High Speed Rail Terminal Storage and Maintenance Facility (TSMF), as the HSR service will be a blended service, with facilities jointly used by California High Speed Rail and Caltrain (Bay Area to Central Valley High Speed Rail EIR – Supplemental Alternatives Analysis, 2010). We suggest a more in-depth analysis of the implications of the Baylands proposals upon the CHSRA project. We suggest that you combine the future storage facility with the Renewable

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Energy Alternative already analyzed in the DEIR (Chapter 5) into a new Variant on that Alternative.

We disagree with the statement in the Draft EIR that the CHSRA project is premature and speculative. Construction contracts for the first 29 miles of rail have already been signed and requests for qualifications for construction of the next 60 mile segment of rail have been released by the CHSRA. Summary of Requirements for Operations and Maintenance Facilities for that project has also been prepared in April of 2013. That document identifies the need for and conceptual design of an approximately 100 acre railyard facility in the vicinity of San Francisco. The Baylands was the recommended location for such a railyard in the CHSRA EIR.

Thank you for the opportunity to comment on this important and transformative project. Please feel free to contact the undersigned if you have any questions.

Sincerely,

Ken Rich
Director of Development

Office of Economic and Workforce Development

Gillian Gillett
Director of Transportation Policy

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January 21, 2014

John Swiecki, AICP
Community Development Director
City of Brisbane
50 Park Place
Brisbane, CA 94005

Re: Comments on Brisbane Baylands Draft EIR

Dear Mr. Swiecki,

Thank you for the opportunity to comment on the Brisbane Baylands Draft EIR. This letter contains the Planning Department comments, both from a technical CEQA perspective and also from a policy perspective.

As stated in the cover letter from our Mayor's Office, San Francisco strongly supports the proposed expansion and modernization of the Recology site, as included in one of the Draft EIR Alternative Plans. We believe that there could be conflicts that would arise out of siting high intensity commercial, office, institutional, residential or open space uses in close proximity to the Recology site. Traffic increases from future Baylands activities could conflict with necessary truck and vehicular access to and from the Recology site on nearby streets. This could result in transportation impacts not only with respect to truck and vehicle traffic, but also to planned Bus Rapid Transit (BRT), pedestrian and bicycle routes through the area. Additionally, noise, odor or air quality complaints or impacts could arise from siting proposed Baylands uses immediately adjacent to an active industrial use.

We believe that the EIR needs to look more closely at the potential for future development on the Baylands site to cause such conflicts with the Recology operations, and then more rigorously discuss and analyze potential Mitigation Measures or Alternatives that may be available and necessary to reduce or avoid potential impacts in order to ensure smooth co-existence of the various activities in the area. We did not find sufficient analysis unique to the potential impacts of siting future Baylands development in close proximity to the expanded Recology operations in the Draft EIR.

Regarding transportation impacts, the Draft EIR states that the Cumulative Without Project travel demand forecasts utilize the Candlestick Point/Hunters Point Study forecasts, developed by the SFCTA CHAMP 3 Model, as part of the analysis for the Candlestick Point/Hunters Point Shipyard EIR. The CHAMP 3 Model included certain assumptions about transportation mode splits, in particular transit and vehicular mode splits, based upon the proximity of existing neighborhoods and other area plans (such as Visitacion Valley, Executive Park and Candlestick Point/Hunters Point) to transit, which would have encouraged pedestrian trips from those areas to an intermodal transit hub connected to the Caltrain Station. The Brisbane Baylands Alternatives propose to move the Caltrain Station south of its current location (i.e., south of the location assumed in the CHAMP 3 Model.) We believe such a relocation of the Caltrain Station would reduce the attractiveness of transit for many

San Francisco residents, and the likelihood of pedestrian trips to the transit hub in particular. This would require a corresponding shift in mode split assumptions for the transportation analysis in the Baylands Draft EIR. We did not see any discussion or analysis of that in the Draft EIR.

Similarly, the Draft EIR lists several transit improvements as being included within its future cumulative scenario (e.g., T-Third Line extension to Caltrain Station; Geneva Avenue BRT; Bayshore Intermodal Station Improvements.) The Baylands proposal to relocate the Caltrain Station further to the south, and the Baylands Alternatives which do not include any new housing, could create significant barriers to the substantial funding that would be required for those transit improvements, based upon MTC's funding criteria. That could seriously jeopardize the construction of those transit improvements. The Draft EIR did not examine whether relocation of the Caltrain Station to the south or adoption of project Alternatives without housing could hinder or preclude construction of the assumed transit improvements, which would in turn require a change in the assumptions built into the transportation methodology and analysis.

Regarding Mitigation Measures, as pointed out in the enclosed letter from SFMTA, the transit mitigation measures in the Draft EIR (4.N-7 and 4.N-9) are too vague and lack the specificity or clarity necessary to understand what is being proposed, how the measures would be implemented or funded, or how effective they would be in terms of mitigating identified impacts. Those measures defer the mitigation to future study, plan development and agreement, without presentation of specific performance criteria, feasible mitigation options potentially available or the effectiveness of such measures. Information regarding the necessary timing, funding requirements or implementation of such measures is also lacking. For example, Mitigation Measure 4.N-7 requires the project sponsor to work with San Francisco's Municipal Transportation Agency to reach an agreement to provide a fair share contribution to capital costs for increased transit service. However there are no performance objectives, no parameters for the types of improvements, no addressing of feasibility and no recognition of the significant lead time required for development, approval, funding and implementation of any such measures. Nevertheless, the Draft EIR concludes that the mitigation measures could reduce impacts to less than significant. We do not see how those conclusions can be reached based upon the level of information provided in the Draft EIR.

Regarding Alternatives analysis, the Draft EIR examines four main Alternative Specific Plan build schemes, each of which results in a large number of significant unavoidable transportation and air quality impacts. The Draft EIR examines a No Project, existing General Plan Build Out Alternative (approximately 2 Million square feet of industrial and commercial development) and the Draft EIR concludes that this No Project Alternative would avoid the significant transportation and air quality impacts of the Build Alternatives. The Draft EIR also analyzes two Reduced Intensity development Alternatives (approximately 5.3 Million – 6.8 Million square feet of development) and the Draft EIR concludes that such Alternatives would not avoid the significant impacts related to transportation and air quality. Hence, all Specific Plan mixed-use Build Alternatives analyzed in the EIR have substantial significant unavoidable environmental impacts, and the only transit-oriented mixed-use Alternative that reduces or avoids those impacts is a No Project Alternative. This leaves a hole in the EIR, whereby the readers and decision-makers are left guessing as to what level of mixed-use development, including residential, could constitute a Specific Plan Build Alternative and still avoid many of the significant transportation and air quality impacts identified for the four main Alternatives and the Reduced Intensity Alternatives analyzed in the Draft EIR.

Given the enclosed comments from other San Francisco agencies, we suggest that the EIR should include within its range of Alternatives a Specific Plan Mixed-Use with Housing Build Alternative that furthers the stated project objectives related to environmental protection, sustainability, contribution to regional housing, transportation and air quality solutions, but minimizes the significant impacts to surrounding communities identified for all of the Specific Plan Build Alternatives presently analyzed. The parameters for such an Alternative would include the following:

Mixed-use development, including housing, at reduced levels (amount of development to be determined by further analysis, presumably somewhere between 2 Million and 5.3 Million square feet) which substantially reduce or avoid the significant and unavoidable transportation and air quality impacts identified for all other mixed-use Build Alternatives;

Transit/transportation infrastructure changes to encourage transit use and reduce potential transportation conflicts: See SFMTA enclosed letter for suggested transportation infrastructure improvements; two variants analyzed, one with Caltrain station moved north, and one with Caltrain station moved south, to compare impacts between different intermodal connection locations;

Expansion of Recology site; and

Revised site layout (or alternative layouts) to maximize transit utilization and minimize or mitigate potential conflicts arising due to proximity of surrounding mixed uses to the Recology site.

We believe that such an Alternative would not only further the stated project objectives, but would also be more in keeping with the regional plans of ABAG, MTC and the BAAQMD, as presented in the Draft EIR. For a project at the size, scale, location and regional importance of the Baylands, we believe that the EIR should provide the public with analysis of a feasible reduced impact Build Alternative such that decision-makers are not left with a choice only between significant, unavoidable impacts of a new plan, or no project.

As also indicated in the enclosed comments from our Mayor's Office, we note that the Draft EIR provides very little information and calls little attention to the conflicts between all Alternatives considered in the EIR and the California High Speed Rail Authority (CHSRA) proposal to use a portion of the Baylands site as an operations and maintenance yard. For the reasons pointed out in the cover letter from our Mayor's Office, we believe that the CHSRA project is reasonably foreseeable rather than speculative. Since the CHSRA project has potential statewide and regional significance and contemplates use of the Baylands site, it would seem that decision-makers and the public should be provided with that information and analysis of potential conflicts between the CHSRA and Baylands proposals in the Baylands EIR. That would require additional impact analysis for each of the Baylands Alternatives, as well as possible inclusion of a new Alternative (or perhaps a Variant to an existing EIR Alternative such as the Renewable Energy Generation Alternative) which would include the CHSRA operations and maintenance yard on a portion of the Baylands site.

