

To: Planning Commission, Staff
From Dana Dillworth
RE: Housing Element 2022 GPA 1, Housing Element Update
August 25, 2022

Has this Housing Element been circulated through the State Clearing House? What is its number? Perhaps it needs to be recirculated.

I wonder how the County of San Mateo and the State of California's Natural Resources departments would respond to a Housing Element which seeks to take irreplaceable, environmentally sensitive habitat (with 60% protection) out of the mix for no-limits, no further study or review dense housing. The City has stated that they have the ability to repay the funders for these properties, however Our General Plan (R-BA) has a stated goal of limiting housing to be protective. This element is inconsistent with our General Plan and our goals of environmental protection for San Bruno Mountain.

I question your lack of CEQA review. In addition, I question the goal to meet ever-increasing RHNA numbers and their impact on a town of this size. It should be questioned, if not challenged.

How do our RHNA numbers keep increasing? How is this a "fair-share" of 2,226 units required of a town of 2,100? We have rezoned multiple times to meet the same goal. (ADU's could +/- double the town, Parkside overlay, and Baylands). Seriously, the only stated goal of our housing element should be to provide low and very-low income housing with protections that they should never be placed into market-rate service without an equivalent in-situ remedy.

Not subject to CEQA in this moment, but a complete CEQA review IS required because you are advising on a foreseeable action by the City that will have enormous environmental impacts.

If the Brisbane Baylands EIR is the only environmental review for this element, in spite of how impressive, the Baylands EIR was not done with the knowledge of SB 9 or imminent State legislation(s) that will further take our Public Open Space resources, Parking facilities, and Transportation corridors to the benefit of dense housing developers.

The Baylands EIR never imagined an elimination of R-1 housing which quadruples housing stock over night under new State mandates. Mums the word, let's not tell the public what is really happening. Additionally, the stated purpose of the Baylands EIR was to meet one developer's goal. It requires adhering to sustainability standards that are not required throughout town because our conservation element hasn't had equal updates. It also requires sufficient water supply to support a new population of 4,000, now even more new residents and building supportive infrastructure. What part(s) of the Bayland's agreement for Open Space, Recreation, Infrastructure, and Community Facilities will be required of the landowners in the Brisbane Acres or other places you might move this high-density zoning to?

CEQA requires that all elements in the General Plan be in balance. When was the last time you studied and mapped open space, conservation, our natural resources, and safety requirements with such diligence? It was 1991-1994 for me. What does the recent 20-year drought mean and how did Covid impact the need and dynamics of housing? What about sea-level rise? Those are the types of studies that are necessary for this Housing Element to be current.

Brisbane Acres are inaccurately being mapped and referred to as Central Brisbane. (Figure B.7.2) I object to this new map, if approved, because Central Brisbane is a specific land use. The map homogenizes the town, it ignores the difference and importance of our R-BA districts which is mentioned in our Open Space Plan as having a special ecological importance. Many

acres were purchased with Open Space funds for improvement for habitat of rare and endangered species. There is an existing environmental determination that requires lower impacts and not scarring the hillside for infrastructure. To speak so casually of the Brisbane Acres' ability to meet or may meet thousands of units of housing needs is unacceptable because you have not considered the impacts to our streets.

As I see block-long cranes and laden cement trucks lumber up a wide part of Humboldt Road to only back down the hill because of the potential jack-knifing or break failures at every turn, I wonder about the future of Brisbane if we adopt a housing plan that would have enormous impacts to our upper acres and the safety of our residents without looking at the obvious constraints, as an exercise.

The city is in negotiations with the Baylands developer. I cannot believe that out of 1800 housing units there will only be about 200 units for low-income housing. Are you aware that the Baylands developers, with city approval, have asked for \$3.5 millions of dollars from the state for clean-up funds? We were told that the reason for so many units, was to pay for the clean-up. What gives?

This element includes language of what to do, where to find units if the current land uses don't produce. Is that a reality? Baylands could renege and we have to place hundreds of units of low-income housing elsewhere? That language should be addressed so that we don't have surprise re-zonings, because alternatives were considered in a public forum, but none have been studied.

Why are the Baylands developers in stakeholder meetings only being asked to do the minimum? In 600 acres, there are many opportunities for housing (if proven to be safe) to meet the needs for all sectors of society, for assisted and transitional housing, for experimental off-grid communities. Near a transit hub, all pluses. How is it that the Baylands developer is not being considered as a greater resource for meeting the needs of the community as a whole? Perhaps the mandate is too low or too weak. Given our years of no new affordable housing, our plan should be immediate solutions. Not the rehashing of systems that don't work expecting a for-profit developer to uphold community values and commitments.

I ask that you send this back to the council for further studies. I ask that you learn the impacts of the new legislation from Sacramento and invite speakers from Community Catalysts <https://catalystsca.org> to provide an alternative view of the Housing mandates. I ask that you question our RHNA numbers and learn what other communities are doing with viewing a presentation from Pam Lee an attorney representing communities who question the recent long arm reach of Sacramento: <https://vimeo.com/738853753> and question whether we have unlimited resources for developers who don't uphold their promises or contribute to the good of their community.

Where was a discussion of sustainability, of eco-villages? Of truly affordable, life-supporting community housing? Of local food production? Where is the James Wine's concept of garden cities? As my family seeks a different, affordable community, we are reminded of the developments of the 70's that had lesser impacts to the land and created livable spaces. I shutter at the thought that you have allowed the developer of the Baylands to be required to do so little for the overriding considerations you are asking us to once more consider.

Thank you.