

4.7 Land Use and Planning

4.7.1 Introduction

Section 4.7, Land Use and Planning, addresses the impacts that land use changes related to the 201 Haskins Way Project (project) would have on the existing land uses in the project vicinity and applicable local and state plans and policies. Project-specific impacts are presented below. A discussion of cumulative impacts is also provided.

4.7.2 Environmental Setting

PROJECT VICINITY

The City of South San Francisco is generally composed of industrial uses in its eastern and southeastern portions and single-family homes to the north and west. The City encompasses 4,298 acres.¹ The project site is located in a light industrial and research and development (R&D) area of the City's East of 101 Area.

There are several existing light industrial manufacturing and distribution uses, generally containing one- to two-story buildings, west of Haskins Way and west of the project site. To the north and northwest, the land use shifts from industrial uses to biotechnology uses, most dominantly the Genentech campus north of East Grand Avenue. The Genentech campus creates a shift in land use to three- to six-story office and R&D buildings, plus additional amenities such as a five-story parking garage, retail uses, and child care. To the east of the project site are the South San Francisco Scavenger Company and Blue Line Transfer buildings, which provide waste collection and recycling service uses. To the south, the existing industrial development meets the San Francisco Bay Trail (Bay Trail) and the San Francisco Bay (Bay) shoreline.

PROJECT SITE

The project site is generally bounded by East Grand Avenue to the north, Haskins Way to the west, the Bay Trail and shoreline to the south, and adjacent parcels containing a recycling center and portions of the Genentech campus to the east. The project site is served by East Grand Avenue as the primary arterial, fed by Haskins Way running north to south and East Jamie Court running east to west.

Phase 1 Area

The Phase 1 area includes two parcels: the 6.45-acre 201 Haskins Way parcel (Assessor's Parcel Number [APN] 015-102-230) located on the north side of East Jamie Court, which contains a one-story terminal building previously occupied by a light industrial trucking terminal use, and the 6.13-acre 400-450 East Jamie Court parcel (APN 015-102-250), which is currently occupied by two three-story office/R&D buildings.

¹ City of South San Francisco, 1999. *City of South San Francisco General Plan* (General Plan), as amended in 2011, Chapter 2, p. 2-3. Available online at: <http://www.ssf.net/departments/economic-community-development/planning-division/general-plan>. Accessed May 10, 2018.

Phase 2 Area

The Phase 2 area includes the 400-450 East Jamie Court parcel (APN 015-102-250, also part of the Phase 1 area), plus six additional parcels: 101 and 151 Haskins Way, 410 and 430 East Grand Avenue (APNs 015-102-210, 015-102-220, 015-102-180, 105-102-160), and 451 East Jamie Court (APNs 015-102-240 and 015-102-290). Five of the six parcels each contain one- to two-story light industrial buildings, and the sixth contains a parking lot.

EXISTING LAND USE DESIGNATIONS

The project site is identified in the *City of South San Francisco General Plan* (General Plan) as a mixed Coastal Commercial/Mixed Industrial (CC/MI) district, with the exception of one parcel in the Phase 2 area (APN 015-102-290), which is designated as Coastal Commercial (CC) only.^{2,3} The existing General Plan land use and zoning designations of the project site and surrounding parcels are illustrated in Figure 2.3: Existing General Plan Land Use and Zoning Designations, in Chapter 3, Project Description, p. 3.9. The *East of 101 Area Plan* designates the entire project site as mixed Light Industrial. The General Plan land use designations supersede the land use designations of the *East of 101 Area Plan*.

The existing zoning designations of the project site and surrounding parcels are illustrated in Figure 3.3: Existing General Plan and Zoning Designations, in Chapter 3, Project Description, p. 3.9. The 101, 151, and 201 Haskins Way parcels; the 410 and 430 East Grand Avenue parcels; the 451 East Jamie Court parcel; and the adjacent parcel (APN 015-102-290) are zoned Mixed Industrial (MI).^{4,5} The 400-450 East Jamie Court parcel is zoned Business Commercial (BC).

4.7.3 Regulatory Framework

This discussion provides a summary of the plans and policies of the City of South San Francisco (City), as well as those of the regional agencies that have policy and regulatory control over the project site. There are no state or federal agencies with land use plans or policies applicable to the proposed project.

REGIONAL

Comprehensive Airport Land Use Compatibility Plan

State law requires Airport Land Use Commissions (ALUCs) to prepare and adopt an Airport Land Use Compatibility Plan (ALUCP) for each public use and military airport within their jurisdiction. Further, ALUCs are required to review the plans, regulations, and other actions of local agencies and airport operators within each Commission's jurisdiction. The San Francisco International Airport (SFO) is

² General Plan, pp. 2-22 and 2-25.

³ City of South San Francisco, 2018. Plans and Policy Documents - General Plan Map (website). Available online at: <http://www.ssf.net/departments/economic-community-development/planning-division/planning-documents/approved-policy-documents>. Accessed May 10, 2018.

⁴ City of South San Francisco Zoning Ordinance §20.110.003.

⁵ City of South San Francisco, 2018. Interactive Zoning Ordinance Map (website). Available online at: <http://zoning.ssf.net/>. Accessed May 10, 2018.

located 1 mile south of the project site. Based on state law and guidance provided in the *California Airport Land Use Planning Handbook*, the 2012 *Comprehensive Airport Land Use Compatibility Plan* prepared for the San Francisco Airport (2012 SFO ALUCP) has four primary areas of concern⁶:

- **Aircraft Noise Impact Reduction** – To reduce the potential number of future airport area residents who could be exposed to noise impacts from airport and aircraft operations.
- **Safety of Persons on the Ground and in Aircraft in Flight** – To minimize the potential number of future residents and land use occupants exposed to hazards related to aircraft operations and accidents.
- **Height Restrictions/Airspace Protection** – To protect the navigable airspace around the Airport for the safe and efficient operation of aircraft in flight.
- **Overflight Notification** – To establish an area within which aircraft flights to and from the Airport occur frequently enough and at a low enough altitude to be noticeable by sensitive residents. Within this area, real estate disclosure notices shall be required, pursuant to state law.

The 2012 SFO ALUCP contains airport/land use compatibility policies and criteria that apply to all land uses except those considered as existing land uses. Airport land use commissions were given authority to:

- (1) specify how land near airports is to be used, based on safety and noise compatibility considerations;
- (2) develop height restrictions for new development to protect airspace in the vicinity of the airport; and
- (3) establish construction standards for new buildings near airports, including sound insulation requirements.