The Brisbane Baylands DEIR highlights the Renewable Energy Generation Alternative as the environmentally superior alternative for the Baylands. The DEIR also states that the City of Brisbane must balance economic, social and environmental objectives in establishing a development plan for

the Baylands. The Planning Department supports these objectives, especially as they pertain to bi-county and regional impacts on housing and transportation.

The Planning Department supports analyzing impacts on housing and transportation infrastruction and reducing them through alternatives that maximize housing, retail and office in a mixed-use centers near high capacity transit. The City of San Francisco does not support moving the Caltrain station south, especially with over 1,600 units planned adjacent to the station, just north of the county line at the old Schlage lock site. Similar transit-oriented development is supported in the Baylands as well. Local transportation impacts should also be considered in light of maximizing regional opportunities in new facilities for California High Speed Rail, Caltrain and Recology.

Additional impacts of concern include:

1) The impacts of uses linked to a high drive-alone mode share and underutilization of transit. These tend to be:

a. Retail and entertainment uses that are not part of a mixed-use development are frequently linked to a high auto mode share.

b. Industrial uses are frequently linked to high auto mode share/low transit usage.

These impacts are greatest with both of the CPP alternatives. In some scenarios, providing mixed-uses that are linked to higher transit use, or a transit-oriented development alternative, may reduce impacts on the regional environment and transportation systems.

2) The Visitacion Valley/Schlage Lock site plans just to the north of the Baylands include open space, housing and commercial development. The impacts on the mixed-use neighborhoods within that site should be considered in each alternative.

3) Demand for housing is high in the Bay Area, especially in and near the City of San Francisco. While development to the north of the county line is increasing regional supply, the City of Brisbane should also address impacts on bi-county and regional housing demand by including housing to the maximum feasible extent.

Lastly, a correction to the Draft EIR should be made at page 4.I-13. The Visitacion Valley/Schlage Lock site plan is being revised: The plan for the site now proposes 1,679 residential units and 43,700 square feet of commercial and institutional development.

Once again, thank you for the opportunity to comment on the Draft EIR for this large and important project on our border. San Francisco looks forward to working together and helping Brisbane create the best possible project for this site.

Sincerely,

John Rahaim
Director of Planning

Office of Community Investment and Infrastructure
(Successor to the San Francisco Redevelopment Agency)

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January 21, 2014

450-004.14-021

John Swiecki
City of Brisbane
50 Park Place
Brisbane, CA. 94005

RE: Draft EIR for the Brisbane Baylands Specific Plan

Dear Mr. Swiecki:

Thank you for the opportunity to review and comment on the Draft EIR for the Brisbane Baylands Specific Plan, June 11, 2013. The Brisbane Baylands project is of interest to the Office of Community Investment and Infrastructure (OCII), Successor Agency to the San Francisco Redevelopment Agency, as the project site adjoins the Visitacion Valley/Schlage Lock Site to the north and is close to the Candlestick Point & Hunters Point Shipyard (Phase 2) Project area and the Executive Park, which involves demolition of an existing 230,000 square feet office building and conversion to 1,600 residential units. In addition, there are a number of existing and planned transportation facilities that require close coordination between Brisbane and San Francisco.

Program level vs Project Level
Because the Draft EIR has been prepared as a "programmatic" rather than a "Project-level" EIR, OCII requests that future development that may occur within the Project Site must be subject to preparation and adoption of project level CEQA analysis. Specifically, an environmental impact analysis of potential increases in air pollutants and noise at intersections, such as Bayshore Blvd., at Sunnydale Avenue and Bayshore at Leland Avenue and other major intersections near existing and future residential neighborhoods should be properly identified and mitigated.

Transportation
The Draft EIR primarily uses traffic counts recorded in 2007 and traffic counts "taken in November 2012 confirmed that volumes in pre-recession 2007 were higher than current volumes. Thus, the use of pre-recession 2007 traffic counts in this EIR results in a more conservative analysis of Project impacts than would re-running traffic models based on post-recession 2010 or 2012 traffic counts" (pg. 4.N-42). It is unclear whether or not the traffic counts utilized take into consideration the adopted Candlestick Point & Hunters Point Shipyard plans, which no longer includes a stadium option. If so, the proposal to relocate the existing Caltrains station to the south should be independently analyzed. The EIR prepared for the Candlestick Point & Hunters Point Shipyard (Phase 2) assumed the existing Caltrain Station would remain at the same location.

Specific comments for the Transportation Resources analysis.

- No reasonable justification has been provided for the proposed relocation of the Caltrain station to the south. No assumption should be made that moving the Caltrain platform to the south, as stipulated in the Draft EIR, would be supported by the Office of Community Invest and Infrastructure, Successor Agency to the San Francisco Redevelopment Agency.

- The Candlestick Point & Hunters Point Shipyard (Phase 2), Visitacion Valley and Executive Park plans based their traffic circulation analysis on the fact that Caltrain would, at the very minimum, remain in its present location. Relocation of the station to the south would result in loss of access and increased travel time to the transit station, which would result in diminished transit usage from existing communities and planned and approved projects within San Francisco. The cumulative traffic impact analysis, and proposed mitigation measures, should reflect diminished transit usage that would result from moving the existing Caltrain station to the south. The DEIR does not clarify or acknowledge loss of ridership.

- The bicycle diagram, depicted on **Figure 4.N-6,** raises a concern: no bicycle access to BRT/Caltrain hub is provided. In addition, the proposed unclassified bike routes should be clearly classified as part of the overall circulation plan. Because the growth concept scenarios involve increased use of the site for work, recreation or residential use, the a program level EIR should be prepared and should analyze the reasonable foreseeable indirect impacts that such growth could have on bike travel lanes and long term storage capabilities at the Caltrain station. It is unclear whether or not adequate bike parking and storage facilities are planned to accommodate the anticipated growth.

- **Outdated Information:** The DEIR employs exhibits from the Project described in the Candlestick Point/Hunters Point Shipyard Phase 2 ("CP/HPS2") EIR. However, the CP/HPS2 EIR also contained a non-stadium variant project, which will be under construction starting in March 2014. The Baylands DEIR should be revised to reflect the implementation of the non-stadium variant at CP/HPS2, including land use and transportation diagrams and the analysis contained in this variant. For example, the non-stadium variant introduces a different street grid on Hunters Point Shipyard, shifts density among the sites, and incorporates additional commercial square footage. As a result, the cumulative analysis contained in the Baylands DEIR may underestimate PM peak traffic demand generated by the CP/HPS2 Project.

- **Recommended Revision:** The transportation analysis in the Draft EIR should be revised to appropriately reflect the impacts of the proposed Caltrain station location on existing and already approved development and overall transit ridership in the interim and horizon years. In particular the analysis must take a finer-grained approach toward understanding the impacts of location on planned and existing development within ½ mile of the current station and on the ridership of the BRT, which depends on timely transfers to attract riders. Implementation of the Baylands project should take into account the development phasing so that station relocation does not precede appropriate development triggers, in effect diminishing transit performance among existing and already approved development for the sake of potential development which phasing may depend on a variety of factors including subsequent approvals, market demand and land acquisition.

Thank you for the opportunity to comment on the Draft EIR. We request that your agency consider our comments prior to certification of the Draft EIR. Please send us copies of all future project level documents, including Mitigation Monitoring and Reporting Program (MMRP) for the project, CEQA findings and, if applicable, statement of Overriding Considerations.

Regards,

Wells M. Lawson
Senior Project Manager

SFMTA
Municipal Transportation Agency

January 17, 2014

Mr. Paul Maltzer
Senior Planner
San Francisco Planning Department
1650 Mission Street (No. 400)
San Francisco, CA 94103

Re: Brisbane Baylands DEIR

Dear Mr. Maltzer:

Thank you for the opportunity to comment on the Brisbane Baylands Specific Plan DEIR. We understand the following San Francisco Municipal Transportation Agency (SFMTA) comments will be attached to a City and County of San Francisco letter to the City of Brisbane.

The development of the Brisbane Baylands ("The Project") will have a critical effect on San Francisco's transportation system and other infrastructure. Not only does the site border San Francisco, but it is immediately adjacent to three major San Francisco development sites (Candlestick/Hunters Point, Executive Park and Visitacion Valley/Schlage Lock). These are all envisioned to provide affordable housing, economic revitalization and major transportation improvements that will benefit the entire San Francisco Bay Area region.

In this letter, we first cover broad concerns that apply to all variants and scenarios. Then we review concerns specific to different variants. Finally, we discuss some changes that Brisbane could consider to better ensure the integrity and sustainability of the San Francisco and regional transportation network while accommodating the Project goals and broad land use principles.

GENERAL COMMENTS

Need for Effective Transit-Oriented Development

The SFMTA supports Transit-Oriented Development (TOD) concepts where development is proposed in and near San Francisco, for four essential reasons:

1) ***Reduced environmental impact:*** TOD encourages use of transit, bicycle and walking over the private automobile and therefore reduces emissions, sprawl, impacts on other infrastructure, and related degradation of open space.

