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City of Brisbane Planning Commission  
RE: Baylands Development

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

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

**1. Sustainability.** The current Plan is touted as being sustainable, but Brisbane has defined sustainability only through an environmental lens. Your Sustainability Guidelines say you should address the 3Es of sustainability – the Environment, Economy and Social Equity, but this Plan addresses only the Environment. It fails on social equity and it fails on the economy.

**2. Social equity.** It is clear that the greatest problem right now in San Mateo County is the glaring imbalance between jobs created and the provision of new housing for those new employees to live in. You see it everywhere. In every city up and down the Peninsula. This Plan can be expected to generate up to 6,500 or more new jobs which will require housing for up to 4,500 families. Yet this Plan includes absolutely no housing. Instead it creates lots of jobs and foists the provision of housing onto adjacent communities who are struggling themselves to provide housing for their own citizens. This is not only selfish planning, but it is unsustainable planning. Without a more equitable balance between jobs and housing, this robust economy of ours is going to eventually crash and burn, probably sooner, rather than later. This Plan should include a substantial amount of housing to offset the number of jobs being created.

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**3. The economy.** The March 22 Economic Feasibility memorandum said the cost to remediate, restore and develop infrastructure for future development could run anywhere from \$600,000 to \$1 Billion. There is no way that a development of 1M - 2M sf of R&D, Recology, a lumberyard, retail, an industrial tank farm, an energy farm, plus Caltrain parking lots can support a cost of that scale. This Plan is economically unfeasible if you wish to create all the parks and do all the environmental work you propose. Either the scope of the development needs to be increased or the scope of environmental improvements needs to be reduced.

**4. TOD.** This Plan is touted as transit-oriented, yet all the illustrative examples I have seen by staff show widely-spaced buildings and vast numbers of parking spaces. This leads me to the conclusion that you do not really believe that this Plan will reduce auto traffic. The areas closest to the Caltrain station and Geneva Avenue are 1) Recology which will have few employees in comparison with offices, but generate lots of truck traffic, 2) the renewable energy farm which will require very few employees, 3) R&D which will attract lots of employees, but may or may not be transit-oriented depending on how the campus is designed, 4) the lumberyard and tank farm which will need few employees, but generate lots of traffic, and 5) Caltrain parking which, by definition, will generate auto traffic. The small retail & recreation area around the roundhouse in order to be economically viable, will need to serve more than just the adjacent R&D and most likely be designed as auto-oriented. TOD means not just being near transit, but designed to encourage transit use. The best way to do this is to develop uses most amenable for transit-use. This includes offices as in the current Plan,, but also housing and mixed-use as proposed in the Paragon Plan.

**5. To conclude:**

- The Plan should include housing
- The Plan should be economically feasible
- The Plan should be mixed-use
- The Plan should take full advantage of its transit-rich location

Right now, it does none of these.

Respectfully Submitted, David Crabbe