After an ALUC has adopted its ALUCP, affected local governments must update their general plans, specific plans, and land use regulations to be consistent with the ALUCP. Even if the local government has amended its plans to be consistent with the ALUCP, it must still submit proposed new and amended general plans, specific plans, land use ordinances (including rezoning), regulations, and facility master plans to the ALUC for review. The City/County Association of Governments of San Mateo County (C/CAG) ALUC reviews local land use policy actions and administers consistency review and submits recommendations to the C/CAG Commission.

Code of Federal Regulations Part 77

The 2012 SFO ALUCP incorporates the provisions in Title 14 of the Code of Federal Regulations (CFR) Part 77, “Objects Affecting Navigable Airspace,” as amended, to establish height restrictions and federal notification requirements related to proposed development within the 14 CFR Part 77 airspace boundaries.⁷ The regulations contain three key elements: (1) standards for determining obstructions in the navigable airspace and designation of imaginary surfaces for airspace protection; (2) requirements for project sponsors to provide notice to the Federal Aviation Administration (FAA) of certain proposed construction or alteration of structures that may affect the navigable airspace; and (3) the initiation of aeronautical studies, by the FAA, to determine the potential effect(s), if any, of proposed construction or alterations of structures on the subject airspace.

⁶ City/County Association of Governments of San Mateo County, 2012. *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (2012 SFO ALUCP). Available online at: <http://ccag.ca.gov/plansreportslibrary/airport-land-use/>. Accessed May 10, 2018.

⁷ Code of Federal Regulations, Title 14, Chapter I, Subchapter E, Part 77.

As identified in the 2012 SFO ALUCP, the project site is located within the Federal Aviation Regulation Part 77 sphere of influence, which is the boundary established to regulate obstructions to airspace navigation, including building heights.⁸ The City is located inside the 14 CFR Part 77 horizontal, conical, primary, approach, and transitional imaginary surface contour areas. The parcels for the proposed project are located within the horizontal surface contour area.

San Francisco Bay Plan

The San Francisco Bay Conservation and Development Commission (BCDC), created by the McAteer-Petris Act, functions as the state's coastal management agency for the Bay.⁹ The *San Francisco Bay Plan* (Bay Plan) was prepared by BCDC from 1965 through 1969 and amended through 2007 in accordance with the McAteer-Petris Act. The Bay Plan guides the protection and use of the Bay and its shoreline. BCDC has permit jurisdiction for the nine Bay Area counties with Bay frontage over areas subject to tidal action up to the mean high tide line and including all sloughs, tidelands, submerged lands, and marshlands lying between the mean high tide and 5 feet above mean sea level (MSL), and the land lying between the Bay shoreline and a line drawn parallel to, and 100 feet from, the Bay shoreline, known as the 100-foot shoreline band.¹⁰ Under the McAteer-Petris Act, BCDC has permit authority for the placement of fill, extraction of materials, or substantial changes in use of land, water, or structures within its jurisdiction, and to enforce policies aimed at protecting the Bay and its shoreline, as well as maximizing public access to the Bay. One parcel within the project site, the 400-450 East Jamie Court parcel, is adjacent to the Bay Trail and a portion of that parcel lies within 100 feet of the Bay shoreline.

LOCAL

City of South San Francisco General Plan

The General Plan, originally adopted in 1999, as amended in 2011, provides a vision for the long-range physical and economic development for the City, provides strategies and specific implementing actions, and establishes a basis for judging whether specific development proposals and public projects are consistent with the City's plans and policy standards. The General Plan contains the following chapters:

- Land Use
- Planning Sub-Areas Element
- Transportation
- Parks, Public Facilities, and Services
- Economic Development
- Open Space and Conservation
- Health and Safety
- Noise

⁸ 2012 SFO ALUCP, Exhibit IV-2, p. IV-5.

⁹ San Francisco Bay Conservation and Development Commission, 2010. The McAteer-Petris Act (website). Available online at: http://www.bcdc.ca.gov/plans/mcateer_petris.html. Accessed May 10, 2018.

¹⁰ San Francisco Bay Conservation and Development Commission, 2012. *San Francisco Bay Plan*, p. 5. Available online at: <http://www.bcdc.ca.gov/pdf/bayplan/bayplan.pdf>. Accessed May 10, 2018.

The General Plan chapters above cover six of the seven elements required by state law (land use, open space, conservation, housing, circulation, noise, and safety) and optional elements (Planning Sub-Areas and Economic Development) that address local concerns and regional requirements. The seventh required element is the Housing Element, which is updated on a more regular basis than the General Plan and published under a separate volume.

The General Plan contains a Planning Sub-Area Element. Policies in this element complement citywide policies included in the Land Use and other elements. Some of these sub-areas have detailed area plans, specific plans, or redevelopment plans. Where appropriate, the General Plan provides guidance as to how these plans may need to be changed in order to conform to the policy direction provided by the General Plan. The sub-areas, 14 in all, were collectively derived from analysis of land use and urban design patterns and existing and needed planning efforts and activities. The project site is located within the East of 101 Sub-Area of the Planning Sub-Areas Element.¹¹

The General Plan governs the amount and intensity of development within the East of 101 Sub-Area and establishes specific policies and goals for the area, including the project site. The proposed project site is designated as CC/MI and CC districts in the General Plan. As shown in Figure 3.3: Existing General Plan Land Use and Zoning Designations, in Chapter 3, Project Description, on p. 3.9, General Plan land use designations surrounding the project site are MI, Business Technology Park (BTP), CC, and Park and Recreation on the shore of San Francisco Bay.¹² Table 3.2: Existing Land Use and Development Standards by Zoning Designation, on p. 3.12, presents the existing General Plan land use and development standards by corresponding zoning designation on the proposed project parcels.

Policies provided in Chapter 2, Land Use,¹³ and Chapter 3, East of 101 Sub-Area,¹⁴ of the General Plan are detailed below.

Policy 2-G-2: Maintain a balanced land use program that provides opportunities for continued economic growth, and building intensities that reflect South San Francisco's prominent inner bay location and excellent regional access.

Policy 2-G-4: Provide for continued operation of older industrial and service commercial businesses at specific locations.