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2) ***Reduced automobile congestion***: TOD provides an alternative growth prototype that would be less likely to add cars that in turn would clog local streets and undermine multi-modal transportation access.
3) ***Increased use of transit***: provided that resources are provided to ensure sustainable transit operations and reduce transit overcrowding, SFMTA supports development that invest in growth in transit ridership, particularly so when Muni is the service provider.
4) ***Compliance with local and regional planning and funding priorities:*** TOD that meets regional (MTC) land use mix and density criteria, as wells as multi-modal access criteria, is readily supported by numerous planning and legislative policies and related funding programs that sustain and support current and future operating needs and capital investments, Development near transit facilities that do not meet these criteria face great policy and funding challenges, including failure to compete well in competitive regional, state or federal grant and financing award programs.

The Project as described in this DEIR does not comply with the metrics and criteria that measure "successful" TOD as described above. . Land use proposals and multi-modal access characteristics of several Project variants (including the Community Proposed Plan and its Recology Expansion Variant) do not reflect regionally-accepted minimums of density and land-use mix that support "viable" TOD. These proposals incentivize rather than discourage use of the automobile for transit station access, and (as a direct contradiction to regional TOD guidelines), jeopardize the long-term funding sustainability of Caltrain station and the related operations that rely on compliance to attract and secure vital regional funding.

The Project must sustain the critical environmental infrastructure, understandably of regional importance, of Recology's existing large recycling and transfer station facility and as well as Recology's proposal for a modernized expanded recycling facility as reflected in the CPP-V variant. The DEIR, however, does not acknowledge or resolve the challenges of transforming the Bayshore Caltrain Station into a regional Bus Rapid Transit (BRT)/Light Rail Transit (LRT)/commuter rail station at its current site, or by moving the Caltrain station south. Instead, it should consider moving the station closer to existing transit-oriented land uses (with a higher density of employee, services and/or residents than the recycling facility) and the existing pedestrian-oriented multi-modal access network and bus hubs to the north that connect to Visitacion Valley and Executive Park. The recycling facility would still remain within walking distance for its employees if the station were to move north, but the truck access it must depend upon would not be impeded by the multi-modal access paths to the Caltrain station needed for more robust ridership. Moving Bayshore Caltrain a few hundred feet north to connect to the east-west access routes that serve the above neighborhoods and the new mixed-use developments at Candlestick

Point and the Hunters Point Shipyard would allow the transformation of Bayshore Station into a regional transit hub while allowing Recology's facility to expand to the south, benefitting both transit function and recycling operations.

Caltrain Bayshore Station; Location, Access and Future Funding Sustainability

The Caltrain Bayshore Station provides an outstanding opportunity to construct an intermodal station supporting all adjacent development and the effective integration of commuter rail, light rail, bus transit, and pedestrian/bicycle networks. The *Bayshore Intermodal Station Access Study Final Report* (March 2012) states that the station "has the potential to transform into a vibrant, central hub for regional and local transit connections...The Bayshore Station represents a rare and important opportunity to truly coordinate transportation with land use to integrate a regional transit station into the surrounding neighborhood at the same time that the neighborhood itself is taking shape" (p. 5). However, the treatment of this station in the Baylands Specific Plan does not support a high-quality transit hub, and the DEIR does not adequately address this issue.

In fact, the DEIR is excessively vague about the station changes. The Caltrain Bayshore Station upgrade to an intermodal station is not detailed sufficiently to show how it could function as a true multi-modal facility. There is a lack of attention to how existing light rail (T Third), planned bus rapid transit and Caltrain service would interface with the Bayshore Station.

The DEIR shows the station moving south by an unspecified distance. This is inconsistent with the current plans for the approved projects at Candlestick Point/Hunters Point Shipyard Phase II, Visitacion Valley and Executive Park, all of which assumed immediate pedestrian access to Caltrain that would be compromised by moving the station platform south. Furthermore, this is inconsistent with the strong support from San Francisco agencies supporting these projects for the "interim" Bayshore Station configuration described in the *Bi-County Transportation Study*, which relies on access to the existing station site – or a future northern relocation of this platform -- to better connect Caltrain with the T Third light rail and the 9 San Bruno bus a the Arleta Station, and the proposed Geneva/Harney bus rapid transit service that connects via Blanken and Tunnel Avenues from the east and south and avoids the freeway interchange and recycling yard traffic closer to Alana Way. A concept graphic is attached to illustrate the following key features of this configuration.

- Closer to existing, mixed-use neighborhoods, with a high proportion of transit-dependent residents;

- Closer to planned high-density development, especially residential (in Candlestick Point, Schlage Lock/Visitacion Valley and Executive Park); and, by focusing on the light rail-to-Caltrain connection at the existing Arleta station,
- Eliminating the need or the unfunded, unresolved connection of the existing T-Third light rail (A station near Blanken and Tunnel would be walking distance from the Arleta T-Third station, probably less than 1,000 feet away.)

A move south would significantly drive up costs of transportation improvements such as the light rail connection and the Geneva Avenue extension and bus rapid transit that make the Bayshore station an essential transit hub (e.g., as shown in Fig 4.N-15, -16). The extended light rail track in Fig 4.N-16 suggest further, undiscussed and unresolved traffic conflicts between light rail and the Geneva Extension. This extra cost is a concern to Brisbane's partners in the Bi-County Study who must share the costs of this extension. This cost burden is especially inequitable and financially untenable because the lower intensity of the Brisbane Project means the Project would not likely have to contribute as much to capital improvements (nor to eventual ridership) as other developments.

Moving the station location north so it would no longer be surrounded by non-residential uses, and a recycling facility (under the Community Plan, Renewable Energy Generation Alternative and Community Proposed Plan Recology Expansion Variant Alternatives), helps ensure that the transit station can remain competitive for regional, state and federal funding. A northern location would be adjacent to the Executive Park development (planned for 1,600 residential units) and Schlage Lock/Visitacion Valley (planned for 1,250 residential units and about 120,000 square feet of commercial space in mixed-use buildings) and close to the Candlestick/Hunters Point development (planned for 10,500 residential units and roughly 4 million square feet of commercial development). The Sunnydale Hope housing project would also add some 900 affordable and market rate residential units to replacement of 785 subsidized units. Thus the northern location would serve true transit-oriented developments that depend on proximity to Caltrain, BRT and light rail; that have lower parking supply; and that benefit from pedestrian/bicycle networks providing better connections.

The DEIR does not clarify the ridership impacts and increased travel time for the transit, bike and pedestrian networks operated by San Francisco created by moving the station south. No discussion or suggestion is provided regarding mitigating the ridership or loss-of-access impacts from this station move to the historic, existing neighborhoods (Little Hollywood, Visitacion Valley, Executive Park) and to their proposed neighborhood plans

that rely upon – and will rely more upon -- direct access to Caltrain. The Visitacion Valley/Schlage Lock, Executive Park and Candlestick/Hunters Point Phase II Environmental Impact Reports did not account for a move south to a less convenient location. (For example, the Executive Park DEIR assumed access to the Bayshore Station via Blanken and Beatty Avenues.)

Muni Transit Circulation, Capacity and Funding Sustainability
The transportation analysis should consider BRT use of Blanken Avenue to cross under the freeway, rather than via the Harney Way interchange and Geneva Avenue extension. This would allow a connection with Caltrain without a conflict with the Recology site.

Muni transit operating and capacity impacts 4.N-7 and -8 are identified as "significant and unavoidable" because Muni is not operated by the City of Brisbane, and capital improvements to the Muni system are not assured. However, the potential mitigation measures to address these impacts are limited to the references of the Bi County fair-share contributions to SFMTA: certainly a capital cost concern, but a future operating cost concern as well. The Project should go beyond the investment in infrastructure it should share with other area developments to include its contributions to extra rolling stock needed to avoid overcrowding and extra maintenance facility space to ensure these vehicles have adequate operational support. These factors were addressed and critical contributions to support these needs were included in the Candlestick Point/Hunters Point Shipyard (CP/HPS) EIR: procurement of additional vehicles, construction of transit non-revenue facilities to accommodate the need to expand capacity. The CP/HPS EIR models the kind of support this Project should also provide. Additionally, the Project should consider the benefits of the more functional, suggested Caltrain and bus rapid transit alignments (and related bike/pedestrian access) moved further north as described in the Bi County Study "interim" plan, bringing transit closer to a land-use mix that complies with MTC's funding criteria for sustaining intermodal facilities. This in turn would help address the related transit operational funding deficiencies of the Project as proposed.

Muni delays due to automobile and truck congestion generated by the development and the relatively low transit mode share (projected as under 15% on page 4.N-82) are likely to be significant (and should also be mitigated through the procurement and facility expansion recommendations). Alternatively, the Project should consider the more functional, suggested Caltrain and bus rapid transit alignments (and related bike/pedestrian access). It would be particularly valuable to separate these networks from freeway traffic and arterial congestion.

Even with the Harney Way double-lane turns and widening in Mitigation Measures 4N-1d and -1e, traffic impacts are deemed "significant and unavoidable" because the street is in San Francisco. However, the mitigation measures do not address the extra impacts and conflicts to the transit, bicycle, and pedestrian networks the widening would create. Alternatively, the Project should consider increasing transit mode share to reduce congestion by such means as recommending the more functional Caltrain and bus rapid transit alignments (and related bike/pedestrian access) described above, particularly those that separate these networks from freeway traffic and arterial congestion.

