

C/CAG Application for Land Use Consistency Determination – Supplemental Information

AGENCY NAME: City of South San Francisco

PROJECT NAME: South San Francisco Lindenville Specific Plan

PROJECT DESCRIPTION

General Plan, Climate Action Plan and Zoning Code Updates adopted in 2022

In 2022, the City of South San Francisco completed work on General Plan, Climate Action Plan and Zoning Code Updates, with an accompanying Program Environmental Impact Report. The 2040 General Plan anticipates approximately 14,312 net new housing units and approximately 42,297 net new employment opportunities by 2040. The C/CAG Board of Directors approved Resolution 22-80 on September 22, 2022, determining that the South San Francisco General Plan, Housing Element and Zoning Code Updates were conditionally consistent with the applicable airport/land use policies and criteria contained in the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (SFO ALUCP). On October 26, 2022, the South San Francisco adopted the 2040 General Plan and Zoning Code Updates with the incorporation of the required conditions.

The 2040 General Plan envisions significant change in the Lindenville sub-area; the vision for this sub-area also includes the introduction of high-density residential and mixed-use areas, with up to 5,600 residential units to link housing growth with job access without increasing residential displacement risk. It also includes high-density employment lands uses based on Lindenville's proximity to Caltrain, BART, or SamTrans service and good access to opportunity. To ensure that new development proceeds in an organized and well-planned manner and includes new housing opportunities, the City Council authorized the preparation of a [Lindenville Specific Plan](#).

Lindenville Specific Plan Description

The Lindenville Specific Plan Area is an approximately 400-acre area located in the southern portion of South San Francisco, south of the Downtown neighborhood and west of the East of 101 neighborhood, which is home to a life sciences employment hub and the other industrial hub in the city. As shown in figure 1, Lindenville is bounded by U.S. Highway 101 (US-101) to the east, the City of San Bruno and Centennial Way Trail to the south, Fir Avenue and Magnolia Avenue to the west, and Railroad Avenue to the north. Lindenville has historically served as the industrial heart, supporting light industrial, manufacturing, and service and repair businesses.

The policy set forth in the Lindenville Specific Plan is consistent with the goals of the General Plan, including the creation of up to 5,600 residential units and employment growth in specific areas. The Specific Plan does refine the land use pattern and creates specific development standards and implementation policies that put those ideas into action, but will not change the basic assumptions analyzed in the General Plan and Program EIR.

The remainder of this Supplemental Information document indicates how the Lindenville Specific Plan fits within the parameters of the previously adopted General Plan and conforms with the ALUCP requirements.

GENERAL CONSISTENCY REFERENCES

The 2040 General Plan includes general actions related to consistency with the ALUCP:

Action CR-1.3.4: Review consistency with San Francisco International Airport Land Use Compatibility Plan. Update the City of South San Francisco's General Plan to be in conformance with noise, safety and airspace protection compatibility standards in the most recently adopted version of the ALUCP.

Action CR-1.3.5: Airport Land Use Commission Review. Ensure that all applicable long-range plans and associated amendments and ordinances are reviewed by the City/County Association of Governments Board of Directors, acting as San Mateo County's Airport Land Use Commission, for a determination of consistency with the most recently adopted version of the ALUCP, as required by State law.

Action CR-1.3.3: Require multi-hazard real estate disclosure. Enact an ordinance to require real estate disclosures of all hazards identified in the Hazard Mitigation Plan, including hazards associated with anticipatory sea level rise and flooding, geologic hazards, groundwater inundation, airport noise and related issues, or wildfire for commercial and residential properties, including ownership and rental.

The adopted Zoning Code also includes a stand-alone section specific to the ALUCP requirements that applies citywide; Chapter 20.300.003 "Airport Land Use Compatibility Plan Consistency".

20.300.003 Airport Land Use Compatibility Plan Consistency

This section establishes standards and requirements related to consistency with the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (ALUCP). The following requirements and criteria shall be incorporated into all applicable projects.

- A. **Airport Real Estate Disclosure Notices.** All new development is required to comply with the real estate disclosure requirements of State law (California [Business and Professions Code](#) Section 11010(b)(13)). The following statement must be included in the notice of intention to offer the property for sale or lease:

"Notice of Airport in Vicinity. This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example: noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you."
- B. **Airport Noise Evaluation and Mitigation.** All projects shall comply with the Noise Compatibility Policies of the ALUCP. Uses shall be reviewed per the Noise/Land Use Compatibility Criteria listed in Table IV-1 of the ALUCP. Projects shall also be evaluated for potential airport noise impacts if the project is located within the 65 CNEL contour line of San Francisco International Airport (as mapped in the ALUCP). All projects so located shall be required to mitigate impacts to comply with the interior (CNEL 45 dB or lower, unless otherwise stated) and exterior noise standards established by the ALUCP or South San Francisco General Plan, whichever is more restrictive. Unless otherwise precluded by State law, projects shall also be consistent with ALUCP Policy NP-4 Residential Uses within CNEL 70 dB Contour.
- C. **Avigation Easement.** Any action that would either permit or result in the development or construction of a land use considered to be conditionally compatible with aircraft noise of CNEL 65 dB or greater (as mapped in the ALUCP) shall include the grant of an avigation easement to the City and County of San Francisco prior to issuance of a building permit(s) for any proposed buildings or structures, consistent with ALUCP Policy NP-3 Grant of Avigation Easement.