Policy 2-I-4: Require all new developments seeking an (Floor Area Ratio [FAR]) bonus set forth in Table 2.2-2 to achieve a progressively higher alternative mode usage. The requirements of the (Transportation Demand Management [TDM]) Program are detailed in the Zoning Ordinance.

Policy 2-I-22: Require that all future development conforms with the relevant height, aircraft noise, and safety policies and compatibility criteria contained in the most recently adopted version of the San Mateo County Comprehensive Airport Land Use Plan for the environs of San Francisco International Airport.

¹¹ General Plan, Chapter 3, pp. 3-40 and 3-41.

¹² City of South San Francisco, 2018. Plans and Policy Documents - General Plan Map (website). Available online at: <http://www.ssf.net/departments/economic-community-development/planning-division/planning-documents/approved-policy-documents>. Accessed May 10, 2018.

¹³ General Plan, Chapter 2, pp. 2-39, 2-41, and 2-46.

¹⁴ General Plan, Chapter 3, pp. 3-44 through 3-49.

Policy 3.5-G-3: Promote campus-style biotechnology, high-technology, and research and development uses.

Policy 3.5-I-4: Unless otherwise stipulated in a specific plan, allow building heights in the East of 101 area to the maximum limits permissible under Federal Aviation Regulations Part 77.

Policy 3.5-I-5: Do not vary permitted maximum development intensities based on lot-size

Policy 3.5-I-7: Prepare signage and streetscape plan for the areas designated as Business Commercial and Business and Technology Park on the General Plan Diagram, treating the entire area as one large campus, with unified signage and orchestrated streetscapes that make wayfinding easy and pleasant.

Policy 3.5-I-8: Encourage the development of employee-serving amenities with restaurants, cafes, support commercial establishments such as dry-cleaners, to meet the needs of the employees in the East of 101 area. Such uses could be located in independent centers or integrated into office parks [o]r technology campuses.

Policy 3.5-I-11: Do not permit any new warehousing and distribution north of East Grand Avenue or in areas designated Business Commercial.

Policy 3.5-I-13: Facilitate waterfront enhancement and accessibility by:

- Establishment of uses that would bring people to the waterfront (see policies 3.5-I-8 and 3.5-I-9);
- Establishment of a bayshore design review area as part of the Zoning Ordinance; and
- Ensuring that the Park Recreation and Open Space Master Plan include specific improvements for shoreline enhancement and accessibility, as spelled out in the East of 101 Area Plan. See policy RE-3 in the plan.

Applicable policies provided in Chapter 4, Transportation; Chapter 5, Parks, Public Facilities, and Services; Chapter 7, Open Space and Conservation; Chapter 8, Health and Safety, and Chapter 9, Noise are discussed in their respective sections of this Environmental Impact Report (EIR). A comprehensive consistency analysis of all applicable policies is provided in Appendix C, Land Use Compatibility Analysis, of this EIR.

East of 101 Area Plan

The *East 101 Area Plan*, which amended the General Plan, originally was adopted as the policy document to guide development in the area. The *East of 101 Area Plan* was adopted by the City Council in 1994 and most recently amended in 2016.¹⁵ The East of 101 Area consists of roughly 1,700 acres of land in the City east of U.S. 101, from the City's northern border with Brisbane and to the southern border adjacent to SFO. The overall goal of the plan is to recognize the unique character of the East of 101 Area and to guide and regulate development in a manner that protects and enhances the area's physical, economic, and natural resources, while also encouraging appropriate development in the area.

¹⁵ The 2016 amendments to the *East of 101 Area Plan* primarily relate to ensuring consistency between the General Plan, the zoning ordinance, and the 2015 *Downtown Station Area Specific Plan*. The project site is not within the Downtown Station Area.

The City interprets the *East of 101 Area Plan* as a design-level document. Development standards and density determinations, specifically floor area ratio (FAR), are established in the subsequently updated General Plan, which guides implementation of the prior adopted *East of 101 Area Plan* and takes precedence over the Area Plan.

Accordingly, where the General Plan and *East of 101 Area Plan* conflict, land use policies and designations of the General Plan supersede those outlined in the *East of 101 Area Plan*. The City has, however, retained the *East of 101 Area Plan* Design Element policies to be the design guidelines for development in the East of 101 Area.

The proposed project site is designated Light Industrial in the *East of 101 Area Plan*.¹⁶ The 400-450 East Jamie Court parcel is also designated with a CC district overlay. While the General Plan Land Use designations supersede these designations, the designations remain relevant for determining applicable design and related guidelines.

Applicable policies from the *East of 101 Area Plan* Land Use Element are as follows¹⁷:

Policy LU-6c: Parking structures serving off-site uses may exceed the Floor Area Ratio allowed in the Light Industrial category, provided they meet the following requirements:

- The number of peak hour trips generated by the parking structure must be less than or equal to the minimum number of peak hour trips that would be expected from any other use allowed in the light industrial category.
- The parking structure shall meet all other applicable City regulations, including all other policies of this plan.
- The parking structure and its design shall not create traffic safety problems or circulation conflicts on public streets.

Policy LU-24: Retail and personal services shall be encouraged throughout the area to serve the employees of the East of 101 Area. In the Light Industrial and Planned Industrial categories, dedicated retail space may be included in a development without being applied to the allowed FAR, provided that such development includes adequate parking and does not exceed 10 percent of the building square footage of a project.

Policy LU-26: Child care facilities may be built as part of a commercial or industrial development and shall not be counted as part of the Floor Area Ratio of the project.

Policy LU-31: No new above-ground bulk fuel tanks are permitted after July 25 1994. Above-ground fuel tanks which are lawfully existing prior to July 1994 may be maintained but may not be replaced or expanded.

The Design Element of the General Plan is applicable to the proposed project; however, individual policies are not listed here and are generally confirmed during the design review process. Policy CON-7, which discusses conservation of biological resources, is discussed in Section 4.3, Biological Resources,

¹⁶ City of South San Francisco, 1994. *East of 101 Area Plan*, adopted July 1994, pp. 56-61. Available online at: <http://www.ssf.net/departments/economic-community-development/planning-division/planning-documents/approved-policy-documents>. Accessed September 1, 2017.

¹⁷ E-mail correspondence from Naree Chan, City Legal Council, on June 22, 2018.

on p. 4.3.10. A comprehensive consistency analysis of all applicable policies is provided in Appendix C, Land Use Compatibility Analysis, of this EIR.