The discussion of Caltrain capacity for Bayshore-serving trains on p. 4N-14 should clarify the unused capacity of about 800 seats per hour. It isn't clear if this is an all-day average. A peak hour capacity by direction should be provided.

Pedestrian and Bicycle Circulation Access to Caltrain and between Projects

Pedestrian and bicycle needs are not adequately addressed in the DEIR. Some of these issues are discussed above. Additional concerns include the following:

The pedestrian and bicycle connections to Caltrain and between the large, proposed development projects are not made clear. The figure on p. 4.N-20 does not show the route of the planned bike path and bike lanes near the planned Geneva Avenue Extension clearly, making it harder to understand potential conflicts with land use proposals. If the Geneva Extension/Overpass is intended as the main bicycle and pedestrian connection to Caltrain, this would force these vulnerable modes to use a wide, heavily-trafficked arterial and contend with voluminous on-ramp and through traffic of freeway-bound cars and trucks. These concerns are not acknowledged in the discussion of Mitigation Measures 4.N-10 and -11.

Pedestrian connections to Executive Park, Candlestick Point State Park and Candlestick Point development are not shown in Fig. 4.N-17. While bike lanes are shown, apparently crossing under the freeway on Alana to Beatty, the route is not clearly explained in the text on p. 4N-61. The text refers to an extension of the Bay Trail to Alana and Beatty, yet the accompanying figure shows bike lanes instead of a Class I path. The figure title (Proposed DSP/DSP-V and Presumed CPP/CPP-V Project Site Pedestrian and Bicycle Circulation) suggests that a reasonably detailed pedestrian and bicycle has not been developed for the CPP and CPP-V alternatives.

Table 4.N-7 refers to peak hour vehicular use of new bike lanes on the Geneva Avenue Extension in a footnote. This seems highly undesirable and should be addressed as an impact to bicycle circulation.

The DEIR needs to be updated as the Cesar Chavez bike lanes have been implemented. On San Bruno Avenue, sharrow markings have been added in both directions between Mansell and Paul. Striping at the Mansell/I280 Off-Ramp has been upgraded.

Errors or Inconsistencies in Text, Graphics and Tables
There are a number of erroneous and outdated assumptions about related projects that have recently been (or are close to being) environmentally cleared, such as Phase II of the Candlestick Point/Hunters Point Project, Executive Park, the SFMTA Transit Effectiveness Project, and the Visitacion Valley/Schlage Lock redevelopment project.

The transportation network shown on maps and in text contains some inconsistencies. For example, the representation of the Candlestick Point/Hunters Point Shipyard (CP/HPS) Bus Rapid Transit, and Caltrain pedestrian and bicycle access network assumes Alana and Beatty Avenues will reach Caltrain (map on page 4.N-31, description of Bayshore Station site and BRT route on page 4N-46, Fig. 4.N-11), but several scenarios make this connection impossible since Beatty is not shown as a through connection to Tunnel Avenue/Caltrain. Perhaps it is assumed that this critical connection will be made through a "streetless" path system in the Recology site for the Community and Recology Variants, yet this lack of connectivity is not discussed in the section describing Mitigation Measures 4.N-10 and -11. The Bayshore Station Access and CP/HPS "interim" Bus Rapid Transit path to Caltrain via Blanken and Bayshore is not reflected in the DEIR.

Critical transit facilities such as stations for the Bus Rapid Transit, Light Rail Transit and Caltrain are not shown on many of the key land use plans. (For example, Figure 3-11, the DSP land use plan shows the Bayshore station site as "retail" and does not show any BRT station sites.). This makes it especially difficult to understand how the Project's land use development patterns would facilitate or impede immediate access to these stations. This lack of clarity makes it difficult to support assumptions of mode-split shifts that are essential to the DEIR. Direct, convenient access to these stations for existing and proposed land uses should be an essential priority of this Project.

Assumptions and related graphics for adjacent projects, such as Candlestick/Hunters Point are outdated. The DEIR shows exhibits from the

Candlestick/Hunters Point EIR, but the project has changed significantly since then. In particular, the bus rapid transit, other Muni transit routes and bicycle network have changed.

Mitigation Measures

The Project has many significant unavoidable impacts, but the mitigation measures are often not specific enough. In particular, several mitigation measures for impacts to San Francisco transit operations require the developer to work with the SFMTA to reach agreement prior to the first occupancy permit. These include fair share contribution to capital costs for additional transit service; the operating costs of additional bus and train service; and the shuttle bus service plan. These mitigation measures are not specific or clear. What if agreements are not reached? Performance goals and a feasible menu of specific measures to attain goals should be identified. Without this, how can the EIR conclude whether impacts are mitigated to less than significant levels? Additional service may require several years of lead time, to procure additional vehicles and prepare detailed operations plans and schedules. A Memorandum of Understanding between the developer and the SFMTA would be desirable.

Transportation demand management (TDM) incentives, such as bundled or mandatory transit pass purchases for employees and residents, could be a valuable mitigation measure for transit impacts, helping provide the funding needed to increase service.

Mitigation measures are proposed to address pedestrian impacts, but no funding mechanisms or commitments are included to ensure implementation.

The Bicycle impacts mitigation measure (4.N-11) is expected to reduce impacts to less than significant, but no specifics are provided. The DEIR states that: "A detailed bicycle circulation plan for the CPP and CPP-V would be specified as part of preparation of the required specific plan should either the CPP or CPP-V Concept Plan scenario be approved, which makes the type of network improvements defined for the DSP and DSP-V scenarios a reasonable assumption for the CPP and CPP-V scenarios in this assessment." Without having this bicycle circulation plan included in the DEIR, it is not possible to assess the feasibility of the mitigation.

COMMENTS ON SPECIFIC VARIANTS

Below are variant-specific comments reflecting the concerns and issues unique to each variant. These comments highlight where undisclosed

potentially significant impacts might be created, or where discussion and analysis might be lacking to adequately assess potential impacts.

Developer-Sponsored Plan (and Entertainment Variant)
This proposals in Figures 4 and 5 show a mix of land uses in the northwest quadrant that seem to best reflect the regional priorities for TOD, but don't seem to support the station siting and networks shown in Figures 4.N 15, 16 and 17. They do not show the Caltrain station location or BRT/LRT stations. Nor do they clarify the relation between these land uses and the transit stations and other multi-modal networks that would demonstrate how they mutually support each other to support the mode-split assumptions consistent with the essential and related expectations of the recently-approved projects at Hunters Point/Candlestick Point, Visitacion Valley, Executive Park. They do not address the range of Caltrain and bus rapid transit issues cited in the Bayshore Access Study and Bi-County Study. At the very least, the bus rapid transit station at Geneva and Bayshore should be shown, as should the range of Caltrain station locations consistent with the above-mentioned recently approved projects and studies.

Community Plan and Renewable Energy Generation Alternative
The land use proposal does not sustain TOD primarily because it inhibits the functionality (access and passenger environment) and funding sustainability of the Bayshore Caltrain station hub. The Preferred Renewable Energy Generation Alternative, Community Plan and Recology Variant would obliterate the pedestrian, bike and BRT paths to Caltrain as shown in Figure 6. The elimination of Beatty as a public right-of-way is not described as in impact to the bicycle and pedestrian access that would benefit critically from being separated from the freeway interchange; this discussion is missing from the description of mitigation measure 4N-3f and other text on page 4.N-104.

Community Proposed Plan Recology Expansion Variant
San Francisco supports expanding the Recology property as needed to meet the needs of this critical facility. Moving Caltrain north, not south, from its present location helps avoid any conflicts with this plan: this allows the expansion of Recology south to the Geneva Extension while allowing adequate land and access connections to Caltrain to the north to ensure compliance with what MTC and other funding agencies would consider land suitable for TOD to be incompatible for mixed-use development. Viable pedestrian/bike access networks should then be shown to clarify no conflicts with a recycling facility along much of the station frontage. These access routes include bus, bicycle and pedestrian connections that should accordingly be re-routed to the north using Blanken and Bayshore. This would avoid conflicting with the vital truck and auto access routes needed to

support an expanded Recology facility. This also avoids conflicts with the elimination of Beatty Avenue as a public right-of-way, which currently is not described as an impact to the bicycle and pedestrian access, and if it were to remain the primary access to Caltrain from the east, might present added conflicts for bicyclists and pedestrians with freeway interchange and recycling truck traffic.

RECOMMENDED CHANGES

We recognize the challenge in balancing the complex land uses and infrastructure networks of the Project. However, the SFMTA hopes Brisbane would consider the refinements and revisions to the Project as described below that could better support and ensure the integrity and sustainability of our transportation network while supporting the Project land use options. In particular, the following recommendations, based on experience with analyses for major neighboring development projects, would maintain the integrity of an essential, regional transit hub and its immediacy and connectivity to established and approved TODs.

- Consider the Blanken Avenue BRT alignment as long-term, rather than interim, allowing BRT to better serve the existing, higher-density communities at Executive Park, Little Hollywood and Visitacion Valley. This would also allow BRT vehicles to avoid conflicts with the freeway ramps and with the industrial, truck-"primary" access needs of Recology as it currently functions and expands.