- D. **Safety Compatibility Evaluation.** All uses must comply with Safety Compatibility Policies of the ALUCP. Project applicants shall be required to evaluate potential safety issues if the property is located within any of the Safety Compatibility Zones established in ALUCP Policy SP-1 and depicted in Exhibit IV-8 of the ALUCP. All projects located within a Safety Compatibility Zone shall be required to determine if the proposed land use is compatible with the Safety Compatibility Land Use Criteria as noted in ALUCP Policy SP-2 and listed in Table IV-2 of the ALUCP.
- E. **Airspace Protection Evaluation.** All projects shall comply with Airspace Protection Policies of the ALUCP.
1. **Notice of Proposed Construction or Alteration.** Project applicants shall be required to file Form 7460-1, Notice of Proposed Construction or Alteration, with the Federal Aviation Administration (FAA) for any proposed new structure and/or alterations to existing structures (including ancillary antennae, mechanical equipment, and other appurtenances) that would exceed the FAA notification heights as depicted in ALUCP Exhibit IV-11. Any project that would exceed the FAA notification heights shall submit a copy of the findings of the FAA's aeronautical study, or evidence demonstrating exemption from having to file FAA Form 7460-1, as part of the development permit application.
 2. **Maximum Compatible Building Height.** Building heights east of Highway 101 and within the Business Professional Office and Business Technology Park - High zoning districts are allowed the maximum height limits permissible under FAA regulations and the SFO ALUCP Critical Aeronautical Surfaces requirements. For avoidance of doubt, the lower of the two heights identified by the ALUCP and the FAA shall be the controlling maximum height.
 3. **Other Flight Hazards.** Within Airport Influence Area (AIA) B, certain land use characteristics are recognized as hazards to air navigation and, per ALUCP Policy AP-4, need to be evaluated to ensure compatibility with FAA rules and regulations. These characteristics include the following:
 - a. Sources of glare, such as highly reflective buildings, building features, or blight lights including search lights, or laser displays, which would interfere with the vision of pilots in command of an aircraft in flight.
 - b. Distracting lights that could be mistaken for airport identification lightings, runway edge lighting, runway end identification lighting, or runway approach lighting.
 - c. Sources of dust, smoke, water vapor, or steam that may impair the visibility of a pilot in command of an aircraft in flight.
 - d. Sources of electrical/electronic interference with aircraft communications/navigation equipment.
 - e. Any use that creates an increased attraction for wildlife, particularly large flocks of birds, that is inconsistent with FAA rules and regulations, including, but not limited to, FAA Order 5200.5A, Waste Disposal Site On or Near Airports and FAA Advisory Circular 150/5200-33B, Hazardous Wildlife Attractants On or Near Airports and any successor or replacement orders or advisory circulars. (Ord. 1646 § 2, 2022)

The Lindenville Specific Plan (LSP) is consistent with the General Plan Actions and includes references to Zoning Code Chapter 20.300.003 "Airport Land Use Compatibility Plan Consistency". LSP Chapter 3: "Land Use and Housing" (page 27 of document, page 33 of 186 of pdf) establishes land use districts and associated standards related to uses, densities and intensities, building height, and other appropriate standards. Sub-section 3.3.2

“Allowed Uses” (page 41 of document, page 47 of 186 of pdf) includes the following standard related to ALUCP Consistency, referencing Zoning Code Chapter 20.300.003.

3.3.3 Allowed Uses - Standards

5. **Airport Land Use Compatibility Plan consistency.** All development shall adhere to land use compatibility requirements established in Chapter 20.300.03 “Airport Land Use Compatibility Plan Consistency” of the City’s Zoning Code.
 - a. **ALUCP Safety Zone Compatibility.** Development projects in Safety Zones 2, 3, and 4 shall adhere to the land use restrictions as defined by the ALUCP.
 - b. **ALUCP Noise Compatibility (Interior).** Future developments under the Specific Plan exposed to conditionally acceptable and generally unacceptable aircraft noise levels, as defined by the ALUCP or the South San Francisco General Plan, whichever is more restrictive, shall complete a detailed noise analysis that includes the required noise reduction measures and noise insulation features included in the design to ensure compatibility with appropriate noise standards.
 - c. **ALUCP Noise Compatibility (Exterior).** Exterior noise requirements of shall adhere to Chapter 20.300.03 “Airport Land Use Compatibility Plan Consistency” of the City’s Zoning Code and Noise Performance Standards in the City’s General Plan, with the following exceptions:
 - i. For new multi-family residential projects and for the residential component of mixed-use development, use a standard of 60 dB CNEL in usable outdoor activity areas. Use noise attenuation techniques such as shielding by buildings and structures for common outdoor use areas. Outdoor uses shall be designed for passive recreational use.
 - ii. For new parks and open spaces, use a standard of 60 dB CNEL. Parks and open spaces shall be designed for passive recreational use.

Section 3.5 “Height” (page 55 of document, page 61 of 186 of pdf) includes the following standard related to maximum allowed heights.

3.5 Height - Standards

1. **Allowed maximum height.** Allowed maximum height is regulated by Figure 12 or the maximum height limits permissible under FAA regulations and the SFO ALUCP Critical Aeronautical Surfaces requirements. For avoidance of doubt, the lower of the two heights identified by the ALUCP and the FAA shall be the controlling maximum height.

NOISE POLICY CONSISTENCY ANALYSIS

The SFO ALUCP establishes noise compatibility zones and related standards within each zone. Both the CNEL 65- and 70- dB contours extend over portions of the Lindenville Specific Plan Area.

As indicated in the General Consistency References above, the Specific Plan Sub-Section 3.3.3 “Allowed Uses” includes Standard 5, which states that “All development shall adhere to land use compatibility requirements established in Chapter 20.300.03 “Airport Land Use Compatibility Plan Consistency” of the City’s Zoning Code.” This ensures that all future land use actions and/or associated development conform to the policies of the SFO ALUCP, including Noise compatibility.