Downtown/Central Redevelopment Plan

The *Downtown/Central Redevelopment Plan* (Redevelopment Plan), originally adopted in 1989, was prepared by the former South San Francisco Redevelopment Agency (Redevelopment Agency) pursuant to the State Community Redevelopment Law (former Health and Safety Code, Section 33000 et seq.).¹⁸ The plan provided the former Redevelopment Agency with the duty to redevelop, rehabilitate, and revitalize the plan area. The plan did not present a specific plan or establish priorities for specific projects. Instead, the plan presents a process and a basic framework within which specific development plans would be presented, priorities for specific projects would be established, and specific solutions would be proposed. In general, the goals and objectives of the plan are as follows: (1) to expand retail downtown; (2) to support various cultural and civic uses; (3) to promote downtown as a financial hub; (4) to eliminate blight; (5) to improve public parking and other public facilities, services, and utilities; (6) to create a pedestrian environment; (7) to emphasize historic architectural styles; (8) to expand and upgrade housing; (9) to promote new and continuing private sector investment; (10) to achieve an environment reflecting a high level of concern for architectural, landscape, and urban design and land use principles; (11) to retain and expand existing businesses; (12) to provide for increased revenues for the City; (13) to encourage public participation; (14) to create local job opportunities; (15) to redesign and develop stagnant or improperly used sites; and (16) to reduce the City's annual costs of providing local services.

The 400-450 East Jamie Court parcel is located in the Redevelopment Plan area.¹⁹ As amended, the term of the Redevelopment Plan extends until July 12, 2030, for purposes of land use controls, and until July 12, 2040, for receipt of property taxes and repayment of indebtedness. The Redevelopment Plan provides that permitted land uses in the plan area include commercial and industrial uses, and may include any use permitted by the General Plan and City ordinances for that area.²⁰ Under the Redevelopment Plan, the type, size, and height of buildings in the plan area are limited by applicable local, state, and federal statutes and ordinances.²¹ The Redevelopment Plan provides that the Redevelopment Agency was authorized to establish limits on height, land coverage, setbacks, design criteria, traffic, and parking through adoption of subsequent resolutions, but the Redevelopment Plan does not impose additional development standards for the plan area.²²

City of South San Francisco Zoning Ordinance, 2017

The existing zoning designations of the project site and surrounding parcels are illustrated in Figure 3.3: Existing General Plan Land Use and Zoning Designations, in Chapter 3, Project Description, on p. 3.9.

¹⁸ City of South San Francisco, 1989. *Redevelopment Plan for the Downtown Central Redevelopment Project* (Downtown/Central Redevelopment Plan), adopted July 12, 1989.

¹⁹ General Plan, Figure 2-7, p. 2-37.

²⁰ Downtown/Central Redevelopment Plan, Section 402, p. 18.

²¹ Downtown/Central Redevelopment Plan, Section 413, p. 21.

²² Downtown/Central Redevelopment Plan, Section 420, p. 22.

Existing zoning on the project site is MI with the exception of the 400-450 East Jamie Court parcel, which is zoned BC.²³ The MI and BC districts are two of the City's base employment districts. Table 3.2: Existing Land Use and Development Standards by Zoning Designation, in Chapter 3, Project Description, on p. 3.12, outlines the development standards for the MI and BC districts for lot size, building height, minimum setbacks, lot coverage, FAR, and landscaping coverage.

The MI zoning district is intended to provide areas for a wide range of manufacturing, industrial processing, general service, warehousing, storage and distribution, and service commercial uses and to protect areas where such uses currently exist.²⁴ Industries that use or produce substantial amounts of hazardous materials or generate noise, odor, or other pollutants are not permitted. Conventional residential and/or group residential development are also prohibited, but live-work uses such as artists' studios are allowed in designated areas. Small-scale retail and service uses serving local employees, residents, and visitors may be permitted as secondary uses. This district is consistent with the General Plan's MI designation. The maximum FAR is 0.4 in the MI zoning district, but increases may be permitted up to a total FAR of 0.6 for development providing specified design and green building measures, subject to approval of a Conditional Use Permit (CUP).²⁵

The BC zoning district is intended for business and professional offices, visitor service establishments, and retail uses with an emphasis on larger and regional-serving uses, largely in commercial areas west of U.S. 101.²⁶ A wide range of nonresidential uses is appropriate, including administrative, financial, business, professional, medical, and public offices, and visitor-oriented and regional commercial activities such as warehouse clubs and other large-format retail uses. The maximum base FAR is 0.5, but increases may be permitted up to a total FAR of 1.0 for R&D establishments or development that meets specific TDM, and specified design and green building standards, subject to approval of a CUP.²⁷ The maximum FAR for hotels is 1.2 with increases to a total of 2.0 for development that meets specified criteria consistent with General Plan policies. Section 20.110.004 of the zoning ordinance also provides requirements for BC districts regarding the orientation of the primary building entrance; building transparency and required openings; and building design features including architectural articulation, entries, and materials.

Climate Action Plan

The purpose of the *South San Francisco Climate Action Plan* (CAP), adopted in 2014, is to demonstrate the City's continued commitment to reduce greenhouse gas (GHG) emissions while protecting unique

²³ City of South San Francisco, 2018. Interactive Zoning Ordinance Map (website). Available online at: <http://zoning.ssf.net/>. Accessed May 10, 2018.

²⁴ City of South San Francisco Zoning Ordinance Section 20.110.001.

²⁵ City of South San Francisco Zoning Ordinance, 2017. Table 20.110.003(C). Applies to MI projects that include high quality, innovative design and product type, and maximum provisions for pedestrian and bicycle use or provision of green building measures over and above the applicable green building compliance threshold requirements pursuant to Municipal Code Title 15.

²⁶ City of South San Francisco Zoning Ordinance Section 20.110.001.

²⁷ City of South San Francisco Zoning Ordinance, 2017. Table 20.110.003(C).

resources in the City.²⁸ The CAP provides goals, policies, and programs to reduce GHG emissions, adapt to climate change, and support the goals of Assembly Bill 32 and Senate Bill 743. Measures and standards identified in the CAP allow the City to simplify the development review process and determine whether projects are eligible for streamlining incentives. The CAP meets the requirements of a Qualified GHG Reduction Strategy and, consistent with the Global Warming Solutions Act of 2006, presents a target reduction of 15 percent below baseline 2005 GHG emissions levels by 2020.