- Enhance the fundability and integrity of the Bayshore Caltrain hub by shifting the platform north toward the tunnel, closer to the MTC-conforming, TOD-compatible land uses to the north, and thereby avoiding the conflicts between multi-modal circulation networks and the traffic/truck circulation and access needs of Recology and the freeway ramps. This also provides a better response to the transit capacity and operation impacts the Project deems as "significant and unavoidable" than the proposed vague mitigation measures alone.

- These recommendations would avoid the expensive, unfunded T Third extensions that are exacerbated by the Project's southern relocation of Caltrain and the BRT routes by developing the Arleta LRT/BRT stop as the regional transit hub instead. This alternative would provide direct Caltrain connections to the adjacent, existing mixed-use neighborhoods, and rapid connections to the Geneva-Harney BRT (interim and long-term), the 9 San Bruno. This would create a true local-regional transit hub where land uses and access networks best justify it, a location more likely to attract sustainable funding

- These recommendations also allow for the deletion of the unfunded (and Project-exacerbated) T Third extension to Caltrain south of Sunnydale, thereby saving millions for the Bi-County partners, and avoiding undesirable, additional Caltrain connection time.

- The Project should promote as its main transit hub the proposed BRT stop at Bayshore and Geneva. This is the only quadrant with appropriately-mixed land uses and densities to sustain TOD funding and functionality, and this station provides the convenient connections via rapid, frequent and flexible service to Caltrain, BART and LRT. This should be promoted as an essential gateway to Project, and is appropriately farthest from the east side of the Caltrain tracks and the interchange dominated by Recology and other non-TOD land uses. As stated above, siting a major, regional transit hub and the supportive TOD land uses and access networks away from this non-TOD quadrant would best balance transportation and land uses.

- The T Third terminal at Sunnydale represents a similar transit access opportunity within immediate walking distance of the northwest corner of the Project. More intensive land uses would ideally be located adjacent to this station.

Thank you again for the opportunity to comment on this important document and Project.

Sincerely,

Peter A. Albert
Manager, Urban Planning Initiatives
attachment


Candlestick Pt/Hunters Pt Shipyard
Exec Park
Vis Valley/ Schlage
Recology
Proposed Geneva Extension
Blanken BRT, Bike and Ped Route
Approved TOD projects
Recology site w proposed expansion
County Line
Future 101 Interchange
Caltrain Station Existing
Caltrain Station in DEIR
Caltrain Station – TOD preferred
T Third transfer to Caltrain
Other T Third –BRT stops
Other proposed BRT/bus stops
T Third & unfunded Caltrain link

Brisbane Baylands DEIR
Comments
San Francisco County Transportation Authority
October 11, 2013

Thank you for the opportunity to comment on the Brisbane Baylands Draft Environmental Impact Report (DEIR). The Authority recognizes the strong vision in the plan and supports the efforts of the city of Brisbane to encourage quality development of much needed housing and job space. We are also glad to see acknowledgement in the DEIR of key previous planning efforts in the area, including the Bayshore Intermodal Station Access Study and the Bi-County Transportation Study.

Strong connections are needed between the work done on the Bi-County Study and the proposed Baylands development, and we appreciate the city of Brisbane's previous cooperation on and commitment to the cost-sharing concepts agreed upon in the Bi-County Study. We see it as an important function for the DEIR to contain language committing development to be responsible for its fair share. We would appreciate clarification on whether the current language is sufficient, in light of observations we make below.

The DEIR's *Cumulative Without Project* (baseline) scenario assumes completion of several projects proposed by the Bi-County study, including the Geneva Ave extension, the US 101 Candlestick interchange re-configuration, the T-Third Light Rail Line extension, and the Bayshore Intermodal Station re-configuration. These projects are not fully funded and in fact rely on public and private contributions, including from the Baylands development, which raises a question about whether they should be included in the baseline scenario, and whether the DEIR can commit the development project to contribute its fair share to these transportation projects.

The area is a joint Priority Development Area (PDA) between San Mateo and San Francisco counties. In order to retain its designation as a PDA and to be eligible for certain regional transportation funds, housing must be included in the development. We understand there to be multiple land use options under consideration, only some of which would result in housing. We strongly suggest that housing be included in the development, as its absence would affect our ability to advocate for funds to build the transportation projects outlined in the Bi-County Study, ones that are assumed to be built in the *Cumulative Without Project* (baseline) scenario.

The DEIR identifies multiple local traffic impacts as significant and unavoidable, including some intersections in San Francisco. Given that finding, we propose that the development project contribute funds toward efforts to address increases in traffic congestion. We acknowledge and support the DEIR's mention of TDM measures as one such effort. However, the DEIR does not provide any detail of such measures. How will TDM measures and commitments to those measures be codified? We would like to see the inclusion of stronger and more specific descriptions of TDM programs and projects that would be implemented. The Bayshore Intermodal Station Access Study included discussion on TDM concepts that is relevant here. Also, we suggest that an on-demand, area-wide traffic calming program, such as the one proposed as one of the Bi-County Study's list of jointly-funded projects, could also be a developer commitment.

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

SFMTA | Municipal Transportation Agency

SAN FRANCISCO
PLANNING DEPARTMENT

October 18, 2016

Steve Heminger
Executive Director
Metropolitan Transportation Commission
375 Beale St.
San Francisco, California 94105

Bradford Paul
Deputy Executive Director
Association of Bay Area Governments
375 Beale St.
San Francisco, California 94105

Subject: San Francisco Comments on the Plan Bay Area Draft Preferred Scenario

Dear Mr. Heminger and Mr. Paul:

The San Francisco Planning Department (Planning Department), the San Francisco County Transportation Authority (Transportation Authority), and the San Francisco Municipal Transportation Agency (SFMTA) appreciate the opportunity to participate in the development of Plan Bay Area 2040 (PBA 2040) over the past year, and the efforts that MTC and ABAG staff have made to meet with us and respond to our questions and concerns. This letter consolidates San Francisco agency input on the Draft Preferred Scenario, focusing primarily on the land use scenario based on the newly provided underlying data.

Overall we appreciate that the transportation investment scenario supports San Francisco's transportation policy and project priorities, which is critical given the land use scenario's proposal for the City to absorb a great amount of the region's jobs and housing growth through 2040. To support access to the jobs and housing allocated to San Francisco, we need to translate PBA 2040 recommendations into real transportation dollars, made available early in the plan period, to support state of good repair, Vision Zero safety improvements, and transit modernization and capacity expansion.

We feel the land use scenario assumptions for San Francisco are ambitious but achievable. For instance, the housing growth assumed for San Francisco far exceeds both historic and recent annual average production numbers. Even with our recent housing bond, we will need substantial additional revenue sources and new policy tools to help us achieve and sustain the higher level of production assumed in the Draft Preferred Scenario. These are not only San Francisco issues—the entire Bay Area needs to confront this housing crisis.

Despite these ambitious goals, the Draft Preferred Scenario fails to meet the Plan's affordability and anti-displacement targets and this outcome is simply unacceptable. The Bay Area's ability to be a place of diversity, opportunity and innovation is severely threatened by this housing crisis. We urge MTC and ABAG to lead the region in an effort to determine what it would take – investment, policy tools and legislative approaches at all levels of government – to meet those targets. Further, we ask the regional agencies to concurrently develop an implementation plan, with specific suggestions for new policies and tools to enable the Bay Area to meet the affordability and anti-displacement targets. This work should be completed by the time PBA 2040 is adopted in Fall 2017.

Our detailed comments on the Draft Preferred Scenario are listed below. We look forward to continuing to work with MTC and ABAG staff to refine the Draft Preferred Scenario, to develop a regional implementation action plan to address the critical housing affordability and displacement challenges facing the region, and to finalize PBA 2040 in the coming year.

Draft Preferred Land Use Scenario

While the housing and jobs projections for San Francisco are ambitious, we believe they are possible with commensurate transportation investment and with new revenues, policy, and legislative changes to support and sustain increased housing production levels, while mitigating displacement risk. We recognize the role that San Francisco, along with Oakland and San Jose, play in the Draft Preferred Scenario which focuses a significant proportion of growth in the Big Three Cities, as is appropriate for reducing the region's greenhouse gas emissions, concentrating the region's growth within its already-urbanized footprint, and meeting other performance goals through 2040. Specific comments relative to the Draft Preferred Land Use Scenario are as follows:

- **Annual housing production rate is appropriate but ambitious for San Francisco (and much higher than current production) without additional tools and resources.** San Francisco has capacity under existing zoning and plans underway for more than the 128,000 units proposed in the Draft Preferred Scenario (which is a 33% increase over PBA 2013 allocation). At peak production rates over the past decades, the City has struggled to exceed 3,500 units annually. Recession years have dipped our production substantially lower. This is despite a current pipeline of over 40,000 entitled units and over 20,000 presently under review. The Draft Scenario calls for average production of 4,900 units annually over the next 25 years.
- **Job growth is significantly higher than what was assigned in PBA 2013 for San Francisco.** San Francisco historically has been and continues to be a sensible and desirable place for job growth regionally, considering its centrality, excellent transit access, dynamic urban environment, walkability, and willingness to accommodate housing. The aggregate jobs allocation for San Francisco is 70% higher than the PBA 2013 (311,000 vs 190,000). While plausible, this depends substantially on densification of existing space. Accounting for the job growth that already occurred in San Francisco between 2010-2015, the growth rate suggested for the next 25 years is approximately 8,900 jobs annually (compared with greater than 20-30,000 for each of the past five years, and 13,000 annually over the past ten). This is slightly higher than the average rate over the past 20 years of 7,500 jobs per year. With our annual metering restriction (i.e. Prop M) of just under one million square feet of office space per year (approximately 4,000 office jobs), prices for commercial space are likely to continue to rise, forcing much of the projected job growth to be directed to existing buildings and pricing more sensitive firms and organizations out of the City, most likely to Oakland, but many also out of the region. Densification in existing space is a key aspect of capacity that the City cannot regulate or affect and can mostly just speculate as to potential overall capacity and likelihood or pace of such absorption. The Planning Department has estimated a potential capacity for citywide office densification between 60-70,000 jobs, which would more than be accounted for by the Draft Preferred Scenario.
- **We question the projected loss of retail jobs in the City**, as retail job growth generally tracks overall job growth and economic activity, along with population growth.

