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File No. 74510

June 28, 2017

VIA E-MAIL

Julia Capasso
Associate Planner
City of Brisbane
50 Park Place
Brisbane, CA 94005
jcapasso@ci.brisbane.ca.us

Re: *Draft Parkside Precise Plan Comments*

Dear Ms. Capasso:

This firm represents DCT Industrial Trust Inc. and its affiliates (“DCT”), the owner of 91-99, 105-115, and 145 Park Lane. The City proposes to include these properties in a Parkside Precise Plan residential overlay zone. As you are likely aware, DCT was actively engaged in the adoption of the City’s 2015-2022 Housing Element Update. DCT did not object to the Housing Element’s recommendation of implementing a Park Lane Residential Affordable Housing Overlay under City’s assurance that DCT’s structures and uses would remain conforming.

We have reviewed the draft Parkside Precise Plan and it appears intended to not impact planning and zoning regulations applicable to non-residential uses. However, the document is at times vague as to its exact regulatory impact. DCT requests that the following revisions be implemented prior to the plan being presented to the Planning Commission as an action item:

- Sections 1.1, 1.2.2 and 3.1.1 should include a statement to the effect “the Parkside Plan policies and regulations only apply to residential development within the PAOZ1 and PAOZ-2 overlay districts. The Parkside Plan has no regulatory impact to non-residential uses within those residential overlay zones and therefore does not limit or amend the permitted uses or development standards applicable to non-residential uses within the PAOZ1 and PAOZ-2 overlay districts. Please refer to a property’s underlying zoning district regulations for the development standards applicable to non-residential uses.”

- The following header and sentence on page 26 could be interpreted to mean that the Parkside Plan impacts non-residential properties within the PAOZ1 and PAOZ-2 overlay districts: “**Non-residential Development:** The Parkside Plan does not change the land use and zoning district designations of properties in the Plan Area not identified for future housing development *outside of* the PAOZ-1 and PAOZ-2 overlay zones.” (Emphasis added.) DCT requests that the following be added to this section: “Furthermore, the Parkside plan does not change the underlying land use and zoning district designations within the PAOZ-1 and PAOZ-2 overlay zones; this means that the Parkside Plan has no impact on the permitted uses or development standards applicable to non-residential uses within those residential overlay zones. Please refer to a property’s underlying zoning district regulations for the development standards applicable to non-residential uses.”
- Table 3.2.1 should be amended to call out the underlying zoning designation of each property. Table 3.2.2 should be amended to add a row that states: “all uses permitted or conditionally permitted by the underlying zoning district.”
- Please make the following revision to the first sentence of Section 3.2.3: “**Intent:** This section addresses the residential development standards for the PAOZ-1 and PAOZ-2 overlay zones”
- Please make the following revision to page 73: “The PA land use designation will allow for residential development in addition to ~~commercial~~ all uses permitted in the existing TC, Trade Commercial land use designation.”
- Please add the following sentence to Section 5.2 and Section 5.4’s subsection for Non-Residential Development: “Non-residential development applications for properties within the PAOZ-1 and PAOZ-2 overlay zones shall be subject to review procedures prescribed in the BMC for the TC-1, Crocker Park Trade Commercial and NCRO-1, Neighborhood Commercial zones.”

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Thank you for your consideration of these comments and DCT looks forward to continuing to work with the City as it develops its Parkside Precise Plan.

Sincerely,



Christian H. Cebrian

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