



April 13, 2018

Billy Gross, Senior Planner  
Planning Commission  
City of South San Francisco  
400 Grand Avenue  
South San Francisco, CA 94080

**RE: Rezoning Proposal for Oyster Point Specific Plan Phases III and IV**

Dear Mr. Gross:

I am writing to express Biocom's opposition to Greenland USA's tabled proposal to update the Oyster Point Specific Plan (OPSP) for Phases III and IV, consisting of a change of proposed use to 1,191 residential units and 22,000 square feet of flexible use retail and/or amenity space. We understand that the issue has been temporarily put on hold, and we'd like to register opposition should this same or a substantially similar proposal be reconsidered by the Planning Commission and City Council of South San Francisco.

Biocom is the largest, most experienced leader and advocate for California's life science sector. We work on behalf of over 1,000 members to drive public policy, build a network of industry leaders, create access to capital, introduce cutting-edge STEM education programs, and create value-driven purchasing programs.

In regional markets throughout California, land available for life science development is scarce. Preserving commercial land for manufacturing, research and development (R&D), and distribution is vital to long-term industry stability and encouragement of growth.

South San Francisco has a global reputation as a leading life science center. Its land use policies have been successful in giving rise to thriving commercial clusters. Therefore, local governments should exercise an abundance of caution to carefully assess potentially unintended and adverse consequences of changes to those policies.

The applicant asked the City of South San Francisco to create an exception to commercial/industrial zoning in the General Plan, via an amendment to the Specific Plan. These case-by-case changes, which allow incompatible land uses for new facilities or extend the presence of existing incompatible uses in commercial/industrial areas, can slowly erode high performing employment centers.

Land zoning plans are created to provide appropriate space between industry and residential to avoid compatibility conflicts. A change of this type could result in complaints from future residents about noise from mechanical equipment or truck deliveries, or unfounded hysteria when adjacent facilities properly use and carefully store hazardous materials. Though a hazardous materials incident may never occur, building codes are





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designed to contain potential incidents to small areas, and companies go to great lengths to ensure safety, pressure could be put on the city to remove or put unrealistic restrictions on R&D facilities.

We have seen the results of collocation have detrimental impacts to the life science industry in other locations, such as the portion of Stanford Research Park adjacent to the College Terrace residential neighborhood in Palo Alto, and a past proposal to locate an R&D park in the community of Torrey Hills in the City of San Diego. In the latter case, residents bought into a new neighborhood knowing a parcel was zoned for light industrial, a designation that includes most biotechnology uses. But when the developer tried to execute on a permit, lawsuits and community opposition led to the project being dropped.

Historically, the need for industry growth, flexibility, and innovation have been wisely reflected in South San Francisco land use planning. The South San Francisco General Plan specifically prohibits residential uses in the eastern part of the city, instead focusing residential uses west of Highway 101. Similarly, South San Francisco's East of 101 Area Plan and the existing land use entitlements resulting from the 2011 Oyster Point Specific Plan point to a designated use for industrial- and R&D-focused areas.

Biocom understands the need for additional housing throughout the Bay Area to address continuing shortages and to house a growing workforce. Housing should be appropriately located and supported by necessary infrastructure and services. The postponed proposal would have resulted in housing adjacent to incompatible uses and far from any residential services. In the future, we would like to work with city officials and life science companies in South San Francisco to identify alternative sites that could accommodate the area's housing needs.

Sincerely,

Joe Panetta, President & CEO  
Biocom