- **The plan needs more explicit and proactive measures to grow middle-wage jobs in the region.** The concept of establishing Priority Production/Industrial Areas (which may overlap with PDAs) is one important implementation strategy that must be further developed. **Distribution of growth within San Francisco should reflect local plans.** The Planning Department has been working with ABAG and MTC staff to make final redistributions of proposed growth within the city to be consistent with current plans and policies. While some improvements to align with local plans have been made from the three draft scenarios presented in May, there still exist some unrealistic discrepancies that should be rectified. Particularly given that at an aggregated citywide level the control totals can generally be accommodated, there is no reason for such PDA-level discrepancies with local plans. For San Francisco, notable over-allocations were shown on the housing side to Mission Bay, Bayview/Hunter's Point Shipyard-Candlestick, Treasure Island, and the Port, and on the jobs side to Downtown-Van Ness-Geary, Balboa Park, Mission Bay, and non-PDA areas. Substantial capacity exists in other PDAs for reallocating all of those households and most of the jobs. Supporting data has been provided to ABAG/MTC.
- **Outside of San Francisco, we see a mostly "business as usual" approach to job growth, reflecting existing trends and not the Plan's policy goals for balanced communities of transit-oriented job growth in communities that also welcome robust housing growth.** Specifically, we question the apparent shift of jobs from PBA 2013 from Oakland and San Jose to the inner East and West Bay communities, particularly given the housing deficits in those communities. This is not where we want to be as a region in terms of sustainable growth near transit and housing – particularly given that both Oakland and San José function as major regional transit hubs.

Draft Transportation Investment Strategy

We are generally encouraged by the direction of the draft Transportation Investment Strategy, which reflects many of San Francisco's policy goals and project priorities. In particular, we are pleased that:

- All San Francisco projects that must be included in PBA 2040 to move forward are included either in whole or through planning capacity.
- The Plan includes a strong focus on fix-it-first for both local streets and roads and transit; the latter has a higher proportion of funding compared to PBA 2013.
- The new emphasis on core capacity transit investments is crucial to the success of the regional transportation system and our regional economy, particularly in the Transbay Corridor.

The following are specific comments on the Draft Transportation Investment Strategy:

- As one of the three big cities taking on most of the region's projected growth, San Francisco is willing to do our part but needs **MTC to direct "real" transportation dollars early in the Plan period to support state of good repair, Vision Zero safety improvements, and transit modernization and capacity expansion** that support access to the assigned jobs and housing within San Francisco, and that support a balanced community.
- We look forward to working with MTC to advocate for and secure new revenue sources to help implement PBA 2040's transportation investment strategy such as a Regional Measure 3 bridge toll increase and potential new state and federal sources.

- **To provide some near-term relief for affordability and displacement pressures, we urge MTC to accelerate funding for the Lifeline Transportation Program, means-based fare implementation, Community Based Transportation Plans, late night transportation, and regional PDA Planning grants for neighborhoods facing high displacement risk.**

We are seeking clarifications and additional detail on certain proposed investment strategies and appreciate MTC's work to provide this information prior to the release of the Final Preferred Scenario, namely:

- Reconfirmation of existing Federal Transit Administration New Starts/Small Starts/Core Capacity priorities and addition of new ones:
    - Downtown Rail Extension
    - Geary Bus Rapid Transit
    - BART Core Capacity Project
    - Caltrain Electrification
    - Better Market Street
- Detail on the distribution of State of Good Repair funding for local streets and roads, particularly from regional discretionary sources. We want to ensure we are receiving a commensurate share of regional discretionary dollars and not being penalized for seeking and securing new local dollars. We understand that MTC staff is working to provide the requested detail later this month.
- Clarification on how MTC will adjust funding and project/program priorities if the transportation and housing revenue measures across the region are not approved in November.

San Francisco has successfully secured local revenues for transportation and housing and is continuing to seek additional revenues given insufficient and unreliable state and federal funds. We have a local sales tax and vehicle registration fee committed to transportation. As you know, we are also seeking voter approval to commit additional local funding for transportation through our charter amendment on the ballot in November. **However, local funds are not enough to meet our needs as one of the three big cities taking on the most job and housing growth in PBA 2040.** We need a meaningful near-term commitment of regional discretionary dollars to support the proposed growth.

Poor Performance of Draft PBA 2040 Regarding Housing Affordability and Displacement

The poor performance of the draft Plan Bay Area 2040 on the anti-displacement and housing cost burden performance measures underscores that the housing affordability crisis is the number one issue facing our region. We understand that there are limited tools presently at the disposal of both MTC and ABAG, but we support the regional advocacy organizations' call for action on this topic. We look forward to working with the regional agencies and local partner jurisdictions to address these and offer the following comments to that end:

- **All jurisdictions, particularly those in the inner Bay region with high quality transit service and large opportunity sites of regional significance, need to take their fair share of housing.** Furthermore, it is not sufficient to simply include housing targets in PBA

2040 – there must be real ways to ensure good faith efforts for jurisdictions to take action to pursue of the housing target.

- **We need regional and state-level structural reform, with real teeth, to ensure adequate housing production and resources region wide.** Despite the dismal projection that even the significantly more aggressive policy-oriented housing production levels assumed in the Draft Preferred Scenario fail to make real progress toward the affordability/displacement targets, the region is not even going to achieve that poor equity outcome (e.g. 67% of low income household income being spent on housing and transportation) because of constraints in production, many cities not doing their part, lack of funding, and no teeth to enforce the Plan. The current case of the Brisbane Baylands is the prime example of the problem. The Draft Preferred Scenario calls for 4,400 units for this opportunity site of regional significance, the property owner is proposing 4,400 units in a mixed use project, but the local jurisdiction has signaled no willingness to allow housing and there appear to be no meaningful ways to compel such consideration. This dilemma completely undermines the effectiveness of PBA at its root and any hope of meeting the challenges of affordability in the region.
- **Concurrent with finalizing PBA 2040, MTC/ABAG staff must develop an implementation plan with specific suggestions for new policies, resources and a legislative agenda necessary to meet these goals.** The following are a sampling of concepts which should be included in the discussions and investigations:
    - Aggressively providing or seeking additional stable funding for housing production and preservation at the regional level, which could include:
        - A regional measure to enact a regional jobs-housing linkage fee (i.e. assessed on new commercial construction to be used for affordable housing), whereby cities would be exempt if they already have a fee or adopt their own fees equal to or greater than the regional fee.
        - A regional housing trust fund and/or financing pool. Critical uses for the funds would include land acquisition and infrastructure costs of major housing opportunity sites. The latter would expedite housing construction for identified major sites of "regional significance" that could produce thousands of units but are held up by huge up-front infrastructure lifts.
        - Given that the above two suggestions may take time to materialize and given the urgency of the situation, to inform the implementation plan, MTC/ABAG should establish a pilot program, to see what it really takes to produce affordable housing and, if possible, also address jobs displacement at the same time. An ideal pilot would use regional funds (perhaps NOAH, TOAH) leveraging local dollars to fund similar efforts in 2 or 3 locations facing high displacement risk to see what works in different locations/types (e.g. big city, suburb)
    - Advocating for significant state funding for housing including permanent dedicated source(s), which could, for example, be funded through commercial property tax reform.

- Pursuing state legislation to increase housing production and compel local jurisdictions to zone for and entitle housing consistent with regional sustainable communities plans. Such reform could build on SB 375 and strengthen the RHNA and SCS process, with real consequences at the state and regional levels for jurisdictions that don't do their fair share. Successful examples in other states include the Growth Management Act in Washington State.
- Pursuing state legislation to improve tools to maintain existing housing stock of rent-stabilized units, protect existing tenants and to enable production of new below-market-rate rental units:
  - Ellis Act reform to allow local jurisdictions to limit removal of rental units and to provide for adequate relocation costs commensurate with local conditions.
  - Legislative reform to address the Palmer ruling and the Costa Hawkins law, such as to allow newly-created rental housing to be rent-restricted such as for inclusionary housing. Taken together, Costa Hawkins and the Palmer decision present a significant challenge to San Francisco's ability to create and maintain new affordable housing.