The CAP provides guidance for a scientific and regulatory framework, a GHG emissions inventory, a GHG reduction strategy, adaptation and resiliency, and implementation. In particular, the CAP includes a Development Checklist for City staff to use to identify applicable CAP measures for discretionary projects and required mitigation standards. The Development Checklist serves as the summary of project-level standards from the CAP. For discretionary projects seeking to use California Environmental Quality Act (CEQA) streamlining provisions, the City may require CAP measures as mandatory conditions of approval or as mitigation for identified GHG emission impacts.²⁹ Relevant criteria include, but are not limited to, the following questions:

- Does the project include bicycle facilities (e.g., bicycle lanes, parking, lockers)?
- Will the project support bike sharing/rental programs?
- Will there be a commute shuttle or public transit stop on site or within 500 feet?
- Will the project provide traffic-calming treatments?
- Is the project paying a traffic impact fee to fund bicycle and pedestrian improvements?
- Will the project provide designated parking spaces for electric vehicles, carpool vehicles, or other low-emissions vehicles?
- Will certification of the building be sought under Leadership in Energy and Environmental Design (LEED) or other green building criteria?
- Will any renewable energy system be installed as part of this project?
- Will any water features exceed CALGreen [Title 24 Green Building Standards] standards?
- Will the project incorporate low-impact development practices?
- Will any xeriscaping be installed?
- Will captured rainwater or graywater be used for irrigation?

4.7.4 Impacts and Mitigation Measures

This section describes the impact analysis related to land use and planning for the proposed project. This section also describes the methods used to determine the impacts of the proposed project and lists the thresholds used to conclude whether an impact would be significant.

²⁸ City of South San Francisco, 2015. *Climate Action Plan*, adopted February 13, 2014, p. ES-1. Available online at: <http://www.ssf.net/departments/economic-community-development/planning-division/planning-documents/approved-policy-documents>. Accessed September 1, 2017.

²⁹ Ibid, pp. 75, 169, 170, and 171.

SIGNIFICANCE CRITERIA

Per the CEQA Guidelines, Appendix G, a land use and planning impact is considered significant if project implementation would:

- a. physically divide an established community;
- b. conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect; or
- c. conflict with any applicable habitat conservation plan or natural community conservation plan.

APPROACH TO ANALYSIS

To facilitate a review of the proposed new land uses and rezoning under the proposed project, SWCA Environmental Consultants (SWCA) prepared a Land Use Compatibility Analysis describing the applicable local and regional land use policies (see Appendix C of this EIR). The results of this analysis in relation to potential land use conflicts are described below.

There are no habitat conservation plans or natural community conservation plans applicable to the project site. Therefore, CEQA Appendix G Land Use and Planning criterion (c) is not applicable to the proposed project. This criterion is not discussed further in this section.

A project that involves a change or intensification in land use would not be considered to have a significant impact related to the topic of Land Use and Planning unless the project would physically divide an established community.

Conflicts with existing plans and policies do not, in themselves, indicate a significant environmental effect related to the topic of Land Use and Planning within the meaning of CEQA, unless the project substantially conflicts with a land use plan/policy that was adopted for the purpose of avoiding or mitigating an environmental effect. The focus of the analysis under Impact LU-2 is on the proposed project's potential conflicts with applicable land use plans and policies. Discussion of policy compatibility, while not required under CEQA, is provided for informational purposes. It does not present a comprehensive analysis of project conformity with applicable local, regional, and state plans and policies. Such analyses would be undertaken independent of the CEQA process, as part of the decision-makers' action to approve, modify, or disapprove the project or aspects thereof.

To the extent that physical environmental impacts may result from such conflicts, the EIR discloses and analyzes these physical impacts under the specific environmental topic sections in Chapter 4, Environmental Setting, Impacts, and Mitigation. Impacts resulting from a change or intensification of employment on the project site are embodied in environmental impacts related to the capacity of existing facilities and services to adequately serve the area, such as those described in Transportation and Circulation, Population and Housing, Public Services, Recreation, and Utilities and Service Systems. Physical impacts of construction and/or operation of the proposed project on the environment are embodied in physical impacts related to environmental topics such as Cultural Resources, Noise, Air

Quality, Greenhouse Gas Emissions, Hydrology and Water Quality, and Hazards and Hazardous Materials.

Project-level and cumulative land use impacts of the proposed project are addressed in relation to the significance criteria.

IMPACT EVALUATION

Impact LU-1: The proposed project would not physically divide an established community. (Less than Significant)

The proposed project would not physically divide an established residential or neighborhood-serving commercial community. The existing site vicinity is characterized by the confluence of existing light industrial uses to the west and northwest and existing office/R&D uses to the east and northeast. The proposed project, during Phase 1 and project buildout, would construct new office/R&D uses on the project site under the proposed rezoning. The proposed project would not introduce new uses to the project vicinity in a manner that would physically divide the existing uses.

The project site is characterized by clusters of one- to three-story buildings, open surface parking lots and landscaping. The project site is generally located along the edge of the East of 101 Area where existing development abuts the Bay and the Bay Trail. Vehicular access is available throughout the project site. Haskins Way and East Jamie Court do not provide thru access. The southern terminus of Haskins Way abuts the Bay Trail. The eastern terminus of East Jamie Court is a dead-end transition into the South San Francisco Scavenger and Blue Line Recycling Center entrances. The proposed office/R&D buildings would not create a physical barrier between existing uses.

There are no existing sidewalks fronting the project site on East Grand Avenue. On Haskins Way, there are existing sidewalks fronting the 201 Haskins Way and 400-450 East Jamie Court parcels, but not the 101 and 151 Haskins Way parcels. On East Jamie Court, there are no sidewalks fronting the 201 Haskins Way parcel, but there are sidewalks fronting the 400-450 East Jamie Court parcel. There is existing public access to the waterfront from a nearby public access point and through walkways provided on the 400-450 East Jamie Court parcel. The proposed project, during Phase 1 and project buildout, would create a network of public pedestrian sidewalks and interconnected open spaces throughout the site, and create a pedestrian link to the Bay Trail from the northern portion of the project site. The proposed network of pedestrian paths and open spaces is intended to encourage pedestrian use through the project site and to promote accessibility of the waterfront. The proposed sidewalks would improve accessibility between the project site and surrounding uses, and would not create a physical barrier between existing uses.

