



SAN MATEO, SANTA CLARA & SAN BENITO COUNTIES

April 16, 2021

City of South San Francisco
400 Grand Avenue
South San Francisco, CA 94080

Via email to:

Lisa Costa Sanders, General Plan Program Administrator (Lisa.CostaSanders@ssf.net)
South San Francisco City Council (council@ssf.net)
South San Francisco Planning Commission (planning@ssf.net)

Re: Comments on 2040 General Plan Policy Frameworks

Thank you for the online survey that closed today, the 16th of April. We have reviewed the data and take this opportunity to submit comments on the Interim Policy Frameworks for South San Francisco's 2040 General Plan. The Sierra Club Loma Prieta Chapter is greatly concerned about the threat of sea level rise and the impacts of development in proximity to the Bay and its natural resources. The Community Priorities highlighted throughout ShapeSSF's Policy Frameworks indicate South San Francisco residents share those concerns.

As such, we were pleased to see a vision for sustainability, conservation, and resilience, including ecological health, embodied in several of the Outcomes, Goals and Policies. In support of that vision, we offer the following recommendations:

Sea level rise

Resilience Zones: Expand the areas subject to heightened standards and guidelines for new construction adjacent to Colma Creek and the Bay shoreline **beyond the proposed 150 feet and 250 feet**, respectively¹. In addition to serving the stated purposes of supporting Bay health and habitat and water quality, widening those bands could create resilience zones that enable nature-based flooding and sea level rise strategies that provide critically needed inland flooding capacity. Larger setbacks and stepped-back building design along Colma Creek can combine with naturalized water edges and flood

¹ **North Bayshore Precise Plan, Mountain View**, is a good example of the use of habitat overlays or resilience overlays with setback requirements for different types of buildings, including stepped facades along riparian corridors. <https://www.mountainview.gov/civicax/filebank/blobdload.aspx?BlobID=29702>

water expansion and retention areas, where possible, to improve flood resilience while also offering potential habitat and recreation benefits. Nature-based shoreline adaptations along the bay such as horizontal levees, oyster reefs, tidal marshes, etc., can benefit from a significantly larger setback at the Bay shoreline².

We particularly appreciate the buyout program as visionary in anticipation of the expense incurred by repeated flood events.

Safety: With significant new housing proposed in the East of 101 area, we are concerned about additional residents becoming vulnerable to hazardous sea level rise impacts. Consider including “*Land Use policies effectively controlled new development to ensure vulnerabilities to climate change and sea level rise were addressed or did not worsen*” as an explicit desirable “Outcome” for the Land Use framework to help center deliberations about land use policies and programs around the certainty of sea level rise.

Conservation

Appropriate access and recreation: It is important to recognize that the dual community priorities of increased public access to nature and ecological protection are not always compatible. Consider adding a policy that public access to natural assets will be designed to improve low-impact recreational opportunities while minimizing intrusion into habitat zones.

Urban Canopy and habitat connectivity: With substantial new development envisioned in the 2040 General Plan, including the creation of new neighborhoods in the Lindenville and East of 101 areas, we hope that South San Francisco will strive for a citywide tree canopy target greater than 22.6% by 2040³. In addition to parks, open space, and improved canopy along streets and public spaces, planning for natural green patches spread across the city can preserve and enhance habitat connectivity, providing important linkages from the San Bruno Mountains to the Bay. A good guide for an integrated approach to urban greening is Sierra Club Loma Prieta’s “[Green Streets/Green Corridors](#)”⁴.

² The Adaptation Atlas is a resource that cities are being encouraged to use by federal, state, and regional agencies involved in the regulatory process and funding for resilience
<https://www.sfei.org/documents/adaptationatlas>

³ The average tree canopy in American cities is 27%. <https://www.deeproot.com/blog/blog-entries/tree-cover-how-does-your-city-measure-up>

⁴ Green Corridor/ Green Streets Guidelines covers greening the city, active transportation network, green infrastructure, urban canopy, green linkages
<https://www.sierraclub.org/sites/www.sierraclub.org/files/sce-authors/u4142/Green%20Streets%20Presentation%20-%201-20-21%20DC.pdf>

Light Pollution

We were happy to see a policy commitment to strengthening low-intensity lighting requirements. We hope the final policy will not only increase energy efficiency, but also support strategies that address the now known health impacts of high kelvin (above 2500) LED lighting and light pollution (both in the day and night time) on people as well as flora, and fauna. The Sierra Club recently adopted an updated Light Pollution Policy, attached for your information. See also the newly adopted [International Dark Sky Association policy for development near habitats](#).

Jobs Housing Imbalance and Transportation

We appreciate the number and density of housing units planned for the city and the fact that they are located near transit. However, as covered in our earlier letters in some detail, we remain concerned about the imbalance given the much larger growth of office space, included in the general plan update, with no plan for where the additional employees generated by this growth are to be accommodated or the transportation solutions that can start to address this.

This is a major concern with the update of the general plan. We strongly suggest including a linkage, with annual reporting to Council, for tracking the number of jobs created by entitling additional office space and the number of housing units being created at the same time. Mountain View's East Whisman Precise Plan includes a requirement to grow housing and jobs to maintain a jobs-housing balance. Other cities are also moving to include such a requirement, given the housing crisis facing the area.

Community Benefits

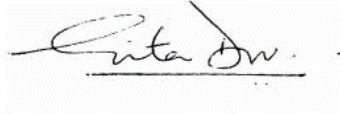
The Land Use framework frequently refers to using development incentives to produce community benefits. However, there is very little detail about what types of benefits would be eligible for such incentives. We encourage you to think outside the box and consider ecology and climate resilience as a key asset for the City's community well-being.

While we appreciate support throughout the Policy Frameworks for ecological restoration and resilience, we remain concerned about a lack of specificity regarding actions designed to achieve those goals and the limited performance metrics to evaluate success. We look forward to continued engagement with the City as the 2040 General Plan update evolves and additional policies and measures are developed.

In addition to the Sierra Club's national light pollution policy, we are providing the link to Sierra Club Loma Prieta Chapter's [Guidelines for Downtown and Station Area Plans](#) for your information as you draft the Land Use element.

Thank you for the opportunity to provide these comments.

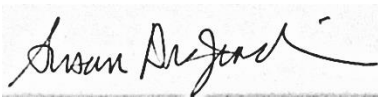
Sincerely,

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Gita Dev, Co-Chair
Sustainable Land Use Committee
Sierra Club Loma Prieta Chapter

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Gladwyn D'Souza, Chair
Conservation Committee
Sierra Club Loma Prieta Chapter

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Susan DesJardin, Chair
Bay 2030 Committee
Sierra Club Loma Prieta Chapter

Cc James Eggers, Executive Director
Sierra Club Loma Prieta Chapter