We look forward to working with MTC and ABAG as Plan Bay Area 2040 is finalized, adopted, and implemented, and again thank both agencies for this opportunity to provide input.

Regards,

John Rahaim
Planning Director, City and County of San Francisco

Tilly Chang
Executive Director, San Francisco County Transportation Authority

Ed Reiskin
Director, San Francisco Municipal Transportation Agency

cc: J. Switzky, Planning Department
M. Beaulieu, A.Crabbe, M. Lombardo - SFCTA
D. Ito, M. Webster, L. Woodward – SFMTA
G.Gillett - Mayor's Office

San Francisco Planning

SFMTA
Municipal Transportation Agency

November 1, 2016

John Hoang
City/ County Association of Governments of San Mateo County (C/ CAG)
555 County Center, 5th Floor
Redwood City, CA 941063

Subject: San Francisco Comments on the Draft San Mateo Countywide Transportation Plan 2040

Dear Mr. Hoang:

The San Francisco Planning Department and the San Francisco Municipal Transportation Agency (SFMTA) appreciate the opportunity to comment on the development of San Mateo Countywide Transportation Plan 2040. This letter consolidates San Francisco agency input on the Draft Plan.

The Bay Area region is facing unprecedented challenges relating to mobility and affordability that threaten to undermine our diversity and ability to remain an attractive beacon of opportunity and innovation. This dilemma stems from dramatically insufficient construction of housing region-wide, robust job growth in areas that are not producing housing and that are not sufficiently transit-served, and insufficient investment in public transit and other non-auto modes. While this characterizes the region as a whole, our two adjacent counties share an even closer bond in performance and outcomes, as the planning and investments of each county directly affects the other, and we must be closely coordinated if these outcomes are to improve. Indeed, our two counties literally share streets, highways, transit station areas, transit lines, and even major development opportunity sites, and our job and housing markets are closely intertwined. Our counties have engaged in some fruitful bilateral collaboration in recent years, and we believe a continued close collaboration and synchronicity regarding transportation and land use planning is necessary.

Our detailed comments on the Draft Plan are listed below. We look forward to dialogue with San Mateo County on refinements to the Draft Plan and continued bi-county cooperation in addressing the critical transportation and housing challenges facing our counties and the region as a whole.

<u>Overall</u>

The Draft Plan sets out a good high-level policy framework of key challenges, opportunities and guiding principles, particularly those that highlight the need for a regional approach, emphasis on reducing VMT, the importance of building housing and mixed-use development near transit (especially improving San Mateo County's severe jobs-housing imbalance), and complete streets.

These principles can be found in many places throughout the document. **However we observe that the Draft Plan should be strengthened in several ways to reflect these principles in the Plan's implementation components, as well as in the detailed discussion of the specific issues, performance measures and investment opportunities.**

- **The Draft Plan should include more substantial and explicit discussion and inclusion of project proposals and studies of mutual bi-county benefit.** The Draft Plan lacks both overview and specifics on several areas of critical bi-county interest. Some of these efforts have been and continue to be the subject of bi-county study to date and in multiple cases these projects and services would literally cross the county line to serve populations and destinations in both counties. We believe that is it essential that San Mateo County not just continue to collaborate in the planning of projects of mutual benefit, but that the County contribute financially toward their realization considering the importance of these projects in improving access to San Mateo County and achieving the Plan's stated goals. In particular, we believe the Plan should both discuss the following projects or planning efforts in the Plan and include them in the project list (ie Appendix B) for the RTP (see sections below for further more detailed discussion of each):
    - Geneva-Harney Bus Rapid Transit (BRT) and multi-modal integration at the Bayshore Caltrain station
    - Core Capacity Improvements, particularly in the Transbay Corridor
    - Muni Metro 19th Avenue Corridor Study, including potential LRV and other multi-modal connections to Daly City BART

  We also note that the Public Transit chapter lacks discussion of existing SFMTA Muni transit service in San Mateo County and Appendix C is missing discussion of San Francisco MTA transit capital projects and bike and pedestrian improvements that would connect San Mateo and San Francisco counties.

- **The Draft Plan should more strongly and explicitly tie transportation investment to performance in production of housing and transit-supportive TOD development.** The Plan notes appropriately that the region's traffic woes, particularly on major corridors and highways in San Mateo County, are particularly driven by the lack of sufficient housing, particularly transit-accessible housing the robust job growth. We note the conspicuous absence of discussion of land use for the Baylands PDA (in contrast to discussion of and performance metrics for housing and TOD in the El Camino corridor PDA), despite the inclusion of multiple transportation projects in and adjacent to the Baylands. All jurisdictions, particularly those with high quality transit service and large opportunity sites of regional significance, such as the Baylands PDA, need to take their fair share of housing. The Draft Preferred Scenario for Plan Bay Area calls for the creation of 4,440 additional households in the Baylands PDA, and this is supported by the property owner proposal for the same housing total as part of a mixed use project. However the jurisdiction of Brisbane has signaled no willingness to allow housing. This outcome is unacceptable and undermines the effectiveness of this Plan at its root and any hope of meeting the challenges of affordability and accessibility in the region. Also notable is the absence of any discussion of or metrics related land use in the Geneva BRT corridor and around the planned Millbrae High-Speed Rail (HSR) station and potential Redwood City HSR station.

- **The Plan's performance measures and metrics should more closely align the Plan's goals for reducing VMT, facilitating multi-modal mobility (particularly related to transit and non-single occupancy auto), roadway safety for pedestrians and cyclists, and coordinating land use with transportation.** It is our observation that many of the proposed metrics could directly conflict with achieving these essential objectives. For instance, Appendix D (Regionally Significant Corridors) contains proposed metrics that focus on vehicular delay and annual vehicle crashes rather than on multi-modal performance, transit improvement and safety for all road users. The Plan notes that Geneva Avenue is considered a part of the countywide Congestion Management Program Roadway System subject to the aforementioned performance standards. However the potential reduction in vehicle lanes necessary to implement BRT (or future LRT) service and other complete street improvements in this regionally significant corridor could be negatively viewed by the proposed metrics given that benefits in increasing transit capacity and person-throughput are not captured by the metrics. Moreover, the safety metric does not include safety factors for pedestrians or bicyclists. Other suggestions related to the Plan's performance metrics include:
    - Include performance measures related to the transportation performance of new development specifically (eg VMT and mode share targets), consistent with the statewide change for CEQA transportation review from LOS to VMT pursuant to SB 743.
    - Mirroring performance measures to implement "transit-oriented development along the El Camino Real corridor in proximity to Caltrain, BART, and prospective bus rapid transit stations," include equivalent performance measures to ensure TOD in proximity to Caltrain and future bus rapid transit in the bi-county area, namely along the Geneva-Harney BRT corridor and in the vicinity of the Bayshore Caltrain Station in the Baylands. These measures and discussion for all development areas should be cognizant and reflective of the guidance in SB 743 that projects pursuing the CEQA streamlining must be consistent with the regionally adopted Sustainable Communities Strategy (i.e. Plan Bay Area).
    - Include measures prioritizing critical bicycle and pedestrian connections to transit in the county and bi-county area.
    - Include measures prioritizing pedestrian and bicycle infrastructure improvements on high injury corridors.
    - Incorporate into performance measures some of the access to public transportation station "basics of good traffic engineering and street design," (ie as discussed on pages 84-85).

- **We support a strengthening of the Plan's commitment to improving the efficiency of the highway system over expansion, particularly the conversion of an existing lane on US-101 to a HOV/T lane.** Such a conversion would better meet this goal than any expansion project, especially given that US-101 is very unlikely to expanded within San Francisco in the foreseeable future.

Geneva-Harney Bus Rapid Transit (BRT) and multi-modal integration at the Bayshore Caltrain station

The Bayshore Caltrain station, the connecting Geneva Avenue corridor, and the areas adjacent to each, are key opportunities for the future of both counties; bi-county cooperation is critical for success of all of these endeavors. The SFMTA-led Geneva corridor BRT project would substantially improve transit access and multi-modal conditions to a key stretch of this major corridor in eastern Daly City and Brisbane, including providing inter-modal connectivity to an improved Bayshore Caltrain station. The BRT line would serve not only planned residential/employment growth areas, but provide connections to the two largest college campuses in San Francisco and two regional retail centers (one existing and one under design). The Daly City portion of the corridor contains a significant share of the TOD land use opportunities in the Geneva corridor. The Draft Plan does not presently, but should, include discussion of this key project and include it in the project list in Appendix B. Indeed, we look forward to collaborating with Daly City, Brisbane and San Mateo County on land use and further multi-modal planning in the Geneva corridor in support of and response to the BRT project.