Standard 5 also includes subsections b and c, which provide additional regulations related to interior and exterior spaces, respectively. Developments with interior spaces that are exposed to aircraft noise levels are required to “complete a detailed noise analysis that includes the required noise reduction measures and noise insulation features included in the design to ensure compatibility with appropriate noise standards.” For developments with exterior areas, any usable outdoor activity areas of residential projects, new parks and open spaces that are exposed to noise levels greater than 60 dB CNEL are required to be designed for passive recreational use.

SAFETY POLICY CONSISTENCY ANALYSIS

The SFO ALUCP includes five sets of safety zones; Safety Zones 2, 3 and 4 extend over portions of the Lindenville Specific Plan Area.

As indicated above, the Specific Plan Sub-Section 3.3.2 Allowed Uses includes Standard 5, which states that “All development shall adhere to land use compatibility requirements established in Chapter 20.300.03 “Airport Land Use Compatibility Plan Consistency” of the City’s Zoning Code.” This ensures that all future land use actions and/or associated development conform to the policies of the SFO ALUCP, including Safety Zone compatibility.

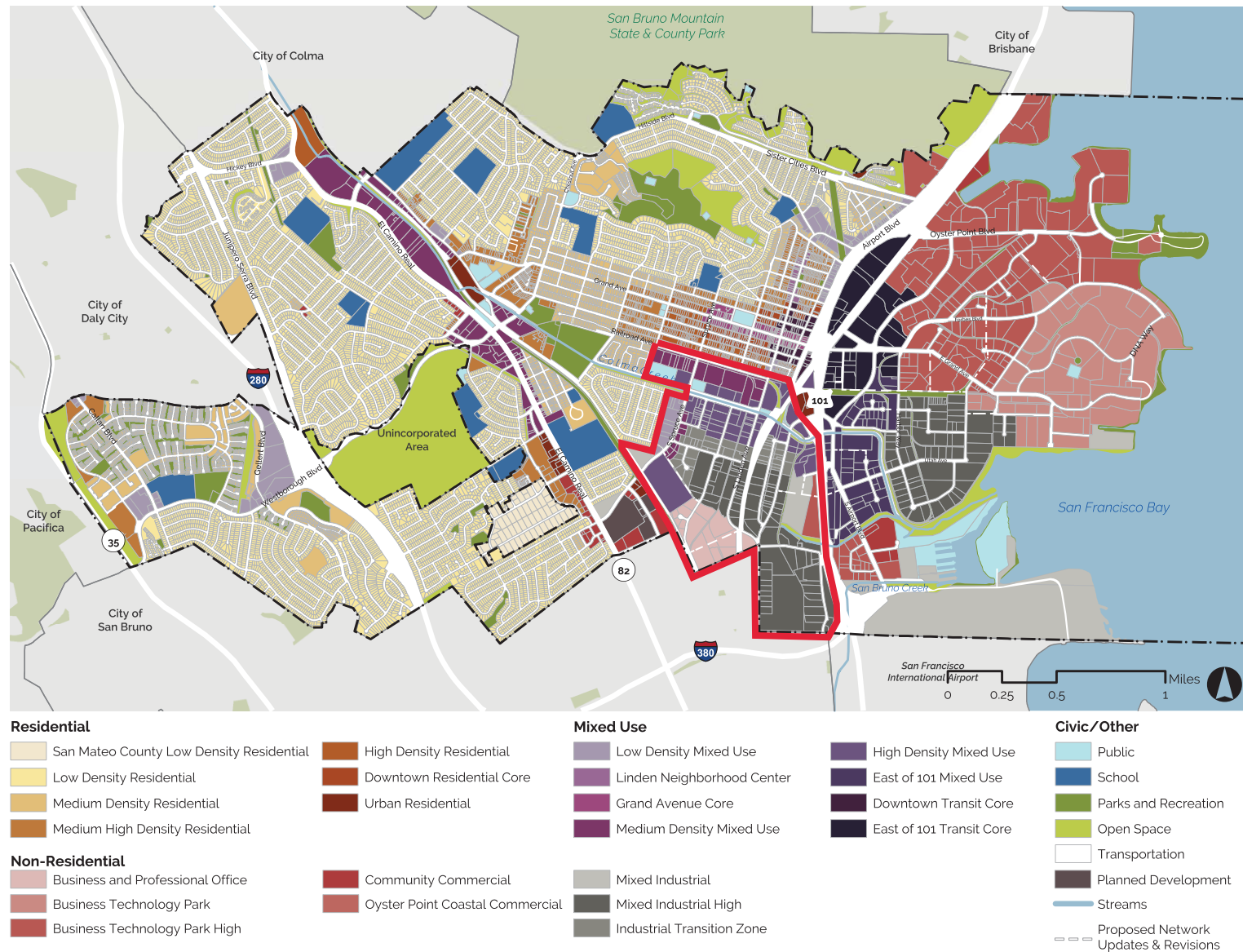
AIRSPACE PROTECTION CONSISTENCY ANALYSIS

The Zoning Code currently allows airport-regulated heights for properties zoned Business and Professional Office (BPO) and Business and Technology Park (BTP) that are located within the Lindenville Specific Plan Area. The Lindenville Specific Plan also will create a Height Incentive Overlay for portions of the T5 Lindenville (T5L) Zoning District to incentivize building heights up to 160 feet in exchange for green building development and additional open space dedication.

As indicated above, the Specific Plan Sub-Section 3.5 Height includes Standard 1, which states that any allowed maximum height in the Specific Plan Area is controlled by the lower of the two heights identified by the ALUCP Critical Aeronautical Surfaces requirements or FAA regulations. All development within the Lindenville Specific Plan Area also continues to be subject to Zoning Code Chapter 20.300.003 “Airport Land Use Compatibility Plan Consistency”. This ensures that all future land use actions and/or associated development conform to the policies of the SFO ALUCP, including Airspace Protection consistency.

Attachments

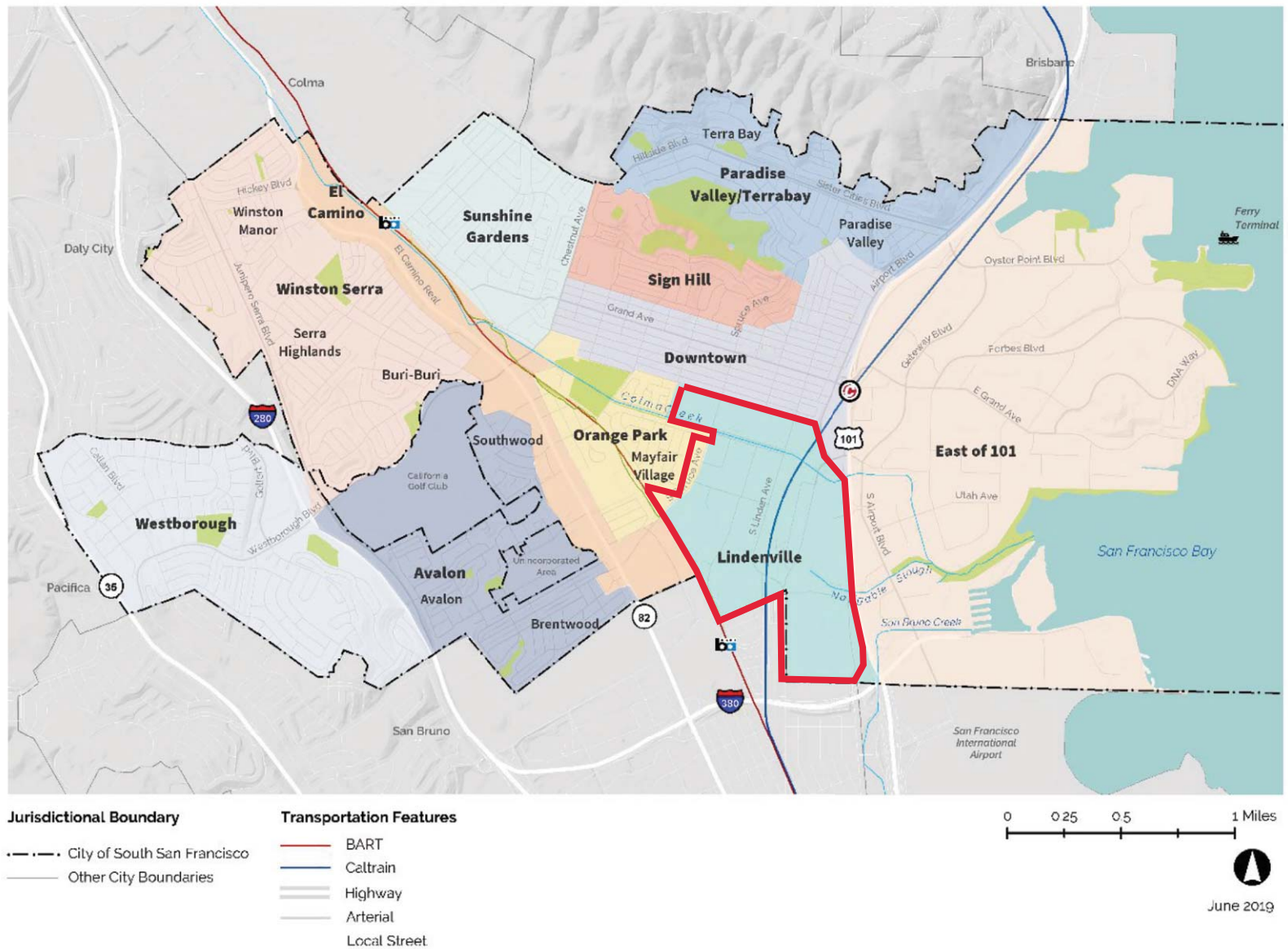
- Figure 1 - Adopted General Plan Land Use Map
- Figure 2 - General Plan Planning Sub-Areas
- Figure 3 - Compatibility Zones and Noise Contours on LSP Land Use Map
- Figure 4 - San Francisco International Airport Noise Contours
- Figure 5 - Airport Land Use Compatibility
- Figure 6 - Exhibit IV-14 - 14 CFR Part 77 Airport Imaginary Surfaces - North Side
- Figure 7 - Lindenville Specific Plan Maximum Heights



Source: Raimi + Associates, 2022.



Figure 1
Adopted General Plan Land Use Map



Source: City of South San Francisco General Plan Update

Figure 2
Adopted General Plan Planning Sub-Areas

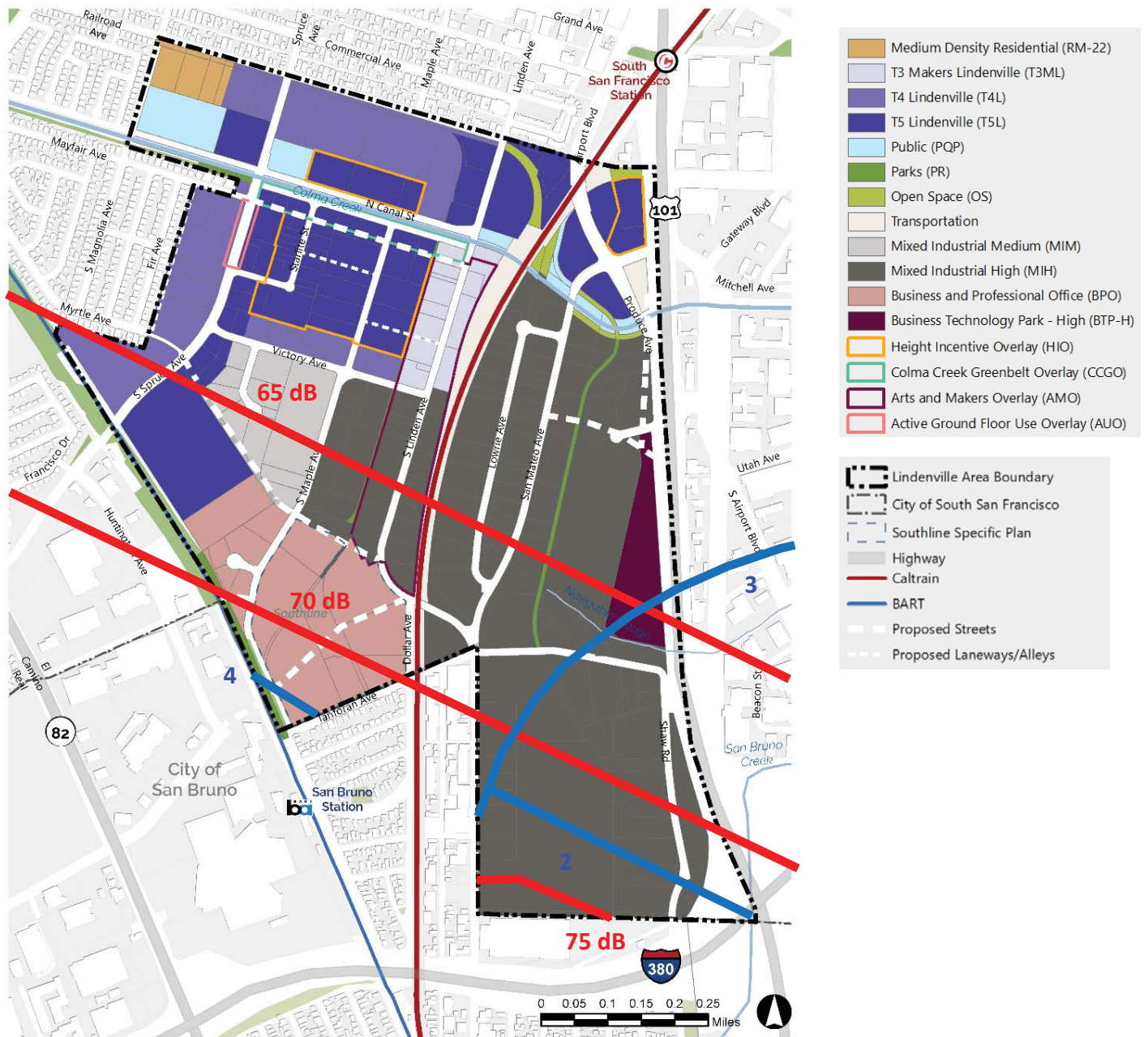
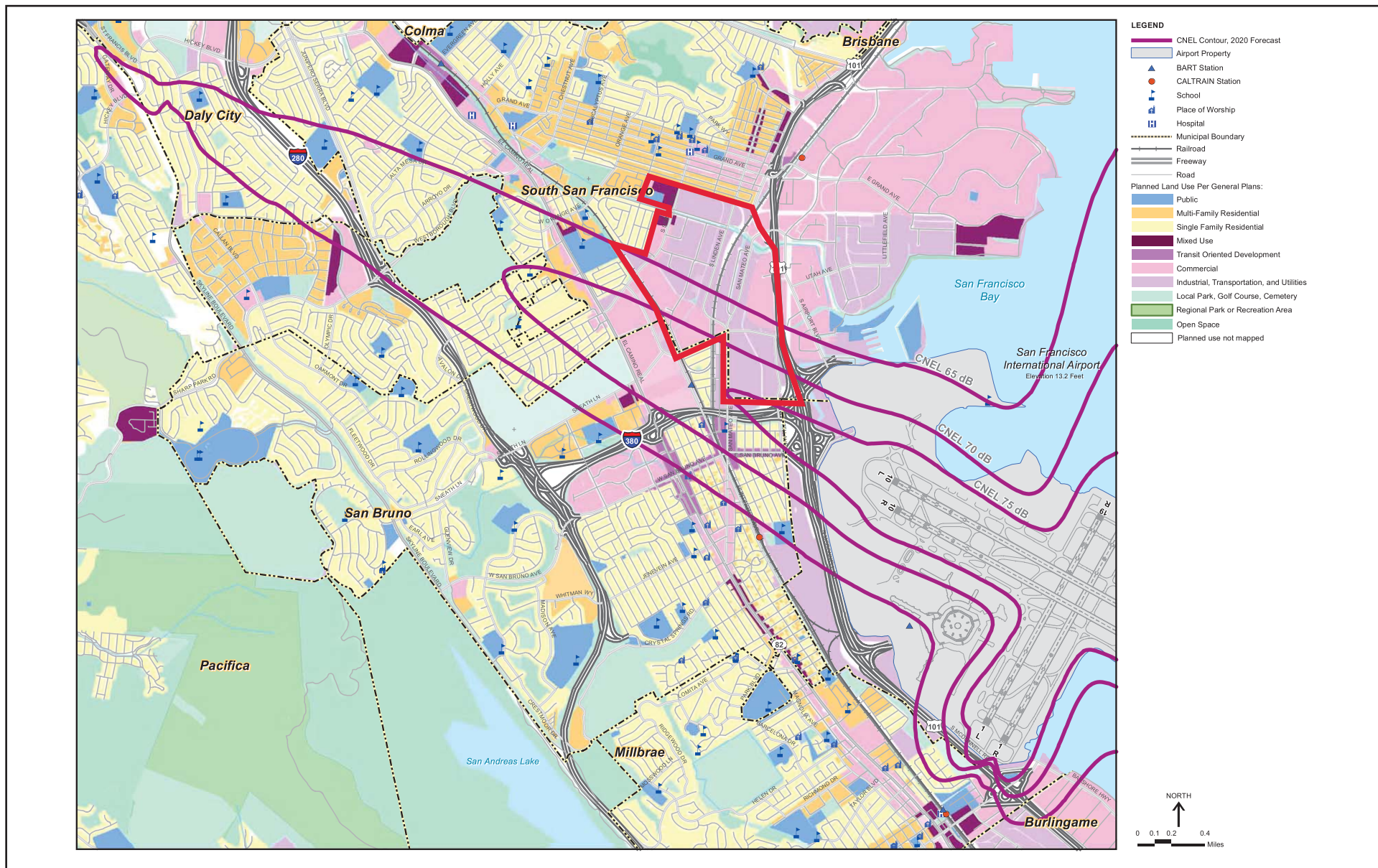
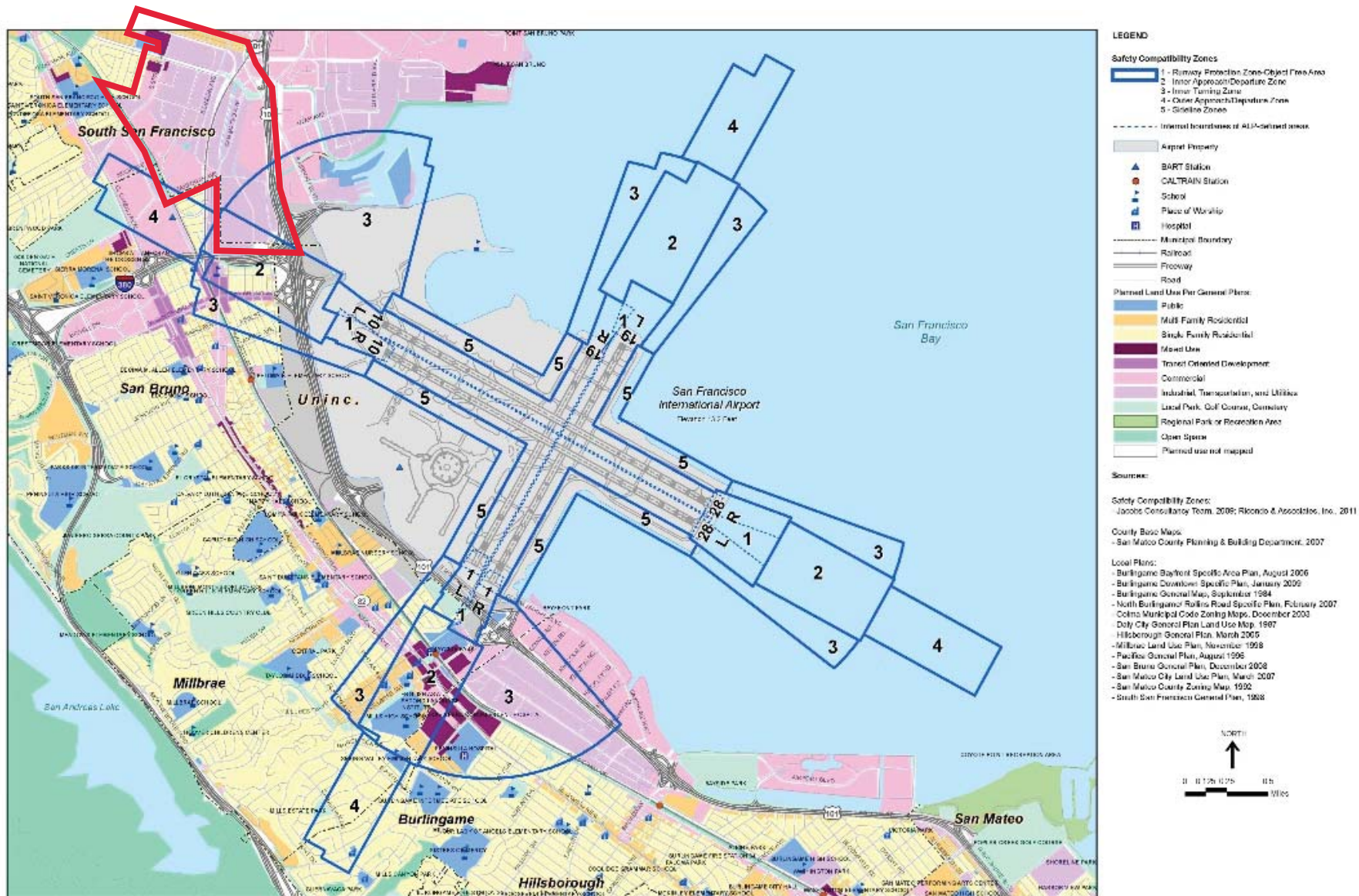


Figure 3
Compatibility Zones and Noise Contours on
Lindenville Specific Plan Proposed Land Use Map



Source: City/County Association of Governments of San Mateo County, 2012. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport. November.



Source: SHAPE South San Francisco, November 2019.

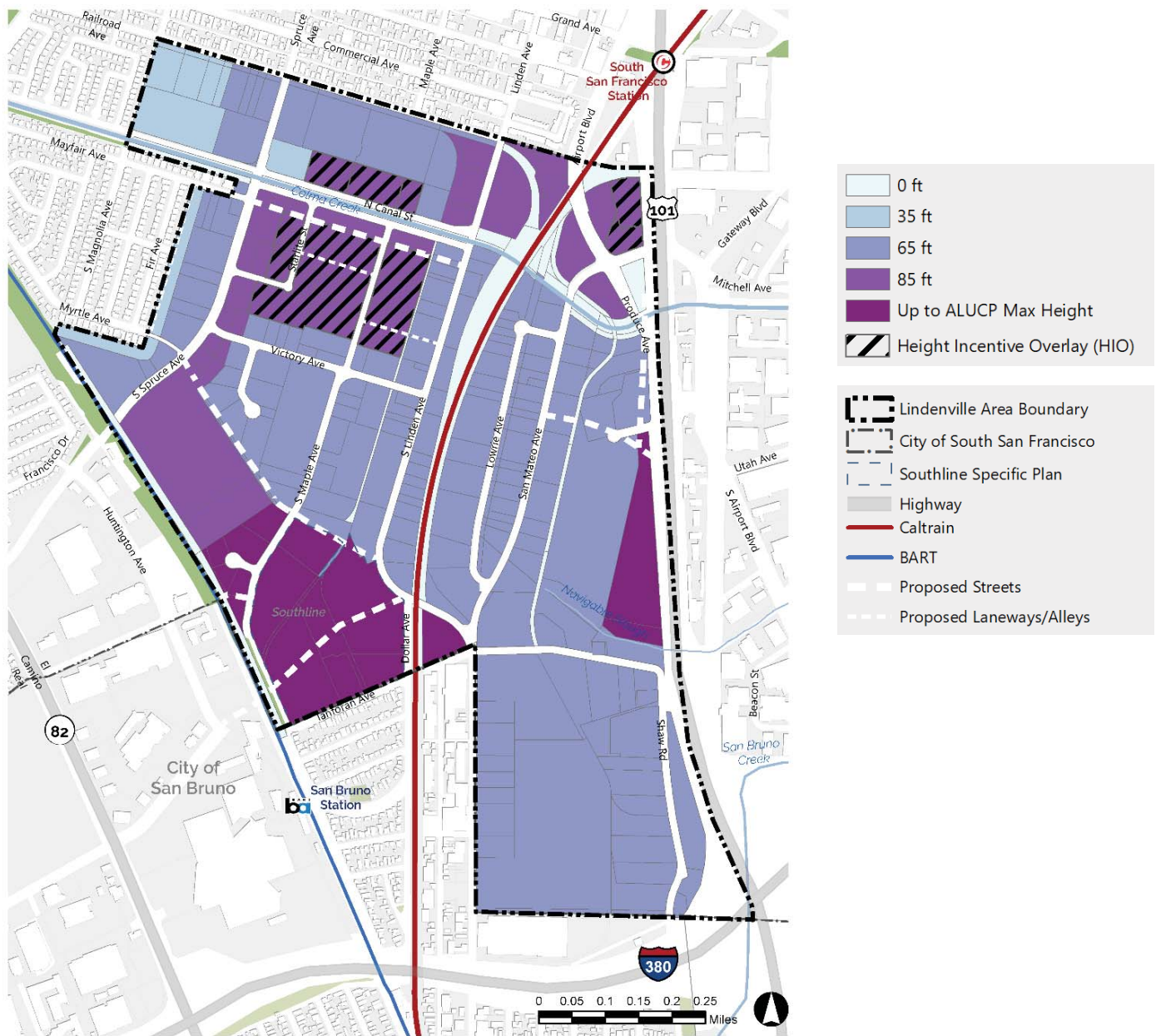


Figure 7
Lindenville Specific Plan Maximum Heights Map



San Francisco International Airport

August 14, 2023

Billy Gross
Principal Planner
City of South San Francisco
Planning Division
315 South Maple Ave.
South San Francisco, CA 94080

TRANSMITTED VIA EMAIL ONLY

billy.gross@ssf.net

Subject: Notice of Preparation of the Draft Lindenville Specific Plan in the City of South San Francisco and Application for Land Use Consistency Determination

Thank you for notifying San Francisco International Airport (SFO or the Airport) of the preparation of the Draft Lindenville Specific Plan (LSP or the Project), dated June 30, 2023, released for public comment and an application to the Airport Land Use Commission's (ALUC) pending land use consistency determination for the subject Project. We appreciate this opportunity to coordinate with the City of South San Francisco (the City) and provide comments in considering and evaluating potential land use compatibility issues that the Project may pose and should address.

According to the application, the Proposed Project is an approximately 400-acre area located in the southern portion of the City, bounded by U.S. Highway 101 to the east, the City of San Bruno and Centennial Way Trail to the south, Fir Avenue and Magnolia Avenue to the west, and Railroad Avenue to the north. The Project area would be home to a life sciences employment hub and other industrial activity in the City, as well as up to 5,600 residential units located mainly in the northwest side of the site and along a transit corridor connected by Caltrain, Bay Area Rapid Transit, and samTrans bus services.

Airport Influence Area

The Proposed Project site is inside Airport Influence Area B as defined by the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (SFO ALUCP). Within Area B, the Board of Directors of the City/County Association of Governments of San Mateo County, acting as the designated Airport Land Use Commission (ALUC), shall review proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezonings, and land development proposals.

The real estate disclosure requirements in Area A also apply in Area B; specifically, a property owner offering a property for sale or lease must disclose the presence of planned or existing airports within two miles of the property.

Noise Compatibility Policies

The southern half of the Proposed Project site falls within the 65-70 and 70-75 decibel (dBA) Community Noise Equivalent Level (CNEL) contour zones. The southernmost corner of the site falls within the Above 75 dB CNEL contour zone. The LSP Draft document Section 3.3.3, Standard 5 (page 41 of the document) states that all development shall adhere to land use compatibility requirements established in the ALUCP, noting specifically that future developments exposed to conditionally acceptable and unacceptable aircraft noise levels shall complete a detailed noise analysis that includes the required noise reduction measures and noise insulation features included in the design to ensure compatibility with appropriate noise standards of the interior. For exterior applications, new parks, and open spaces, a standard of 60 dB CNEL shall be used

AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO

LONDON N. BREED
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in outdoor activity areas, and the use of noise attenuation techniques such as shielding by buildings and structures for common outdoor use areas shall apply. With these controls in place, the LSP would not appear to be inconsistent with the Noise Compatibility Policies of the SFO ALUCP, provided that aviation easements be granted to the City and County of San Francisco for any conditionally compatible uses which are added to the 65-70 dB or 70-75 dB contour zones.

Safety Compatibility Policies

Portions of the Proposed Project lie within Safety Compatibility Zones 2, 3, and 4. According to the LSP, development projects in these safety zones must comply with the safety compatibility policies established in the ALUCP (or as stated in the South San Francisco Zoning Code Chapter 20.300.03 “Airport Land Use Compatibility Plan Consistency”), to define compatible and incompatible land uses. Therefore, the LSP would not appear to be inconsistent with the Safety Compatibility Policies of the SFO ALUCP.

Airspace Protection Policies

The critical aeronautical surfaces above the Proposed Project are at an elevation of approximately 110 to 190 feet above mean sea level (AMSL) as defined from the origin of the North American Vertical Datum of 1988 (NAVD88). Ground elevation varies within the Proposed Project site which may affect the maximum allowable height as measured above ground level (AGL). This should be carefully evaluated to stay below the allowable critical aeronautical surfaces described in the SFO ALUCP. To avoid any potential ambiguity which may come from a project modifying the ground elevation, the Airport recommends the following modifications to Section 3.5 of the LSP Draft (additions underlined; deletions in strikethrough; bold is original):

1. **Allowed maximum height.** Allowed maximum height is regulated by Figure 13 or the maximum height limits permissible under FAA regulations and the SFO ALUCP Critical Aeronautical Surfaces requirements. For avoidance of doubt, the lower of the ~~two~~ three heights identified by Figure 13, the ALUCP, and the FAA shall be the controlling maximum height.

Section 3.5 of the LSP notes that “Building height measurement procedures are defined in Zoning Code Chapter 20.040.005.” That zoning code notes that, depending on type, “building height is measured from the average level of the highest and lowest point of that portion of the lot covered by the building to the highest point on the roof or the top of the parapet wall or mechanical equipment screening wall” or “...a point that is half the distance between the highest point on the ridge and where the eave meets the plate.”¹ These definitions are inadequate to ensure the protection of critical aeronautical surfaces because (1) those surfaces are expressed in elevation AMSL, which is independent of the local ground level and (2) airspace evaluation of buildings use their tallest points regardless of where they sit in relation to the midpoint of the ground level elevation.

Because of the ambiguity between elevation AMSL and height AGL, the Airport recommends that the following underlined language be added to Section 3.5 of the LSP Draft:

2. **Height measurement.** Building height measurement procedures are defined in Zoning Code Chapter 20.040.005 (“Measuring Height”). Only for purposes of determining the allowed

¹ City of South San Francisco Zoning Code, Chapter 20.040.005(A), retrieved 10 August 2023.

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maximum height, buildings are evaluated using their top elevation above mean sea level as defined from the origin of the North American Vertical Datum of 1988. This includes any antennas, machine rooms, architectural parapets, or other appurtenances.

The creation of a Height Incentive Overlay for portions of the Zoning District in the Lindenville Specific Plan to incentivize building heights up to 160 feet in exchange for green building development and additional open space dedication should be clarified, as the requirements of the SFO ALUCP still apply to the Overlay. To avoid ambiguity, the Airport recommends that the following underlined language be added to Section 3.5 of the LSP Draft:

4. **Development incentives for the Height Incentive Overlay.** Projects that comply with the requirements for the Height Incentive Overlay are eligible for the following incentives.
 - a. Building height. Within the overlay, the maximum primary building height is allowed to be up to 160 feet, allowing maximum primary building height in excess of maximum that is allowed under a site's base district. This allowance does not negate the need to comply with the maximum height limits permissible under FAA regulations and the SFO ALUCP Critical Aeronautical Surfaces requirements, as described under Policy 1 of this section.

Future development project sponsors whose projects would exceed the FAA notification requirements described in Title 14 Code of Federal Regulation Part 77 and depicted in Exhibit IV-11 of the SFO ALUCP must follow FAA procedures for airspace review as for both (1) the permanent structures and (2) any equipment taller than the permanent structures required to construct those structures (i.e., construction cranes, etc.).

If the additions described above are made to the Draft LSP, then it would not appear to be inconsistent with the Airspace Protection Policies of the SFO ALUCP.

* * *

The Airport appreciates the City for incorporating policies and standards within the Lindenville Specific Plan to help define requirements necessary for all future developments to remain consistent with the ALUCP for the protection of navigable airspace, safety of people and property on ground, and noise compatibility within the plan area. A copy of the relevant policies is attached to this letter.

Please consider these additional comments for inclusion in the Lindenville Specific Plan and the ALUC's Land Use Consistency Determination for the Proposed Project. If I can be of assistance, please do not hesitate to contact me at (650) 821-6678 or at nupur.sinha@flysfso.com.

Sincerely,

DocuSigned by:
Nupur Sinha
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Nupur Sinha
Director of Planning and Environmental Affairs
San Francisco International Airport

Mr. Billy Gross
August 14, 2023
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Attachments

SFO ALUCP Airport Influence Areas and Compatibility Policies

cc: Susy Kalkin, Airport Land Use Committee
Audrey Park, SFO
Chris DiPrima, SFO