For these reasons, the proposed project would have a less-than-significant land use effect related to physical division of a community. No mitigation measures are necessary.

Impact LU-2: The proposed project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. (*Less than Significant*)

Comprehensive Airport Land Use Compatibility Plan

Because the proposed project would involve a rezoning, the project would be required to refer to the ALUC for a determination of consistency with the relevant policies of the 2012 SFO ALUCP. Based on the existing and ongoing development of office/R&D uses in the East of 101 Area, no substantial inconsistencies with safety policies are anticipated. There are three airport/land use compatibility issues addressed in the 2012 SFO ALUCP that relate to the proposed project: (a) consistency with noise compatibility policies; (b) safety criteria; and (c) airspace compatibility criteria.

Noise Policy

The 2012 SFO ALUCP uses the Community Noise Equivalent Level 65 decibel (dB) noise contour for determining land use compatibility. The proposed project site is located outside of the Community Noise Equivalent Level 65 dB noise contour.³⁰ Therefore, the noise policy is not applicable to the proposed project.

Safety Policy

The *California Airport Land Use Planning Handbook* requires ALUCPs to include safety zones for each runway end. The 2012 SFO ALUCP includes five safety zones and related land use compatibility criteria. The proposed project site is located outside of all safety zones established for the 2012 SFO ALUCP.³¹ Therefore, the safety policy is not applicable to the proposed project.

Height of Structures, Use of Airspace, and Airspace Compatibility

The City is located inside the 14 CFR Part 77 horizontal, conical, primary, approach, and transitional imaginary surface contours. The parcels for the proposed project are located within the horizontal surface contour. The height for the imaginary surface established for the horizontal surface at the site location is 163.2 feet above MSL. The proposed project parcels are located at between 12 and 23 feet above MSL. The proposed buildings under the proposed project are designed to be constructed at a maximum building height of 99 feet above ground level. Maximum structure heights would be approximately 110 to 122 feet above MSL. A structure built at a maximum of 122 feet above MSL would be well below the imaginary surface height established.

Under federal law, the project sponsor is required to comply with all notifications and other requirements described in 14 CFR Part 77. The project sponsor would be required to file Form 7460-1, Notice of Proposed Construction or Alteration, with the FAA to determine whether the project would constitute a hazard to air navigation, and if any airspace safety design features (such as lighting) would be necessary. Based on the proposed project's maximum height of 122 feet above MSL, no additional safety

³⁰ 2012 SFO ALUCP, Exhibit IV-2, p. IV-5.

³¹ Ibid.

requirements are anticipated. Therefore, the proposed project would be consistent with the airspace policies as established in the adopted 2012 SFO ALUCP.

San Francisco Bay Plan

For the proposed project, BCDC's jurisdiction includes the Bay and areas within 100 feet inland of the mean high tide line. A portion of the existing 400-450 East Jamie Court parcel is under BCDC's jurisdiction. The portion of the parcel inside the shoreline band contains a segment of parking lot, asphalt walking paths, a viewing and seating area, a concrete plaza, landscaping, and assorted public access amenities (e.g., benches, tables).³² Outside the shoreline band, the parcel contains two existing office/R&D buildings and access to the Bay Trail.

Phase 1 Development

The proposed Phase 1 development of the parcel would be outside the 100-foot BCDC shoreline band. The proposed site plan and building addition at the 400-450 East Jamie Court parcel would be north of the existing 400 East Jamie Court building. Other development in the Phase 1 area would occur at 201 Haskins Way, which is located north of the 400-450 East Jamie Court parcel and would also be outside of the 100-foot BCDC shoreline band.

Views of the Bay from local roads or from the project site would change with additional development of office/R&D uses at 400-450 East Jamie Court or 201 Haskins Way. However, the Bay trail segment adjacent to 400-450 East Jamie Court parcel is not a designated vista point, wildlife refuge, or waterfront park under Bay Plan Map 5. The existing site and surrounding land uses include light industrial uses, office/R&D uses, and a recycling center use. Additional office/R&D use on the 400-450 East Jamie Court parcel from development of the 25,000-square-foot (sq. ft.) building addition would be consistent with the character of these existing uses.

The proposed 400-450 East Jamie Court building addition and development on 201 Haskins Way would maintain compatibility with appearance, design, and scenic view policies established by the Bay Plan, and site development would not require issuance of a new permit from BCDC. Impacts particular to visual character are further discussed in Section 4.11.3, Aesthetics, on pp. 4.11.1-4.11.8.

Project Buildout

The majority of development proposed under the conceptual Phase 2 site plan (including the conceptual East Grand Building and expanded parking garage), which would be constructed under project buildout, is located north of the 400-450 East Jamie Court parcel and would be located well outside the 100-foot BCDC shoreline band. However, views or access to the Bay from local roads or from the project site

³² In 2003, BCDC issued a permit (BCDC Permit No. M02-70, originally issued on July 17, 2003, and currently consisting of Corrected Permit No. M02-70, dated October 30, 2003, and Amendment No. Two, dated June 26, 2006; as corrected and amended, the "BCDC Permit") regarding the use of certain portions of the 400-450 East Jamie Court parcel for public Bayshore access. Development of Phase 1 of the proposed project would not impact the portion of the 400-450 East Jamie Court parcel affected by the BCDC Permit. Phase 2 of the proposed project would be reviewed for consistency with the BCDC Permit.

could change with additional development of office/R&D uses at 400-450 East Jamie Court at project buildout. The majority of the parcel is not within the 100-foot shoreline band.

In addition, up to 85,000 sq. ft. of floor area of additional BTP use on 400-450 East Jamie Court would be permitted under project buildout. Additional office/R&D use on the 400-450 East Jamie Court parcel would be consistent with the character of the existing industrial and office/R&D uses in the project vicinity. However, site-specific, project-level design of Phase 2 is not currently proposed and would be subject to a separate plan review and discretionary approval process. If Phase 2 development were proposed within the 100-foot shoreline band, that development would be subject to BCDC review and approval.

Nonetheless, any new development or changes to the existing site plan at the 400-450 East Jamie Court parcel under project buildout would involve BCDC consultation to determine consistency with Bay Plan policies and BCDC Permit No. M02-70 for any portions of the project site that are within its jurisdiction.

City of South San Francisco General Plan

The Land Use Compatibility Analysis, available as Appendix C to this EIR, presents a list of relevant General Plan guiding and implementing policies applicable to the proposed project in the Land Use; East of 101 Sub-Area; Transportation; Parks, Public Facilities, and Services; Economic Development, Open Space and Conservation; Health and Safety; and Noise chapters. Appendix C discusses whether the proposed project would be consistent with the policy, or inconsistent with the policy. As shown, the proposed project would not be inconsistent with most General Plan policies.

The proposed project would involve removal of an existing trucking terminal use at 201 Haskins Way, and existing light industrial uses on 101 and 151 Haskins Way, 410 and 430 East Grand Avenue, and 451 East Jamie Court. The project site is not designated for permanent operation of older industrial and service commercial uses. The existing light industrial uses on the proposed project site include a trucking terminal, a kiteboarding equipment distribution warehouse, a packaging manufacturer, a van rental service, audio and visual equipment rental services, and a janitorial equipment supplier. These existing uses are relatively small-scale, modern industrial uses that do not represent a historic industrial use.

The proposed project would not construct new warehousing or distribution uses. The proposed project would involve new office/R&D uses under the existing CC/MI and CC land use designations for allowable development of up to 1.0 FAR through a rezoning, CUP, and implementation of a TDM Plan and incorporation of design and green building standards per the South San Francisco Municipal Code (Municipal Code) FAR-Bonus Incentives Program. The proposed project is consistent with previous and ongoing expansion of R&D uses in the East of 101 Area, including the *Genentech Master Plan* area as well as other biotechnology campus sites.

During Phase 1 and project buildout, the proposed project would include employee-serving amenities. In particular, amenities within the proposed 25,000-sq.-ft. building addition at 400-450 East Jamie Court are conceptual at this time but the building would include an employee-serving café space. Additional

opportunities for employee-serving amenities to be included in the development program of Phase 2 during project buildout would be determined in coordination with the City.

As described in Section 4.9, Transportation and Circulation, Policy 4.2-G-13 directs the City to strive to maintain Level of Service (LOS) D or better on arterial and collector streets, at all intersections, and on principal arterials in the Congestion Management Program (CMP) during peak hours. Nonetheless, Policy 4.2-G-14 permits the City to accept LOS E or F after finding that: (1) there is no practical and feasible way to mitigate the lower LOS; and (2) the uses resulting in the lower LOS are of clear, overall public benefit.

This EIR identifies all feasible mitigation measures to maintain LOS D or better at all intersections and freeway segments in the CMP during peak hours that currently are operating at LOS D or better. With feasible mitigation incorporated, LOS D would be maintained at two intersections in the CMP under existing plus project conditions: Littlefield Avenue/East Grand Avenue during the AM peak hour and Gateway Boulevard/South Airport Boulevard/Mitchell Avenue during the PM peak hour (see Impact TR-1 and Impact TR-3 for further information).

However, the existing plus project conditions would cause one intersection in the CMP (Allerton Avenue/East Grand Avenue in the PM peak hour) that is currently operating at LOS D to operate at LOS E or F (see Impact TR-2). Under year 2040 conditions, the project would cause four intersections in the CMP that would be operating at LOS D to operate at LOS E or F: Forbes Boulevard/Harbor Way/East Grand Avenue and Littlefield Avenue/East Grand Avenue in the AM peak hour (see Impact C-TR-7 and Impact C-TR-8) and Dubuque Avenue/Grand Avenue Overcrossing and East Grand Avenue/Grand Avenue Overcrossing in the PM peak hour (see Impact C-TR-4 and Impact C-TR-5).

For two intersections, Allerton Avenue/East Grand Avenue in the PM peak hour under existing plus project conditions (Impact TR-2) and Littlefield Avenue/East Grand Avenue in the AM peak hour under year 2040 conditions (Impact C-TR-8), there is no practical and feasible way to mitigate to LOS D at these locations due to right-of-way constraints and impacts to pedestrian and bicycle facilities (see Impact TR-2 and Impact C-TR-8 for further information). For three intersections under year 2040 conditions (Forbes Boulevard/Harbor Way/East Grand Avenue in the AM peak hour, and Dubuque Avenue/Grand Avenue Overcrossing and East Grand Avenue/Grand Avenue Overcrossing in the PM peak hour), the proposed mitigation measures could reduce the proposed project's contribution to the cumulative traffic impact but these measures are not in the current Traffic Impact Fee and Capital Improvement Program. Because the City has not yet completed the Transportation Impact Fee and Capital Improvement Program updates to include or fund these measures, these impacts would remain significant.

A TDM program would also be required to be prepared and implemented pursuant to Municipal Code Chapter 20.400. However, it cannot be guaranteed that the TDM program would reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level and these impacts would be significant and unavoidable. As part of its consideration of the project, the City will consider a statement of overriding considerations that will explain the overriding public benefits of the project. Therefore, the proposed project would generally

be consistent with Policies 4.2-G-13 and 4.2-G-14 if the City makes the requisite findings set forth in Policy 4.2-G-14.

The proposed office/R&D uses under the proposed project are generally consistent with current land use plans and policies under the General Plan, and the CC and CC/MI districts. No conflicts with land use policies under General Plan or development standards of the CC and CC/MI district would occur under the proposed project.

East of 101 Area Plan

The proposed project would involve new office/R&D office uses. The proposed project is consistent with previous and ongoing expansion of biotechnology and R&D uses in the East of 101 Area.

Under the *East of 101 Area Plan*, the proposed project site is designated as Light Industrial, with the 400-450 East Jamie Court site designated as mixed Light Industrial/Coastal Commercial.³³ However, development standards and density determinations, including FAR, are established in the General Plan, which was updated after the adoption of the *East of 101 Area Plan* and takes precedence over the Area Plan. Accordingly, where the General Plan and *East of 101 Area Plan* conflict, land use policies and designations of the General Plan supersede those outlined in the *East of 101 Area Plan*. Applicable policies from the *East of 101 Area Plan* Land Use Element are discussed above in Section 4.7.3.

The proposed project would construct a parking structure on the 201 Haskins Way parcel during Phase 1 development, which would be expanded east during development of the conceptual Phase 2 site plan at project buildout. This parking structure would serve as a campus-wide parking resource for the project site (totaling eight parcels), but would not serve off-site uses. The parking structure would be provided to serve office/R&D uses which are typical of other similar developments. At project buildout, the parking structure would be accessed from driveways on Haskins Way, East Grand Avenue, and East Jamie Court and would not create traffic safety problems or circulation conflicts. A detailed discussion of traffic safety and circulation impacts is provided in Section 4.8, Transportation and Circulation. Therefore, the proposed project would not conflict with Policy LU-6c.

The proposed project would provide employee-serving amenities, such as retail. These uses would not exceed 10 percent of the building square footage of the project, and would not be applied to the allowable FAR. Therefore, the proposed project would not conflict with LU-24.

The proposed uses would not require installation of new underground fuel tanks, which are prohibited under Policy LU-31.

The proposed project site plan as it is presented in Chapter 2, Project Description, has been developed in accordance with Chapter 8 of the *East of 101 Area Plan*, which contains design guidelines for commercial development and streetscapes. These guidelines are interpreted during the design review process, which

³³ City of South San Francisco, 1994. *East of 101 Area Plan*, adopted July 1994, Figure 4. Available online at: <http://www.ssf.net/departments/economic-community-development/planning-division/planning-documents/approved-policy-documents>. Accessed September 1, 2017.

would involve iterative revisions up until project approval. City staff are responsible for determining final consistency under that process. No substantive conflicts have been identified for the proposed project.

In summary, the proposed project would be consistent with the applicable provisions of the *East of 101 Plan*.

Downtown/Central Redevelopment Plan

The Redevelopment Plan provides that permitted land uses in the plan area include commercial and industrial uses, and may include any use permitted by the General Plan and City ordinances for that area. The proposed project would construct new office/R&D uses permitted by the General Plan and would therefore be consistent with the Redevelopment Plan.

South San Francisco Zoning Ordinance, 2017

The proposed project would involve a rezoning of the project site from the MI and BC districts to the BTP district. The proposed zoning text amendment would amend Table 20.110.002, “Land Use Regulations – Employment Districts,” of the Municipal Code to clarify that for parcels with a dual General Plan designation of CC and MI, the new BTP development would be considered consistent with and would be subject to the development standards applicable to the CC designation. In contrast, the continuation of pre-existing freight forwarding, customs brokering, wholesale, warehousing, and distribution uses would be considered consistent with and would be subject to the development standards applicable to the MI designation.

The proposed rezoning would increase the maximum allowable FAR at project parcels under the existing MI district from 0.6 to 1.0, and would maintain the maximum allowable FAR of the 400-450 East Jamie Court parcel under the BC district (1.0).

Climate Action Plan

The proposed project would include alternative transportation-related amenities (bicycle facilities, bike sharing, commute shuttle, electric vehicle and carpool vehicle parking spaces); payment of the City traffic impact fee; adherence to LEED Gold standards, City and National Pollutant Discharge Elimination System conservation measures (water conservation, low-impact development, and landscaping); and infrastructure to support photovoltaic solar panels on the new office/R&D parking structure. A detailed description of the proposed project’s design features in relation to the CAP criteria is shown in Table 4.5.4: Analysis of Consistency with the CAP, in Section 4.5, Greenhouse Gas Emissions, on pp. 4.5.15–4.5.17. The project sponsor, in coordination with City staff, would perform ongoing review and identification of applicable CAP Measures for New Development, or for Additions, Alterations, and Tenant Improvements, to be incorporated into the proposed project as project features, mitigation of environmental effects, or mandatory conditions of approval commensurate with the project’s intensity of use and site-specific conditions. Therefore, the proposed project would be consistent with the CAP.

Conclusion

Conflicts with existing plans and policies do not, in themselves, indicate a significant environmental effect related to the topic of Land Use and Land Use Planning within the meaning of CEQA, unless the project substantially conflicts with a land use plan/policy that was adopted for the purpose of avoiding or mitigating an environmental effect, such that a substantial adverse physical change in the environment related to Land Use would result. To the extent that physical environmental impacts may result from such conflicts, the EIR discloses and analyzes these physical impacts under the specific environmental topic sections in the corresponding sections of Chapter 4, Environmental Setting, Impacts, and Mitigation.

The proposed project, during Phase 1 and project buildout, would not conflict with land uses plans and policies such that a substantial adverse physical change in the environment related to land use would result. For this reason, the proposed project would have a less-than-significant land use effect related to conflict with a land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. No mitigation measures are required.

Potential conflicts with applicable policies will continue to be analyzed and considered as part of the review of entitlements applications required for the proposed project independent of environmental review under CEQA. They also will be considered by the decision-makers during their deliberations on the merits of the proposed project and as part of their actions to approve, modify, or disapprove the proposed project.

Impact C-LU-1: The proposed project would not make a cumulatively considerable contribution to a significant cumulative impact on land use and planning. (*Less than Significant*)

Section 4.1, Approach to Environmental Analysis, on pp. 4.1.7–4.1.9, identifies foreseeable future projects that are located within an approximately 0.5-mile radius of the project site as well as projects that are located within the East of 101 Area. The majority of the proposed projects listed consist of office/R&D and commercial uses. The proposed project would contribute to these changes in land use and expand these changes further into the remaining light industrial portion of the East of 101 Area. Office/R&D development under the proposed project in combination with foreseeable future projects would increase the density of the existing neighborhood but would be consistent existing office/R&D uses and planned development in the East of 101 Area.

As discussed above under Impact LU-1, the proposed project, during both Phase 1 and project buildout, would extend a network of pedestrian paths and open spaces to facilitate public access through the project site and to the waterfront. Each of the projects listed in Section 4.1 would also be designed to accommodate pedestrian access and connectivity. Therefore, the proposed project, in combination with reasonably foreseeable future projects, would not contribute to the physical division of an established community.

Similar to the proposed projects, the office/R&D uses proposed under the foreseeable future projects would be consistent with existing land use plans and policies. The City has encouraged the redevelopment of underutilized sites with high-quality campus-style biotechnology, high-technology, and research and development uses. Furthermore, each of the foreseeable future projects would be required to conform to

the same land use policies, such as encouraging the development of employee-serving amenities (e.g., open space, café space, child care, etc.).

For these reasons, the proposed project, under both Phase 1 and project buildout, in combination with past, present, and reasonably foreseeable future projects, would have less-than-significant cumulative land use impacts. The proposed project would not make a cumulatively considerable contribution to a significant cumulative land use impact, and no mitigation measures are necessary.