The Bayshore Caltrain station area continues to be a subject of much study and discussion, in terms of both multi-modal station access as well as land use adjacent to the station, particularly in the Brisbane Baylands. We note that at least two of the proposed Brisbane-related projects listed in Appendix B would require San Francisco coordination and participation, though these are not noted as bi-county projects. However, as discussed above, San Francisco continues to be concerned about the apparent lack of openness by the City of Brisbane to incorporating appropriate amounts of housing on this immense transit-oriented site of regional significance, as well as concern over the potential direction of the site's overall transit-orientation and compatibility with plans in San Francisco and for the future of Caltrain and High Speed Rail. Implementation is in full swing of the pedestrian- and transit-oriented redevelopment of the adjacent Schlage Lock site on the San Francisco side of the border, and San Francisco staff are diligently working to lead discussions through the Bayshore Multi-Modal Facility Study, funded by MTC, about near term multi-modal integration and station access improvements in the area to benefit nearby residents and workers in both counties. An enhanced Bayshore Multi-Modal Facility would support increased service to the Caltrain Bayshore Station, which is needed to serve planned and potential development in both counties. We want to emphasize our continued desire for productive engagement with San Mateo county-level and local jurisdictions in these ongoing efforts.

Core Capacity/ Transbay Corridor

We believe that the Plan should recognize capacity enhancements and rail expansion in the Transbay Corridor as one of the lynchpins to improving access to San Mateo County and improving conditions in key corridors of concern to the County (e.g. the 101 corridor). Our job and housing markets are regional. High levels of auto commuting and the congested conditions on major highways in San Mateo County are largely due to the constraints and inadequacy of the regional transit network. The current major bottleneck in the region's transit network is the Transbay crossing between the huge East Bay housing and job market and San Francisco, from which connections via BART and Caltrain then feed downstream to San Mateo county and points south. Realizing a fully integrated regional and statewide rail system that connects the East Bay to San Mateo County through a new Transbay rail crossing (i.e. via Caltrain, CA HSR) would unlock vast

opportunity and connectivity for San Mateo County businesses to access workers and San Mateo County residents to access jobs throughout the region and beyond via fast, high-capacity seamless transit. Moreover, this fluid connection would enable travelers and commuters who merely travel through San Mateo County, presently congesting its highways, to use these transit services. The MTC is currently completing its Core Capacity Transit Study to identify short, medium and long term solutions to improving and expanding Transbay transit service. We request and recommend that San Mateo County be both supportive of these efforts, participate in their deliberation, and contribute toward their realization.

19th Avenue Corridor/Daly City BART Connections

The SFMTA is leading an effort to study major rail transit improvements in the southern section of the 19th Avenue corridor. This congested corridor is of major bi-county importance. This ongoing study includes concepts for realigning the existing Muni Metro M-line, including potential subway alignments, and substantially improving pedestrian and bicycle conditions on 19th Avenue and streets in the area. This study includes early explorations for subsequent phased extension/connection to Daly City BART. Such a connection would substantially improve bi-county transit connectivity and access for residents and workers in both counties, and provide higher-quality alternatives to driving in the corridor on both sides of the county line.

We look forward to further discussion and engagement with San Mateo County as this Transportation Plan is finalized, adopted, and implemented, and to ongoing collaboration on the many of the specific projects and efforts of mutual bi-county interest. Thank you again for this opportunity to provide input.

Regards,

John Rahaim
Planning Director, City and County of San Francisco

Ed Reiskin
Director, San Francisco Municipal Transportation Agency

cc: J. Switzky, S. Gygi, J. Shaw – Planning Department
T. Chang, J. Hobson, M. Lombardo, M. Beaulieu, A. Crabbe – SFCTA
S. Jones, D. Ito, M. Webster, L. Woodward, K. Wheeler, L. Brisson – SFMTA
G. Gillett, J. Buckley – Mayor's Office
K. Kirkey – MTC
M. Chion – ABAG

BOARD of SUPERVISORS

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San Francisco 94102-4689
Tel. No. 554-5184
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TDD/TTY No. 554-5227

MEMORANDUM

TO: John Rahaim, Director, Planning Department
Olson Lee, Director, Mayor's Office of Housing and Community Development
Harlan Kelly, Jr., General Manager, Public Utilities Commission
Ed Reiskin, Executive Director, Municipal Transportation Agency
Deborah Raphael, Director, Department of the Environment

FROM: Alisa Somera, Legislative Deputy Director
Land Use and Transportation Committee

DATE: October 7, 2016

SUBJECT: LEGISLATION INTRODUCED

The Board of Supervisors' Land Use and Transportation Committee has received the following proposed legislation, introduced by Supervisor Kim on September 27, 2016:

File No. 161044

Resolution urging the City and County of San Francisco and all relevant agencies to closely monitor and review any development proposal for the Brisbane Baylands Area to ensure that the City of Brisbane prepares a comprehensive and complete Environmental Impact Report, which includes legally required analysis of all impacts, including transportation, air quality and greenhouse gases, water supply and wastewater, and housing and population needs, in particular significant impacts that will occur within San Francisco; and urging Brisbane to adopt a responsible Land Use Plan for this area that will include needed workforce housing.

If you have comments or reports to be included with the file, please forward them to me at the Board of Supervisors, City Hall, Room 244, 1 Dr. Carlton B. Goodlett Place, San Francisco, CA 94102 or by email at: alisa.somera@sfgov.org.

c: Scott Sanchez, Planning Department
Lisa Gibson, Planning Department
AnMarie Rodgers, Planning Department
Aaron Starr, Planning Department
Joy Navarrete, Planning Department

Jeanie Poling, Planning Department
Eugene Flannery, Mayor's Office of Housing and Community Development
Sophie Hayward, Mayor's Office of Housing and Community Development
Juliet Ellis, Public Utilities Commission
Donna Hood, Public Utilities Commission
Janet Martinsen, Municipal Transportation Agency
Kate Breen, Municipal Transportation Agency
Dillon Auyoung, Municipal Transportation Agency
Guillermo Rodriguez, Department of the Environment
Anthony Valdez, Department of the Environment
Mei Ling Hui, Department of the Environment

Lew, Lisa (BOS)

From: BOS Legislation, (BOS)
Sent: Tuesday, October 04, 2016 1:15 PM
To: Lim, Victor (BOS); Calvillo, Angela (BOS); Carroll, John (BOS); BOS Legislation, (BOS); Somera, Alisa (BOS)
Cc: Yu, Angelina (BOS); Pagoulatos, Nickolas (BOS); Chung Hagen, Sheila (BOS); Lew, Lisa (BOS)
Subject: RE: Supervisor Mar Co-sponsorships

Good afternoon, Victor,

Supervisor Mar has been added as a co-sponsor to File Nos. 161026 and 161044 on the legislation and in Legistar. His addition will be reflected on the minutes.

Brent Jalipa
Legislative Clerk
Board of Supervisors - Clerk's Office
1 Dr. Carlton B. Goodlett Place, Room 244
San Francisco, CA 94102
(415) 554-7712 | Fax: (415) 554-5163
brent.jalipa@sfgov.org | www.sfbos.org

From: Lim, Victor (BOS)
Sent: Tuesday, October 04, 2016 12:55 PM
To: Calvillo, Angela (BOS) <angela.calvillo@sfgov.org>; Carroll, John (BOS) <john.carroll@sfgov.org>; BOS Legislation, (BOS) <bos.legislation@sfgov.org>
Cc: Yu, Angelina (BOS) <angelina.yu@sfgov.org>; Pagoulatos, Nickolas (BOS) <nickolas.pagoulatos@sfgov.org>; Chung Hagen, Sheila (BOS) <sheila.chung.hagen@sfgov.org>
Subject: Supervisor Mar Co-sponsorships

Madam Clerk and colleagues,

Supervisor Mar would like to be added as a co-sponsor to the following items:

32. 161026 [Expend Grants - Qualified Legacy Businesses - Legacy Business Program - Amounts Up to $1,000,000] Sponsor: Campos

44. 161044 [Urging City Agencies to Monitor and Review Any Development Proposal for the Brisbane Baylands Area and Urging the City of Brisbane to Prepare a Complete Environmental Impact Report and Approve a Responsible Land Use Plan]

Thank you.

Sincerely,

Victor Wai Ho Lim, Legislative Aide
Office of Supervisor Eric Mar, District 1
San Francisco Board of Supervisors
City Hall, Room 284
San Francisco, CA 94102
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Print Form

Introduction Form

By a Member of the Board of Supervisors or the Mayor

I hereby submit the following item for introduction (select only one):

☐ 1. For reference to Committee. (An Ordinance, Resolution, Motion, or Charter Amendment)

☒ 2. Request for next printed agenda Without Reference to Committee.

☐ 3. Request for hearing on a subject matter at Committee.

☐ 4. Request for letter beginning "Supervisor [ ] inquires"

☐ 5. City Attorney request.

☐ 6. Call File No. [ ] from Committee.

☐ 7. Budget Analyst request (attach written motion).

☐ 8. Substitute Legislation File No. [ ]

☐ 9. Reactivate File No. [ ]

☐ 10. Question(s) submitted for Mayoral Appearance before the BOS on [ ]

Please check the appropriate boxes. The proposed legislation should be forwarded to the following:

☐ Small Business Commission ☐ Youth Commission ☐ Ethics Commission

☐ Planning Commission ☐ Building Inspection Commission

Note: For the Imperative Agenda (a resolution not on the printed agenda), use a Imperative Form.

Sponsor(s):

Kim; Peskin, Campos

Subject:

Resolution Urging City of Brisbane to Build Responsible Project Including Housing on Brisbane Baylands

The text is listed below or attached:

Please see attached

Signature of Sponsoring Supervisor:

For Clerk's Use Only: